January 6, 2025

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

My name is Cindy Hansen and I am a life long Alaskan, having been born and raised in Juneau. My father was Ladd Macaulay and I have been a member of the DIPAC board since its inception.

I oppose proposal 156 because it lacks sound scientific justification and doesn't account for the significant role hatcheries continue to play in sustaining both wild stocks and local economies. These cuts would pressure wild salmon stocks, as Hatchery supplementation currently mitigates overfishing of wild populations, ensuring sustainability and access for all user groups.

In 2024 commercial, sport and personal use fishermen had great opportunities to fish in the Juneau area. The three major river systems header DIPAC's release sites also met their wild stock escapement goals (Chilkat River- on sockeye and Chinook, Chilkoot River- Sockeye, Taku River- Sockeye, Coho and Chinook escapement goals were met).

DIPAC's chum program has been consistent for 30 years and will not be increasing production. DIPAC will not be requesting any more permits capacity increases in the future as the facility is maxed out on usable land and water available. DIPAC has been operating at the same five release sites for chum salmon since 1996, with only minor production increases since that time (from 121 million chum permitted eggs to 135 million eggs).

Please oppose this proposal, so we can continue to have salmon to harvest in Southeast Alaska.

Sincerely,

Cindy Macaulay Hansen

Cindy Macaulay Hansen
[redacted]
Auke Bay Alaska 99821

PC202

Submitted by: Kurt Hansen
Community of Residence: Seattle, WA

My comment is mainly directed at proposal 156. I oppose any reduction of hatchery production in S.E. Alaska. I believe that these are very managed and well run operations.

The benefits to communities and user groups, including sport, commercial, tribal, subsistence in S.E. are immense. Reductions in these programs would have wide ranging negative impacts on communities and their economies.

PC203

Submitted by: Chris Hanson
Community of Residence: Sitka

Regarding the king salmon allocation to sports vs commercial debate –

It is unconscionable that the charter fleet is allowed to operate without in-season management. It is equally unconscionable that the non-resident consumption of the king resource should deprive the Alaska residents of king fishing opportunities.

Commercial trollers sell pounds, charter operators sell experience. Charter operators do not, should not, and cannot, legally sell pounds (or quantities) of fish.

There is a fundamental truth about how the market works that often obscures the discussion here. The charter fleet would have us all believe they are selling limits of fish, and the lack of limits is hindering business. If this was true, I challenge any charter operator to demonstrate an historical pricing program that offers a discount if the limit of fish legally available is not caught. They will not provide this, as it doesn't exist. Therefore, they are not selling fish – and should not expect fish to sell from the troll fleet that is legally allowed to do so.

The takeaway, of course, is that the charter fleet wants access to the commercial take in order to more easily, and profitably, sell trips by guaranteeing access to kings all season long. This is not theirs to sell, and comes at a great price to the commercial troll fleet.

It is exclusively the province of the commercial fleet to sell fish, while the charter fleet sells an experience. Just as a charter operator cannot sell fish by the pound to their clients, I cannot sell a crew spot on my boat for the "experience." We would both run afoul of the law in attempting to do so.

I strongly encourage the board to adopt one of these proposals supported by the ATA (Alaska Trollers Association) that call for in-season management of the charter fleet, and also adopt resolutions that provide for resident sport fishing priority over non-resident opportunity.

PC204

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Hartley of Ketchikan, Alaska. I am a personal use and sports fisherman, and charter captain and operator. Salmon is a major protein source for me and my family, has been. I was raised on salmon. My charter income is a major income source for this household. Pinks and chums make up the majority of my guest catches in the summer. ANY reduction will do harm. I think tourism is probably the most important reason some want the amounts sustained, and it isn't going away, if anything it's increasing. The more we take the fewer left for commercial. I think a reduction will harm everyone.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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.

Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

William Hartley
Ketchikan, Alaska
[redacted]

PC205

Submitted by: Arne Hatch
Community of Residence: Seward, AK

I strongly oppose proposal #156 which reduces the pink and chum salmon production of hatcheries in SE Alaska. I believe this proposal is shortsighted and will unnecessarily hurt fisherman and communities.

Thank you for the opportunity to comment.

I am opposed to Proposals 258 and 259. Among other areas, Proposal 258 opens areas to commercial Dungeness Crab (DC) fishing near Juneau that have historically been closed to commercial fishing. Our family participates in the personal use DC fishery primarily in Gastineau Channel. This area is easy to access from our home in Douglas and we primarily fish the area with our small skiff. This fishery provides food as well as a fun activity. We are very concerned that opening this area to commercial fishing will result decreased catch rates along with gear conflicts. Gastineau channel is a relatively small area and fishing hundreds of commercial pots may result in few locations to set personal use pots. The area is already heavily utilized by sport and personal use DC fishers.

I am also opposed to the decrease in minimum size limit for Alaska residents in proposal 258. We are very happy with the abundance of full size crab and the seemingly heathy stock. Is it worth potentially negatively impacting this stock for the benefit of commercial crabbers? I don't think this tradeoff is prudent.

I am also opposed to proposal 259 especially areas easily accessible to Juneau residents. A full understanding of how having a commercial fishery in the Fall may impact the success of personal use DC fishers is needed before such a commercial fishery is established.

Jon Heifetz

Douglas

January 10th 2025

Alaska Board of Fish
SE & Yakutat Finfish & Shellfish Meeting
Ketchikan, AK January 28- February 9, 2025

Dear Board Members,

I support proposal 108.
I oppose proposal 110.

My name is Soren Heinecke, I'm a guide and lodge employee at Chinook Shores Lodge in Ketchikan. I am an Alaska resident and full time, year round employee at our lodge. Maintaining and operating a lodge is an endeavor that requires huge investment and full attention. This is not a seasonal gig or a side hustle. My family's income is wholly reliant on our sport fishing regulations, and the opportunity to target King Salmon is a major part of our ability to operate during June and July. This is especially true in June, when there are not more diverse salmon runs to round out the catch opportunity for our guests. Since 2017 we have been able to make this work with the 3 fish annual limit, however I feel that we are at the absolute baseline in terms of what is required in order for us to attract any business at all during June. Loss of our June trips would cut a full month from our 4 month fishing season, effectively destroying my ability to provide for my family. We are simultaneously facing reduced catch opportunity for halibut, ling cod, and rock fish, which puts more emphasis on king salmon opportunity. The non resident king salmon limits have been cut systematically for decades, and there is not much further down to go. As stated previously, I do believe that we are as low as we can go while remaining viable. It is critical that we retain, at minimum, the 3 fish annual limit for non resident sport fishermen during June.

I would like to voice support for proposal 108. This proposition put forth by SEAGO is an effective, fair way to manage the allotments between sport fishermen and trollers. It is crucial to set up a framework that allows management of sport fishing quota to a rolling average of 20%. Allowing for over harvest by the sport sector during low abundance years is the only way to balance out the inevitable under-harvest during high abundance years, and puts us in a position to realistically achieve something close to our 20% allotment. According to the figures provided by the ADFG in table 3 of Special Publication 24-19 (p.11), the 26 year average sport fish harvest has been **20.7%.** According to the ADFG in RC-2, the 9 year average is **19.97%** (p.115). This is clear, historical evidence demonstrating that managing the sport fishing allocation to a rolling average of 20% is an effective form of management. These averages have only been achievable by allowing sport fishermen to exceed the 20% allocation in years of low abundance. If we are not able to do so, trollers will scoop up all the uncaught king salmon on high abundance years while holding us to a hard line via in season management during low abundance years. Proposition 108 offers an effective, fair solution to the changes in the PST that will most closely emulate our historical management practices.

Ultimately, as guides we are in the business of selling **opportunity**, not pure poundage of fish harvested. Removing our customer's opportunity to catch fish also removes our ability to support ourselves, our families, and our communities. Personally, I do not believe that we as sport fishermen are asking for much, just the ability to stay operational and keep our businesses afloat. We only have 4 months in which to earn our living for the entire year, and further restriction or removal of opportunity severely jeopardizes a large portion of our season. Our industry is important to the Alaskan economy and deserves protection.

SIncerely,

Soren Heinecke

Submitted by: Amy Hemenway
Community of Residence: Petersburg

Proposal 105: OPPOSE - I oppose this proposal because the number of non-resident fisherman is unrestricted, can vary greatly, and has increased significantly overtime, whereas resident fisherman has remained relatively constant (or one could argue it has decreased over time since the population in SE Alaska had decreased). Management of sensitive species such as King Salmon and demersal shelf rockfish is very important to prevent over fishing, and one logical way to do this is to differentiate between non-resident and resident fisherman limits since the number of non-resident fisherman is an unknown quantity each year and has the potential to continue to increase over time.

Proposal 108: OPPOSE - I oppose this proposal because in-season non-resident/sport harvest of King Salmon SHOULD happen. By not managing in-season, they are more likely to over shoot their 20% allocation, which takes away from the other gear groups. In-season management is in place for most commercial fisheries, and would not negatively affect the functioning of charter/guided sport fishing in the long run. If they continue to operate without in-season management, then their potential to overfish their allocation harvest limit could severely damage the other gear groups by reducing their level of fishing to a point that they may no longer be able to afford to operate. Also, if King Salmon are to be managed in a way that their species can survive for a long time into the future, then all fisherman that are harvesting them should be willing to participate in active management of the species.

Proposal 110: SUPPORT - I support this proposal because non-resident King Salmon harvest should definitely be managed in season. If all of the other gear groups are managed in-season and subject to closures (or lack of openers), then the sport/non-resident fleet should also be held accountable for their harvest levels so that they also are kept within the bounds of what they are allocated. It is unfair that other gear groups, like trollers, have to reduce their allocation just because non-resident harvest went well over their limit. In-season management is a great way to prevent over-harvesting for any group, and keeps the allocation between groups fairly distributed.

Proposal 116: SUPPORT - I support this proposal because reducing the limit for non-residents will still allow them to fish and shouldn't negatively impact the sport/charter fleet. Reducing limits now is a better management decision than having to close later. Closing the fishery, whether scheduled ahead or by emergency order, would significantly impact the sport fleet, whereas reducing limits keeps them operating and hopefully helps make the fishery last a long time into the future.

To the Alaska Board of Fish.

Thank you for providing the opportunity to comment on these proposals. The management of Alaska's fisheries is of the greatest import to Alaska residents. Maintaining strong fisheries is essential for our economic, cultural and physical health. The opportunity to make comments and have our comments seriously considered is vital to democratically managing our incredible ecosystem.

105: I do not agree with this proposal. It is a straight up reallocation away from residents who live, work and pay taxes in our state towards nonresidents who have little to no connection with our home.

108: I do not agree with this proposal. It is a reallocation of fish from the commercial troll sector to the commercial guide sector. It fails to provide a compelling reason that the guide industry cannot be managed in season to suit the conservation needs of the fishery. The fundamental issue is that the commercial guiding sector has experienced exponential growth when the fishery had long since been fully allocated. Another issue is that outer coast guides are hammering on the May and June runs on the outside coast. This unfortunately coincides with the timing of our struggling Southeast SOC runs.

110: I strongly agree with this proposal. It addresses the continuous problem of the guide industry overrunning its quota and causing the shutdown of the August commercial troll fishery. As a commercial troller I find it extremely frustrating to hear the guide industry complain of in season management when our second king opening is snatched away from us for their benefit with no recompense. Obviously we have to stay within our PST quota and manage for fish first, but the current management plan is failing to keep the guide sector within its bounds.

The commercial troll fishery is primarily resident owned and operated while the sport king harvest is over 75% nonresident. In my lifetime I have seen the small town of Elfin Cove where I grew up turn from a village of local fishers who lived in Alaska year round and raised families here to a seasonal conglomeration of out-of-state fishing lodges. It has gone from a town with a school and community activities to a ghost town in winter. The State constitution requires that our fisheries be managed with a resident priority. Additionally, this proposal addresses the issue of SOC interception on the outer coast

113: I disagree with this proposal. While it is a confusing proposal it seems like the goal of it is to reallocate 5% of the quota away from the trollers to the guide sector. This is a dangerous precedent. The solution to the guide industry overharvesting of their quota isn't to reallocate the quota from other users. The quota has already been allocated. Commercial fisheries were forced to become limited entry since it is impossible for natural resource industries to expand forever. Perhaps it is time that the commercial salmon sport fishing industry also goes to limited entry.

115: I believe this is a good proposal. This year the nonresident sport fishery went so far over its quota that ADFG couldn't square the circle even by taking the August troll opener allocation. Not only did this affect commercial trollers, it shut down the resident fishery for the month of September. This prevented locals who live and work here from being able to harvest fish. Reducing the annual non bag limit would also help our SOC as they try to migrate through the May/June charter fleets to reach their home rivers. Additionally, this would reduce the volatility of the King salmon management by allowing sport fishermen to be certain they could retain at least one fish all season. It would also prevent commercial trollers from being unsure if they will be able to fish or not in August.

120: I think this is a good proposal. Unfortunately, for a variety of reasons we are in a period of low king salmon abundance and our fisheries have to adjust to that reality. This proposal is very similar to 119 and 118 indicating that both commercial fishers, local sport fishermen and the Southeast tribal governments are in agreement

130: I do not agree with this proposal. I think the solution to trollers losing their August opening is more in season management of the guide fleet. Having one big opener in July would likely decrease the per pound value of king salmon. It would also make it harder for ADFG managers not to go over the allotted troll quota.

132: I agree with this proposal. As a troller I can attest that it can be very difficult to accurately measure 28 inches to the tip of the tail on a king salmon. The precise posture of their tail can easily change if they are legal to be retained or not. This is especially difficult when the fish is feisty or the weather is sloppy. When I was a technician for ADFG we always measured to the fork of the tail, because it provides a more consistent length than the tip.

192: I agree with this proposal. Allowing pots to be longlined simply makes it simpler for resident fishermen with smaller boats to fish for cod given the large amounts of buoy line required to reach the necessary depths. An additional benefit is that it reduces the amount of buoy lines deployed which could prevent whale entanglements and reduce navigation obstacles.

203: I disagree with this proposal. Lingcod limits should not be liberalized for nonresident non-guided anglers. There has been an explosion in the quantity of "non-guided" operations in Southeast Alaska as a way to get around guided requirements. This proposal will result in less opportunity for local anglers and subsistence fishermen in order to preserve the fishery.

204: I agree with this proposal. Pots are a much cleaner way to fish than hooks and slinky pots are ideally suited to fishermen with smaller boats. We should encourage fishermen to switch to methods of fishing that reduce bycatch.

205: I agree with this proposal. Pacific cod suffer from barotrauma and cannot be returned unharmed. Therefore we should encourage fishermen to retain them and use them for food instead of prohibiting retention and forcing fishers to waste the fish.

206: I agree with this proposal. It seems reasonable to reopen yelloweye to locals with a restrictive bag limit. There seems to be healthy populations of yelloweye and local harvest makes up a very small part of total harvest.

209: I agree with this proposal. I have personally witnessed the amount of nonresident pressure on pelagic rockfish exploded in the last two decades. This situation will result in the ADFG having to take action to preserve the vitality of pelagic rockfish populations. During the same time there has been little increase in resident fishing pressure. ADFG's proposal 210 is an example of this. Instead of reducing the resident bag limit the State needs to focus on reducing the unchecked growth in guided and unguided nonresident harvest.

210: I partially agree with this proposal. Something needs to be done to preserve pelagic rockfish populations, but I don't think reducing the resident bag limit is it. I grew up in Cross Sound and still spend most of my summer season fishing there. Over the last two decades Pelican and Elfin Cove have gone from having a handful of charter boats each to 5 or 6 dozen boats each from May-September. That doesn't take account of the dozens charter boats in Gustavus that also run out to Cross Sound everyday. Since that explosion in pressure black rockfish in Cross Sound have become both scarcer and smaller indicating at least a local depletion. During that time period, however local fishing pressure has been reduced as local residents have been displaced by out-of-state lodges. The logical solution to this problem is to reduce the bag limits for the ever growing charter sector.

Matthew Hemenway

PC210

Submitted by: Jay Hendricks
Community of Residence: Juneau Alaska

I absolutely oppose proposition 156. I was born and raised commercial fishing. My family and many other families in my community depend on hatchery fish. Our cities depend on it and most of all our state. I have followed wild fish and hatchery fish heck I live it. I've seen people saying this run is effected by overfishing so it's managed only to bounce back. People said the blob and yes it might have had something to do with some runs but some have bounced back. When it comes to chinook crack down on our heavily, HEAVILY saturated charters in Alaska. Guided and non guided. I've sat at the airport in sitka and watched pallet after pallet of 50 pound boxes going on planes. Our salmon and halibut are being fished by tourists and being shipped out in a commercial capacity. This is a poor reaction the will leave a giant dent in our communities and economy.

PC211

Submitted by: Andy Stock
Herring zProtectors

Community of Residence: San Francisco

Please error on of the long term side of conservation. There's a lot of pressure on the resource.

PC212

Submitted by: Alyssa Hetherington
Community of Residence: Juneau

I oppose proposal 242 because I believe all user groups deserve a chance to harvest king crab in 11A.

Alaska Board of Fish: Yes on Proposition 105

Twenty years ago I left commercial fishing and developed a new business called Highliner Lodge & Charters in Pelican Alaska. A few years later in 2007 I wrote an affidavit for Alaska Longline Fishermen's Association attesting to the Alaska Board of Fish that reducing our charter lodge guests to one halibut a day, from the previous bag limit of two per day would NOT ruin my business. I thought it was the only fair position to take given that commercial fishermen had already had their halibut quota cut by about 70% at that time. That did not make me popular with the other charter fishing operations in Alaska to see the least! The regulation went into effect and we continued to grow. My wife and I had only 4 employees at that time; two of them were our children... and we broke even that year!

I am writing just as sincerely today asking the Alaska Board of Fish to consider the damage done, not only to hundreds of local businesses, but damage done to all small communities in coastal Alaska by cutting the non-resident bag limit to below 1 King Salmon a day, and below three King Salmon per year.

Since 2008 we have grown our business from less than 100 guests a year to nearly 800 guests booked for 2025. Twelve years ago, in 2008, we employed *four* individuals, in 2025 we will employ thirty (30) individuals. Six of these individuals have year-round positions, another six employees make enough income that they do not need to take another job in the off-season. Many of these young men and women have worked at their Highliner Lodge & Charter careers for over 5 years and are now buying homes, getting married, and having children. They have real careers doing what they love.

City of Pelican Alaska received a combined $750,000 in income from the Highliner Lodge in 2023 and 2024. We are by far the biggest tax payer, the largest consumer of utilities which the City of Pelican owns. The City of Pelican has only about 60 year-round residents. And without the Highliner Lodge and charter fishing in general the city couldn’t survive.

Being a seasonal business, almost 100% of our income is derived in the months of May through August. Should our clients not be able to harvest king salmon, we will see a large portion of our income disappear. Should that happen, the City of Pelican will be directly impacted, all of our employees will be deeply impacted, and all of our future growth will be at risk.

Today Highliner Lodge has approximately $20 million invested in and around Pelican Alaska. That investment has spawned six new businesses. They include the Highliner Lodge, Mad Max Mobile Marine (Suzuki Marine Dealership), Fairweather Expediting and Transport Company, Fairweather Development Company, Middle Finger Marina, and Sunny Side Boatyard and Repair.

Highliner Lodge is almost exclusively a charter fishing lodge and 90% of all of our income from the above businesses comes from the Highliner Lodge. The other businesses are supported by the Highliner Lodge income. Should that income shrink substantially due to our inability to catch and keep King Salmon we will not be able to support and develop many of the other six businesses… creating a situation where they *cannot* be supported until they are profitable and can stand alone.

The Highliner Lodge has financed one other charter fishing lodge and one self-guided fishing lodge; further supporting the City of Pelican. The combined employment of all nine of these businesses is forty-four (44) individuals.

As I stated in the beginning of this letter, I started supporting my family commercial salmon trolling for King salmon fishing in 1976 out of Metlakatla, Alaska. I commercially trolled for salmon until about 1995. I have seen the commercial king salmon fishery decline in value over almost all of those years. Both of my sons also bought boats and commercially fished for King Salmon. Both of those sons have given that up as a viable way to make a living.

Charter fishing, on the other hand, has grown dramatically over that same time period and continued to grow over the 15 following years to today. The income that City of Pelican receives from just the Highliner Lodge alone far exceeds the income that was ever received from Pelican Seafoods Inc… which went out of business in 2009.

Without charter fishing there is no future for any young person in any remote fishing village of Alaska. There are no viable alternatives to charter fishing and tourism in these villages. While whale watching and sightseeing are in demand like never

before in Alaska, only charter fishing can provide the amount of income to allow entrepreneurs today to become financially solvent, spin off new businesses, and be independent from industrial tourist interests aka the cruise ship industry.

Please consider the dire direct effects of severely limiting and/or canceling entirely charter fishing access to King Salmon. You may be canceling the future for entire generations in remote Alaska fishing villages.

Steve Daniels

Highliner Lodge & Charters

Pelican Alaska

PC213

Submitted by: James (Steve) Daniels
Highliner Lodge & Charters Inc

Community of Residence: Pelican

Yes on Proposition 105

No on Proposition 115

Twenty years ago I left commercial fishing and developed a new business called Highliner Lodge & Charters in Pelican Alaska. A few years later in 2007 I wrote an affidavit for Alaska Longline Fishermen's Association attesting to the Alaska Board of Fish that reducing our charter lodge guests to one halibut a day, from the previous bag limit of two per day would NOT ruin my business. I thought it was the only fair position to take given that commercial fishermen had already had their halibut quota cut by about 70% at that time. That did not make me popular with the other charter fishing operations in Alaska to see the least! The regulation went into effect and we continued to grow. My wife and I had only 4 employees at that time; two of them were our children... and we broke even that year!

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Without charter fishing there is no future for any young person in any remote fishing village of Alaska. There are no viable alternatives to charter fishing and tourism in these villages. While whale watching and sightseeing are in demand like never before in Alaska, only charter fishing can provide the amount of income to allow entrepreneurs today to become financially solvent, spin off new businesses, and be independent from industrial tourist interests aka the cruise ship industry.

Please consider the dire direct effects of severely limiting and/or canceling entirely charter fishing access to King Salmon. You may be canceling the future for entire generations in remote Alaska fishing villages.

PC214

Submitted by: Ben Hinde
Community of Residence: Petersburg

I oppose proposal #251. Delaying the summer season start to July 1 will decrease fishing season length and harvesting opportunity. My understanding is that the August 15 end date is to decrease handling of crab during a known mating period. So readjusting the 60 day season closure date is not likely going to be supported by the F&G Dept.

Also worth mentioning is that in most of the dungeness grounds in Southeast, sea otter predation is occurring and increasing regardless of commercial season length, shell condition, or mating schedule.

Ben Hinde

PC215

Submitted by: Colton Holmes
Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173, 174, 175, 176, and 177, which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such action are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for Tribal citizens by establishing a co-management framework. I strongly support proposal 179, which protects an important subsistence area. I also strongly support proposal 181, which minimizes herring mortality from test sets.

I oppose proposals 182 and 183, which expand access of commercial permit holders to herring in Sitka Sound. I believe that expanding access to commercial permit holders will endanger this treasured resource and harm Tribal members in the Sitka Sound who rely on herring for their way of life.

PC216

Submitted by: Karina Holst
Community of Residence: Sitka

My name is Karina Holst, and I am representing myself. I grew up in Sitka trolling with my Dad, and worked at SPC for five summers through college. I married a commercial fisherman, and we raised 4 kids fishing on our boat as the sole source of income. One son is now a full time troller. We fished in areas and fisheries that best suited our family, and that looked different every year depending on the age and abilities of our crew. This has included trolling, longlining, shrimping, crabbing, and dinglebar. We currently troll, longline, and dinglebar, and rely more on hired crew outside family as our children are grown. Fishing together as a family has always been a priority to us, as is preserving that way of life for future generations in Alaska. It's an important and stabilizing aspect of our industry. But it has to be profitable, no matter what your operation. If a fishery is not profitable, the first thing to go is the crew. No action should be taken that further reduces our local resident fleet's ability to support their family and to hire crew. This belief guides my thoughts about the following proposals...

I oppose Proposal 199. Having a weather delay by area in the Lingcod fishery has the unintended consequence of concentrating fishing efforts in an area with a smaller quota, therefore closing that area quickly. Not all boats are able to run to an isolated area like East Yakutat, and they rely on the areas closer to home. Having the entire fleet descend on one area is never a good scenario. A weather delay should be for all areas simultaneously or not at all.

I also strongly oppose 202. This proposal does not just clarify the language, it would change the way we fish and greatly decrease safety and profitability for our crew (we would need less crew). As currently written, "Dinglebar troll gear is gear that consists of a single line that is retrieved and set with a troll gurdy or hand troll gurdy with a terminally attached weight from which one or more leaders with one or

more lures or baited hooks are pulled through the water while a vessel is under way; only one troll gurdy line or hand troll gurdy line may be deployed in the water at any time. " It is clear to me that the intention of this wording is to not have more than one gurdy wire deployed. There is no confusion. It does NOT say you can't have more than one train in the water or onboard. The proposed new wording doesn't even allow for having a spare train onboard! One gurdy wire, one dinglebar is only ever used on our boat. When the dinglebar comes up, the train is removed and taken to the opposite side of the boat. A different train is then deployed and taken to depth on our one gurdy wire. This gives a second crew member time to haul in the train safely, and to also take care of broken gear and tangles, which are many. If we're not able to fish this way, back, shoulder, and hook injuries are inevitable in the rush to get the train emptied as quickly as possible to get it back in the water. It takes a tremendous amount of upper body strength to haul in these trains when they're loaded with open mouthed lingcod. Our female and younger crew need a little more time to get it done, and being able to deploy a train while servicing another makes this possible. Changing the language as drastically as this proposal intends makes this fishery no longer family friendly. It's also a huge step backwards in profitability. If the department is concerned about exceeding the GHL, proposal 200 with the mandatory check ins will solve that. On our boat, we voluntarily check in frequently during the dinglebar season. I support Proposal 200.

I strongly oppose Proposals 108 and 113. These both seek to transfer King Salmon from historic, local, and primarily resident commercial fishermen to nonresident anglers. The idea of payback in the future is uncertain and unreliable, and does nothing for the commercial fisherman who must quit fishing because it's no longer profitable and he can't support his family. Trollers do not have an alternate fish of value to replace this loss, and the financial impact is severe to the fishermen and to the communities. King Salmon is by far the most valuable source of income to trollers, there is no way to make up the difference by catching other species. Having a decent king opener can make or break your season financially, and is an important factor for crew retention. The 80/20 split must be maintained and measures taken to keep the non resident sector from taking from the local sport/subsistence and commercial sectors who rely more heavily on this resource.

I support 109 and 110. In season by management by ADFG is essential in keeping all sectors within their harvest levels. Allowing one sector to flourish and grow unchecked at the expense of another is not acceptable. Trollers have two summer opportunities to catch king salmon. It is devastating to be told mid season that your second opportunity has been given away.

Thank you for this opportunity to voice my concerns about the future of our livelihood. I appreciate all your hard work and dedication.

Submitted by: Louie Holst
Community of Residence: Sitka

My name is Louie Holst, I am from Sitka and I am representing myself. I have been commercially fishing in Southeast Alaska since I was 12, (for 40 years). My wife and I have homeschooled and raised our 4 children while trolling, long lining, crabbing, dinglebaring and shrimping. We have always fished as a family.

I oppose 199. Having a weather delay by area will cause effort to be concentrated into adjacent areas, possibly areas with smaller quotas. This proposal, as written, has unintended consequences. For example, a weather delay in EYAK area while NSEO opens normally would concentrate excessive effort into NSEO. NSEO has a much smaller quota and that excessive effort would create chaos for NSEO. Any weather delay scenario must include a delay for all areas. But, it's not practical to delay the opening of SSEOC because of a gale warning 250 miles away in EYAK. I would argue that weather delay for the lingcod fishery will create chaos and is not warranted.

I oppose 202. This proposal claims to clarify dinglebar gear, but it actually re-defines dinglebar gear, completely changing how the fishery is prosecuted. As currently written, "dinglebar troll gear is gear that consists of a single line, that is retrieved and set with a troll gurdy or hand troll gurdy with a terminally attached weight from which one or more leaders with one or more lures or baited hooks are pulled through the water while a vessel is making way; only one troll gurdy line or hand troll line may be deployed in the water at any time." The limiting factor is "only one gurdy line", this is the meat of the regulation.

When we dinglebar, we have only one gurdy line in the water, with one dinglebar, (a dinglebar is a 6', two inch diameter steel bar that weighs 65#) attached. When the gear comes up, we disconnect the train from the gurdy line and move it to the opposite side of the boat. Then, a different train is deployed and sent back down on the gurdy line to depth. Only one gurdy line and bar are ever used! Dinglebar gear is bottom contact gear. It's very common for the train to sustain damage from the ocean floor. Lingcod, with their sharp teeth are constantly tearing up the jigs and leaders. We are constantly replacing/fixing damaged gear, and always have a few backup trains ready to go in case of excessive damage or if we lose a whole train. If we are in a rush to re-deploy the train, we will end up setting damaged gear, leading to increased gear loss which is bad for the ecosystem. I raised my kids fishing with me, and now I have predominantly female crew. Hauling in the train by hand is physically demanding, in fact the most difficult task in all fisheries we participate in, and requires lots of upper body strength. Requiring us to only have one operational train will lead to back injuries, shoulder injuries, and hook injuries as the rush to get the train serviced and back out will become our top priority. This proposal will not only cause injuries, it will make the fishery not family friendly. I would not have been able to allow my children to work that gear because it takes younger or smaller crewmembers longer to bring the heavy train in. Furthermore, I currently have a predominantly female crew. If this proposal passes, requiring only one train, I could be forced to let current crew go in favor of someone stronger that can turn gear faster. I really do not want to be forced to make that type of decision. Adding the language "all weights, including dinglebars, cannon balls, and other fishing weights must be disconnected from the troll wires of all other gurdies that are mounted on the vessel" is sufficient to keep anybody form

running additional unlawful gear. Also, Proposal 200 for mandatory in season checkins, which I am in full support of, will maintain managers ability to keep us within the GHL. We must be allowed to have a second train trailing behind the vessel for safety sake, for the fishery to remain family friendly, and to protect our female crew members livelihoods. I would like to someday dinglebar with my grandchildren.

I oppose 261. I'm strongly against any area closures. Every BOF cycle there are a few of these closures targeting somebody's favorite spot. Personal use shrimping is currently open year round. It's not unreasonable to allow commercial shrimpers access to traitors cove for a measly 10 days.

I oppose 108 and 113. We are currently in low abundance with no end in sight. When, exactly, will trollers be "paid back" for non resident guided sport overages? The short answer is trollers will not see those fish in the foreseeable future. The 80/20 split must be protected and completely maintained. Furthermore, the resident sport fishers must be protected from the non resident guided sport sector's overages. These proposals seek a reallocation from troll to non resident guided sport which the troll sector cannot afford.

I support 109 and 110. The 80/20 split must be maintained and fortified. Everyone must share in the burden of conservation during low abundance, including the non resident guided sport sector. In season management must be utilized to keep the non resident guided sport sector within their allocation.

Thank you for this opportunity and for taking the time to read and consider my concerns.

PC218

Submitted by: Mark Holst
Community of Residence: Sitka

Hello,

My name is Mark Holst, I am the owner/operator of the 44’ commercial Troller October. I was born in June as the season was starting and was on the water within days and have not stopped fishing since.

I oppose proposal 104

I do not necessarily oppose a limited subsistence king salmon fishery, however I oppose this specific proposal for two reasons.

Reason 1:

“The Pacific Salmon Commission states:

The parties shall:

A. Implement a comprehensive and coordinated chinook fishery management program that:

(ix) includes a commitment to discuss within the commission significant management changes that a party is considering that may alter the stock or age composition and incidental mortality of a fishery regimes catch “

Reallocating %5 of the PSC harvest ceiling to a new fishery could significantly change both the stock and age composition of those fish. Which, I would argue, is currently not allowed without the commissions approval.

Reason 2:

The PSC lists 3 Chinook salmon fisheries in SEAK, Sport, Net, and Troll. A fourth additional fishery is currently not allowed.

Not only is this proposal not allowed by the pacific salmon Commission for multiple reasons, it will also have severe impacts on other SE Chinook fisheries. Reallocating %5 of the total PSC harvest ceiling as an "off the top" quota would mean, after the troll and sport 80/20 split after the net allocation, a direct cost to Trollers of %4, and a cost to the Sport fishery of %1. In 2024 %4 would have been 8,286 fish. The total Troll harvest allocation was 153,000 chinook, subtract 45,000 for the winter troll fishery catch and your left with 108,000 chinook for the spring and summer fisheries, subtraction of 8,286 fish would be reducing the spring and summer troll fishery by 7.6%. This is a major reduction, and will heavily impact the troll fleet in a time of historically low quotas and financial hardships.

I oppose proposal 108. This proposal seeks to regulate the sport fishery to harvest an average of 20% versus management aimed at a yearly 20% allocation target. It specifically highlights the sport fisherys inability to harvest its 20% allocation on high abundance and its ability to exceed harvest allocation on low abundance years. My question is why should the Troll fleet have to pay out of pocket with 5% if its chinook salmon allocation for the the inability to manage the sport fishery to the sport fishery harvest ceiling? I'm 23 years old, and as a young commercial Troll captain I have worked extremely hard to have the opportunity and privilege to continue fishing the same way we Trollers have for generations. If Trolling is open to the retention of King salmon you can bet l'lI be fishing to make sure I am able to make my payments and make ends meet, in fact, as I write this I am currently on anchor waiting for daylight to fish another day. As someone who fished year round, allowing the Sport fishery to exceed its historic 20% harvest ceiling by 5% is a direct reduction of 5% of my king salmon to the predominately non resident sport fishery. Fuel is expensive, groceries are expensive, gear is expensive, boat payments with high interest rates are expensive, insurance is expensive, I fish alone and do not hire crew because I honestly can't afford to pay crew a living wage. That extra 5% that historically would be only harvested on low abundance years is very costly for trollers once you take into account all the fixed expenses we have that do not change with high or low abundance years. With coho prices continuing to be historically low and boats like mine that are not equipped to efficiently Troll for chums, I and other fishermen like me, more and more have to rely on King salmon as our main source of income.

I oppose proposal 113

This proposal will disrupt the longstanding historic 80/20 Troll/Sport split to a 75/25 split. The Alaska state constitution says: "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." Data found in the ADF&G sport fish overview shows In 2023 155,584 anglers fished in SEAK, of which 82% were nonresident. However statistics show that 85% of combined power and hand Troll permits are owned by residents of Southeast Alaska.

Reallocating 5% from a predominately resident commercial fishery to a predominately nonresident Sport fishery clearly violates the resident preference found in the Alaska state constitution.

I support proposal 116 and 117. These proposals, if adopted, could bring stability to both the Sport and Troll fisheries by effectively slowing down the excessive non-resident sport catch to a sustainable catch rate without affecting the Troll fishery while reducing in season management. Data from the department found in the overview of sport fisheries for king salmon through 2024 show that on average 45% of the total region wide chinook salmon harvest occurs in the 4 week period from approximately June 7th to July 4th. Slowing the excessive non resident catch rate during that time frame will increase resident sport fishing opportunities later in the summer by avoiding region wide resident sport fishery closures. The Alaska constitution states: "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." On August 22, 2024 the department announced that on august 26th through September 30th 2024 that sport retention of chinook salmon would be prohibited for residents and non residents alike. Closing the resident sport fishery due to excessive non resident harvest clearly violates the resident preference outlined in the Alaska state constitution.

I oppose proposal 199. Having a weather delay by area has the unintended consequence of concentrating fishing efforts in an area with a smaller quota, therefore closing that area quickly. I have personally dinglebared a 32’ double ender, a very small and slow boat. I could not safely travel the distance to the east yakutat area. If the entire fleet descended on areas closer to town with lower quotas and typically calmer waters, because of a weather delay in one area, they could very fast and efficiently catch the quota of those areas. A weather delay should be for all areas simultaneously or none at all.

I strongly oppose proposal 202

This proposal doesn't clarify, it completely rewrites regulation. The department states "vessels participating in the directed lingcod fishery with dinglebar gear are operating multiple lines at the same time." Current regulations already prohibit the use of multiple Lines in the water, I completely approve of clarifying regulation to read "all weights, including dinglebars, cannon balls, and other fishing weights must be disconnected form the troll wires of all other gurdies that are mounted to the vessel." Any other "clarification" wording in this proposal, which isn't clarification at all and completely changes the fishery, is regulatory overreach and completely unnecessary. Rewriting regulation to prohibit the use of 2 trains unnecessarily complicates regulation with extreme difficulties in regards to safely and effectively engaging in dinglebar fishing operations. Dinglebar is not a high dollar fishery. In order for this fishery to be profitable for us fishermen we must be efficient, and this proposal takes a very long step backwards in both profitability and safety.

If we are restricted to the use of only 1 train, it will be of the utmost importance to service the train and remove fish from the hooks and redeploy as fast as physically possible, causing serious safety concerns. I grew up dinglebaring as a kid with my dad, would I have been able to to manually service a train with hundreds of pounds of fish on it in a timely manner and still be efficient at the age of 12? Of course not! I loved dinglebaring as a kid, as well as many other fisheries, it gave me the opportunity to learn the importance of a good work ethic while also being paid a fair and honest crew share. This proposal ,as written, will inhibit families to the point where we can not be efficient enough to make the fishery

profitable. My dad would have been forced to either leave the fishery completely or leave me and my siblings at home and hire crew. I do not want to have to make that same decision with my future children.

PC219

Submitted by: Vivian Holt
Alaska Native Brotherhood Camp 1

Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

Hoonah Indian Association
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Hoonah, AK 99829-0602
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Proposal # 137: Support

I'm writing to ask for the board's consideration and support for Proposal 137, submitted by the Hoonah Indian Association (HIA), to increase the possession limits of Basket Bay to match the annual limit. Although I would have liked to speak to this in person, unfortunately the Board of Fish and Federal Subsistence Board were scheduled during the same time frame, and I am previously committed to attending the Federal meeting in Anchorage.

Basket Bay has several years' worth of data from Fish Resource Monitoring Programs (FRMP). While the most recent round of monitoring ended in 2017, the data showed the stock to be stable and healthy with averaged returns of 4,600 sockeye per year, being larger than many similar monitored systems in the area that enjoy greater limits and usages. Some with far less monitoring and abundance data.

Previous increases and adjustments to Basket Bay limits were done when:

- Less data was available.
- More reported harvesting was being done.
- There was a greater interception of Basket Bay bound Sockeye in the Icy Strait seine fishery.
- The environmental damage from nearby logging was more significant.

While the Basket Bay FRMP was discontinued in 2017, the Forest Service Fish Biologist who had been operating that project continues to travel to the system and fish alongside Angoon Alaska Youth Stewards. His impression of the stock health is favorable.

Reported subsistence harvesting in the area has been on a general decline. While there may be some initial increase in harvesting by increasing the daily limit to match the annual, there is no indication that this would cause a sudden substantial jump in effort. Basket Bay is still a remote location located alongside the ever wiley waters of Chatham Strait. Increasing the daily limit to match the possession limit will only aid those fishers who utilize this stock to safely meet their subsistence needs more efficiently.

Efforts in the seine fishery in this area have diminished with only a few boats participating in the Point Sophia and Point Augusta openers in recent years.
The environment continues to heal itself from the effects of logging.

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Furthermore, HIA has expressed its intentions of re-visiting FRMP work at Basket Bay and will begin monitoring community usage and encouraging accurate harvest reporting to fill and update data gaps.

Please approve this proposal to help the people of Hoonah, Angoon, and Tenakee Springs meet their subsistence needs.

Thank you,
Jackson Combs
Subsistence Fisheries Biologist
Hoonah Indian Association – Environmental
Jackson.combs@hiatribe.org

Average escapement based on most recent available data:
Basket Bay: 4,600 (Years 2010-2017)
Neva Lake: 4,142 (2013-2023)
Kanalku: 1,579 (Upper) 2,4345 (Lower) (2004-2014)
Sitkoh : 6,876 (2011-2021)
Hanus : Data from 1962-1965 + partial 1995

2023 Juneau Management Area **Subsistence and Personal Use Salmon Fishing Permit Conditions**

Subsistence Salmon Permit Conditions

1. Chinook salmon, trout and char may be taken only incidentally by gear operated under the subsistence fishing guidelines of this permit. The possession limit for Chinook salmon is 2 fish.

SUBSISTENCE SALMON FISHING LIMITS AND SEASONS

Salmon Species	Limits		Season Open Dates	Location
	Possession	Annual		
Sockeye	50	50	June 1–Aug 15	Surge Bay
	50	50	June 1–July 20	Hoktaheen Cove
	20	20	June 1–July 31	Kanalku Bay
	15	30	June 1–July 31	Basket Bay (Kook Lake)
	50	50	June 1–Aug. 31	Sitkoh Bay
	50	50	June 1–Aug. 15	Hanus Bay (Lake Eva)
	25	25	June 1–July 31	Berg Bay
	20	20	June 1–Aug 15	Neva/South Creeks
	50	50	July 1–Aug 31	Hasselborg River/Salt Lake
Pink	150	150	June 1–Sept 30	All streams within the Hoonah and Angoon subsistence areas.
Chum	50	50	June 1–Oct 31	All streams within the Hoonah and Angoon subsistence areas.
Coho	20	20*	July 1–Oct 31	Hasselborg River/Salt Lake
	20	40*	June 1–Oct 31	Other streams in the Hoonah and Angoon subsistence areas.

*A household total limit of 40 coho salmon for the entire season from any combination of streams.

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Table 1. Subsistence effort and harvest of salmon at Kook from 1985 to 2016 as reported on State and Federal subsistence fishing permits.

	State Subsistence/Personal Use Permits[a]						Federal Subsistence Permits[b]		
Year	Permits Fished	Chinook	Sockeye	Coho	Pink	Chum	Permits Fished	Sockeye	Coho
1985	37	0	450	0	2	0			
1986	78	1	1427	1	4	6			
1987	55	0	1233	0	50	5			
1988	30	0	316	0	2	21			
1989	35	0	505	6	87	34			
1990	32	1	477	0	0	16			
1991	28	1	406	0	0	1			
1992	34	1	602	1	23	5			
1993	27	0	475	2	201	125			
1994	23	0	348	19	33	29			
1995	21	0	387	1	7	24			
1996	20	0	302	27	42	25			
1997	18	0	187	52	18	0			
1998	19	0	327	0	0	1			
1999	23	0	418	1	0	0			
2000	19	0	252	0	2	5			
2001	23	0	279	50	50	0			
2002	38	0	645	0	20	0	0	0	0
2003	39	0	941	16	2	0	0	0	0
2004	46	0	691	55	52	8	0	0	0
2005	14	0	169	0	0	0	1	0	0
2006	25	0	507	0	0	0	0	0	0
2007	13	0	136	0	10	0	0	0	0
2008	15	0	172	0	1	1	0	0	0
2009	13	0	170	10	5	16	0	0	0
2010	34	0	553	12	13	7	0	0	0
2011	29	8	414	78	4	0	0	0	0
2012	4		101				0	0	0
2013	10		135				0	0	0
2014	18	0	277	0	14	0	0	0	0
2015	25	0	302	0	29	0	0	0	0
2016	20	0	354	0	0	0	0	0	0
Spearman's rho non-parametric trend test (Conover 1980):									
rho	-0.5463	-0.2542	-0.4709	0.02595	-0.1237	-0.486			
P-value	0.0013	0.1753	0.0066	0.8918	0.5148	0.0065			
N	32	30	32	30	30	30			

[a]State subsistence data from ADF&G October 2017.

[b]Federal subsistence fishing permits were not issued before 2002.

Board members,

My name is Courtney Howard. I run an old wood 50' commercial Troller/Longliner. I live in Sitka and have been a Southeast Alaska resident my whole life. I grew up sport fishing king salmon with my family, but didn't get involved in commercial trolling until 2014. We've seen big changes in Sitka in my lifetime. When I was a kid, my step dad would take me out sport trolling around town. The only time there was a high volume of boats on the water was the local salmon derby, otherwise we virtually always had the drag to ourselves wherever we were trying. These days I think it's hard for locals to afford to take the family out fishing, hard to justify the expense especially as the kings have gotten smaller, and you might get skunked. Over the same span of my lifetime, the charter industry has grown from almost nothing to the booming gold rush industry it is now. As I come and go from town throughout the fishing season I pass the spots my step dad used to take me sport trolling when I was a kid and they're usually crowded with charter boats these days. People don't know what's going on here in Sitka; the volume of charter boats, the volume of fish flying out in fish boxes, and how that's changing things for other user groups, commercial, resident-sport, subsistence(All of which I'm speaking as a member of). The Chinook is an icon of Alaska, King Salmon is a strong brand name, and as the species declines, scarcity only creates more of a frenzy on the demand side. Clients come from all over the world and pay good money so that when the day comes that the salmon are finally gone, they can tell their grandkids how they once caught a Wild Alaska King Salmon. The tragedy of the commons is easy to understand when the terms are fish, and as a local I see it. I see young ambitious people getting into the charter industry, I see guys who used to commercial fish selling out and buying charter boats. I see the allure of it myself.

It's really no wonder the charter sector wants a larger allocation, they are still growing and expanding, they are not limited entry. These are fully allocated resources, if we continue to allow more charter boats to operate every year, more non-residents to harvest king salmon from our waters…where do you suppose the additional fish will come from? The only way that non-resident sport fishermen get more kings is by taking kings away somewhere else, meaning residents. My primary concern is that the charter industry needs to be stabilized at a size, this industry's size should be relative to the fish, not the economic demand. Limiting entry for the salmon charter fleet is critical to resource and community stability. The charter clients get a great deal right now, where they might pay around $3000 for a few days of fishing but bring home fish that would cost them $2000 to buy at the grocery store. It doesn't end up costing them much more to fly up and catch it themselves than it would to buy my product in the supermarket.

The king salmon means a lot to rural southeast communities. The local commercial winter king salmon fishermen are economic bedrock for rural communities in Southeast Alaska throughout the slow winter months.

The king salmon means a lot to my business. I'm on my third wood boat and have diversified into additional fisheries and don't troll as much as I used to, but it was the year round access to the king salmon that allowed me an entry point into being a captain of a commercial fishing boat instead of a deckhand, and over the years has been a consistent source of revenue. Markets and the abundance of fish are both fluctuating creating a volatile business environment that we hedge against with diversity. Trollers have access to chum and coho and king, and that diversity is key to the sustainability of a commercial troll operation over decades. It's not always

the king salmon that make your year, but if they weren't there, you wouldn't make it a decade. In recent years the other fisheries I do have seen collapses in dock prices and trolling provides not only a significant component of the revenue I currently earn but also something to fall back on should longlining become entirely unprofitable for operations at my scale. It was not easy to diversify into other fisheries. I have huge loan payments on IFQ sablefish and halibut that currently exceed the revenue I am making from catching that fish. I make my loan payments by trolling and catching more sablefish or halibut that I lease from other people. These are hard times for commercial fishermen, we're barely holding onto our careers. Our boats are old, crew is scarce and we are being paid less for fish in relation to the inflated cost of doing business, so every fish counts, every allocation is an important component of having a profitable season or one where you barely can make your payments.

In regards to the current proposals on the table, I am strongly opposed to Proposals 108 and 113 which aim to reallocate king salmon to the sport/charter sector. I do believe in the importance of resident priority for all fishery resources and any way to ensure that fishing is not closed to resident sport and subsistence fishermen, but these proposals are led by the non-resident guided sector which, like the rest of us, need to learn to live within their means. There is no fishery which is completely open and unrestricted. They all have quotas, allocations and lots of rules and regulations. Conservation should be the burden of all sectors. We do not foresee years of high salmon abundance in the future, therefore why should any business model assume unlimited access and growth.

I also strongly oppose Proposal 156. As access to king salmon has become more unstable, a lot of commercial salmon trollers have geared up to fish hatchery chum salmon. Chum salmon has become a staple part of my income and though the price has had huge fluctuations over the last 7 years, it has been consistent in terms of access and run size. This proposal aims to decrease hatchery pink and chum salmon production by 25%. Again, another threat to my ability to operate a business and maintain a commercial fishing operation. With less king salmon and the threat of less chum salmon, I am left with few options for making up the lost revenue.

I support Proposals 109, 110 and 111 and hope the board can find the common goals in these proposals and use one of them as a vehicle to amend the current king salmon management plan. The three most important factors that the commercial troll fleet is united in supporting are:

1. Maintaining the 80/20 king salmon allocation.
2. Reinstating the use of in season management to ensure the sport sector maintains at or below their 20% allocation.
3. Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

ADFG employs a number of sport fishery biologists. They have the tools and ability to conduct in season management to ensure allocations are met and not exceeded. As a commercial fisherman, if I exceed my quota or allocation I am met with lawful consequences. The last 2 fishing seasons, the sport fishery sector has grossley exceeded their allocation and not been met with any consequences. ADFG data for 2024 shows that the *non-resident harvest*

of king salmon was 67% ,leaving resident anglers 33 %. *Non-resident guided harvest* makes up, on average, 50% of the harvest.

My family has a very high dependance on king salmon as both a staple food source and a source of income to pay the bills and allow us to continue to live in Alaska. As a resident of a rural community, it is not easy financially to live here and a subsistence lifestyle, including access to king salmon is important to making it work. My wife also works in the commercial fishing industry and since the birth of our son has spent more and more time advocating at a state and federal policy level for our small boat commercial fishing fleet to maintain its existence. Year after year, more threats loom. It was just 2 years ago that we didn't know if we would have a king salmon season because the Wild Fish Conservancy lawsuit threatened to shut it down completely. But the Judge sided with the commercial salmon trollers. They cited the importance of the fishery to the rural and native communities of Southeast Alaska. Trollers are the backbone of our communities. There aren't many communities in SE Alaska without trollers. Even the smallest communities like Port Alexander or Tenakee Springs have a resident troll fleet. Please don't continue to threaten the existence of commercial salmon trolling by allowing a reallocation of the resource.


KOLSTRAND
KFAB
TINY
BUT
MIGHTY


NORFJORD

WATERFALL RESORT
ALASKA

Alaska Board of Fisheries
PO Box 115526
1255 W. 8th St.
Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

I am Andrew Howland, a member of the sales and marketing team with Waterfall Resort in Ketchikan. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me, as well as the different user groups in our region. I can speak only from the sales side of this industry, as I speak with potential leads every day, attempting to get them to come and enjoy our amazing fishing resort located on Prince of Wales Island.

The proposals that we **SUPPORT** would be the following;
Proposal 108 – SEAGO's proposal which helps maintain a 3-2-1 type platform like we have had, but adds an additional ceiling cap of 5% of the troll fishery to help protect commercial fish from having sport/charter going too far over their allocation and into their quota, and also runs on a 9-year average since returns have a history of being cyclical over time for possible payback provisions if needed. This will also help provide a little stability within the industry. Being able to speak to the limits when selling our resort(s) has been very beneficial, in lieu of not having those answers or telling potential guests that they could change. June has been tough to sell, but when the limits are 3/person it is easier. Lowering this amount to 2/person total retention would reduce their total catch and reduce their enthusiasm to "chase kings." When bag and annual limits for kings were better and we had better regulations for halibut, lingcod, and rockfish mid-May through June was the easiest part of the season to sell. Now it is the most difficult and requires us to incentive guests to come during this time, reducing our revenue. There is little opportunity left the first half of the season, and we can't afford to go any lower and expect customers to keep coming.
Proposal 113 – Shifts to an allocation of 75/25 which would help give enough King Salmon to the sport and charter industry through most allocation levels (not in all cases of very low return years.)

The proposals that we **OPPOSE** would be the following;
Proposal 116 – Science does *not* support this type of regulation in years of high abundance.
Proposal 117 - Science does *not* support this type of regulation in years of high abundance.
Proposal 119 – Closing two days a week to Non Resident King Fishing; Science does *not* support this type of regulation. Our season is so limited already, removing two days of the week would force all guests to eliminate those days from consideration, reducing our revenue.
Proposal 120 – Closing weekend to Non Resident King Fishing; Science does *not* support this type of regulation. Our season is so limited already, and would not work for many and their vacation schedules. Many corporate clients try to come over weekends, this would make their trip more difficult to accomplish.
Proposal 140 – Only allowing Barbless Circle Hooks outside Terminal Hatchery Areas (THA's); That's basically everywhere our guests fish. Science says this is *not* needed.
Proposal 141 – No baited hooks outside THA', which includes everything not just Kings; Science does *not* show this is needed.

WATERFALL RESORT
ALASKA

Proposal 104 – Subsistence allocation of 5,000 King Salmon; Do *not* support this as Federal Fisheries handle subsistence.

As an operator and for me as an individual salesperson, we depend on this industry for income while simultaneously providing revenue to Ketchikan and its' businesses which include stores owned by locals and natives. We often recommend our guests overnight in town, sometimes two separate nights for each booking, which leads to revenue for the many restaurants, bars, stores, and excursion outfits. This provides more tax dollars for the local municipality. Not only do our guests spend disposable income in town but our operation does too. The King Salmon is what Ketchikan is built on, with its' many stores devoted to the subject. If further restrictions are put in place for guests to catch their own, and create stores and lifelong memories that they share, this will affect Ketchikan and its' businesses tremendously also.

I urge the board to consider these points when making allocation decisions to ensure that sport fishing remains a viable and valued part of Alaska's fishery management. Thank you for your time and dedication to preserving these resources for all stakeholders.

Sincerely,

Andrew Howland

Andrew Howland
Waterfall Resort

Madam Chair Carlson - Van Dort and members of the Alaska State Board of Fisheries (BOF):

My name is Carter Hughes. I am a Sitka based troller. I have been in the Alaska seafood industry since 1994. I have been working on longline and troll vessels in Southeast Alaska (SEAK) since 1998. I bought my first boat, a troller, in 1993. I have lived in Sitka since 2000. I lived in Pelican during the 1990s. I have worked most of my adult life in the seafood Alaska seafood industry. Trolling represents well over half my income. I sell most of my fish to Seafood Producers Cooperative (SPC) in Sitka and Yakobi Fisheries in Pelican. I am older now and primarily fish in the summer and spring hatchery openers. I have fished vigorously in the winter king salmon fishery in the past, but I have a smaller boat now and the weather is a bit rough for me. I have previously sat on the boards of the Alaska Trollers Association (ATA) and SPC for a combined duration of 25 years. I am submitting these comments on proposals that are being considered at the current BOF meeting in Ketchikan in a few weeks. Most of my comments concern the King Salmon Management Plan (KSMP).

As a troller, I need stability in my fishery. There has always been an element of uncertainty and always will be. The past two years have been very difficult. My boat is an ice boat. I catch clean and ice all my fish and deliver them every 3-5 days to a tender vessel or processing plant. I am not set up to freeze or slush fish. I target King and coho salmon. During the past two years, the troll fishery has seen about 32,000 kings reallocated to the part of the sport fishery that caters to nonresident fishermen. The number of lodges that are in the areas I fish, Sitka north to Cross Sound, is increasing. The lodges are also staying open longer. Thus, they are harvesting more. Some of these lodges offer bare boat rentals, and their harvest is not closely monitored. While trolling has been limited entry for decades, the sport sector that caters to nonresident sport fishers is not. Limited entry is their business. My concern is to restrict the nonresident sport harvest, which is now considerably more than the resident sport harvest, so that the troll fishery can continue to harvest under the same scenario it has for decades. I would like to return to a scenario where trollers and sport sectors continue the decades old allocation split of 80% troll / 20% sport. I would also like to have two summer openers, as has been the case, where 70% of the kings are caught in a July opener and 30% are caught in an August opener. I want to see the sport fish fishery managed to its harvest ceiling, while not closing the season to resident sport fishers. I don't support any of the proposals that use averaging at the current time. Averages can very greatly depending on the years that are used and the management scenarios, such as abundance prediction policies. At the current time these things are highly variable. It seems that the Pacific Salmon Treaty is in flux, even between the 10-year negotiation terms. There is now a strict punitive policy that has dire consequences for Alaska if it exceeds the SEAK annual quota allocation. This was implemented in 2018 and further changed last year so that a previous method that would have generated a higher king salmon quota number for SEAK was reduced. The idea of the sport sector being able to pay back overages with a large SEAK quota year is no longer a realistic expectation. The only way to manage the sport fishery to its harvest ceiling will be

to limit the nonresident daily bag limits and annual harvest limits in the earlier part of the season, May and June in particular. If this is not done, then there will continue to be overages and early closures for both the troll fishery and resident sport fishermen as there was last year. the harvest rates won't go down any other way because the nonresident sport harvest and the businesses that cater to that are growing. Trollers could grow too if they weren't limited in number and allowed to exceed their harvest ceiling by not being managed in season.

My comments on proposals will support my previously stated perspective.

I Oppose Proposal 104: Proposal 104 initiates an ocean subsistence fishery for king salmon. It allocates 5000 kings or 5% of the total quota to subsistence, which ever is greater. The problem with this is that kings are already fully allocated and utilized. This will add further stress to the KSMP. It will also need a monitoring and accounting system. I would rather see resident access protected by restricting nonresident harvest.

I Oppose Proposal 105: This proposal claims that the Alaska State managed king salmon sport fishery must treat resident harvesters and nonresident harvesters equally in the Exclusive Economic Zone (EEZ- outside 3 mile) because of the Magnuson Stephens Act (MSA). The management of the king SEAK king salmon fishery has been delegated to AK for many decades by the National Marine Fisheries Service (NMFS) and the North Pacific Fisheries Management Council (NPFMC). This management responsibility has been in place before the establishment of the KSMP in the early mid 1990s. There is a strong precedent for its continuation. Neither NMFS nor the NPFMC has displayed any interest in including the SEAK sport king salmon fishery under the MSA. They would be the one to make that decision if they thought it appropriate. If this proposal passes, there will be a strong incentive to shift fishing effort to the EEZ by businesses that cater to nonresident harvest because there will be a profit incentive to do so. Also, it will be difficult to enforce as there is no easy way to determine where the fish are caught.

I Support Proposals 106 and 107: These proposals would prohibit the landing and processing of fish caught in the EEZ inside AK State waters or on land. If P 105 passes, this would be necessary to keep from rupturing what is left of the KSMP. The other option would be to close the EEZ to sport fishing for king salmon.

I Oppose Proposal 108: I want to see the 80 /20 ratio maintained and I want to see the sport fishery managed to its harvest ceiling.

I don't support Proposal 109 as written. I do support a modified version of 109 which will be submitted as an RC: Proposal 109 is in a state of being modified, but it seeks to

maintain the sport harvest within its harvest ceiling. It also calls for in season management of the sport fishery.

I support Proposal 110: Proposal 110 reinserts the words "sport fish" into the management regulations that previously existed and were agreed two by all parties at the 2022 SEAK BOF meeting that year.

I support aspects of Proposal 111, but not the entire proposal: Proposal has 3 flaws that render it unworkable for me. It does not request that the sport fishery be managed to its harvest ceiling, and it follows what I believe is a false assumption that there will be higher abundance tier years that will allow for the troll fleet to harvest at 81%. The bag limits and annual limits are too liberal. I don't see that overages can be prevented if nonresident harvest levels of king salmon are at a daily bag limit of 3 and the sport target percentage is at 22% under any likely quota that is generated in the next 3 years leading up to a renegotiated PST. The annual and bag limits for nonresidents would have to be lowered at the bottom 3 tiers for this P 111 not to repeat what happened last year, ie no Aug troll opener for kings and sport fishery shutting in August or earlier. Maybe Ak will get a better deal at the next treaty negotiation. Until then, It is likely that allowing for a daily bag limit of 3 any time of year will lead to what happened last year, less kings for both trollers and AK resident sport fishers. I think P 111 is very informative (perhaps the most informative) as a read for describing the current problems with the KSMP. I could support this proposal if the bag limit numbers were decreased, and sport fish harvest ceiling were put back into **5AAC 29.060**. This proposal will also have modifications that will be submitted as an RC that I support.

Proposal 112 concerns averaging techniques and I don't support that at the current time.

I Oppose Proposal 113 for the same reason I oppose P 108.

I support Proposal 114 with qualifications:

I Support Proposals 115 - 117: All these proposals seek to reduce the nonresident bag and annual harvest limits in some form. This will have to happen if future overages in the nonresident harvest are to be prevented and closure to the resident sport fishing and continued loss of the Aug king troll opener are to be avoided.

I would support 119 and 120 only if P110, 109 and one of 114 -117 were not to pass.

I Oppose Proposal 121: 121 is the status quo, which is untenable for trollers and resident sport fishers.

I Support Proposal 124: 124 seeks to provide extra opportunity for the resident sport fishers in inside waters by making a week more time available to residents who are fishing

in areas that are closed to conserve King Salmon Stocks of Concern (SOC)if the stocks for the transboundary river in that area is predicted to make escapement.

I Support Proposals 125 -126: These proposals close a loophole that allows for sport fishing in the inner Cross Sound and parts of Icey Straits during a time of year when SOC fish are transiting. This proposal will facilitate a more rapid recovery of the SOC.

I Support Proposal 129: This proposal will not change the harvest limit for the Yakutat spring troll fishery. It will allow one extra day a week to fish which can be important for the small boat fleet, many of which are skiffs. Weather can be a concern there and the extra day will help.

I Support Proposal 130 as a fallback proposal if p121 or something like it were to pass. It is not my preferred option. I like having 2 troll king openers in the summer.

I Support Proposal 131: 131 allows for a noncompetitive troll king fishery in August if the number of days of the second opener is to be less than 3. Currently that management tool is not available until September. This would eliminate the need for a 2-day closer preceding the opener that is shorter than 3 days. The opener would noncompetitive instead by assigning a number of kings to each vessel that may be harvested during a set duration of days. This would eliminate logistical hardships for both the troll fleet and the processers that handle troll fish.

I Support both Proposals 132 and 133: These proposals change the measuring technique and minimum size of king salmon in the spring troll fisheries, which target AK hatchery fish. The fish would be measured from the snout to the center of the tail and the size would be reduced to 28 inches. the measuring technique would be far more consistent than the previous method of measuring from the snout to the outer tips of the tail. It would also allow trollers more access to AK produced hatchery kings, which tend to be smaller because they only spend 2 years in the ocean.

This concludes my comments on KSMP proposals. I have 2 more proposals I wish to comment on.

I Oppose Proposal 156: Proposal 156 will cut hatchery chum and pink production by limiting the egg take and decreasing it by 25%. There are very few hatchery pinks produced in SEAK. There is no reason to cut the egg take of pink salmon in SEAK. Chum salmon is an essential part of the business model for the hatcheries and all the fishing fleets of SEAK. Chum salmon cost recovery pays for other salmon production, such as king and coho that are harvested by all common property groups.

I Oppose Proposal 202 as written: Proposal 202 uses a very poor definition of line for gear in the dingle bar (directed lingcod) fishery. It defines a line as a spare assembled train present on the boat. This is utterly inappropriate. All boats carry spare gear. Spare gear is

necessary so that one does not have to run to town if there is a gear loss incident. The proposal should read that there can only be one train in the water at a time. This would achieve the purpose of making it easy for enforcement to tell if there was more than one line in the water at a time. It should be legal to have a spare train in a tub on deck or in the wheelhouse. If the proposal were rewritten to state that a line is defined as a train in the water, this proposal would be more palatable.

This concludes my comments on proposals.

There are 2 RC's that I have read that will be submitted at the time the BOF meeting starts. One is from Territorial Sportsmen Incorporated (TSI) and Alaska Trollers Association (ATA) and the other is from the Ketchikan Advisory Committee (KAC). They draw from some of the proposals I have discussed. Either of these would be my preferred option for a revised King Salmon Management Plan. Both KSMP revisions will protect the resident sport and troll fisheries from unintended closures.

Thank you for reading my comments and thanks for all your hard work and dedication.

Sincerely,
Carter Hughes
FV Astrolabe
Sitka

PC224

Submitted by: Ben Hughey
Community of Residence: Sitka

I'm writing to recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

HUNA TOTEM CORPORATION

[redacted]

Via Email Only

January 10, 2025

Attn: Board of Fisheries

Re: Letter of Support – Southeast Alaska Hatcheries (Proposal 156)

Dear Board of Fisheries:

I am writing to express Huna Totem Corporation's support for Southeast Alaska hatcheries and opposition to Proposal 156.

Having reviewed Proposal 156, which seeks a 25% reduction in pink and chum salmon production, we believe it is important to emphasize the critical role our hatcheries play in maintaining the health and sustainability of our salmon population. Reduction of chum revenue would have a negative impact in other fisheries including sockeye, chinook and coho. These populations are vital to the ecosystem, economy, and cultural heritage in Southeast Alaska.

Salmon are central to our Native Alaskan heritage. Many of our shareholders rely on salmon for food security, traditional practices, and cultural continuity. Rural communities, which rely heavily on subsistence fishing, would be disproportionately affected.

The potential impacts of these reductions could extend beyond our shareholders and their communities, greatly affecting both the commercial and sportfishing industries. A reduction in salmon would limit the fishing opportunities available to visitors and drastically hamper the experiences that attract countless visitors to Southeast Alaska each year.

I strongly believe that supporting the operation and success of Southeast Alaska hatcheries is essential to protecting both the environment and the economic and cultural strength of southeast Alaska. I appreciate your attention to this matter and ask for your support in ensuring the long-term sustainability of our vital salmon resources.

9301 Glacier Highway, Suite 200, Juneau AK, 99801 | *o* 907.789.8500 | *f* 907.789.1896 | www.HunaTotem.com

Thank you for your time and consideration. If you have any questions, please feel free to contact me at [redacted] or russell.dick@hunatotem.com.

Sincerely,

Russell Dick
President & CEO
Huna Totem Corporation

Krissa A. Huston
8184B Threadneedle St
Juneau, Alaska 99801

January 13, 2025
Board of Fisheries
Madam Carlson-Van Dort, Chair

Hello all and thank you for the opportunity to comment. My name is Krissa Huston. Aana Tlaá yóo x̲at duwasáakw. My Lingit name is Aana Tlaá and I come from the Thunderbird house. I am commenting on behalf of myself. I am a herring harvester, social scientist, a previous seafood industry professional, and I've been studying Alaskan and global fisheries since 2013. In May of this year I completed my masters thesis titled "Pacific Herring: Alaskan Native Traditional Foods in Export Markets" which focuses on the historical discourse regarding the Sitka Sound Herring Sac Roe Fishery and the management, policies, and markets that have affected the well-being of all fisher groups. On the basis of my personal connection to the fishery as well as my professional research, I urge the BOF to reconsider the current management structure of the Sitka Sound Herring Sac Roe Fishery. The current proposals to the board to change quota, gross harvest levels, closed water boundaries and to expand permit holders gear to use open pounds are not new ideas. I believe that fundamental changes in management, which I propose herein, will allow for a reimagined management system that will benefit both commercial and subsistence fishers and contribute to the well-being of the community.

SUPPORT: PROPOSALS 171, 172, 175 & 177 "Current harvest rates do not consider the current herring stock productivity. **An in-depth analysis has not been conducted for Southeast Alaska stocks, so reducing the maximum harvest rate to 15% would provide a more precautionary maximum until such an analysis can be completed.** The impacts to historical fisheries over the past 20 years would have been minor if the proposed 15% harvest rate was used in the past." (ADF&G, 2024)

I propose that the board works with the North Pacific Fisheries Management Council and the National Oceanic and Atmospheric Association to create a **Pacific Herring Stock Structure Working Committee** composed of diverse community members, tribal nations, and researchers to address the need for a new analysis of the current biological stocks of Pacific Herring in the Gulf of Alaska. This working group could inform policy through a Management Strategy Evaluation (MSE) framework as proven successful for the Atlantic Cod Stock Structure Working Committee developed through their multi-year research project that informed the New England Fishery Management Council of new considerations for stock assessments (McBride & Smedbol, 2022; Chapman & Singer, 2021).

This type of framework has the potential to inform more accurate stock assessment models that include fish productivity change due to climate through observational models and considering age population models. Through scientific research such as genetics, tagging, and otolith microchemistry paired with Indigenous Science and community driven interests, collaborative research can inform new management models. Herring production through cultivation of marinescapes is a Tlingit management method that should be considered as well as reintroduction methods such as the transplantation of herring stock to new habitat (Thornton, 2010). Additionally, **accurate age population models would allow fisheries management to set appropriate catch limits in order to sustain all age classes of herring enough to feed the ecosystems and ensure age stocks are not pushed to extinction.**

SUPPORT: PROPOSALS 173, 174 & 176 "The fishery will not be conducted if the spawning biomass is less than 25,000 tons. **A reduction in commercial harvest may benefit the ecosystem and other user groups by an unknown extent.** This proposal will decrease the GHLs however a more in depth analysis of herring stock is needed. The harvest rate strategy proposed for Sitka Sound (see Proposal 171) is comparable to strategies recommended for *prey species* in global meta-analyses, although lower maximum harvest rates have recently been applied to herring stocks in the North Pacific." (ADF&G, 2024).

*"Pretending, by omission, that they are not a forage fish is a scientific and legal absurdity. Herring are classified as forage fish by most government agencies, including the United States Geological Survey and the National Oceanic and Atmospheric Administration," -**Thomas Thornton**, citing a paper by the Sitka Tribe of Alaska*

SUPPORT: PROPOSAL 178 "A reduction in commercial harvest may benefit the ecosystem and other user groups by an unknown extent." (ADF&G, 2024) I urge the board to consider ecological frameworks that will allow for new opportunities for research to be conducted that will contribute to the current science management models. **An alternative approach to economics for this fishery should include ecological economics and ecosystem-based fisheries management models that aim to produce sustainable and healthy ecosystems for herring and other marine species** (Knapp, 2012). Working towards ecological frameworks - which explicitly incorporates the consumption needs of other species that rely on herring such as humans, whales, birds, and pinnipeds that live in the herring ecosystem (McKechnie et al. 2014 in Thornton & Herbert 2015).

SUPPORT: PROPOSAL 179 Since fisheries closures prompted by low herring biomass decline the livelihoods of local fishing communities and affect cultural identity, more coordinated effort to protect key spawning grounds for herring and harvesters should be taken (Trochta et al. 2020). Promisla Bay is an area of high productivity which should be protected for the ecosystem and for subsistence harvesters using sustainable practices.

SUPPORT: PROPOSAL 180 "This will improve the clarity of the southern boundary of the Sitka Sound herring sac roe fishery." (ADF&G, 2024)

OPPOSE: PROPOSAL 181 There has been a sharp change in herring geographical distribution and spawning behavior since commercialization began (Thornton et al. 2010). "The current management of the test setting program is considered conservative and **is necessary for the department to manage the fishery in accordance with existing management plans.** The department has the authority to close an opening based on poor herring quality" (ADF&G, 2024). However in recent years Sherri Dressel, the ADF&G Herring Scientist has stated that she believes that the tribe's concern for herring scarcity is important but raises issues such as global warming and industrialization as the culprit for changed fish behavior (Rose, 2021). **The indication that herring behavior has changed speaks to the need for more research on current herring stock and behavior changes in response to current environmental and human pressures.**

OPPOSE: PROPOSAL 182 A working group was formed in January of 2000 and the conversation continued about the possibility of an Open Platform SOK (also referred to as Open Pound Herring) Fishery in Sitka Sound. Community opposition at the CFEC meeting in 2015 stopped the CFEC from moving forward on regulatory changes.In March of 2016 the BOF voted 'no action' on the proposal due to lack of regulatory authority. In 2018 another proposal for the open pound was put forward asking the BOF to request CFEC to modify the administrative areas so that seine permit holders can use herring pound gear in Sitka Sound (CFEC, 2022). BOF Chair Reed Morisky wrote a letter to the CFEC stating "*...the historical back and forth delays are not serving the public process.*" (CFEC, 2022). The concerns of community members including tribal members were not heard at the Board of Fisheries meeting, instead there were implemented expansions of commercial herring fisheries (Thornton & Moss, 2021). **The Board of Fish Executive Director John Wood wrote about the current state of herring management stating that the two agencies (Board of Fish and Commercial Fisheries Entry Commission) are continuing to operate in their regulatory constructs which is not resolving management issues** (Dunleavy, 2024.)

OPPOSE: PROPOSAL 188 The proposed management plan will not improve the management of the fishery.

OPPOSE: PROPOSAL 189 "It is unlikely reducing the maximum length of a herring purse seine would lead to more precise fishing or a reduction in the amount of released sets in a fishery." (ADF&G, 2024)

A new evaluation of the "Optimum Number" of Limited Entry Permits should be revisited since a calculation of that number has not been done since 1977 and it depends on the price of fish and costs of harvesting, which both change over time (CFEC, 2022; Knapp, 2012).

SUPPORT: PROPOSAL 190 I propose that the Board consider researching and developing opportunities for local markets that don't rely exclusively on foreign markets with unreliable pay for fishers. Tlingit and Haida Central Government Food Sovereignty division (at Central Council of Tlingit and Haida Indian Tribes of Alaska, or CCTHITA) has begun a funded program with Indigenous permit holders to locally distribute ROK to tribal community members all across traditional trade routes, as far as California (Tlingit & Haida, 2022). **A new collaborative approach to herring management in Sitka should reflect diverse community needs and sustain the social, economic, and cultural well-being of the communities in Southeast Alaska that rely on herring.** The subsistence economy is equally important to the commercial fisheries for cash-economic markets, and especially important during tough times in communities (Dick, 1996).

Co-Management between the state of Alaska and local tribal nations should be considered for management of the Sitka Sac Roe Herring fishery. Current barriers to communication between State agency departments and Tribal Governments have limited timely management of both herring fisheries in Southeast Alaska. **Underfunded state agency departments such as the subsistence division, limit the ability for the state of Alaska to efficiently collect timely and relevant data on herring** (BOF, 2022). **Adaptive management and a re-examination of the current economic markets impacting fishers participating in the Limited Entry Sac Roe fishery are needed.** Elsewhere, co-management agreements have been established for management of pacific herring fisheries such as between Department of Fisheries and Oceans Canada and the Heiltsuk (Haíłzaqv) Nation (Fisheries and Oceans Canada, 2024).

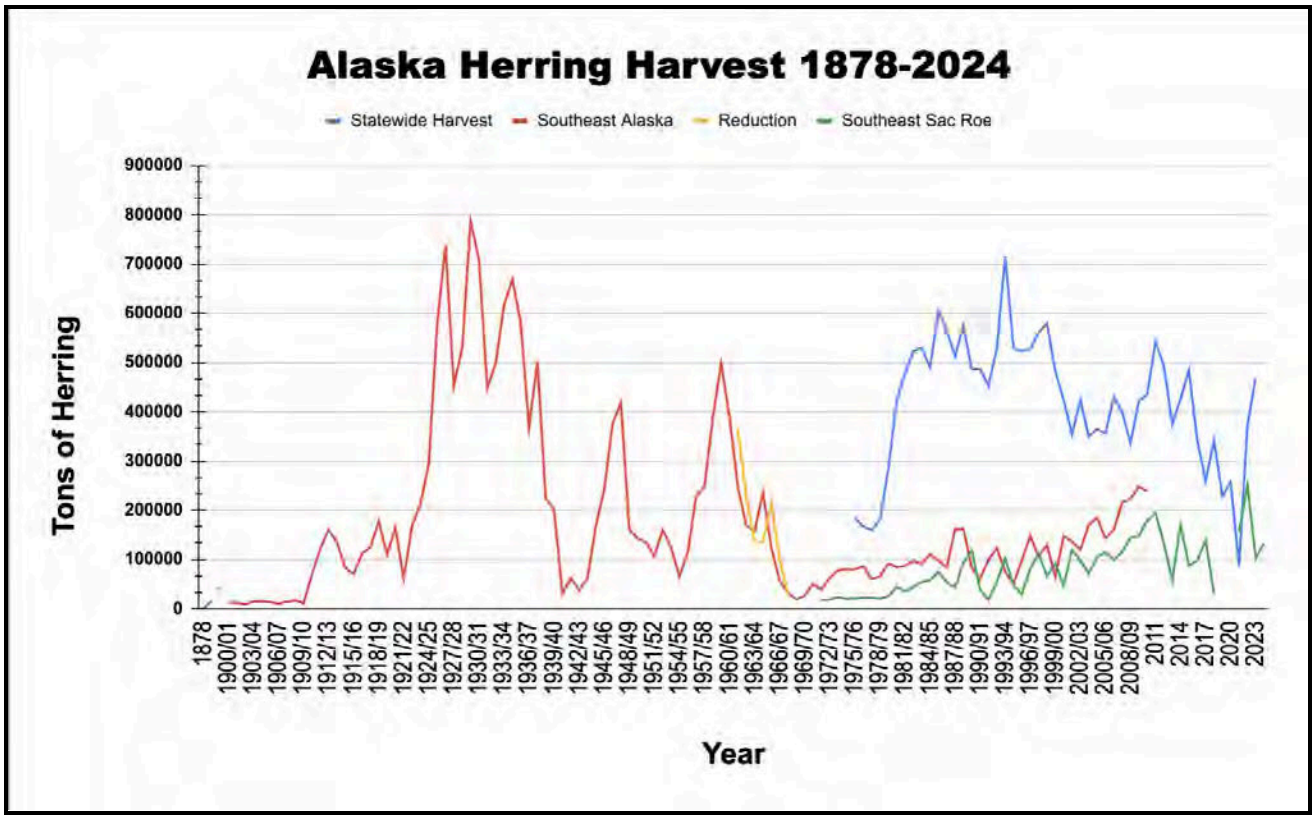

Figure 1: *Historical Statewide Herring Harvest from 1878-2024 with data representing Southeast Alaska harvest, overall Alaska State Herring reduction harvest, and Southeast (Sitka) Sac Roe herring catch in tons. (Herbert, K., 2020; Dupuis, A., 2023; Dupuis, A., 2024). Note.* Graph created by Krissa Huston Davis (Davis, 2024).

In conclusion: Today herring biomass is assumed to be high, however the current management plan threatens to reduce Sitka Sound Pacific Herring to a depleted biomass unable to sustain a healthy ecosystem without an in depth analysis of current stock populations. The current Pacific herring biomass in Southeast Alaska (Figure 1) represents only a fraction of the documented harvest levels recorded since the onset of commercial herring fisheries in the region in 1878. Fishery closures prompted by low herring biomass decline the livelihoods of local fishing communities and affect cultural identity (Trochta et al. 2020).

Gunalchéesh, thank you for the opportunity to comment.

Sincerely,
Krissa Huston
[redacted]

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PC227

Submitted by: Reyn Hutten
Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. I believe it is necessary to manage the Herring fishery in Sitka Sound conservatively, in order to avoid overfishing and disintegration of spawning grounds, as has been a repeated historical pattern in the region. It is critical to protect the resource for generations of humans and the hundreds of other downstream ecosystem benefits that a healthy herring population supports.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

PC228

Submitted by: Braden Jay
Community of Residence: sitka

Board of fisheries thank you for your time, my name is Braden Jay and I'm a small family business participating currently in the summer troll fishery and spring spot prawn fishery. I have spent my entire life commercial fishing across the sate but primarily in SE Alaska and hope that one day my children, if they choose, will be able to as well. I hope that my comments are taken into consideration due to the growing concern my family, fellow fisherman, and I have regarding these two fisheries and their longevity and sustainability.

proposal 108 opposition

proposal 113 opposition

I oppose proposal 108 and 113 do to that fact that this will only lead to greater shares of the king salmon quota being given over to the sport fisherman and specifically benefiting None residents. This only benefits the sport fishery and will lead to greater harm of the commercial fisheries access to an already dwindling fishery and cause economic harm to local communities. None residents should not be the priority, the priority should be with the families and community that depend on this fishery to make a living and feed themselves. In both proposals it is only seeking to gain more for the ever growing sport fishery but at the cost of others which it already has. We need to maintain the 80/20 split with in season management just as the commercial fishery has to insure that overages aren't at the costs of others.

proposal 109 support

proposal 110 support

I support both proposals 109 and 110, as partially mentioned in my comments in my opposition of proposal 108, we need to managed the sport fishery so they don't continually over harvest their share of

the quote at the detriment of others specifically commercial trollers who are now struggling with the burden of ever growing operating costs and reduced access to the fishery. We need to prioritize and support our local communities, commercial fisherman, and resident anglers prioritizing their access. We need in season management of the sport fishery to insure they only harvest their 20 percent allocated just as the commercial fishery is managed in season. King salmon is becoming a finite resource and our families depend on this resource please ensure that we maintain a fair balance in the allocation of quota.

proposal 224 opposition

I oppose 224 because having the shrimp fishery changed to the spring was an absolute relief, we have only seen a steady decline in shrimp stocks with our previous fall harvest and time has already shown us that this will lead to the collapse of the fishery. This is in part due to greater participation and to harvesting shrimp when they are full of roe. We only need to look at British Columbia's spot prawn fishery and it's a massive success as an example. It's fishery is well managed, sustainable, and harvested in the spring and have only seen continued improvement in the fishery since they switched to a spring time fishery because at one point they were indeed a fall time fishery but due to declining stock made drastic changes. We share the same waters and theres no reason we can't do the same here with our fishery. Besides the fact of the health of the fishery it has also opened up access to a much wider market for the sale of shrimp leading to better quality, prices, and access to markets. We also get the added benefit of much better weather conditions and safer fishing.

proposal 225 opposition

As stated above for the same reason I oppose this action, it's more or less the same as proposal 224. Wether its for sport or commercial having the shrimp fishery in the spring is only going to help improve shrimp stocks. Many marine biologist have already looked at this and the argument that a female out of the water is the same with or without roe is just not true. The numbers grow exponentially for an undisturbed breeding season do to less impact of there habits and allowing them to reproduce undisturbed without our interference. I would also add that at this point we can't honestly expect to see massive changes in the fishery but given enough time we will. The fishery is not the same as it was in the fall and myself and others have already found fishing to be just as good if not better but both commercial and sport will have to reevaluate where they traditionally fished for prawns in the past. They are still there but there patterns and locations have changed do to the season.

proposal 226 opposition

I oppose this due to the fact that it's extremely rash to make massive cuts to the GHL's. Stocks have been in decline do to our previously poor harvest periods and greater participation. Given enough time I'm confident we will see continued growth in our spot prawn fishery but we need to give it that time. Two season of fishing the spring is far from a good data points or any useful biology data, we need to give it time. There's plenty of examples of successful shrimp fisheries managed in the spring without GHL reductions or pot size reduction. I've fished both pots and I can tell you that we still catch the same regardless of the pot sizes we've used season to season. Personally I prefer 39" pots anyways but don't believe pot size will be a contributing factor of stock reduction. I"d also like to add that I personally have only seen and improvement since it was changed to the spring, our fishing has improved

drastically. Their location depends on the time of year just like every other fishery and given enough time and effort I'm positive most will arrive at the same conclusion.

proposal 227 opposition

I believe this would only be useful for a handful of people who would own multiple permits for financial gain allowing them personally greater access to the the fishery and would argue for it under the guise of shrimp stocks and less gear impact on stocks. It would also exclude anyone limit finically from buying another permit, or if they did have a second permit they may not have the vessel to carry that many pots. I can't see this being of benefit to the fishery as a whole.

Thank you for your time.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is John Jensen of Petersburg, Alaska. I am a subsistence, commercial, personal use, and sports fisherman. I no longer commercial fish as I retired several years ago. I do support hatcheries at this time. If in the future scientific data becomes available showing there are negative effects from hatcheries I would withdraw my support. What I do know is that hatcheries provide a large positive economic boost to the region and the State. They benefit fishermen both commercial and sport, as well as the processing sector.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities. I commercial fished for 55 years and have seen a lot of up and downs in the salmon fishing industry. The advent of hatcheries has helped level out the large swings in salmon returns over the past four decades.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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.

Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

John Jensen
Petersburg, Alaska
[redacted]

PC229

Submitted by: John Jensen
Community of Residence: Petersburg Alaska

Madam Chair ,and members of the board'

I'm submitting comments on two proposals at this time.

The first is Proposal 242. I adamantly oppose this proposal. the reallocation of 100% of the 11-A RKC to the personal use fishery. The PU fishery already has 60% of this fishery. This area is a critical part of the commercial fishery when it is allowed. The most productive portion of 11-A is already closed to commercial fishing for RKC, to help support a better fishery for the personal use participants. 11-A is a important part of the stock analysis when contemplating a commercial fishery, this is alluded to in RC-2, page 22 under effects if this proposal were to be adopted. Another thought to keep in mind while deliberating this proposal is that only two of the 58 permits are held by non Alaskans, 25% are held by Juneau residents, and over 50% are owned by Petersburg residents. When this fishery is allowed it is an economic boost to these local communities.

The commercial fishery is closely monitored when being prosecuted, where as the personal use fishery is not.

The next proposal I will comment on is 243. I'm in support of this idea, but would like to see some minor tweaks that would enhance the possibly of future fisheries. This fishery should be allowed any time there is a reasonable harvestable surplus, say 25,000 pounds or better. If ADF&G have concerns of over harvesting these stocks, even with Individual Catch Limits, maybe they could open the non surveyed areas to the fishery. It probably would be very beneficial to have that kind of information on areas they dont have the funding to survey. If allowed it could be monitored very closely with daily call ins and the vessels could be monitored electronically as to where they are fishing. There will be specific substitute language offered at the meeting after it is developed.

PC230

Submitted by: Jared Jillie
Myself

Community of Residence: Wrangell, Alaska

The simple fact is that the charter fleet in SE AK has grown immensely over the last few years especially with the rise in tourism after the Covid Pandemic. The current management language is clearly not working and causing huge negative impacts to local resident user groups. As a resident commercial troller the last two years of August king openers is unacceptable. The charter sport fishery needs to be MANAGED IN SEASON. Fish and Game needs to have the means and language within the regulations to do this. RC063 needs to be eliminated and by no means should there be a increase in the charter quota at this time. Without lodges being required to obtain limited entry permits for there operations the charter fleet can and is growing unchecked and will continue to do so. I am in favor of any proposals that reduce non-resident annual limits which are grossly over generous. I am especially in favor of P115. One king salmon per non-resident is enough. There are plenty of Coho and other sport fish to fill their freezers. The current system of allowing the charter fleet to harvest well over their allotted 20% is a complete embarrassment to the State of Alaska's fisheries management. The charter fleet is not a "sport" fishery. It is a commercial fishery hiding beneath improper language of law.

I am in favor of:

P110, P115, P116, P117 and P120

I strongly oppose:

P108, and P112

PC231

Submitted by: Nicholas Johanson
Community of Residence: Washington

I oppose 156

PC232

Submitted by: CeeJay Johnson
Community of Residence: Sitka

As a Sitka resident and member of a tribal family that practices subsistence harvesting—including herring eggs, I support proposal 179 regarding the protection of Promisla Bay

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Dear Chair Carlson-Van Dort and Board Members,

Thank you for your time and energy weighing these topics.

My name is Lindsay Johnson, I am a lifelong Alaska resident and have been an active power troll permit holder for the past 8 years; salmon fishing is my family's primary source of income.

Please adopt proposals that allow the department to manage in a way that ensures Alaska families are able to sustain themselves locally through subsistence and commercial harvest, like proposals 104, 124, and the following that also:
reduce unnecessary fish mortality, like proposals 122/123, 132/133, and 134;
and maintain the 80/20 troll/sport allocation, like proposals 109 & 110.

My husband, two young kids and I live in Haines in the winter and on the boat throughout southeast in the summer. Trolling June through September funded initial capital expenses of our ski and snowboard manufacturing business and construction of a big house (with sun and a view!) in Haines, which like many rural southeast communities grapples with housing and employment opportunities. I feel lucky have been able to earn a decent living with my family on

board in the waters I grew up subsistence/sport fishing, and the winters available to enjoy another part of the region.

What you all decide on these proposals will likely influence the course our lives take from here. Without reliable opportunity to catch king salmon, I don't know if I'll be able to earn enough trolling to stay in it. I say that as someone who fishes hard for cohos, and usually does ok at it. I'm not as good of a king fisher, but they all add up. Not making it trolling would not be for lack of effort on other species; it's just the math of less-valuable fish.

The past couple of years have been discouraging with the second king opener disappearing. In 2023 it really damaged my direct market business, as I counted on being able to catch those August kings in the vicinity of my processor then couldn't fulfill orders.
Last season, with that burn in mind, I fished the July opener in a different area than where I usually catch kings that time of year because I had to be sure to put enough pounds away for direct market. That would have worked fine except there weren't many fish weren't where I was; there were lots down where I normally fish that opener. It was good I got my pounds in, and kept my customers happy, but I didn't make the kind of money I could have, had I felt free to fish where I wanted.

Long story short is that extra uncertainty in the summer king fishery hampers business. There is inherent uncertainty in fishing, especially treaty fish, but the moving targets we've seen with 5AAC 47.055 on the books has been destabilizing to our historic fishery, where the majority of participants buy groceries and fuel and gear here, and contribute to our communities the rest of the year.
Further increase in the nonresident sport fishing (charter) sector allocation is not sustainable or on the whole beneficial to local communities; it will be the death of a proud way of life in this region. Therefore I strongly oppose proposals 108 and 113. I do not think proposals 105, 112, 114, and 121 offer correct answers either.

I support proposal 109 and others or whatever modified version makes it easiest to maintain the 80/20 quota and give the department tools to manage for that ratio.

I support proposals 122, 123, 132, 133, 134, 140, 141 and 193, which offer common sense solutions to reducing unnecessary fish mortality.

Likewise 199 would buffer weather risk to fishers.

I oppose proposal 167–seiners are already efficient— but support PVOA's next proposal, 168 which closes an aircraft loophole.

I do not agree with the concept of proposal 130 unless we are in a reality of consistently using-or-losing our king salmon quota in July. There is more opportunity for more boats–the smaller, slower, less weather-sensitive, less technologically-advanced boats— if all our proverbial eggs aren't in one basket.

Thank you for considering my perspective among all of the information you've gathered. I plan to attend what I can of the Ketchikan meeting given ferry and school schedule limitations; see you there!

Sincerely,

Lindsay Johnson

Support 104, 106, 109, 110, 115, 116/117, 119, 120, 122, 123, 124, 125, 126, 129, 131, 132/33, 134, 136/7, 140/141, 150, 153, 168, 193, 199, 230

Oppose 105, 108, 113, 114, 121, 130, 167, 207/08

PC234

Submitted by: Steven Johnson
Herring harvesters

Community of Residence: Sitka

I support prop 179. It's very important to harvesters and their safety.

PC235

Submitted by: Willa Johnson
Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound. Herring are an important traditional food as well as being vital to Southeast Alaska ecosystems, capping the sac roe fishery ensures that ecosystems and fish populations remain healthy and sustainable.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

PC236

Submitted by: Evan Jonjak
Community of Residence: Wrangell, AK

I strongly object to reallocating fishing opportunities away from commercial fisheries to sport fisheries. Therefore, I oppose 242, 156, 108, and 115 ....and support 110,11,116,117

Commercial fisherman are so emotionally invested in SE Alaska that they often forego prosperity to live their life there. The state should not turn its back on them for the sake of catering to sport fishermen.

Sitka, AK Jan 13 2025

Alaska BOF members and F&G staff,

My name is Eric Jordan, I am a salmon troller in SE Alaska. I have been hand and power trolling since my parents took me fishing

in March of 1950 when I was 5 months old.

Ours is a multigenerational fishing family as my grandfather hand trolled out of Gedney Harbor in the 60's and my wife, sons, and grandchildren still work in the family trolling businesses.

Thank you for working to conserve, share, and enhance Alaska's fisheries. After 50 years of service working with fisheries groups from the Sitka AC, to the AP to the NPFMC, to NSRAA, to 9 months on the BOF, I understand the commitment you and your families have made.

I am going to focus on 6 proposals (104,108,109,132,156,179).

Here is a synopsis of my comments followed by my detailed comments in order of their proposal numbers.

On SE king salmon allocation and management:

1. I support the 80/20% allocation between sport and commercial interests with a % of the sport allocation being recognized as traditional subsistence harvest in the rural areas of SE Alaska , like proposal 104, and traditional resident personal use (sport fishing) in the non-rural ares of Ketchikan and Juneau.
2. "In season management" for all users is critical for meeting conservation and sharing goals. Better accounting for guided, bare boat rental, and other sport harvest is essential for effective in season management.
3. If the board chooses not to use 104 as a vehicle to protect traditional resident harvest of king salmon with rod and reel in SE Alaska then I support 109 with various amendments proposed by the Ketchikan and Sitka AC and ATA and Territorial Sportsmen.
4. I strongly oppose 108 and 113. Re-allocating king salmon away from mostly resident hand and power trollers to people who can afford to travel thousands of miles to charter or rent boats to 'play' with these great fish is unconscionable to me.
5. I helped develop proposal 132 with my great friend and fishing partner Tad Fujioka, who has passed. I strongly support it.

6. I strongly oppose 156. As a founder of NSRAA and long time board member (recently retired) I know how important hatchery salmon production is to SE Alaska.
7. As a long time advocate for and author of herring conservation proposals adopted by the BOF I strongly support 179.

Detailed comments by proposal number:

Proposal 104

I believe this is the vehicle the BOF should use to conserve and protect traditional harvest of king salmon to eat in SE Alaska. I greatly appreciate the work done by the Southeast Alaska Subsistence Regional Advisory Council, which I served on 20 years ago. Based on my work facilitating and drafting subsistence proposals with local leaders on Sitka area herring, halibut, shellfish, and sockeye management, I have taken the liberty to go through the proposal and humbly suggest amendments to the plan which would further define and set up management of traditional subsistence king salmon harvest with hook and line in the rural areas of SE Alaska. My hope is the BOF will provide a similar plan for the resident sport fisheries in the Juneau and Ketchikan areas.

My comments are to strengthen and add details to this important proposal. Taking king salmon with rod and reel is a customary and traditional harvest method in the marine waters of SE Alaska. As we face the challenges of conserving and allocating king salmon for local people catching king salmon to eat in face of stocks of concern restrictions on resident sport fishermen and unrestricted (no limited entry) guided sport and bare boat rental (largely non-resident) growth, immediate action needs to be taken to protect the traditional and customary harvest of king salmon by SE rural and non-rural residents to both eat. This amended proposal will protect the rural residents. Other action needs to be taken to protect the resident king salmon harvest in the Juneau and Ketchikan areas.

Allocating SE Alaska king salmon to non-residents spending all kinds of money and green house gas emissions to play with the food of rural SE native villagers and hand and power trollers, or resident sport fishermen of Juneau and Ketchikan is wrong. It disrespects these great salmon to "play" with them; and: it literally takes food out of the mouths and off the tables of resident SE Alaskans.

PROPOSAL 104. proposed amendments in **bold underlined.** (deletions) in brackets.

5 AAC 29.060. Allocation of King Salmon in the Southeastern Alaska-Yakutat Area and 5 AAC 01.720. Lawful Gear and Gear Specifications.
Allocate (5,000) king salmon (for) ***from*** (the) **South East** Alaska's **sport** quota to a king salmon subsistence fishery and establish provisions ***such as gear, daily, and seasonal limits, time and areas of exclusive subsistence use, size limits, catch records and other protections such as time and area restrictions on sport and or commercial fisheries to protect subsistence opportunities*** for the king salmon subsistence fishery.

1. Modify 5 AAC 29.060 (King Salmon Management Plan) to add an ("off-the-top") allocation of (5,000) fish or 5% of the total PSC harvest ceiling (whichever is greater), from the **"sport allocation"** similar to those allocated to the net fisheries.
2. Establish a household subsistence permit for king salmon in marine waters in 5 AAC 01.745. The annual household limit may be set by the department to meet allocation goals. The daily limit of two king salmon in 5 AAC 01.730(j) shall not apply to a directed subsistence king salmon fishery in marine waters. ***However, the minimum size limit of 28" overall or 26 .5" fork length for retention shall apply. In season h***arvest reporting requirements shall be implemented to allow

the department to monitor **and in-season manage** the subsistence fishery for conservation and allocation.
3. Modify 5 AAC 01.720 to permit use of rod and reel in a subsistence king salmon fishery in marine waters under a household permit.
4. Establish permit conditions that prohibit subsistence taking of king salmon in waters closed to sport retention of king salmon by resident anglers. This provision applies the conservation time and area closures used to protect Alaska stocks to the subsistence fishery. Subsistence king salmon fishing will be prohibited in non-subsistence areas ***defined as …….*** King salmon may not be taken under sport regulations and a subsistence permit on the same day.
5. Any unused harvest allocation shall be allocated to the troll ***or resident sport*** fishery as in 5 AAC 29.060(b)(6)***(7?)***

What is the issue you would like the board to address and why? In the 2021-22 cycle, the Board approved a proposal (Proposal 125) to modify 5 AAC 01.730 to allow ADF&G to issue subsistence permits for king salmon. This proposal seeks to take the next step and outline the implementation of a subsistence king salmon fishery in marine waters. In the staff comments on Proposal 125, ADF&G focused on potential subsistence fisheries on Alaska king salmon stocks, presumably as net fisheries in terminal areas, as is typical for subsistence fisheries. The continued low abundance of southeast Alaska king salmon stocks would severely limit the opportunity for such fisheries, at least in the foreseeable future. Currently, the vast majority of king salmon taken by residents for noncommercial household use are taken in marine waters under sport regulations. Much of that harvest would be characterized as subsistence taking using the “8 factors” listed in 5 AAC 99.010, used by the Board to establish customary and traditional subsistence use. For example, king salmon have long been relied upon as the only available source of fresh salmon when other species are not available, and are harvested as food rather than strictly for recreation. The harvested fish are shared in traditional networks like other subsistence resources. This proposal seeks to establish a regulatory framework that recognizes and provides for the continued subsistence use of king salmon in marine waters.

Under the proposed framework, a separate subsistence allocation would provide for the continuation of subsistence use if resident sport fisheries were closed due to in-season management actions to stay within the sport allocation. It would also allow for a more efficient annual household harvest, as sport bag limits may require several trips to harvest the same number of fish, with each trip involving significant amounts of fuel and time. Most importantly, it would establish a regulatory structure for the long-standing and ongoing subsistence use of king salmon that currently occurs within the sport fishery regulations, a system with different practices and needs than subsistence users. While it may appear to add a user group to an already tightly allocated resource, the subsistence user group has long been using the resource – this proposal simply provides the Board an opportunity to create an effective management structure for a user group that is currently unrepresented in the existing system. The proposal applies the time and area restrictions used in the sport fishery to protect Alaska stocks, so that only areas open to sport fishing for king salmon will be open to subsistence harvest. Finally, it provides for unused allocation to be rolled over to the commercial troll fishery, so that treaty fish are not left on the table.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Southeast Alaska Subsistence Regional Advisory Council during their Winter 2024 meeting.

PROPOSED BY: Southeast Alaska Subsistence Regional Advisory Council (HQ-F24-016)

Erics comments in italics: *I have had the great privilege to be asked to facilitate various task forces to propose regulations to protect subsistence harvest of shellfish, sockeye salmon, herring and halibut. One of the important issues left undefined in proposal 104 is: Subsistence king salmon fishing will be prohibited in non-subsistence areas* ***defined as …….*** *I believe it is important to define the King salmon subsistence area with local knowledge.*

Then the rest of SE Alaska could be "non-subsistence areas. For example: in Sitka local task forces have defined the subsistence areas for Redoubt Lake sockeye, and our local area management

plan (LAMP) for subsistence halibut. A starting point in Sitka for the subsistence king salmon area could be the LAMP for halibut, or the Sitka Salmon Derby area which encompasses the traditional rod and reel area near Sitka used to harvest King salmon to eat.

After conservation comes subsistence in Alaska. The best way to conserve, respect, and prioritize King Salmon for Alaskans, in my view from over 50 years involvement in the BOF and AC processes, and carefully considering all the proposals and some draft group comments, is to pass an amended and detailed version of proposal 104 as I have suggested, or other versions that may be suggested by the sponsor and others.

Proposal 109

After reading the proposals and various draft RC's on the SE Alaska King Salmon Management Plan, I believe that the best vehicle to manage the SE King Salmon sport and commercial fisheries (beyond subsistence and personal use) is 109 with amendments from Ketchikan and Sitka AC's, and the Alaska Trollers Association and Territorial Sportsmen RC.

Proposal 132, The late Tad Fujioka and I generated an agenda change request that was denied in 2023. Under his lead we realized our two ocean male king salmon (Andrews Creek tributary of the Stikine River) returning to the Sitka Area had a much flatter tail than the more deeply forked tail of the treaty stocks off of Sitka. In paying close attention over the past 3 years we noticed that in addition to keeping these 2 ocean males which are not wanted as brood stock, and sometimes weigh up to 12 lbs at 28", we noticed that measuring king salmon 26-30" was quicker and definite when measuring snout to fork than snout to tip of the tail. Having an easier more definitive measuring method made releasing the kings much quicker resulting

in less handling and associated mortality.

And resulted in more confidence in the legality of the keepers.

I understand this proposal has evolved after extensive discussions with staff and enforcement to the point where it is being considered for the troll fishery beyond the spring hatchery fisheries near Sitka in district 13 to larger areas and perhaps all of SE Alaska. I am fine with starting implementation near Sitka or including more of SE Alaska.

This is a win- win proposal: trollers or other users will be able to keep more Alaska Hatchery 2 ocean kings not needed for brood stock and the quicker, surer measuring will reduce mortalities on "shakers".

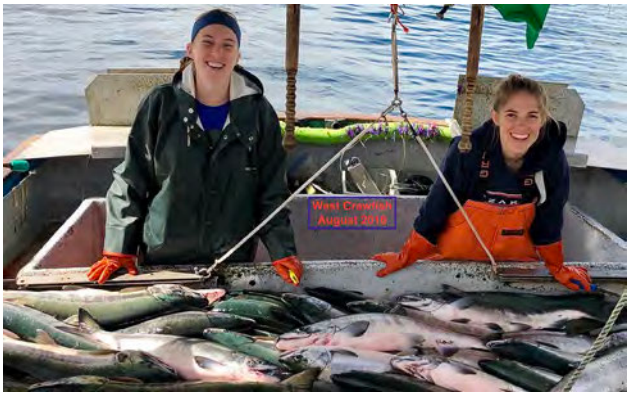
Proposal 156 To reduce SE Alaska Hatchery production by 25%.

Opposed does not adequately convey my outrage that this proposal is generating some support. As a founder and second hired employee of NSRAA in 1977 and a long time board member I am keenly aware of the restrictions on hatchery production and remote release sites in SE Alaska. As a long time conservationist I was asked by my friend, Paul Peyton, with the Alaska Coalition to get ANILCA and associated wilderness protections passed by Congress for President Jimmy Carter to sign. The coalition was facing pushback from some fishermen who were worried that Wilderness designations would remove good hatchery and remote release sites from development. So, I worked with NSRAA executive director Derek Poon, NSRAA board members, and conservationists to draft language allowing hatchery programs in the wilderness areas with some stipulations. It ended up being included in the bill and allows NSRAA to work in areas like Shamrock Bay and Crawfish Inlet south of Sitka.

Additionally, Alaska state senator Richard Eliason, a Sitka fisherman, proposed and shepherded legislation through the Alaska Legislature to provide the strongest protections for wild salmon in the world. I nominated Senator Eliason to the ”Wild Salmon Hall Of Fame” for his work banning farmed salmon in Alaska and his work protecting wild salmon. He was one of four finalist at the awards ceremony in Bremerton, WA.

I have been reading studies on hatchery salmon straying as an NSRAA Board member, and associated JRPT member, for years. There is no scientific evidence I have heard of or seen that our SE Alaska Hatchery/ocean ranching programs are hurting the genetics or survivals of SE Alaska wild stocks.

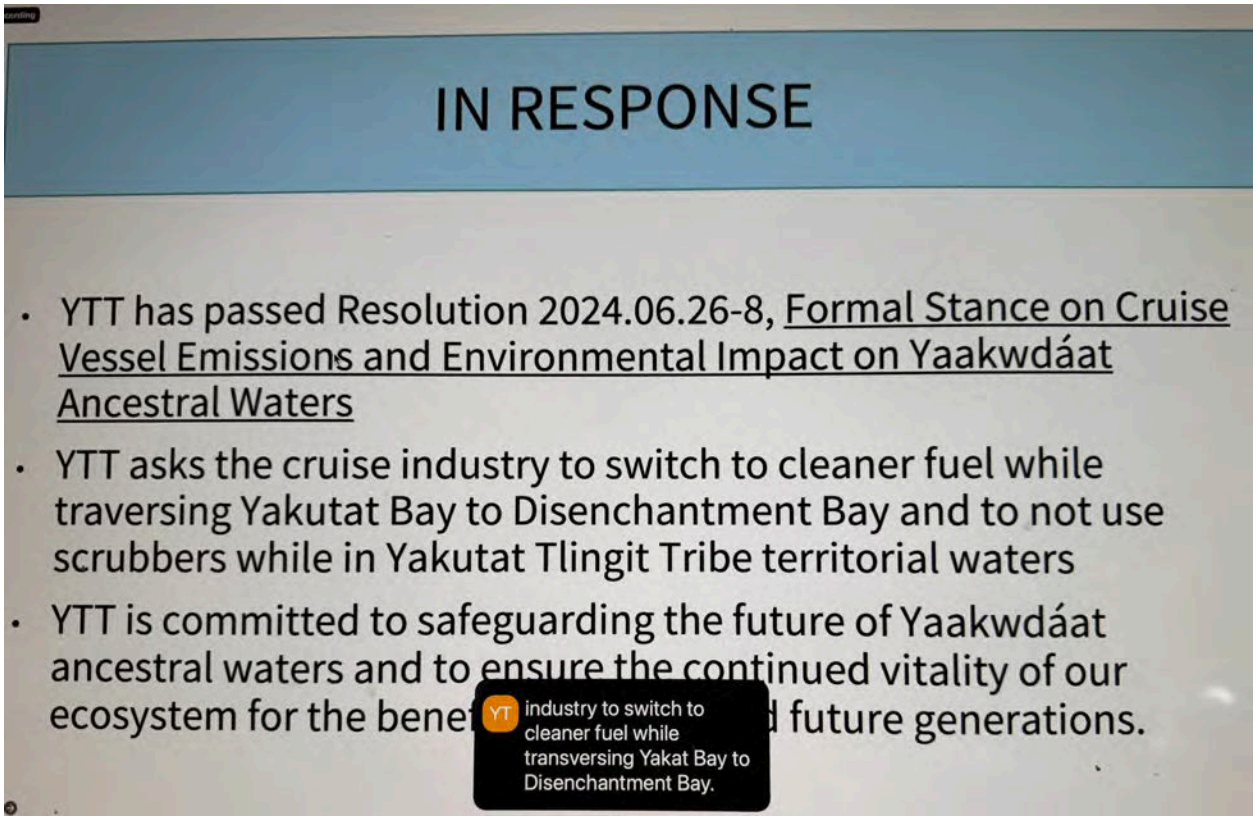
But, our SE Alaska hatcheries have produced over a billion dollars in salmon harvest value since the 70's. Trollers alone caught 9 million dollars worth of hatchery chums in the Sitka area in 2022.



Proposal 179

I strongly support proposal 179 to add Promisla Bay to the herring spawning and subsistence harvest sanctuary areas. I have a long history, as my father "Skip" Jordan did before me, protecting herring and herring subsistence. As secretary of the Sitka AC I wrote the first minimum threshold proposal in 1976. I also helped, with Tad Fujioka and the Sitka AC, get the first herring spawning and subsistence harvest protected area through the BOF in Ketchikan circa 2009. I think it is clear that even with a greatly increased herring biomass in the Sitka area in recent years one of the preferred areas for subsistence herring harvest out of the ocean swells and almost all local winds is Promisla Bay.

Another reason for supporting this area is to avoid the toxic scrubber emissions into the marine waters near the cruise ship terminals. While we don't know the full extent of the poisoning effects of these toxins on our marine food and our bodies yet, we do know there could be adverse effects. Yakutat Tlingit Tribe is so concerned they have passed this resolution:


IN RESPONSE
YTT has passed Resolution 2024.06.26-8, Formal Stance on Cruise Vessel Emissions and Environmental Impact on Yaakwdáat Ancestral Waters
YTT asks the cruise industry to switch to cleaner fuel while traversing Yakutat Bay to Disenchantment Bay and to not use scrubbers while in Yakutat Tlingit Tribe territorial waters
YTT is committed to safeguarding the future of Yaakwdáat ancestral waters and to ensure the continued vitality of our ecosystem for the bene
future generations.
YT
industry to switch to cleaner fuel while transversing Yakat Bay to Disenchantment Bay.

PC238

Submitted by: Karl Jordan
Community of Residence: Sitka in Summer, Sequim in Winter

I support proposal 109 and 110 with RC amendments.

I strongly oppose proposals 108 and 113.

JEDC
Juneau Economic Development Council

612 West Willoughby Avenue
Juneau, AK 99801
Phone: (907) 523-2300
Fax: (907) 463-3929
www.JEDC.org

January 13, 2025

Alaska Department of Fish & Game
C/O Board of Fisheries
1255 W. 8th Street
Juneau, AK 99801

Dear Executive Director Nelson and Board of Fisheries Members,

I am writing to inform you that the Board of Directors of the Juneau Economic Development Council (JEDC), at their meeting on January 13, formally adopted a resolution opposing Proposal 156, which is under consideration by the Board of Fisheries at the upcoming Southeast and Yakutat Finfish and Shellfish meetings on January 28 through February 9, 2025, in Ketchikan. JEDC fosters a healthy and sustainable economic climate in Juneau and throughout Southeast Alaska. In collaboration with other organizations, JEDC implements initiatives to maintain, expand, and create economic opportunities that help make Juneau a great (capital) city; strengthen key regional industries, develop next generation talent; and promote entrepreneurship and small businesses.

After careful review and deliberation, the JEDC Board concluded that Proposal 156 would have significant detrimental economic and social impacts on Alaska's hatchery programs and the communities, like Juneau, they support. In the accompanying resolution, the JEDC Board outlines our concerns in more detail and calls for the proposal to be opposed in light of these considerations. We urge you to work in collaboration with the Alaska Department of Fish and Game, industry representatives, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

We appreciate your attention to this matter. Please feel free to contact me directly if you would like to discuss our position further.

Thank you for your time and consideration.

Sincerely,

Brian Holst
Executive Director

JEDC
Juneau Economic Development Council

RESOLUTION of the Board of Directors

Resolution 2025-01: *JEDC Opposition to Alaska Board of Fisheries Proposal 156*

WHEREAS, the Board of Directors of the Juneau Economic Development Council (JEDC) has assembled in a meeting this the 13th day of January 2025;

WHEREAS, JEDC initiatives are to help make Juneau a great (capital) city, strengthen key regional industries, promote entrepreneurship and small businesses, develop talent, and deliver economic development services;

WHEREAS, Alaska's salmon hatchery programs have successfully operated for nearly 50 years, supplementing wild salmon harvests and supporting commercial, sport, subsistence, and personal use fisheries across the state; and

WHEREAS, Alaska's salmon hatchery programs are responsible for supporting approximately 4,200 jobs, $219 million in labor income, and $576 million in economic output annually, benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon; and

WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to hatchery-supported ecosystems in southeast Alaska and threatening the stability of salmon resources on which coastal communities like Juneau depend; and

WHEREAS, a reduction in hatchery production would not only diminish the availability of chum salmon for commercial fishing, but would also limit access to these salmon for subsistence, personal use, and sport fishing, thereby directly impacting food security, cultural practices, and recreational opportunities in Juneau; and

WHEREAS, the Douglas Island Pink and Chum, Inc. (DIPAC) and other southeastern Alaska hatcheries such as the Southern Southeast Regional Aquaculture Association (SSRAA) and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in generating economic stability, providing jobs, and supporting local communities through hatchery operations; and

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicate long-term planning and financial commitments for these organizations, and jeopardize the sustainability of Alaska's hatchery program; and

WHEREAS, DIPAC employs approximately 28 year-round employees and up to 50 seasonal employees, offers free education programs to the Juneau School District which includes free transportation for students, is frequented by tourists and tour operators, and is a regular source of tax revenue for Juneau; and

WHEREAS, DIPAC and other southeastern Alaska fisheries rely on revenue from chum and pink salmon to fund production of sockeye, coho, and Chinook salmon; and

WHEREAS, the passage of Proposal 156 could potentially force DIPAC to eventually cease operations which would devastate Juneau seafood processors that rely on DIPAC for the viability of their programs and would also result in a significant loss in fishing opportunities and income to commercial fisheries users, sport charter programs, marine and shoreside sport users, and personal use fisherman, thereby impacting the tax revenue Juneau gains from local fishery-related businesses; and

WHEREAS, Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups; and

WHEREAS, Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management.

NOW, THEREFORE, BE IT RESOLVED THAT:

- **SECTION 1:** The Board of Directors of the Juneau Economic Development Council strongly opposes Alaska Board of Fisheries Proposal 156 and urges the Board to reject this proposal to prevent detrimental economic and social impacts on Alaska's hatchery programs and the communities they support.
- **SECTION 2:** The Board of Directors of the Juneau Economic Development Council reaffirms its support for DIPAC and other southeastern Alaska fisheries including SSRAA and NSRAA, acknowledging their essential contributions to Juneau's economy, community well-being, and sustainable fishery practices.
- **SECTION 3:** The Board of Directors of the Juneau Economic Development Council calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

The undersigned hereby certify that the Board of Directors of the Juneau Economic Development Council duly adopted this Resolution on January 13, 2025.

Garrett Schoenberger, *Chair*

Melissa Kookesh (Jan 13, 2025 15:54 AKST)

Melissa Kookesh, *Secretary*

JEDC Board Resolution 2025-01

Final Audit Report 2025-01-14

Created:	2025-01-14
By:	Cagney Ramirez (cramirez@jedc.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-FZfaem2DWAJgY2_D8GVURCr4f5PIbfj

"JEDC Board Resolution 2025-01" History

Document created by Cagney Ramirez (cramirez@jedc.org)
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Document emailed to Melissa Kookesh (mmkookesh@gmail.com) for signature
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Email viewed by Melissa Kookesh (mmkookesh@gmail.com)
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Document e-signed by Melissa Kookesh (mmkookesh@gmail.com)
Signature Date: 2025-01-14 - 0:54:11 AM GMT - Time Source: server

Agreement completed.
2025-01-14 - 0:54:11 AM GMT

PC240

Submitted by: Greg Kain
Community of Residence: Sitka

Alaska BOF

PO Box 115526

1255 West 8th Street

Juneau, AK 99811

Members of the Alaska BOF,

My name is Greg Kain and am the owner of Kain's Fishing Adventures in Sitka, AK. Thank you for taking my written comments. The proposal's I support and oppose are the following.

Support 108,113

Oppose 104,109,110,111,114,115,116,117,118,119,120

I wish to express my thoughts on the proposed reduction of king salmon bag limits for non-resident anglers during the early season and not address each proposal individually to conserve the board's time.

I believe it is essential to maintain the opportunity to catch a higher percentage of king salmon at the beginning of the season as we have been doing in the past years. During the early season there are fewer alternative species to catch and our reliance on catching king salmon is crucial. Further reducing the king limits any further then a 3 fish annual non resident limit at the beginning of the season would lead to a decline in customers.

I employee local Alaskan captains who work for me each year along with other local employees. They rely on this income earned to support their families and pay their bills. Additionally, I contribute to the local economy by paying taxes, purchasing fuel, bait and tackle, doing boat repairs, buying groceries, hotel rentals, etc. Our customers also play a significant role in supporting local businesses. If early season bag limits were reduced, the number of employees hired and the funds circulating in local businesses would significantly diminish.

ALASKA SEAPLANES
FLYING AT A HIGHER STANDARD

ISLAND AIR EXPRESS

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

Dear Members of the Alaska Board of Fisheries,

I am Jodi Garza the President of Kalinin Holdings based in Juneau. Kalinin Holdings is the owner of two Southeast Alaska-based commuter airlines, Alaska Seaplanes & Island Air Express. Combined, our two airlines represent the largest scheduled air transportation network in Southeast Alaska. We provide scheduled service to thirteen Southeast Alaskan communities extending from Haines to Ketchikan. We also operate many wheel and floatplane charters to a multitude of locations throughout Southeast Alaska. Between both airlines, we employ over 250 people throughout region.

I am writing to you today to express how important the charter fishing industry in Southeast Alaska is to both Alaska Seaplanes and Island Air Express. Between both companies, we transport over 60,000 passengers during the summer season (May, June, July, August, & September). A very high percentage of our summer passengers are directly related to the fishing charter businesses in this region, and our summer season passengers represent about two-thirds of our annual passenger traffic. It would be of grave concern if the independent tourism sector of Southeast Alaska economy diminished in any way. As with many businesses in Alaska, the summer season is when we make the majority of our revenue in order to remain in business year-round. If our summer passengers were to decrease substantially, we would have no choice but to limit our year-round scheduled service to some or possibly all of the communities we currently serve.

It is quite clear after reviewing the recently completed McKinley Research report on the economic value charter fishing provides in Southeast Alaska that this sector is very important economically. There are numerous local companies regionwide that rely on the success of the southeast charter industry. The report concludes that the charter industry is responsible for bringing $271 million in spending each season to Southeast Alaska and provides 1,750 local jobs.

The Southeast Alaska charter industry is one of the top economic contributors in the Southeast region. Based on the slim limits charters already operate under I have a hard time understanding how they could successfully continue if any of these limits were decreased more. Specifically, I am concerned with the proposed King Salmon limits. The majority of lodges and charters operate on a three-day fishing experience. In May & June there are no species of Salmon to catch other than King Salmon. Limiting King Salmon to less than one per day/ three annually during these months could quite possibly destroy fishing trips for charter operators in May and June. Anglers will not travel to Alaska on a three-day fishing trip for two King Salmon, three 36” halibut, one lingcod, and a handful of black rockfish. It seems charter limits are as severe as they can be already, and I propose that the body consider an increase in King Salmon allocation for sportfishing charters in Southeast.

In summary, I ask that the members of this board fully understand the ramifications of limiting non-resident King Salmon retention in Southeast Alaska. If the lodge and charter operations are reduced in this region it will have a substantial negative impact on the residents, businesses, and the economic health of the communities of Southeast Alaska.

Respectfully,

Jodi Garza
President, Kalinin Holdings, Inc
jodi@flyalaskaseaplanes.com

January 13, 2025

Board of Fisheries
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Dear Board Members,

Re: Proposals 182 and 183

1. Herring Proposal 182. 5 AAC 27.XXX. New section. Establish provisions for a herring sac roe purse seine permit holder participating in the Sitka Sound sac roe herring fishery to use open pound instead of purse seine fishing gear.

Support Proposal 182. The proposal demonstrates what Statewide Management of herring has been and continues to be. The attached paper "Open Platform Spawn on Kelp" written by Phillip R. Mundy, PhD, John Gissberg PhD and Samuel Sharr BS outlines the legal and regulatory arguments for this proposal.

The proposal is consistent with the Sitka Tribe of Alaska's wishes because it doesn't allow new users on the biomass of Sitka herring. As the proposed alternative method is adopted by Sitka seiners, over time, it will reduce the number of herring seiners killing fish. This proposal allows the potential to produce a herring product that will be consumed in the USA because sushi and kelp are now USA's menu items. The proposal had two years of test fishery with reports by Alaska fisheries managers written about the alternative method. A kelp study was written documenting plenty of kelp. In the past the BOF has allowed the use of alternative gear to limited entry permit holders. The proposal represents sound management of Alaska's resources.

2. Herring Spawn on Kelp Proposal 183. Add the Sitka Sound area in Sections 13-A and B as open area to northern spawn on kelp permit holders and limit pound type to open pounds.

Oppose Proposal 183. If approved the proposal adds 113 more users to Sitka 's already limited entry herring stock of fish. Sitka area 13A-B herring stocks are a limited entry herring stock. CFEC has done an optimum study in Sitka to determine the number of users of that stock of herring that concluded 47 permittees were sufficient.

Northern Pound permittees have never been allowed access to Sitka area 13A-B herring stocks even though the CFEC overlapped the areas. Sitka stocks were limited entry before Northern Pound limited entry was established. Allowing Northern Pounders access to Sitka stocks would place more users on a herring stock that is limited to the present users. The addition of more users will likely be in violation of the Limited Entry Act and subject to lawsuits from existing Sitka permit holders. Adding 113 additional permittees to a fishery with an existing fully utilized stock is not a good idea.

Thanks for your consideration,

Darrell Kapp

Open Platform Spawn on Kelp

An Added Alternative Harvest Method for Sustainable Management of Sitka Sound Herring Fisheries

December 23, 1996

Fisheries and Aquatic Sciences, 1015 Sher Lane, Lake Oswego, Oregon 97034-1744

Sitka Sound Herring Spawn on Kelp

The Open Platform Alternative Harvest Method

Acknowledgments

We thank the following individuals for advice and assistance received; Dave Carlisle, Bill Davidson, Steve Fried, Fritz Funk, Paul Gronholdt, Inez Hopkins, Scott McAllister, Slim Morstad, Dan Nomura, Michelle Ridgway, Herman Savikko, G. Thomas (DFO), and John Wilcock. We thank the following institutions for publications and other information freely provided; Alaska Department of Fish and Game, California Department of Fish and Game, Canadian Department of Fisheries and Oceans, and the Washington Department of Fisheries and Wildlife. The opionions expressed and the accuracy of the facts tendered are solely the responsibility of the authors.

About the Authors

The Fisheries and Aquatic Sciences team which produced this summary and the technical report on which it is based included Phillip R. Mundy, PhD, John G. Gissberg, PhD, and Samuel Sharr, B.S. Dr. Mundy has been working on Alaskan fisheries management problems for over twenty years in communities such as Emmonak, Bethel, Dillingham, King Salmon, Chignik, Soldotna, Cordova, and Juneau. Phil has held positions as Associate Professor at the University of Alaska, and Chief Fisheries Scientist with Alaska Department of Fish and Game, and he now works as a consultant to industry and government. Dr. Gissberg, an attorney who earned his PhD in fisheries, has thirty-five years experience in Alaska fisheries matters. He has served in State of Alaska positions in fisheries science, law, and policy. As Regional Fisheries Attache for the U.S. Department of State in the U.S. Embassy in Tokyo, John was responsible for herring roe quota negotiations for the U.S. Trade Representative. Mr. Sharr has seventeen years of experience as a fishery biologist with the Alaska Department of Fish and Game, serving in Anchorage and Cordova. In addition to his research on the biology and management of salmon and herring fisheries in Prince William Sound, Sam directed the field research program into the effects of oiling on salmon for five years following the *Exxon Valdez* oil spill in 1989. Sam is presently employed a private fisheries consultant.

Notice

This document makes no guarantees or representations regarding the income which may be derived from commercial fishing in the future. Models of fishery value and average income per harvester are provided for the purposes of illustrating the potential of the alternative harvest method relative to past perfomance of other harvest methods only. Since future economic outcomes depend on many factors which may change through time, the income achieved by an individual harvester or fleet cannot be predicted.

Sitka Sound Herring Spawn on Kelp

The Open Platform Alternative Harvest Method

Introduction

We believe a herring harvest method which has been successfully applied in California and British Columbia for over ten years offers new opportunities and challenges for the managers and harvesters of herring in the area of Sitka, Alaska. Open platform herring spawn on kelp fishing would provide a unique way to increase the value of a major commercial fisheries resource without affecting its sustainability, while at the same time providing managers and regulators of the resource more options and less stress. The following summary of the biological and legal research has been conducted at the request of an interested group of Alaskan herring harvesters.

While this summary is based on a more formal, technical report containing additional data, scientific, and legal sources (available upon request from the address on the cover), we have tried in this summary to explain the method of open platform spawn on kelp harvesting with a minimum of technical jargon.

The Herring Spawn on Kelp Opportunity

Open platform harvesters suspend kelp leaves, known as blades, down into the water from lines attached to floating platforms which are located in areas where herring are known to spawn. As the herring spawn, their eggs stick to the blades, making a highly valuable seafood product known on the international market as *kazunoko kombu,* and in the restaurant trades as *tanzaku* and *komochi kombu.* The blades are detached from the line and removed from the water when the proper thickness of eggs has been deposited. Blades are trimmed of any areas which do not meet strict product quality standards, and placed in a tote for delivery to market. The trim is returned to the water where the eggs may hatch. Strict product quality standards bring the best prices and help hold market share.

While experience with management, harvesting and marketing in other parts of the west coast has demonstrated the ability of spawn on kelp to add value to herring harvests, we started by asking whether this information applied directly to the Alaskan management system, and to the particular circumstances of the Sitka Sound area. Any new harvest method needs to be carefully developed to fit the nature of the waters, the resource, the existing management program, and the community in which it operates. Responsible fishery development works from a firm knowledge of the local biology of fish and kelp, the management opportunities and challenges, the market opportunities, and the ecological, legal and cultural contexts of the state and the borough. An opportunity to add value to Alaskan fisheries needs to be carefully weighed against its ability to work within the existing program of sustainable management of the herring resources.

Sitka Sound Herring Spawn on Kelp

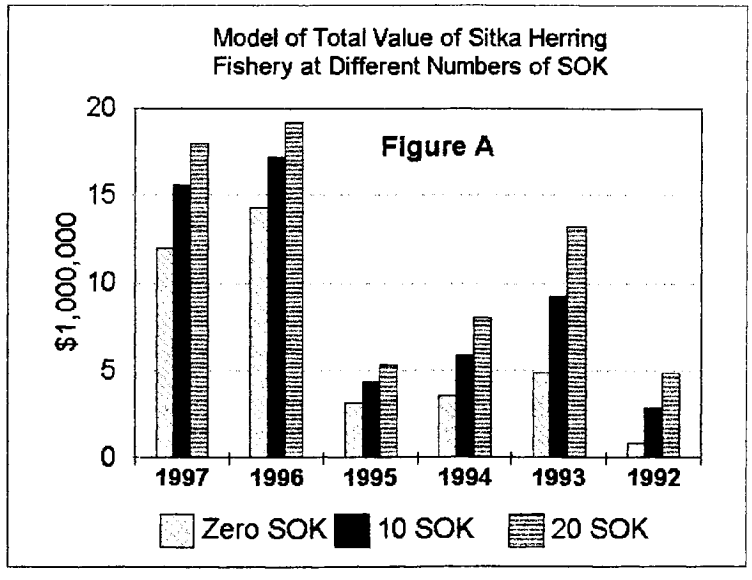
The Open Platform Alternative Harvest Method

Market Opportunities

A good reason to consider the alternative of open platform herring spawn on kelp is the opportunity to add value and market opportunities to the herring resource. By diversifying the herring product, the normal ups and downs in availability of herring stocks, and prices for individual products, may be offset.

Markets for herring spawn on kelp in Japan are diversifying and growing. Of the two basic market opportunities in Japan, the traditional year-end gift market, and the emerging restaurant and sushi bar market, the the open platform product is best suited to the restaurant market. Product destined for the gift market requires a very thick coat of eggs, which is not readily available from the open platform harvest method. In the growing restaurant market, the standard product, known as *tanzaku*, or *komochi kombu*, has the thinner coating of eggs characteristic of natural spawning which is obtained from the open platform harvest method. The year around consumption in restaurants and sushi bars provides a marketing advantage over the seasonal year end gift market which is limited in scope and duration. A product which is consumed year around means less volatility in demand.

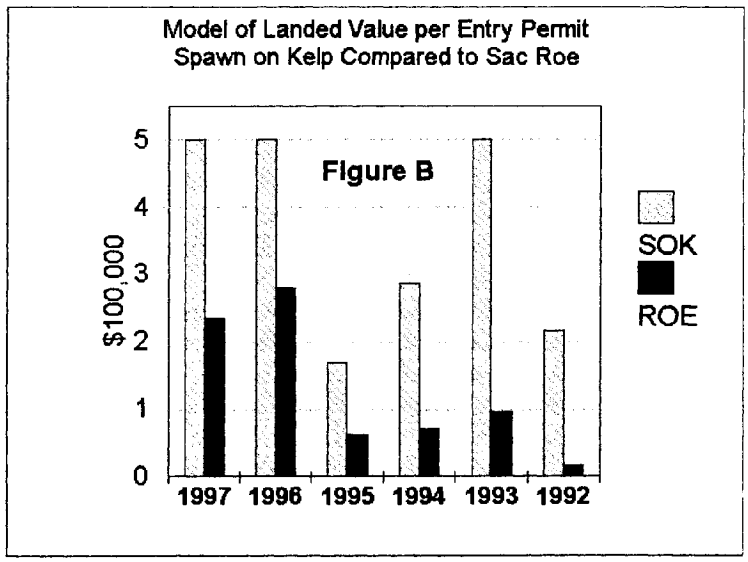
A model of the possible economic benefits to the Sitka Sound herring fishery of adding the open platform spawn on kelp harvest method was developed. The model applies the harvest management approaches and market information from spawn on kelp harvests in other localities to the historic, and 1997 projected, allowable harvest levels and prices for the Sitka Sound herring fishery. The model had three outcomes which were very promising for the addition of the alternative method; 1) increased total landed value of the Sitka herring fishery, 2) increased annual relative income for individual entry permit holders who fish spawn on kelp, and 3) stable or increased relative income for individuals who use seine harvest methods. The first model outcome is shown in Figure A, where the combined seine and open platform harvest methods increase the total landed value of the herring fishery in direct relation to the proportion of the permits which use the open platform method. As the number of permit

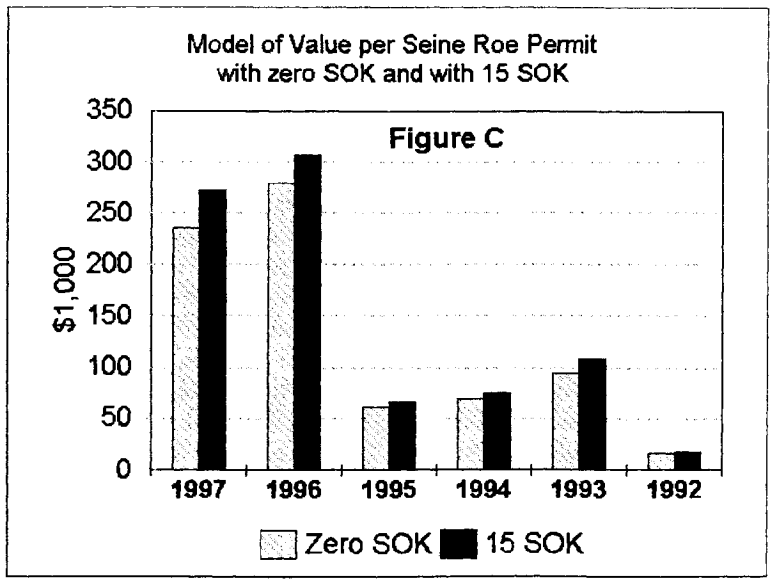


Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

holders who harvest by the spawn on kelp method increases, the overall landed value of the fishery is projected to increase.

The second model outcome, illustrated in Figure B, is that the average annual landed value of a permit using the spawn on kelp harvest method is expected to be higher than that of a permit using seine harvest methods. The difference in expected incomes is due to the higher average unit price paid the harvester for the spawn on kelp product. The third model outcome, illustrated in Figure C, demonstrates that the permit holder who prefers the seine method is more likely than not to receive increased relative income, as the number of permits fishing spawn on kelp increases. A positive effect of spawn on kelp harvest on average income per seiner is expected because the annual weight of product a kelper can handle is limited, and because the kelper's product includes the weight of water absorbed by eggs and the weight of the kelp. As a consequence, the model's average annual value per Sitka seine roe harvester was higher with the spawn on kelp harvest method in place than without it, as illustrated in Figure C. To address kelper capacity, the model returns 20% of the average share of the total allowable harvest of each spawn on kelp harvester to be split among the remaining seine harvesters. So the expectation from the model is that the spawn on kelp alternative harvest method can increase the average annual landed value of all Sitka Sound herring entry permit holders, whether or not they choose to use the alternative.





Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

Of course all model projections are based on past information, and the actual changes in landed value which may be achieved in the Sitka herring fishery in future years will depend on the prices paid for the seine roe and spawn on kelp products, the proportion of permit holders who choose the spawn on kelp alternative, and the levels of allowable herring harvest, among other familiar factors. To give an idea of the model assumptions which are more fully described in the technical report, an example of the model is shown in the box on the last page of this report.

Will the open platform method replace the seine method in the Sitka herring fishery? It's not likely. In fact, in years of high abundance, it is unlikely that an entry permit holder fishing open platform gear would attempt to catch as much as an average share of the allowable harvest. As is the case with any premium seafood market, the *komochi kombu* market can be expected to fluctuate in accord with production from California, Puget Sound, British Columbia and Prince William Sound. It is likely that harvesters will make a decision on how much product to harvest based on market conditions each year, and it is likely that the amount of spawn on kelp product actually harvested each year would be only a fraction of the total allowable harvest of Sitka herring each year.

Sustainable Management Opportunities and Challenges

Managing for a sustained yield for the maximum benefit and the maximum use consistent with the public interest are Alaskan ideals written into the state constitution. Sustainable management means providing for the conservation needs of the herring resource while offering fair harvest opportunities for subsistence and commercial harvesters. But estimating how many herring can be safely harvested each year is never an easy task for managers, and once the fish are harvested there are no second chances for managers to make a better estimate. Present harvest management does a good job of protecting the herring resources, but in so doing it has to overcome substantial technical challenges under considerable pressure each year.

Increasing harvest management options is another of the reasons why development of the open platform herring spawn on kelp harvest method is very much worth taking time to consider, since this method of harvest offers the possibility of second chances in making management decisions. Combined with traditional methods of herring harvest, the open platform method could make it easier for managers to achieve their annual sustainable harvest objectives. For example, in situations where the harvestable biomass of herring was too small, or too geographically concentrated, to permit authorizing a seine fishery, the open platform alternative might be used. Open

Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

platform gear could harvest small quantities by controlling the number of platforms each permit fishes. The concern of over harvest is reduced by platform fishing, since amounts in excess of harvest targets could be left in the water to hatch. At any given locality the actual proportion of herring eggs on the kelp which would hatch successfully if left unharvested is initially an unknown, although experience in British Columbia indicates hatching success could be high.

An important question to answer with regard to development of the open platform harvest method is how the spawn on kelp harvest will be counted against the number of herring which can be safely harvested each year. A conservative approach is to develop a conversion factor which is multiplied into a ton of allowable roe herring harvest to give the equivalent weight in spawn on kelp. The harvest limit for the spawn on kelp harvest method is then set by applying the conversion factor to the sustainable harvest limit for the whole herring fishery. For example, in other herring fisheries, the conversion factor of 412 pounds of spawn on kelp product per ton of spawning herring (20.6%) has been used to guide harvest management.

Why is the 20.6% conversion factor considered conservative as a harvest management guideline? With regard to harvest, in practical effect, because absorbed water and added kelp cause eggs on kelp to weigh more than eggs before spawning, open platform fisheries would actually take fewer eggs, pound for pound of herring, than sac roe fishing. With regard to the reproductive capacity of the stocks, the allowable harvest for the present Sitka herring seine roe fishery is the number, or weight, of herring which can be removed from the present population without reducing its ability to produce future generations of herring. Since removing eggs does not remove, or kill, the herring, and since some of the herring will live to spawn again, removal of 412 pounds of spawn on kelp cannot have the same impact on future production of herring as removal of a ton of herring spawners. By trading spawn on kelp for spawners, the harvest manager gets a bonus in future production.

In the proposed management plan which is outlined at back of this document, experience from other fisheries has been used to suggest how an open platform spawn-on-kelp alternative harvest method could be added to the sac roe fishery of the Sitka fishing district. Suggestions on answers to such questions as how the amount of harvest each year can be determined, how the amount actually harvested can be controlled, and how the harvest data can be collected and interpreted are also addressed in the narrative at the end of the management plan outline. These suggestions are based on a synthesis of information from other fisheries, but the right answers specific to the Sitka district will need to be worked out before the alternative

harvest method can be made available. Some more detailed ideas on how to answer these questions are available in the companion technical report which is available on request to the address on this page. The question of how the open platform alternative may fit in with the limited entry process is addressed in the next section.

Legal Context

How does a new harvest method work in a limited entry fishery such as the Sitka Sound herring sac roe harvest? How would the Commercial Fisheries Entry Commission approach the matter of deciding who would harvest the spawn on kelp?

Since the Sitka Sound seine fishery already fulfills the conservation, management, and economic requirements of Alaska's limited entry statutes, the fishery is not open to new entrants. See Southeast Alaska Roe Herring Purse Seine Fishery - Optimum Numbers Report, Commercial Fisheries Entry Commission (1992). Alternative harvest methods such as open platform spawn on kelp do not create additional herring, so it does not make sense to create more limited entry permits which would put even greater pressure on the existing fishery management system. The open platform method should be viewed as an alternative harvest method for those who already have access to the resource through the limited entry permit system.

Therefore, on the basis of experience in other parts of Alaska, the current permit holders could harvest the spawn on kelp. Administratively, current permit holders could opt for the platform harvest by trading their share of the sac roe quota for a roe on kelp quota. As explained elsewhere, the weight of the roe on kelp share would be different from the sac roe quota by an amount to be determined by fishery managers. The total weight of roe on kelp and the sac roe harvest each year would be set by fishery managers to meet the objective of providing for sustainable use, as is now the case.

How has the use of alternatives to seine harvest been treated in limited entry herring fisheries in other parts of Alaska? In Prince William Sound the harvest of various species of kelp-bearing herring roe from the spawning areas may be the oldest of the herring roe fisheries. These wild herring roe fisheries had a harvest allocation along with other herring fisheries, such as the food, bait and sac roe fisheries. By incrementally reducing the wild roe allocation, starting in 1979, an allocation was made for PWS spawn on kelp harvesters who hung blades of kelp inside a floating net pen enclosure called a pound net. In this type of fishing, the herring are caught by purse seine and placed into the pound net containing the kelp to produce the kazunoko kombu product.

Thus, the legal basis for a spawn on kelp platform fishery in Sitka Sound exists and

Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

can be adapted from existing fisheries in Alaska and elsewhere.

Ecological Context

The open platform herring spawn on kelp harvest method is attractive in an ecological context because it offers fishery regulators and managers the opportunity to provide increased commercial value, while lowering the proportion of the spawning population killed during commercial harvesting operations each year. Under the spawn on kelp harvest method, a greater landed weight of finished product with a higher unit value is obtained from each spawner. This is possible due to the added weight of the kelp, and because each herring egg absorbs enough water after being released from the spawner to weigh more than half again what it weighed inside the spawner. For example, the 200 pounds of roe that would be recovered from 2,000 pounds of 10% roe herring taken by seining would be increased by water absorption and kelp to approximately 412 pounds of marketable product.

Risk of harvest to the future productivity of the resource is further reduced, since many of the herring spared by spawn on kelp harvest will live to spawn again the next year. Herring spawn on kelp fishing focuses the loss due to harvest on a single generation, or cohort, rather than spreading the losses across a number of future generations, as happens when the spawner is killed. To take one important herring age class as an example, 1,000 six year old spawners, when harvested by the seine roe method, would provide no further benefit to the fishery. But the same 1,000 six year old herring when "harvested" by the spawn on kelp method, would contribute 360 seven year old spawners in the next harvest year, at 36% annual survival.

By focusing harvest on eggs, thereby increasing the weight of product produced by each spawner and sparing the spawner, open platform fishing converts potential losses from the herring populations into valuable product and future herring production. Although there is a relation between the biomass of herring spawning in Sitka and future production of herring, the chances of any one herring egg hatching and surviving to produce a spawner are very slim. Each mature adult herring has won an ecological lottery by surviving long enough to spawn. This is why a spawner can be thousands of times more valuable to the future of the population than an egg. Open platform spawn on kelp harvest does not diminish the importance of the relation between spawning stock and future production of herring. It is, however, important to recognize that a significant demographic risk inherent in harvesting whole herring is not present in open platform spawn on kelp harvests.

The open platform spawn on kelp method is a good candidate for incorporation into sustainable harvest strategies because it

Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

may lower the risk of harvest management actions to the future of herring populations, but what about the kelp? In an ecological management context adding another species to the management equation requires concern not only for the future of herring populations, but for the future of the kelp populations as well. Since giant kelp beds help support diverse marine life, including sea urchin, abalone, and salmon, the harvest of kelp in a sustainable manner is an important concern.

Fortunately, some studies have been done on the biology of giant kelp, known to scientists as *Macrocystis*, in southeastern Alaska. A comprehensive survey of giant kelp biomass has not been conducted in southeast Alaska since 1913. That survey, which did not cover all of southeastern Alaska, estimated a standing crop in excess of 400 thousand tons. Although giant kelp is found from Dixon Entrance to Icy Straits, it is often harvested from the west side of Prince of Wales Island, not far from the city of Ketchikan. The biomass annually harvested in southeastern Alaska since 1980 has varied from four to 45 tons. The peak harvest of 45 tons is 0.01 percent of the biomass estimate of 1913, so even given substantial interannual variability, the amount of giant kelp needed for the alternative harvest method should be sustainable.

Conclusions

Together the open platform spawn on kelp and the purse seine sac roe harvest methods offer more options for maintaining a sustainable herring resource and increasing income per permit than could be provided by either method alone. By diversifying product, and by increasing the landed value of product per pound of herring harvested, the combined methods offer to put the fishery and allied businesses on a more stable economic base. By reducing the number of herring killed per ton of product landed, the combined methods offer resource managers the unique opportunity to decrease average fishing mortality while increasing the average value of the fishery. We hope you find both types of offer interesting enough to want more information, and to support development of a fishery management plan for Sitka herring which includes the alternative harvest method of open platform spawn-on-kelp.

On the pages following is an explanation of how the alternative method might be implemented in fishing regulations, and a table which illustrates what the catches and incomes might have been under the allowable harvest levels of past years, and as projected for 1997.

Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

OUTLINE OF PROPOSED AMENDMENT TO TO 5 AAC 27.XXX; 5 AAC 39.105. REFERENCE ALASKA BOARD OF FISHERIES 1996/1997 PROPOSALS, # 441, PAGE 296.

The following is an example of how the fishing regulations implementing the open platform spawn-on-kelp fishery in conjunction with the sac roe fishery could work.

1. An alternative harvest method is made avilable to Sitka sac roe seine permit holders in the form of open platform herring spawn-on-kelp, SOK.

2. Each permit holder declares early in the calendar year if the the permit will be used to fish SOK or sac roe. A permit cannot fish both methods in the same year, so once declared, the permit is locked in to the SOK fishing method for the year.

3. A permit holder may operate from one to three SOK platforms of fixed size. The department shall set the number of platforms annually according to the total allowable harvest of herring.

4. Harvest limitations for SOK

(A) when the total harvestable biomass divided by the number of permits is equal to or greater than 152 tons, no permit holder fishing SOK may harvest or sell more than 25 tons of SOK. [See example years 1993, 1996, and 1997 in box following.]

(B) when the total harvestable biomass divided by the number of permits is less than 152 tons, no permit holder fishing SOK may harvest or sell more than eighty percent of 20.6 percent of the total harvestable biomass divided by the number of permits. [See example years 1992, 1994, 1995 in box following.]

(C) once the permit holder fishing SOK has harvested or sold the weight of SOK specified in 4A or 4B, any hung kelp remaining on the permit holder's platform(s) shall be left in place until the attached herring eggs hatch or die of natural causes. [Note: In all cases a permit holder fishing SOK is regulated to take less than an average seine catch of sac roe. As a result, the amount of roe herring which could be made available to be harvested by seine gear is expected to increase as the number of permit holders fishing SOK increases. See rows 9 - 12 in the box following.]

Management Considerations

Identification of individual platforms and weighing of product may be similar to other Alaskan herring pound fisheries. The unit of gear is the platform, and harvest is controlled by the number of platforms, and by monitoring the weight of product landed. Pounds SOK landed can be related to the harvestable biomass estimate by the conversion factor of 0.206 tons of SOK per ton of 10% sac roe herring. In age structured models of herring production, the equivalent biomass of sac roe

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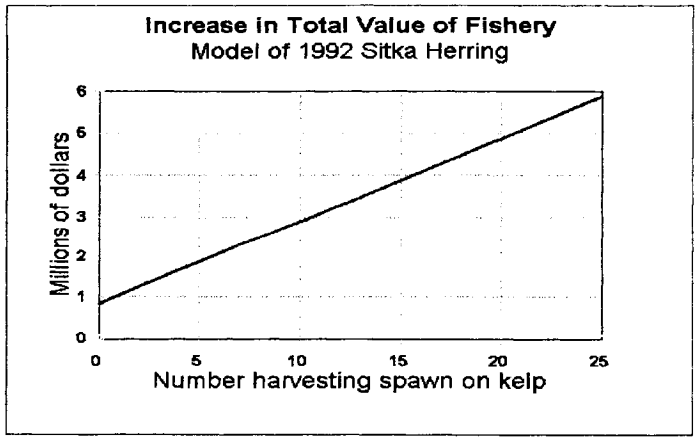
Model Results of Open Platform Herring Spawn on Kelp Harvest Method Applied to Sitka

Year	1997	1996	1995	1994	1993	1992
1. Allowable Harvest, in Short Tons	10,000	8,144	2,609	4,432	9,691	3,356
2. Average harvest per permittee, 51 permits (tons)	196	160	51	87	190	66
3. Harvest returned to SR fishery per SOK (tons)	75	39	10	17	69	13
4. Harvest quota to determine SOK share (tons)	121	121	41	70	121	53
5. Harvest retained by SOK permittee (tons of SOK)	25	25	8	14	25	11
6. Harvest SOK [maximum 50,000] (thousand lbs)	50.00	50.00	16.86	28.64	50.00	21.69
7. Value SOK at $10.00 per lb. (thousands)	$500.0	$500.0	$168.6	$286.4	$500.0	$216.9
8. Average price per ton for roe herring	$1,200	$1,750	$1,200	$800	$500	$250
9. Value seine roe per permit, 0 SOK (thou)	$235.3	$279.5	$61.4	$69.5	$95.0	$16.5
10. Value seine roe per permit, 10 SOK (thou)	$257.2	$295.8	$64.4	$72.9	$103.4	$17.3
11. Value seine roe per permit, 15 SOK (thou)	$272.7	$307.4	$66.5	$75.3	$109.3	$17.8
12. Value seine roe per permit, 20 SOK (thou)	$293.1	$322.7	$69.3	$78.5	$117.2	$18.6
13. Value, combined fishery, 0 SOK, (millions)	$12.0	$14.3	$3.1	$3.5	$4.8	$0.8
14. Value, combined fishery, 10 SOK, (millions)	$15.5	$17.1	$4.3	$5.9	$9.2	$2.9
15. Value, combined fishery, 20 SOK, (millions)	$18.0	$19.2	$5.4	$8.0	$13.2	$4.9

removed by SOK could be treated as dead herring by proportionally removing it across the recruited age classes before calculating production. Although this is a conservative assumption for the purposes of achieving conservation, this approach lacks biological similitude, since the herring are not, in fact, dead. As experience with SOK harvest increases, the effect of SOK should be to reduce the reproductive potential of the population which should be apparent in estimates of the Ricker parameter alpha, if the level of SOK is sufficient to be detectable. Low levels of SOK harvest may be lost in the interannual variability, given the many factors which intervene after the egg stage to determine the rate of recruitment of a cohort.



Sitka Sound Herring Spawn on Kelp

The Open Platform Alternative Harvest Method

Fisheries and Aquatic Sciences, 1015 Sher Lane, Lake Oswego, OR 97034

Sitka Sound Herring Spawn on Kelp

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Fisheries and Aquatic Sciences, 1015 Sher Lane, Lake Oswego, OR 97034

Alaska Department of Fish and Game
Board of Fisheries Support Section
Art Nelson, Executive Director

RE: Support Documents for Proposal 182 submitted for 2025 SE Finfish meeting record.

January 10, 2025

Spawn on Kelp (SOK) in Sitka Sound was first proposed to the Board in 1996. Since then issues regarding resource conservation and subsistence needs have come to the forefront and the economies of the fishery have horribly declined. The sac roe product is no longer in high demand. Diversifying the fishery using SOK as an alternative harvest method for existing G01A permit holders would address many of the concerns surrounding the fishery while improving the overall value of the fishery.

In 1998 and 1999 an experimental open pound spawn on kelp (SOK) fishery was conducted in Sitka Sound. The documents included in this PC have been submitted at past meetings. A lot of time has passed since the experimental fishery but the data, studies, and reports produced are still relevant. The market for herring roe products has not changed much from the time these documents were produced. A small market for existing herring roe products still remains but expansion is possible with the addition of the thinner product that would be produced with SOK.

This PC contains the following documents:

- Spawn on Kelp and the Sitka Sound Herring Fishery.
- ADFG Report to the Board re: 1998-99 Experimental spawn on kelp fishery in Sitka Sound.
- Assessment of Macrocystis Biomass, Quality, and Harvesting Effects in Relation to Herring Roe on Kelp Fisheries in Alaska.
- Open Pounds and the Traditional Subsistence Fishery.
- An Update of Market Variables Affecting Demand in Japan.
- ROK Marketing Questions and Answers.
- Letter from Elderwood Trading regarding SOK in Sitka Sound.

The markets for Sitka Sound SOK are not the markets for thick SOK, but for a thinner product at a lower price point with a perceived value which can be more easily consumed in the marketplace. The existing market for SOK is hampered by large fluctuations in volume which have limited market expansion. SOK production in Sitka Sound would ease fluctuations in overall supply giving distributors the opportunity to expand the market, generate more awareness of the product, and increase demand for the product. Increased demand leads to higher prices. This will not happen overnight but it is time for a departure from status quo. SOK in Sitka Sound is a step in the right direction. Please support Proposal 182.

Respectfully Submitted,

Ryan Kapp

Spawn On Kelp and the Sitka Sound Herring Fishery

Allowing an Open Pound Spawn on Kelp (SOK) fishery in Sitka Sound will increase the overall value of the fishery while killing less fish than the existing harvest method.

The biology of spawning herring is a big factor in producing more value from the same biomass.

Currently, herring harvest can begin when roe recovery is sampled at 10% roe weight. Put simply: 100 tons of fish equals 10 tons of eggs. In some Sitka Sound openings roe recovery has been as high as 13%. In an experimental SOK fishery conducted in Sitka Sound in 1998 and 1999, Alaska Department of Fish and Game determined that 100 tons of herring biomass harvested with SOK converts into 27 tons of product. This represents a recovery of 27% which more than doubles the existing fishery recovery.

The reason for this increase in weight is biological. Upon fertilization the herring egg hydrates with water increasing the weight of the egg. SOK eggs are spawned, fertilized eggs that are hydrated while seine caught sac roe are pre spawn eggs and not hydrated. Because of this hydration the weight of an individual egg produced with SOK is more than twice as heavy as an individual sac roe egg.

With SOK the value of the eggs is increased as well. For example: 100 tons of herring at current prices (optimistically figure $200 per ton) is worth $20,000. That same 100 tons of herring harvested with SOK equates to 27 tons of product or, for simple math, a little over 50,000lbs. 50,000lbs of product sold at current prices (realistically figure $5 per pound) is worth $250,000. In this scenario the SOK product is worth more than 12 times the value of the traditional sac roe product.

While harvesting with SOK increases the value of the fishery product the best part is with Open Pound SOK no herring are killed. An Open Pound SOK fishery means the herring can swim into and out of the kelp as they please. There are no nets used at any time. The fish swim in, spawn, and return to sea making them available to spawn again in the future.

Increasing the value of the resource while causing the resource less harm is a win / win scenario. Incorporating Open Pound SOK into the Sitka Herring fishery would be a benefit both now and well into the future.

Sitka Sound Herring Spawn on Kelp

Open Harvest Platform

Experimental Fishery Report

Spring 1998

Submitted to

Alaska Department of Fish and Game

Commercial Fisheries Division

ADF&G Contract No. 11-122-98

Submitted by

Paul Gronholdt and Associates

P.O. Box 288

Sand Point, Alaska 99661

Prepared by

Oceanus Alaska
119 Seward Street, Suite 9
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EXECUTIVE SUMMARY

In response to a call for change in the Sitka Sound herring fishery, the Board of Fisheries prompted the Alaska Department of Fish and Game to conduct an experimental fishery using the Open Harvest Platform roe on kelp gear alternative. The goals of exploring diversification of the fishery were to improve conservation and encourage greater economic yield to participants.

Paul Gronholdt and Associates carried out the Experimental Fishery in accordance with contract specifications outlined by the Alaska Department of Fish and Game. The team's experience, good weather and an excellent herring return contributed to PGA's attainment of the goals of the experimental fishery.

The PGA team worked in concert with ADF&G research staff to support sampling efforts and generally track the fishery. PGA maintained communications with ADF&G staff from March 15 through the consummation of final product sales in Japan in the late summer.

This report provides a narrative describing procedures and schedules involved in the execution of the experimental fishery. Additional documentation on the harvest details is provided as attachments to this report.

MACROCYSTIS KELP HARVEST

About five tons of *Macrocystis* fronds were harvested from a single kelp bed along the north shore of Heceta Island, Sea Otter Sound. ADF&G reports that this included an estimated 4,080 fronds, each bearing an average of 16 blades. Thus, an estimated 65,280 total blades were "fished" as spawning substrate.

OPEN HARVEST PLATFORM FISHING

About 47 fishermen, consultants and processing crew were directly involved in the fishery. Four platforms were fished in Sitka Sound for two to four days each. Excellent spawn coverage was achieved. They carried out kelp gathering, rack loading, fishing and harvesting from March 16 through the 25th. Processing continued for an additional 2-1/2 weeks.

HERRING UTILIZATION

An estimated 104 tons of herring provided spawn for the final product harvested in the experimental fishery. 6,900 tons of herring were taken in the traditional sac roe fishery.

PROCESSING AND MARKETING

The total yield of this effort was 57,038 pounds of "Kazunoko kombu", which sold for 261,538 USD. 74% of the product was graded as #1 or #2, and the average price was $5.46 per pound. Grade 5 fetched $0.45 per pound, and Grade 1 paid $7.58 per pound.

Fine silt found in the spawn layers made processing very difficult. Half of the product required light-table examination and special cleaning. Quality was impacted considerably, and the final price paid for the product reflected this problem. Experts feel that Sitka Sound resources and the level of local fishery sophistication can be focused to meet the stringent standards of an emerging Japanese market in the coming years.

SUBSISTENCE INTERACTIONS

PGA coordinated fishery logistics through their Sitka Tribe subsistence liaison, Mike Miller. The Sitka Tribe's attorney, Tribal biologist, Miller and other tribal leaders indicated that none of the conflicts that Tribal members had anticipated transpired during the experimental fishery.

ENVIRONMENTAL AND CONSERVATION MERITS

The environmental and conservation merits of this fishery were demonstrated in 1998. The fishery appeared to leave minimal impact to the kelp bed or Sitka Sound ecosystem. PGA's observations indicate that neither the kelp nor herring involved in the fishery were killed. This sublethal harvesting method has clear conservation benefits for both of these resources.

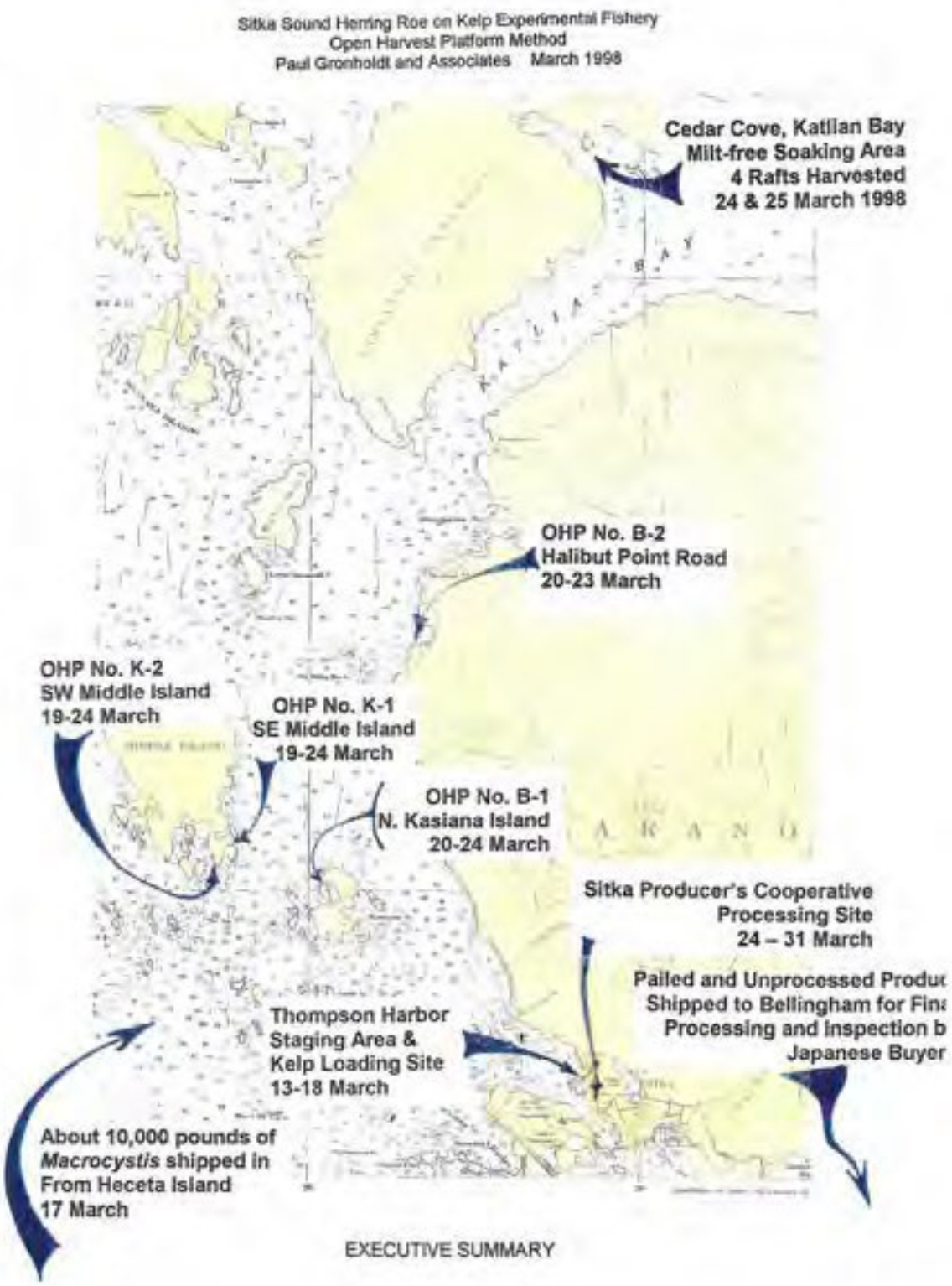
ECONOMIC BENEFITS TO SITKA

The Sitka community derived economic benefits from the fishery through short-term jobs and the direct purchases of goods and services. Raw fish taxes and city sales tax paid on local goods also contributed to the community's springtime economy.

WHAT'S NEXT?

The collective benefits of the open harvest platform method were largely realized in the 1998 experimental fishery. Fishery resource conservation merits were demonstrated, subsistence and other fisheries proceeded without disruption, and the roe on kelp produced was of acceptable quality. The funds generated in the fishery covered ADF&G management costs and offset most of PGA's expenditures.

Paul Gronholdt and Associates is satisfied with the overall outcome of the fishery. The PGA team feels that lessons learned in 1998 can contribute to a strategy of refining production standards for Sitka Sound roe on kelp which will lead to greater market niche security in the future.


Sitka Sound Herring Roe on Kelp Experimental Fishery
Open Harvest Platform Method
Paul Gronholdt and Associates March 1998
Cedar Cove, Katlian Bay
Milt-free Soaking Area
4 Rafts Harvested
24 & 25 March 1998
OHP No. B-2
Halibut Point Road
20-23 March
OHP No. K-2
SW Middle Island
19-24 March
OHP No. K-1
SE Middle Island
19-24 March
OHP No. B-1
N. Kasiana Island
20-24 March
Sitka Producer's Cooperative
Processing Site
24 – 31 March
Pailed and Unprocessed Produc
Shipped to Bellingham for Fin
Processing and Inspection b
Japanese Buyer
Thompson Harbor
Staging Area &
Kelp Loading Site
13-18 March
About 10,000 pounds of
Macrocystis shipped in
From Heceta Island
17 March

Sitka Sound Herring Spawn on Kelp
Open Harvest Platform Method
Report on Experimental Fishery Results
1998 Season

Contents

Section 1. Introduction and Background

This report describes the methods used by Paul Gronholdt and Associates in conducting the Sitka Sound Herring Spawn on Kelp Experimental Fishery. The results of the 1998 fishery and some of the challenges encountered in adapting the Open Harvest Platform fishery technique and marketing strategy to Sitka Sound are discussed.

Background

The Sitka Sound herring fishery has allowed only sac roe seine gear since entry to the fishery was limited in about 1977. Along the West Coast of North America, this singular gear type management regime for herring harvest is unique to Sitka (Garza 1996). In accordance with the Limited Entry Act optimum number provision, the CFEC established the maximum number of participants in the Sitka sac roe fishery at about 50 permits.

1.1 Diversification of the Herring Fishery

In early 1998, about one third of the Sitka Sound sac roe seine permit holders organized an effort to support the development of a spawn on kelp alternative to the Sitka Sound sac roe herring fishery. Under the leadership of a native of Sand Point, Paul Gronholdt and Associates submitted BOF Proposal No. 441. The proposal sought to "Allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe in the form of kelp in lieu of or in addition to using purse seines."

Purse seine permit holders in the group, contracted biologists and consultants went before the Board of Fisheries in support of proposal No. 441 in Sitka (January 1998).

The Board of Fisheries took no action on proposal 441, but acknowledged the potential conservation and economic benefits of the gear type. In order to explore several aspects of the proposed open harvest platform method, the Board requested that the Alaska Department of Fish and Game conduct an experimental fishery. ADF&G responded by designing an experimental fishery and soliciting bids for the 1998 season.

1.2 Experimental Fishery Terms

Terms established by the Department for conducting the experimental fishery required that the contractor deposit a $64,000 bond with the department, have at least two years experience in the spawn on kelp fishery, and have an appropriate vessel, platforms and other equipment necessary for achieving the test fishery goals. To further ensure a successful outcome, the Department also required that the contractors provide a harvest, marketing and processing plan, and hold a letter of agreement with a licensed Alaskan seafood processor for handling the roe on kelp product.

The goals of the test fishery were to first produce a sufficient quantity and quality of roe on kelp from four rafts to generate $336,000 in product sales to pay department and contractor's expenses. The project would serve as an opportunity for ADF&G to conduct resource research on both kelp and herring, as well as observe the fishery for environmental impacts, gear conflicts and subsistence interactions.

Sitka Sound Herring Spawn on Kelp Experimental Fishery Report
Paul Gronholdt and Associates March 1998

Paul Gronholdt and Associates were awarded the test fishery contract on February 25, 1998. Comprised of 13 Sitka Sound herring sac roe permit holders, about 40 crewmembers, and five consultants, the "PGA team" commenced with mobilizing their vessels and open harvest platforms for the fishery in early March.

Section 2.0 Results of the 1998 Experimental Fishery

From early March through mid-July, Paul Gronholdt and Associates carried out the experimental fishery, processing and marketing of roe on kelp as described in their contract with the Alaska Department of Fish and Game. The results of this coordinated effort were beneficial economically as well as informative to community members, the experimental fishing team and the ADF&G research and management staff.

The PGA team successfully transferred California OHP fishing technology to Sitka Sound, and adapted the method to Alaskan conditions. Sitka residents were able to observe the entire process and learn directly the logistics involved and impacts resulting from the alternative gear system. ADF&G researchers implemented their research plan with few changes, and obtained data upon which to base their analysis of the fishery.

Finally, the overall quantity and quality of the roe on kelp yielded by this fishery were very good, considering it was a first attempt at the fishery in Alaska. Sales of the product were sufficient to reimburse most of the PGA team's costs, and covered the entire ADF&G experimental fishery research budget.

Detailed records of activities involved in the experimental fishery are noted in the chronology in attachment D. The following section highlights the manner in which each facet of the fishery was conducted, notes any discrepancies from the original plan, and briefly explains the results of each phase of the operation.

2.1 Staging for the Test Fishery

The PGA team began staging for the test fishery in early March. Robert Glenovitch shipped his custom-manufactured aluminum roe on kelp rafts and other equipment from Bellingham to Sitka on the F/V Alicia Jo. Crew from the St. Zita assembled the rafts and moored them in New Thompson Harbor on March 13.

About 60 fish totes were stored on a barge leased from Excalibur Drilling. Located inside the Thompson breakwater, the barge served as a useful platform for the kelp stringing and open harvest platform loading operation.

2.2 *Macrocystis* Kelp harvest

High quality *Macrocystis* kelp is essential for the production of excellent herring roe on kelp. Desirable kelp blades are at least 6 inches wide and 20 inches long, with smooth margins, no holes and free of encrusting growth.

Although *Macrocystis* grows from Dixon Entrance to Icy Strait, mature blades meeting these harvest criteria in the early spring are not abundant throughout the plant's Alaskan range. On March 13 and 14, Darrell Kapp and crew inspected *Macrocystis* kelp beds around Baranof Island. No kelp of sufficient blade size and abundance could be located near Sitka Sound.

Kapp conferred with Bill Davidson about the situation and coordinated a team of kelp harvesters to travel further south. On March 15, Jim Beaton directed his crew on the F/V Starrigavan to depart Sitka for Sea Otter Sound. Kelp quality expert Warren Westrom

screened several kelp beds and located a supply of mature *Macrocystis* about 120 miles south of Sitka. Beaton notified ADF&G of the harvesting site and schedule.

On March 16, PGA's biologist and two ADF&G technicians flew to the North end of Hecata Island where they rendezvoused with the Starrigavan crew. Two fishermen that live on Hecata Island were contracted to gather kelp for the fishery, and joined the team onsite.

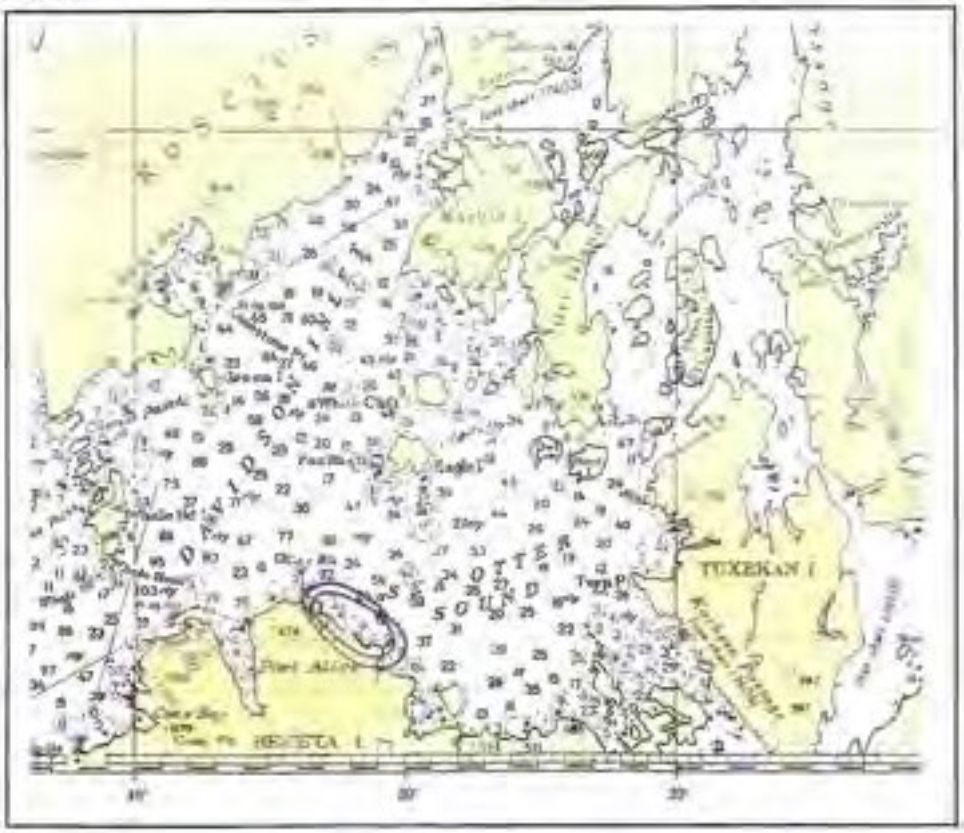


Figure 2.1 Nautical chart indicating the location of the North Hecata Island kelp bed. Nine people harvested about 4,000 *Macrocystis* fronds from this site in about 10 hours.

The following individuals participated in the kelp harvest at North Hecata Island:

- Johnny Weyhmiller and crew
- Rob Miller, Sitka
- Charley Frisbee, Hydaburg
- Lee Morris, Captain F/V Starrigavan
- Steve Frago, Crew, F/V Starrigavan
- Becca Johnston, Crew, Starrigavan
- Michelle Ridgway, PGA Biologist
- Warren Westrom, Kelp Quality Advisor

(Nicole DuClose & Eric Parker, ADF&G)

The kelp team commenced with the *Macrocystis* harvest on the morning of March 16, and completed the task by 1900 hours that evening. All kelp used in the test fishery was harvested from one bed located at North shore of Heceta Island, about two miles SE from Gas Rock, at 55 °49.43 North 133° 31.145 West (Figure 2.1). This site lies within ADF&G statistical area 103-90.

In accordance with contract stipulations Warren Westrom directed the kelp team to weigh and inventory each tote of kelp and maintain the kelp harvest logbook. Pursuant to ADF&G kelp harvesting regulations 5 AAC 37.300, the crew harvested *Macrocystis* from small skiffs by hand, removing only the upper portion of the fronds.

Westrom oversaw that kelp harvested met quality control standards. Frond sections taken were about six to eight feet long. The four to five newly formed blades at the tip of each frond are unusable and were trimmed off to reduce mucilage buildup in the totes.

Photograph 2.1 *Macrocystis* kelp harvesting in Sea Otter Sound, North shore of Heceta Island. Kelp blades are in good condition, but slightly smaller than preferred. PGA's biologist, Michelle Ridgway was monitoring the harvest and observing for impacts to the kelp resource and effects on marine mammals and birds in the area. 16 March 1998

A total of 10,236 pounds of kelp was harvested and transported in 40 standard fish totes. The ADF&G research team estimated that this consisted of 4,080 fronds with an average of 16 blades per frond, or 65,280 total blades.

The Starrigavan crew lashed the totes of *Macrocystis* to the deck, and kept them lidded during transport. Weather was rough through Chatham Straits, but the kelp arrived at Thompson Harbor in excellent condition.

Kelp Harvest Impacts

The ecological effects of the kelp harvest were difficult to gauge. As there was no provision made for conducting a quantitative study of the kelp prior to harvest, both ADF&G field technicians and PGA's biologist made general observations of the harvest.

Ridgway photographed the kelp bed prior to and following harvest. Neither observations made on the day of harvest nor the photographs reveal that the bed had been diminished in any way. ADF&G biologists revisited the kelp harvest site on April 9, and reported that "there was no obvious impact on the kelp bed". Ridgway revisited the site in July and September. Based upon surface observations only, she did not see obvious signs of deterioration in individual plants or in the bed.

Even when harvesting fronds in the kelp bed, it was difficult to detect any reduction in the kelp biomass. However, it was obvious to all pickers when high quality blades became scarce in an area. Upon completing the harvest, we felt that we had taken most of the higher quality fronds from the kelp bed – which is about 1/3 square mile in size.

We assume that impacts to the kelp bed from this harvesting included some damage to the individual plants which were "pruned". Because only one or two fronds were taken from each plant, the *Macrocystis* plants will likely recover the lost biomass by summer's end.

Ridgway observed seals, cormorants, marbled murrelets, gulls and numerous seaducks in the bay during harvest activities. Three seals remained in the kelp while skiffs collected fronds, it did not appear as if they were disturbed at all. Other than the likely short-term disruption to the fish and invertebrate populations dwelling under the kelp canopy, it does not seem as if this year's level of harvest resulted in long-term damage to the kelp bed or the ecosystem it supports.

Kelp User Conflicts

Potential conflicts between the Spawn on Kelp Experimental Fishery and subsistence harvests of kelp or SOK on the West Coast of Prince of Wales Island was cited as a concern prior to the fishery (Comments to the Board of Fisheries by Dolly Garza, 1998).

The PGA team harvested kelp for the experimental fishery only at the Heceta Island site, many miles away from the traditional kelp harvest areas used by the communities of Craig, Klawock Sitka and Hydaburg (see figure I in the Executive Summary). There were no concerns or conflicts reported as a result of the kelp harvest.

2.3 Open platform fishing

The Starrigavan crew arrived with the *Macrocystis* in the evening on 17 March. The PGA core team of seine boat skippers and advisors met to review the kelp loading procedure and by 2100 hours mobilized their crews to begin work. The ADF&G staff were notified of project activities and were on site as the kelping procedure began.

Four seine boats anchored rail to rail in Thompson Harbor, near the Excalibur barge. In windy, cold weather, 37 crew members, boat captains and four contractors engaged in stringing and loading kelp on racks for 6 1/2 hours, completing the task at about 3 a.m.

The kelp loading procedure involved the following steps:

- *Macrocystis* fronds were removed from totes and trimmed to 6-foot lengths
- A seine lead weight was attached to the bottom end of the frond, and a length of gangion line to the top end of the frond. The gangion was made off to a piece of groundline. Fronds were spaced about 1.5 meters apart along the kelp line.
- Lines bearing fronds were "coiled" into totes, much like baited longline gear
- The Merlin crew took fully loaded totes to the open harvest platforms, and "shot" the lines into place. From 37 to 43 lines were placed on each of four platforms, each line bearing about 28 fronds.
- Kelped platforms were then allowed to settle for about a day in Thompson Harbor

Photograph 2.2 Loading kelp; late night in Thompson harbor. Two assembly lines involving about three dozen-crew members prepared kelp fronds for suspension in the open harvest platforms. Weights and gangions were attached to each frond, and then fronds were attached to kelp lines on the four platforms. 3,858 fronds were fished in the experimental fishery.

On March 19, vessels in the PGA fleet slowly towed two loaded kelp racks to fishing sites designated by Darrell Kapp with input from Subsistence Coordinator, Mike Miller. Details of the logistics involved in handling each rack during the fishery are provided in the Chronology (Attachment D), and in the interim report (Attachment E).

Rack K-1 was anchored in a small cove on the SE end of Middle Island, and K-2 was secured in a nameless cove on the SW end of Middle Island in the evening of 19 March (Figure 2.2). On 20 March, racks B-1 and B-2 were towed to anchorages on the north end of Kasiana Island and to North Magic Island. Later on the 21st, raft B-2 was tied to a private dock located on Halibut Point Road, where it remained for the rest of the fishery.

Figure 2.2 Location of each open harvest platform used in the SOK experimental fishery

All rafts were adorned with two to four blinking warning lights and signs displaying ADF&G permit numbers. Each raft was positioned near a steep beach, and tied to shore with one or two stout shorelines. The corners of each raft most distant from the beach were secured using 50-pound longline style anchors.

Spawn Deposition

1998 was an excellent spawning season in Sitka Sound. ADF&G reports that spawning in the Sound occurred from March 19 through April 12, with major spawning from March 21-25. Spawning events began earlier than usual, and over 65 miles of shoreline was spawned upon.

We observed spawning at every raft by the 21st of March. Schools of male and female herring milled around the rafts and, seemingly responding to the same cue, females

began to deposit eggs on the kelp blades. Like a seamstress sewing stitches, each female laid her eggs on blades in rows. Males released milt in the rack areas on an intermittent basis. On March 23rd, the PGA team and ADF&G managers observed that most of Sitka Sound was a sea of milt.

While the gear was fishing, two dozen members of the PGA team shared the task of monitoring rafts for spawn deposition, observed and responded to subsistence fishing activities in the area, and generally guarded the platforms (see Chronology). Each raft was tended each night they were in place. The crew monitored spawn deposition at each site, and eventually lowered most kelp lines to improve blade exposure to spawning herring.

During the fishing period, representatives of the Alaska Department of Fish and Game, USFWS Protection, members and staff from the Sitka Tribe, and members of the general public from Sitka visited the roe on kelp rafts.

By March 23, all racks had from one to four egg layers deposited on most blades. At about 8 o'clock p.m, the Ryan D. Kapp towed platform number B-2 from the Halibut Point Road site about five miles to Cedar Cove in Katlian Bay. The raft was tended overnight while the product soaked to cleanse away excess milt.

On the 24th, the remaining three rafts were towed to Cedar Cove for soaking. Weather was calm, and product loss from the rafts during the tow was negligible. Seine boats towed the rafts at a speed of about 2 knots.

Photograph 2.3 Open Harvest Platform fishing! The PGA team inspected platforms several times daily. If upper blades were not receiving spawn deposition, gangion extension lines, or "drops" were used to lower the kelp lines in the water column.

Photograph 2.4 The condition of *Macrocystis* blades was closely monitored. Cool temperatures, high saline water and early spawning in Sitka contributed to the preservation of kelp quality.

2.4 Roe on Kelp Product Harvesting

Five seine boats and their captains and crew gathered in Cedar Cove for harvest of the first rack on the morning of the 24th of March. We first worked with the ADF&G research team to tag randomly designated fronds for sampling and set up ADF&G's sampling station. About 30 people engaged in harvesting and packing roe on kelp for about three hours.

The team removed each frond from kelp lines, then snapped all blades off of the stipe or stem, stacked blades carefully and then packed them into standard-sized fish totes. ADF&G collected every marked frond for sampling and maintained counts of all fronds harvested. Totes full of roe on kelp blades were loaded on to the deck of a seiner, and taken to the Sitka Sound Producer's Cooperative for processing.

The crew harvested the three other racks in this manner on March 25th[th]. Weather was cold, windy, and sleeting occasionally. The harvest proceeded without incident of note. About 50 totes of roe on kelp were delivered to the SPC plant by evening of the 26[th].

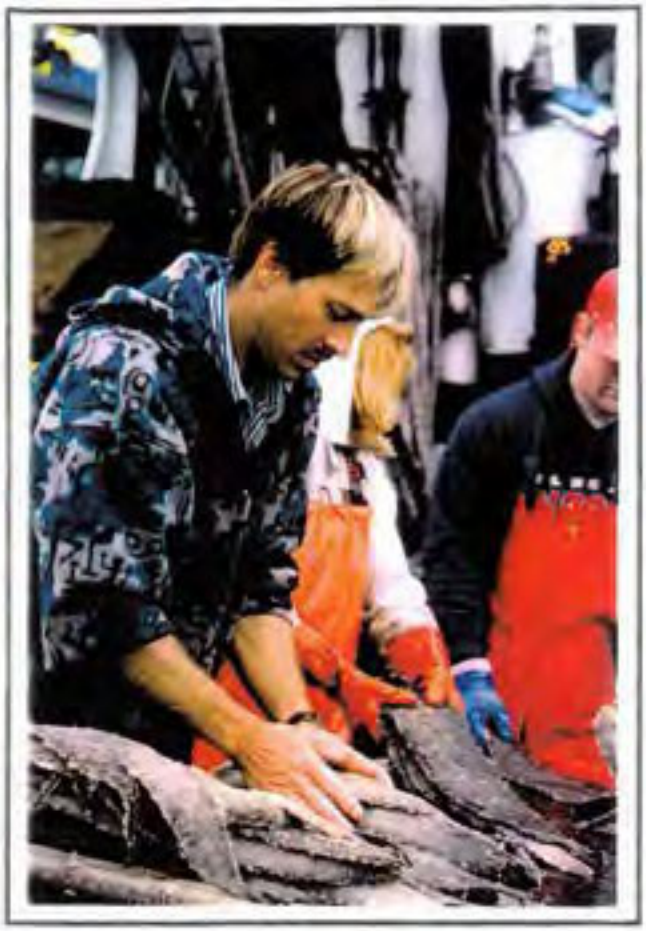
Photograph 2.5 Paul Gronholdt's F/V St. Francis positioning a kelp platform in Cedar Cove following a two-hour tow from the fishing grounds. The roe on kelp was allowed to soak in the milt-free waters for 12 to 24 hours prior to harvest to reduce product adhesion.

Photograph 2.6 Product harvesting begins. Teams of kelp handlers worked from the decks of two seiners moored to the platform. ADF&G researchers have set up a sampling station on the aft deck of the Robert Glenovitch's St. Zita.

Photograph 2.7 Kelp "clotheslines" were hauled in and fronds removed gently to avoid breakage. Two to four herring egg layers were deposited smoothly on most blades.

Photograph 2.8 Deck crews removed weights and ganglion lines from each frond, then snapped blades from the attachment point to the stipe, leaving the pneumatocyst attached to the stipe.

Photograph 2.9 Herring Roe on Kelp Harvest: Blades were gently placed into fish totes for transit to Sitka Producers Cooperative, about two hours away.



Photograph 2.10 Herring Roe on Kelp Harvest: Ungraded *Macrocystis* blades were stacked carefully to prevent egg loss during packing.

2.5 Roe on Kelp Processing

Sitka Producer's Cooperative

Seine boats in the PGA fleet delivered about 50 totes of fresh *Macrocystis* blades laden with herring roe to the Sitka Producer's Cooperative on the 24th and 25th of March. 12,332 pounds of product were landed on 24 March, and 42,135 pounds were landed on the 25 March, for a total of 54,467 pounds of "raw" roe on kelp. Kanaway Seafoods Fleet Manager, Sandy Souter monitored the landings, recording weights of individual totes by raft. Per contract arrangements, landings were made on an ADF&G experimental fishery gear card (Attachment F).

An SPC crew of 8 to 14 people worked under the direction of Kanaway Seafoods SOK Operations Manager, Richard Walsh. This crew worked for about 7 days at the Sitka Plant. Crew size varied because some workers tended to intermittent deliveries of longline-caught fish to SPC. Processing at SPC would have continued an additional week or so, but specialized processing at an outside plant became necessary.

As described in PGA's Processing Plan, the crew proceeded to introduce a 100% brine solution into each tote following delivery. After initial brining, heavy depressors and lids were placed on the product, and totes were rotated until each attained the desired level of brine saturation. Absorption of salts from the brine is dependent upon kelp thickness and egg deposition consistency, and is therefore variable. Over the course of about 24 hours, totes were treated with two to four brining sessions.

Brined blades were trimmed, graded, drained in baskets and then weighed. Blade pieces were placed in pails by grade, and topped with a scoop of fine salt (Photographs 2.11 – 2.15). The target net packing weight was 34 pounds of product per pail. The crew filled each pail with brine and shook loose any air bubbles, then they sealed the pails with airtight lids for storage.

The product was held at about 20° Fahrenheit during all phases of storage, domestic shipping and transport overseas. The high salt content of the product precludes damage from freezing at this temperature.

Silt Setback

During the course of processing, the Kanaway team discovered signs of silt in the product. They inspected further and found that two rafts had been contaminated with very fine layers of silt either on the kelp or mixed in with the egg layers.

Silt contamination is unacceptable in the marketplace. Since SPC did not have the proper equipment for inspecting and cleaning silt from the product, the crew sealed brined totes from two silty rafts and shipped them south.

The crew palletized the processed pails and loaded them with brined totes into containers for shipment to Bellingham. Alaska OutportTransportation Association and Northland Services, Inc. transported totes of unprocessed product and pails of processed product from Sitka to Home Port Seafoods plant in Bellingham on April 11, April 20 and May 7.

Kanaway Seafoods, Inc. Bellingham, Washington

Eight to ten crew processed Sitka Sound roe on kelp for about ten days. According to Richard Walsh, about five days of this time was consumed addressing the siltation problem. The cleaning effort was worth while, as it effectively salvaged the product and improved both grade and price.

Photograph 2.11 About 50 totes of SOK were harvested from Sitka Sound during the test fishery. Blades were treated with a saline solution until the product was saturated with brine. The Sitka Producer's Cooperative crew processed SOK from two rafts, and shipped totes from the other two rafts to Bellingham to remove fine silt with specialized equipment.

Photograph 2.12 Kanaway Seafoods processing experts guided Sitka Producers' Cooperative crew members in trimming and grading Roe on Kelp produced in the 1998 test fishery.

Photograph 2.13 Roe on Kelp grades are based upon kelp quality and size, and on thickness and uniformity of the herring spawn deposited on each blade. Sitka Sound SOK was of very good quality, and was well received by consumers in Japan.

Photograph 2.14 The SPC crew drained and then weighed SOK into 17-pound baskets. Graded product was then consolidated into pails for shipment to Japan.

Photograph 2.15 Pailed SOK was topped with a scoop of fine salt, air bubbles were "bounced" out of the pails, and then each pail was lidded. This brined product was held at 30 degrees during storage and shipping. 57, 038 pounds of roe on kelp was produced during the test fishery.

2.6 Product Quality Assessment and Marketing

Sitka Sound "Kazunoko Kombu" was graded both in Sitka at the SPC plant and at the Home Port Seafoods plant in Bellingham. Richard Walsh was responsible for directing all grading. All graded and pailed ROK was held at the Bellingham Cold Storage for buyer evaluation.

In advancing along the learning curve through the execution of this experimental fishery, some SOK grading criteria were not met. These are parameters which influence the ultimate price for the product and which can be improved upon in the future:

- Some *Macrocystis* kelp was too young and exuded mucilage such that eggs did not adhere well.
- The size of most of the blades used was slightly smaller than ideal – broader blades would have been more acceptable.
- The egg coverage was generally very good, some was not consistent
- Kelp "melting" – some kelp showed signs of deterioration at processing time.
- Silt was present in some of the product, even after extensive washing
- Egg sloughing, or "peeling" occurred in a small percentage of the product, and is related to kelp deterioration

Pacific Coast SOK Quality Comparison

Kanaway's Souter and Dan Nomura offered the comparison that Sitka Sound product was better than the quality of SOK harvested in California – which is graded at a scale about two levels lower than was PGA's product. Within the region, Souter and Nomura estimated that PGA's SOK not quite on par with BC production. Nomura indicated that the Sitka Sound area resources are of sufficient quality to potentially produce BC grade SOK, but the BC fishermen's technique is more refined for dealing with Northern roe on kelp production.

In Nomura's opinion, Hoonah Sound SOK is still top quality in southeast Alaska – so superior that it fills a unique niche for extremely thick, or "jumbo" SOK in the Japanese gift market. Both in quality and in price, Sitka Sound product quality is between that of Craig/Klawock and Hoonah Sound.

Product Purchase by Japanese Importers

Upon inspection of the lots in late June, Kanaway Seafoods concluded negotiations on the sale of the product with the Japanese buyers. Their apprehensions regarding the purchase of product from a new location and some concern over residual silt in the roe inspired a very thorough inspection of product quality. The buyers concluded that most of the product was of good quality for the target market. Buyers purchased the entire volume.

Sales of the product were finalized on 29 June 1998. Dan Nomura provided the following information on weights and grades assigned to the product.

Summary of Kanaway Seafoods Final Production and Settlement Report
Prices and Total Values Reported are Net, Less 3.3% Processor Tax

Grade	Weight (pounds)	Percentage By Grade	Price per Pound	Total Value ($$$)
1	11,821	21%	$ 7.58	89,603.18
2	30,166	53%	$ 5.78	174,359.48
3	9,078	16%	$ 4.40	39,943.20
4	1,461	3%	$ 3.21	4,689.81
5	1,233	2%	$ 1.19	1,467.27
5P	1,137	2%	$ 0.45	511.65
5T	2,142	4%	$ 0.45	963.90
TOTALS	**57,038**	—	**(avg. $5.46/lb)**	**$261,538.49**

Once in Japan, Sitka Sound Roe on Kelp was fairly well received by retail buyers and consumers. The Japanese companies processed the brined ROK into a variety of products for distribution. Most of the product was sold to the more common restaurant and grocery store markets. According to Dan Nomura, a small amount of Sitka Sound product was sold through the gift market. Buyers reported that the products were broadly accepted alongside production from other locales (B.C, Hoonah and Craig).

Product Prices

Marketing consultant Dan Nomura conceded that the prices paid for the Sitka Sound product were lower than hoped for, but were acceptable considering market circumstances. The seafood market in general has been suffering from the low value of the Japanese yen, an unfavorable exchange rate, and the flagging Japanese economy. Since roe on kelp is a specialty market, it has suffered more than have markets for more essential goods. These factors, coupled with product unfamiliarity, yielded suboptimal prices for a developed product, but satisfactory prices for first year production.

Japanese importers have expressed an interest in purchasing SOK from Sitka Sound in the future. Nomura feels that this interest will support increased production of SOK from southeast Alaska. However, several significant hurdles must be addressed.

Based upon his recent research in Japan, Nomura has concluded that the corporate gift market for roe on kelp is shrinking, but prices remain high for the smaller volumes purchased in this market. Markets for thinner product, like that produced in Sitka Sound, are slowly expanding. A trend that began in 1997, in which a decrease in import prices led to expanding the market for these lower priced products, continues.

Most British Columbia and California producers currently cater to this market. About 1.5 year's of production from these sites is currently on inventory. Nonetheless, Nomura feels that if Sitka Sound SOK methods were refined to more specifically meet market

needs for a thinner, everyday Kazunoko kombu product, there will be opportunities for building markets for more SE Alaskan SOK.

General factors influencing the current market climate for Kazunoko Kombu and which will influence market expansion opportunities in the future include:

- Supply quantity of competitive sources of Kazunoko kombu
- Product quality
- Economic conditions in Japan
- Market niche development
- Pricing
- Inventory/Carryover
- Level of marketing effort and effectiveness

These issues present a challenge to the future of roe on kelp fisheries in Alaska. Experts such as Dan Nomura and Alaskan seafood marketing authorities are optimistic that implementing a well-devised strategy for producing consistently high-quality product to fit the needs of the thinner style Kazunoko Kombu market will yield favorable economic results in the long term.

Section 3. Subsistence Fishery Interactions

Prior to the test fishery, subsistence stakeholders in the Sitka Sound region expressed apprehension regarding the potential impacts of the SOK fishery on traditional and customary uses of *Macrocystis* kelp, herring stocks and the roe-on-hemlock-branch personal use harvest. In response to these concerns, the Board of Fisheries directed ADF&G to require the contractor to carefully monitor the test fishery and endeavor to ameliorate any conflicts that might arise.

Macrocystis for the experimental fishery was collected miles away from traditional harvest areas near Craig, Klawock, Hydaburg, and Sitka. Therefore, there was no competition for kelp with the traditional and customary harvesters of kelp or roe on kelp in those areas.

PGA hired Mike Miller, member of the Sitka Tribe of Alaska, to serve as liaison between subsistence harvesters and the test fishery team. Miller participated in ADF&G planning discussions and tribal meetings before the 1998 herring season. Community members, city officials and others interested in the fishery contacted Miller before, during and after the season to have general questions answered from his local perspective.

Miller remained onsite in Sitka Sound during every phase of the test fishery (Photograph 3.1). In addition to monitoring subsistence activities in the Sound during the fishery, Miller also assisted subsistence harvesters who wanted to suspend hemlock boughs near or on the HROK platforms (Photographs 3.2, 3.3).

Miller communicated daily with PGA's onsite biologist, Michelle Ridgway. Miller received no reports of conflicts or complaints from members of the subsistence community at any time. Subsistence harvesters setting branches or harvesting wild spawn on kelp near the platforms said they had no difficulty working around the structures or attendant vessels. Excellent harvests were reported by subsistence harvesters collecting branches set on, near or miles away from the HROK platforms during the 1998 season (Photograph 3.4).

Concerns and questions from locals regarding the test fishery were also directed to ADF&G, the Sitka Tribe of Alaska leaders and staff, and to the City of Sitka. A summary of responses to the test fishery from these organizations follows.

Alaska Department of Fish and Game, Sitka Office
Dave Gordon, Bill Davidson and Doug Mecum directed the 1998 Test Fishery in Sitka Sound. They indicated that members of the Sitka community were interested in the fishery, and frequently asked questions about the new gear type. But no one from the public expressed having conflicts with the fishing team or their gear during the test fishery.

"Neither the department nor the contractor's liaison with PGA received any complaints from individuals participating in the subsistence harvest of SOK or roe on branches." Doug Mecum, Reporting to the Board of Fisheries in Wasilla, October 1998

Sitka Tribe of Alaska (Also see Attachment H)
Reported by Jude Pate, Legal Counsel for the Sitka Tribe of Alaska
and Jack Lorrigan, Biologist for the Sitka Tribe of Alaska

Jude Pate observed the test fishery through daily boat excursions to the test fishing grounds, and filmed many aspects of the fishery. He also solicited and documented the responses of Tribe members to the fishery during and following the season.

Pate reported that the Sitka Tribal members involved in subsistence harvesting in 1998 reported "no conflicts with the 1998 test fishery participants or their gear". He conveyed that all test fishery participants were diligent in communicating with the Tribe, and are considered to have done an excellent job at conducting the test fishery.

Photograph 3.1 Paul Gronholdt, President of PGA, aboard the Tug Thunderbird – observing subsistence fishing near the test fishery platforms. All members of the PGA team shared in the responsibility of avoiding conflicts with traditional fisheries and adjusted test fishery operations as needed per PGA's subsistence liaison's guidance.

Photograph 3.2 Sitka Sound area subsistence fisherman setting hemlock trees in an active herring spawning area for gathering herring eggs on branches at North Kasiana Island, March 1998. The trees were anchored with rocks and tied to trees on shore. Within three days these trees were covered with 4-5 layers of herring spawn.

Photograph 3.3 Subsistence fisherman, setting hemlock trees for subsistence harvest of roe on branches near an open harvest platform used in the test fishery. Miller and others fishing branches in the area had successful harvests and indicated that the platforms were not an obstacle to their gathering of herring eggs.

Photograph 3.4 Sitka Sound area subsistence fishermen enjoyed an excellent harvest of herring eggs on hemlock branches in the 1998 season. With over 60 miles of spawn in the Sound, there was a multitude of sites available near town for traditional egg gathering.

Section 4.0 Environmental Considerations

The conservation merits of the open harvest platform roe on kelp fishery were evidenced during this experimental fishery. Relative to sac roe and closed pounding fisheries, there are some clear resource conservation benefits. It is beyond the scope of this report to analyze these conservation aspects or to assess environmental impacts incurred during the OHP fishery.

Rather, we report here our observations made during the fishery, and mention the research undertaken by the Alaska Department of Fish and Game. Some commentary on potential impacts of this fishery and contrasts with environmental concerns arising in other herring fisheries are discussed briefly.

Alaska Department of Fish and Game Research

In order to learn as much as possible about the OHP fishing method and the impacts of this experimental fishery upon herring stocks and the *Macrocystis* resource, ADF&G initiated a research plan during the spring 1998 season. Department statistician, Dave Carlisle, designed a randomized sampling program to estimate the total amount of herring eggs deposited on kelp blades. These data were used to estimate the total amount of herring "participating" in the OHP experimental fishery.

Sitka management biologists and their crew carried out the sampling plan, and other southeast technicians conducted the egg deposition counts. In addition, ADF&G staff was present for every phase of the fishery. They recorded field observations, which might provide insight into impacts of the OHP method (Photographs 4.1 – 4.3).

In their preliminary report, ADF&G estimated that 10.5 billion eggs were deposited on kelp blades in the fishery. Based upon results of their fecundity study, ADF&G estimated that 104 tons of herring were utilized in the fishery. The conversion of herring to pre-brine weight of SOK is 0.26.

ADF&G reported that PGA harvested about 10,000 pounds (5 tons) of *Macrocystis* kelp, which included 4,080 fronds, each with an average of 16 blades, for a total estimate of 65,280 blades. The Sitka Area Management Biologist and his staff visited the harvest site on the north shore of Heceta Island about six weeks following the harvest. They reported that "there was no obvious impact on the kelp bed".

ADF&G's detailed findings from this research and data analysis are forthcoming. A summary of their preliminary research results is presented in the Progress Report to the Board of Fisheries, dated October 16, 1998.

The *Macrocystis* Resource and Kelp Bed Ecosystem

Southeast Alaska harbors extensive beds of *Macrocystis* kelp, but the biomass, distribution, and ecological role of these kelp beds is not fully known. The increase of herring roe on kelp fisheries in recent years has created competition for high quality kelp blades that are mature at the time of herring spawning activity. After conducting the test fishery, the PGA team feels that there is good quality kelp in southeast to support the growth of the roe on kelp fishery. However, a strategy may be needed to ensure that every fishery group has access to high quality kelp at the time of their fishery.

In other Pacific coast regions with active roe on kelp fisheries, harvesters and managers have encountered times when high quality kelp was not available in sufficient abundance to support the fishery. This dearth of kelp has been due in part to factors including inter-annual variability, low light in spring months leading to poor early season growth, and possibly overharvests. Kelp scarcity has been experienced in Canada and California. In order to continue producing roe on kelp in some areas, British Columbia recently allowed roe on kelp "pounders" to harvest kelp in marine parks.

We do not yet understand the impacts of *Macrocystis* harvests on the plant, the kelp bed, or the marine community this habitat supports. We feel that the selective harvesting of fronds from some plants did not impact the kelp bed extensively. Because the harvest occurred early in the growing season, it is likely that emergent understory fronds replaced the biomass harvested by late summer.

Ridgway's observations of the kelp bed in July and September suggested that this was so. Non-quantitative observations indicated there were no gaping holes or obvious signs of damaged kelp in the bed that was harvested.

Marine species flying or swimming near the kelp beds at the time of harvest did not seem to be disturbed. We presume that the use of outboard engines, coupled with surface canopy frond removals would cause motile species to relocate – at least temporarily. The broader ecological implications of this kelp harvest are not yet known.

Herring Resources and Health

Both environmental and conservation benefits of the passive OHP fishing method for the herring stock are numerous. As described in Mundy, *et al* 1998, we observed herring volitionally swim into the kelped platforms and voluntarily spawn on hanging kelp blades. The fish were never herded and the PGA fishing team did not observe any signs of the herring being stressed when spawning. Even in the presence of crewmembers on the rafts, herring proceeded with spawning at a leisurely pace. It was assumed that most fish spawning on OHP kelp had already spawned elsewhere, or were destined to do so following deposition on the "fishing" blades.

Thus, herring "participating" in the OHP fishery contribute to the genetic diversity and gamete abundance of the Sitka Sound herring stock, and they swim away to return for potential spawning in subsequent years. The effects of this fishery on herring therefore seem to be in the removal of an unknown percentage of each spawner's gamete production.

Some other potential environmental consequences of the OHP fishery include:

- Herring seem to be attracted to the shelter provided by the platforms – their migration or spawning on wild habitat may be altered.
- Anchors used to secure the rafts may have some impact on the benthic community, but this is assumed to be minimal.
- Some blades may break away from the platforms, and eggs may slough off of blades to the seafloor. This may attract scavengers, and the sloughed eggs may not hatch. The impact of this is assumed to be negligible.

Based upon observations made during the experimental fishery, these impacts appear to be minimal and have no inordinate or long-lasting environmental consequences.

Comparison of Environmental Consequences in other Herring Fisheries

In contrast to other herring fisheries and unlike other roe on kelp methods, the Open Harvest Platform method in not lethal to herring or *Macrocystis* kelp. The OHP manner of harvesting results in a removal of gametes from the herring genetic pool and partial removal of biomass from individual kelp plants.

Herring involved in the traditional sac roe fishery are either killed, or are held while roe composition is determined, and then released. Ultimately, they are considered dead.

Seined herring introduced into closed herring roe on kelp pounds are allowed to spawn for several hours to several days. Because there is no reasonable means of counting the number of fish in the pounds, Commercial Fisheries Director, Doug Mecum, noted that "we are unable to regulate the amount of herring in each (closed) pound" (January 1998 BOF Meeting, Sitka).

This situation has led to fishermen exceeding the herring quota in these fisheries on numerous occasions. Additionally, some fishermen and observers of the fishery report that the fish are clearly stressed while in the pound, and upon release.

Recent research in Prince William Sound has confirmed that closed pound herring have a high rate of viral infection. In 1998, this VHS virus was isolated from the water of three pounds in PWS in sufficiently high levels to transmit the disease to nonimmune fish.

Wild harvests of roe on kelp in Alaska involve the taking of whole seaweed plants using knives, rakes, or by handpicking. In contrast, *Macrocystis* is not killed or dislodged during harvest for use in the OHP fishery.

Because herring are neither crowded nor stressed when using the OHP method, the environmental consequences incurred in the sac roe and closed pound fisheries are not at issue. This sublethal take of both herring and kelp resources is more beneficial to the genetic integrity of those species and likely contributes to potential sustainable yield of those resources.

Photograph 4.1 The Alaska Department of Fish and Game, Commercial Fisheries Division developed a rigorous research plan to gather data on the experimental fishery.

Section 5.0 Economic Review

Although the 1998 experimental fishery was, by design, not a profitable endeavor for PGA, a review of the costs and benefits resulting from the fishery are useful for predicting the potential scale of economic impact the alternative fishery could have on Sitka. Benefits derived by the Sitka Community through the 1998 experimental SOK fishery included direct income to locals through short-term jobs, and moneys generated through taxes and retail sales of goods and services.

This section is not intended to serve as an economic analysis of the spawn on kelp industry. Figures on the revenues generated in the fishery are in section 2. Comparisons of the economic yields in various herring fisheries are reviewed in Mundy, Sharr and Ridgway, 1998. This section provides a synopsis of the types of expenditures incurred in the fishery, and an approximation of the labor force involved in each phase of the operation.

Sitka Area Jobs

An average of about ten local people worked at Sitka Producer's Cooperative processing roe on kelp for about seven days. They were paid through contractual arrangements between SPC and PGA. Four other southeast residents were contracted by PGA to assist with the kelp harvest (two from Sitka, two from the Craig area).

Eight to ten people worked on further processing at the Home Port Seafoods plant in Bellingham for ten days. Had the product not been silted, or if proper equipment had been available in Sitka to handle the silt-cleansing task, this employment would have been based in Sitka.

Two consultants from the Lower 48 and two consultants from southeast Alaska were hired by PGA for onsite monitoring of the fishery, to serve as local liaisons, and to report on performance of the test fishery. These contracts were for one to several weeks in duration.

In order to monitor and conduct research on the experimental fishery, ADF&G tasked southeast staff with project-specific duties. This resulted in additional work for field technicians, statisticians, lab technicians, and Sitka area management staff. Most of the additional staff time and associated costs were compensated for by the contractor's required surety bond with the State.

Overall Labor Force Involved in the Fishery

Fishing by the Open Harvest Platform method is very labor-intensive. Since most captains and crew were new to this fishery, the test fishery involved a great number of people for some parts of the operation. Over time, crews may become somewhat more efficient, but the sophisticated nature of the fishery requires a great deal of attention to detail, and always requires more labor than the direct harvest herring fisheries.

Based upon logbooks entries and notes made by PGA team members, the table below summarizes the estimated number of workers involved in each phase of the test fishery in 1998.

Estimated Number of People Involved in the Experimental Fishery				
Phase of the Fishery	Number of People Involved *			Approx. Number of Person-Days*
	Total	PGA Crew	Contractors Or plant crew	
Mobilization and Staging	6	6	0	24
Kelp Harvest	9	4	5	11.25
Loading Racks w/ Kelp	37	31	6	27.75
OHP Fishing	10	8	2	40
Towing Rafts to Harvest	8	8	0	8
Harvesting in Cedar Cove	30	30	0	45
Harvest/Transport to SPC	6	6	0	9
Processing at SPC	8-12	0	8-12	70
De-Mob in Sitka	4	4	0	4
Processing at Home Port	8-10	0	8-10	90
Loading/Shipping to Japan	3	0	3	0.75
Marketing/Sales Effort	1.5		1.5	30
TOTALS	—	—	—	359.75
*Est. person days = average number of people X estimated # days worked on that task				

General Expenditures in Sitka

Beyond the investment in equipment and costs to mobilize in Sitka, the PGA team incurred some expenditure while conducting the fishery in Sitka. These general costs included the following:

- Barge Lease
- Lodging for some PGA members
- Restaurants and groceries: (About 30 people for six days)
- Fuel for five vehicles and some vessels
- Three rental cars
- Taxicabs
- Entertainment
- Harbor Fees
- General purchases – supplies

The community of Sitka received some benefits through city sales taxes. And 3% of the total ex-vessel price of the roe on kelp product was paid to the State in raw fish taxes. A percentage of this contributes to the City of Sitka's community apportionment of statewide raw fish taxes.

Discussion and Final Remarks

The 1998 Experimental Fishery proceeded largely as anticipated. PGA's collective experience, as well as good weather and an early herring spawn contributed to the overall success of the fishery.

The roe on kelp suffered from the silt infiltration, but otherwise the product met expectations reasonably well. The price paid was sufficient to cover most costs for conducting the experimental fishery and associated research and management. The PGA team feels that the quality of product can be improved with increased monitoring of seawater conditions prior to and during the fishery.

The Sitka Community did not experience any resource user conflicts as a result of the fishery. Commercial and subsistence harvesters appeared to be either unaware of the fishery, or content with the manner in which it was conducted in Sitka Sound.

Within the scope of the PGA team's ability to observe impacts on the marine ecosystem, the fishery met many of the anticipated environmental and conservation goals. Neither fish nor kelp plants were likely killed in this "harvest".

Final Remarks

The quantity of Sitka Sound SOK available for harvest in the future is dependent upon the abundance of spawning herring and *Macrocystis* kelp and management decisions regarding their exploitation rates. The Alaska Department of Fish and Game, the Commercial Fisheries Entry Commission and the Board of Fisheries will determine resource assessment, quotas and allocation issues.

The overall market outlook is challenging. Experts conveyed that implementation of a strategic plan to tailor roe on kelp production to fit emerging market trends is necessary to ensure SE Alaska's product a niche in this specialty market arena. Participants in the 1998 experimental fishery concur that meeting these market needs with more refined Sitka Sound roe on kelp product is plausible. The PGA team feels that pursuing this market potential and hence diversifying the herring fishery management regime will provide broader economic benefits from this resource to the people of southeast Alaska.

ASSESSMENT OF *MACROCYSTIS* BIOMASS, QUALITY, AND HARVESTING EFFECTS IN RELATION TO HERRING ROE-ON-KELP FISHERIES IN ALASKA

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ABSTRACT

Interest in harvesting *Macrocystis* kelp for use in herring roe-on-kelp (ROK) fisheries is increasing, but information on the biology and ecology of kelp is limited for southeast Alaska. This is a report of a four month pilot study to evaluate the amount of kelp available for harvest and the recovery rates of kelp from harvest. Estimating the amount of kelp available consisted of first estimating the total abundance of kelp in a survey area and second estimating the biomass of available and desirable kelp. The total biomass was estimated by surveying the surface area of kelp beds in selected regions on the west coast of Prince of Wales Island. Randomly selected index beds were surveyed to determine kelp density, and samples were measured and weighed to estimate the average weight of kelp. An estimated 225,225 tons of *Macrocystis* kelp were found in the survey area. The harvest of kelp for ROK is highly selective. By comparing harvested to available kelp, it was found that blades at least 14 cm in width and fronds with a high proportion of desirable blades were selected. The proportion of blades and fronds meeting these selection criteria was estimated for the index beds, and the biomass of desirable kelp was estimated to be 32,663 tons or about 14% of the total kelp biomass in April. The growth in kelp canopy was rapid from March to April, with March canopies about 45% smaller than April canopies. Therefore, the biomass of desirable kelp in March was about 18,000 tons. Even if kelp harvests increase 10 times over present levels, the harvest will only represent about 3% of the lowest estimate of the biomass of desirable kelp.

There were few significant effects of experimentally harvesting kelp canopies in March and/or April. Kelp beds that were experimentally harvested at both times or only in April had shorter fronds and possibly fewer large fronds and fronds per plant. This experiment was monitored only one month after the last harvest, so there may not have been sufficient time for the cut kelp to fully recover. This preliminary experiment indicates that kelp recovers rapidly from harvesting in the spring.

INTRODUCTION

Kelp beds are a conspicuous element of the outer northeast Pacific Coast (Foster and Schiel 1985). All kelp belongs to the order *Laminariales* (*Phaeophyta*), and are made up of holdfasts, stipes, and blades. Some of the kelps produce floats that buoy them to the surface, these are known as the canopy forming kelps. The giant kelp, *Macrocystis* sp., is a well known canopy forming genus that occurs in much of the coastal Pacific Ocean. The terminology associated with *Macrocystis* is fairly complex as is the morphology (Figure 1), consisting of an attached holdfast with numerous fronds supporting numerous blades. *Macrocystis* often grows in thick beds that form a unique and important habitat.

Kelp beds play an important role in nearshore ecosystems in at least three ways (Duggins 1988). Kelp beds greatly increase the habitat complexity, increase sedimentation rates, and contribute large amounts of fixed carbon to the ecosystem (Duggins 1988, Duggins et al. 1989). Kelp beds provide as much as 15 m^2 of surface area for every square meter of substrate (Wing and Clendenning 1971), providing habitat for infaunal and epifaunal organisms (Duggins 1988). In addition, several species such as fish, mysids, and shrimp utilize kelp beds extensively (Coyer 1984). Juvenile and young-of-the-year fish may exhibit particularly strong, positive relationships with kelp beds (Carr 1991, Ebeling and Laur 1985). Kelp beds can also be significant sources of production, contributing large amounts of carbon in the form of attached plants, drift plants, particulate organic matter (POM), and dissolved organic matter (DOM) (Duggins et al. 1989). This carbon production is not limited to kelp beds as some of the unattached plants drift outside of the bed with some pieces drifting miles from the source bed. In areas with lush kelp beds, about 50% of the total carbon in some fishes and birds is derived from kelp primary production (Duggins et al. 1989). Finally, kelp beds alter the flow of water in and around the bed (Jackson and Winant 1983). This altered flow results in higher sedimentation rates that may increase suspension feeding and recruitment of planktonic larvae. Altered flow caused by kelp beds may also increase the availability of planktonic food sources, such as barnacle cyprids, to resident kelp bed fish (Gaines and Roughgarden 1987).

The morphology of kelp blades has been shown to be dependent upon water movement in many kelps (Norton 1969, Druehl 1978, Norton et al. 1982, Koehl and Alberte 1988). In low flow areas, blades generally have more undulations, are larger, wider, and are not split. *M. integrifolia* shows similar plasticity in growth form (Druehl 1978, Hurd et al. 1997). This plasticity in growth form is highly functional. Undulations dramatically increase drag forces, resulting in higher blade mortality in high flow regimes, but in low flow areas the undulations serve to increase nutrient uptake by initiating turbulent flow around the blade (Hurd et al. 1997). Also, larger blades are better able to gather light but cannot withstand the drag and accelerational forces exerted by wave action (Denny et al. 1985).

There has been interest in harvesting kelp for various purposes on the Pacific Coast of North America since at least 1911 (Foster and Schiel 1985). In California, about 100,000 tons of kelp are harvested annually for various products. Harvesting north of California has been sporadic, with few large scale commercial harvests. In British Columbia and Alaska *Macrocystis* kelp is harvested to support the herring roe-on-kelp (ROK) fishery. Since the price paid for the end product is dependent upon the quality of the kelp blade, harvesting kelp for ROK is highly selective. In particular, fronds with many wide blades are desirable.

The research described here was initiated due to interest in harvesting kelp for a roe-on-kelp (ROK) fishery near Sitka, Alaska. A proposal was made by commercial harvesters to the Alaska Board of Fisheries in 1996 to allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe on kelp. This would be in lieu of, or in addition to, using purse seines. The board took no action on the proposal at their 1997 meeting, but requested that the department conduct

an experimental gear test fishery. The department conducted the test fishery in 1998 focusing on management issues related to the pound fishery and the gear. A second test fishery was conducted in 1999 primarily to fund the kelp research described here, as well as to revisit some issues related to fishery management. A second proposal to allow for a roe-on-kelp fishery in the Sitka area will go before the board at their 2000 meeting.

An understanding of the abundance and dynamics of giant kelp, *Macrocystis* spp., is essential to manage the use of this alga for existing and emerging herring ROK fisheries. Kelp harvests in Alaska are currently being managed with limited knowledge of kelp abundance, growth, or recruitment. In conjunction with other roe-on-kelp fisheries, the Sitka Sound open harvest platform herring roe-on-kelp test fishery presents the possibility of greatly increasing the harvest pressure on *Macrocystis* kelp resources. At least two pieces of information are needed to properly manage kelp harvests in Alaska, 1) the amount of kelp that is available and desirable for harvest, and 2) the effects of harvesting on kelp beds and associated communities. This report provides a preliminary assessment of the abundance of *Macrocystis* kelp resources in Alaska. Also, the results of an experiment assessing the short term effects of harvesting on kelp beds and the ability of kelp beds to recover from harvests are reported.

METHODS

Standing Crop Estimates

Aerial Surveys

Aerial surveys of kelp beds on the west coast of Prince of Wales Island were conducted between March 23-29, 1999 (Figure 2). The coastline was surveyed by Scott Walker, an experienced ADF&G herring spawn recorder. During the flight all significant *Macrocystis* kelp beds were marked in red pen on black and white charts by the surveyor, recording the approximate outline of each bed. The area around Duke Island and Tree Point was surveyed on 11 June 1999.

The resulting maps with marked kelp beds were analyzed to ascertain the surface area of kelp beds. The original maps were scanned into digital format (Figure 3), and an image that included only the red "kelp beds" was produced from the original scanned image (Figure 4). These two images were produced with Adobe PhotoShop. Using an image analysis program (Optimus), the original image was used to scale the red only image, using landmarks of known length. An averaging procedure (5x5 pixels) was applied to the red-only image to eliminate small lines, numbers, and letters within the red patches. The red patches were then automatically outlined, and any remaining unwanted "holes" or other images were removed by hand. The image analysis program then determined the total area of mapped kelp beds and the data were downloaded to Excel for analysis. The Duke Island and Tree Point survey was not analyzed due to relatively low *Macrocysnis* abundance and limited time.

Index Beds

One index bed was randomly selected from each subdistrict surveyed, resulting in a total of 11 index beds. To select a bed, a randomly placed point was located in each subdistrict. The bed that was closest to the point and was at least 20 m^2 in surface area was selected. To estimate the growth of beds during the spring, these index beds were photographed during the March aerial survey and on April 28, 1999. Photographic methods were consistent between dates and the altitude was recorded for each photograph. For each index bed, a pair of photographs, one each from March and April, were selected based upon similarity of photograph angle, direction, and altitude. The photographs were scanned into digital format and analyzed using Optimas image analysis program. All canopy forming kelp was outlined by hand using the image analysis program and the total area of kelp plant canopy (excluding water area between fronds) was obtained. This is not the same measure of the surface area of beds obtained from the hand-drawn bed maps in March which includes water area between fronds.

The April photographs were calibrated using a photograph of an object of known dimensions taken from the same altitude. The March photographs were calibrated by measuring a distinctive object in the April photograph and using the same object as a scale in the March photograph. This procedure insured that each pair of photographs were calibrated similarly. If the calibrations were off, they were off by the same amount for each date so between date comparisons could still be made.

To estimate the length of fronds and the density of plants and fronds, four index beds were visited between April 19-24. The density of kelp in each bed was estimated by scuba divers. Six transects were oriented perpendicular to the long axis of the bed and placed at even intervals along the length of the bed. If transects were longer than 20 m, then 20 m long sections were sampled at the inside edge, outside edge, and approximate center of the transect. The total length of the transect was recorded as well as the distance between transects. The start and end depths of each transect were also recorded. Divers swam along transect lines and counted the number of large (>1.5m) and small (<1.5m) *Macrocystis* fronds for each holdfast encountered within one meter of the transect line. Every tenth frond was measured for length starting with the tenth frond.

Commercially Harvested Bed

Kelp was harvested for the Sitka Sound open harvest platform test fishery from a bed on the northeast side of Port Alice in Sea Otter Sound (Figure 2). This bed was surveyed by scuba in March just after the harvest and again in April as part of the index bed survey. The methods of survey were similar to the methods used for the index beds. The total harvest taken from this bed was recorded.

Frond Biomass

To estimate the average weight of fronds, 22 fronds of varying length were weighed and measured. The fronds were cut into 1 meter sections starting from the tip and working towards the base. The weight and section number were recorded for each section. At the base, the length of the final piece was also recorded. Thus, the total weight and length of each frond could be determined.

Total Biomass Estimates

The total biomass was estimated by multiplying the total surface area of kelp beds (March) by the average density of large fronds (April) and the average weight per frond (April). The average weight per frond was estimated by multiplying the ratio estimator of average frond weight/average frond length from the weighed fronds by the average length of fronds in the index beds. The relationship between frond length and weight was linear and had a zero intercept, so using a ratio estimator was appropriate. The surface area of the beds drawn in March was assumed to remain constant through April for purposes of this calculation.

An estimate of the variance associated with the total biomass estimate was generated by combining variance estimates for both frond density and average frond biomass. Frond density averages and variances were weighted by bed size (Cochran 1977). The variance associated with the average frond biomass was calculated using the methods of Barnett (1991).

Estimated Versus Harvested Biomass

Two small beds were surveyed by scuba divers to assess the accuracy of the biomass estimates. The beds were small (<150m^2) enough that an entire frond count census was completed for each bed in one day by two scuba divers. Every tenth frond was measured for length. After surveying, the canopy was harvested from both beds and the total frond biomass was harvested from one bed. All harvested material was weighed. Thus, the estimated biomass from scuba sampling could be compared to the actual biomass obtained by harvesting.

Desirable Biomass

Blade Morphology

The morphology of individual kelp blades was examined to assess the desirability of kelp. Three fronds from each of ten systematically located points in the Port Alice bed were collected before any commercial harvest occurred. The tenth, fifteenth, and twentieth blades from the apex were detached and measured. The youngest free blade was counted as blade number one. The total length and maximum width of each blade were measured. In addition, the number of holes in the blade, the general condition of the blade, and the presence or absence of epiphytes and silt were recorded. The harvested kelp was also sampled. Forty haphazardly selected fronds were collected from the harvested kelp and three randomly chosen blades were sampled. The morphology of blades sampled before harvest was compared to commercially harvested blades to determine the criteria used to select blades sampled.

Fronds were collected from the four visited index beds to determine the proportion of desirable blades over the entire region. Fronds were collected over dive transects. The initial goal was to collect a frond at three locations (inside edge of bed, outside edge of bed, and in the center of the bed) along each transect,

but time constraints often reduced the sample size. Blades were then sampled in the same manner as the blades in the harvested bed.

Frond quality was assessed by comparing the number of desirable blades out of the three sampled blades between fronds from various locations. As with blade morphology, frond selectivity was determined by comparing the fronds available in the harvested bed before harvest to the fronds actually harvested. The proportion of fronds desirable over the entire region was then determined by using the sampled fronds from the index beds.

Biomass Estimates

The biomass of desirable kelp was estimated by multiplying the total area of kelp beds by the density of desirable fronds by the average weight of fronds harvested. The density of desirable fronds was estimated by multiplying the total frond density by the proportion of fronds that were available and the proportion of fronds desirable obtained from the index bed surveys. Available fronds were defined as those that were at least 5.3 m in length. This definition was needed to eliminate those fronds that did not reach the surface (average depth of about 3 m) and have enough additional length to harvest (2.3 m, obtained from the average length of harvested fronds).

The variance component of the biomass estimate was obtained by combining variance estimates from the average weight of harvested fronds and the average density of available and desirable fronds.

Effects of Harvesting

Experimental Design

The goal of this experiment was to assess the impact of harvesting on kelp beds. Three kelp beds in the Craig area were used (Figure 2), and four 20 m transects were permanently established in each bed perpendicular to the depth contours. Kelp density was estimated using the techniques described above for index beds for each study plot before any treatments were assigned.

All transects were marked, numbered, and surveyed between 24-25 March 1999. After the initial survey, the experimental treatments were assigned to the transects. There were four experimental treatments, 1) March harvest (early), 2) April harvest (late), 3) March and April harvest (early+late), and 4) an unmanipulated control. Each of the four treatments were randomly assigned to the four plots in each bed. After treatments were assigned, the plots receiving the early and early+late treatments were harvested by cutting all fronds around the mean low water mark. An 8-meter wide swath centered on the transect line was harvested. The late and early+late plots were similarly harvested after sampling in April. All plots were resurveyed using the standard dive measurements on 24-26 April and 15-16 June 1999.

RESULTS

Standing Crop

Aerial Surveys

The aerial survey identified 751 distinct beds from eight regions on the west coast of Prince of Wales Island (Table 1). The average bed size over the surveyed area was 46,936 m^2 ranging from 415 to 886,774 m^2. More than 35 million square meters or 3,524 hectares of kelp beds were surveyed (Table 1). It should be emphasized that this is only a partial survey of *Macrocystis* kelp on the west coast of Prince of Wales Island. It is estimated that this survey represents about 60% of the kelp in this area. In addition there are kelp resources around Baranof Island, Sumner Strait, Kuiu Island, and Duke Island but the area of these resources is unlikely to exceed the kelp beds on the west coast of Prince of Wales Island. In 1913, Cameron (1915) estimated there are about 45,300 acres (18,332 hectares) of kelp in southeast Alaska, but only a small portion of this was *Macrocystis*.

Density Estimates

Many characteristics of kelp populations at the index beds were evaluated using the information from scuba surveys (Table 2). The selection of Port Alice was heavily biased and the scuba surveys reflect this bias. The density of plants, large fronds, and frond length were all greater at Port Alice compared to the index beds (Table 2). The density of small fronds and the number of fronds per plant at Port Alice were both within the range observed at index beds. The overall density of individual plants was about 0.34/m^2 (excluding Port Alice data). There were more large fronds (mean of 2.44/m^2) than small fronds (0.46/m^2) at all index beds. The number of fronds per plant ranged between 3.8 and 12.5 with an average of 9.3. Excluding Port Alice, frond length was relatively constant between sites and averaged 6.1 meters.

The average depth of the 4 index and 3 experimental harvest beds was 3.28 m below mean low water (MLW), ranging from 1.25 to 6.13 m below MLW. The depths at Port Alice were greater than at the index beds ranging form 4.27 to 9.45 m below MLW and averaging 7.08 m below MLW.

Frond Biomass Estimates

There was a linear relationship between the length of a frond and its weight (Figure 5). Length was a good predictor of weight, explaining 88% of the variation in frond weight. Since a plant of zero length cannot have any mass, the intercept must be zero. In this case a ratio estimate (average weight:average length) is a simple method to estimate average frond biomass from a sample of lengths. The ratio generated from the data in Figure 5 is 0.39 kg/m. The average length of fronds at the surveyed index beds was 6.11

meters, so the average weight per frond was 2.37 kg. (0.39 kg/m* 6.11 m). The variance about this estimate was 0.065, calculated using Barnett's (1991) method.

Total Biomass

The estimated biomass of kelp in the areas surveyed was 204,319,652 kg (225,225 tons) with an 80% confidence interval of ±43,802,512 kg (48,284 tons). Based upon the weight per unit area, this estimate corresponds to "very thin" beds reported by Cameron (1915) and the June harvest yields of Coon (1982).

Estimated Biomass Versus Harvested Biomass

The estimated biomass at both beds was greater than the actual harvested biomass (Table 3). At Pt. Ildefonso, only the canopy was harvested, so the biomass below the harvest level was left. This site, however, was only 2-3 m deep, so the amount that was left was minimal. Not all of the harvested material was weighed as some fragments drifted away before weighing.

Desirable Biomass

Blade and Frond Quality

The harvest of kelp for the roe-on-kelp fishery was highly selective with both blades and fronds being chosen for high quality. According to Richard Walsh (personal communication) of Home Port Seafoods in Bellingham, Washington, the two most important factors in grading kelp blades is the overall health and the blade width. For the 1999 SOK fishery, kelp blades in the 14-16 cm size range or higher were selected relative to the blade widths available in the bed (Figure 6). At Port Alice, blade widths in the bed did not change between March and April (Figure 7), but blade areas increased from March to April, indicating that blades grew in length but not width (Figure 7). The width of blades varied between the index beds (Figure 8). Eagle Island had narrow blades with few blades wider than 16 cm. Those blades that were wider than 16 cm were often torn and broken. There was a higher percentage of both narrow (<14 cm) and wide (>20 cm) blades at Harmony Island relative to Port Alice. The few samples taken at Balena Island indicate that most blades were in the 14-18 cm range. At Port Real Marina, blades were very wide with almost all blades more than 16 cm wide, but most blades at this site were covered with fine silt or damaged by grazers.

To evaluate the quality of fronds, the three blades sampled on each frond were rated as desirable or undesirable. A desirable blade had to be at least 14 cm wide, have few small holes, no large holes, free of silt, and not torn. Virtually all of the harvested fronds from Port Alice used in the test fishery had 2 or 3 desirable blades of the 3 sampled (Figure 9), and the percentages used in these two categories were

greater than the available fronds in the Port Alice bed. In the index beds, 38.7% of blades had 2-3 desirable fronds. Most of these desirable fronds were found at one index bed.

Available and Desirable Biomass

To determine the biomass of kelp available and desirable for kelp harvest, both the density of large fronds and the weight per frond needed to be adjusted for the selection of fronds. The density of fronds available for harvest was calculated by multiplying the total large frond density by 51.25%, which is the proportion of fronds that were longer than 5.3 m. The threshold length of 5.3 m was deduced as follows: The average depth of beds surveyed by scuba in this study was rounded down to 3 m below MLS, and this length was added to the average length (2.3 m) of the cut segments of fronds harvested for the Sitka ROK fishery. That is, a frond must be at least 3 m to get to the water surface and then be an additional 2.3 m to make the frond worth harvesting. Thus, the estimated density of available fronds was the average frond density, (2.45 fronds/m^2) (Table 2), times the proportion of fronds longer than 5.3 m (0.5125) with a result of 1.26 available fronds/m^2. The proportion of desirable fronds in the index beds was 38.7%. Therefore the density of available and desirable fronds is 1.26 available frond/m^2 times 0.387, equal to 0.486 available and desirable fronds/m^2. The average weight of harvested fronds was 1.73 kg/frond. Thus, the biomass of available and desirable fronds in the surveyed area in April 1999 was 29,631,711 kg with an 80% confidence interval of ±20,161,522.8 kg, or about 14% of the total kelp biomass.

Growth of Beds - March to April

The canopy cover within all index beds increased from March to April (Table 4, Figure 10). The percent increase in cover ranged from 12% to 311% with a mean increase of 82%. Thus, beds in March will average about 45% less canopy than beds in April. If there is a linear relationship between canopy cover and biomass, then the April biomass estimate can be appropriately reduced to obtain a March biomass estimate. Decreasing the April biomass estimate by 45% results in a total biomass in March of 112,375,808.4 kg and a desirable biomass in March of 16,297,441.3 kg.

Effects of Harvesting

Over three months there were few detectable effects of harvesting upon *Macrocystis* plants or beds (Figure 11). To account for variation in the starting densities or lengths, differences between the June sampling date and the pre-harvest March sampling date were statistically analyzed (Table 5). Average frond length was significantly lower on plots harvested later in the season compared to the early harvest or control plots (Figure 11F, Table 5). There were also marginally significant decreases in the density of large fronds and the number of fronds per plant in the plots harvested in both March and April (Figure 11C, E, Table 5). There were no detectable effects of harvesting on the densities of plants, small fronds, or juveniles (Figure 11A, B, D, Table 5).

DISCUSSION

The total biomass estimate is made up of aerial surveys of the extent of kelp beds, estimates of frond densities, and estimates of frond weight. Each of these three components can contribute to errors in the biomass estimation. Any error inherent in the aerial survey methods was not quantifiable, so the estimate of total kelp bed area was treated as a census with no error in the analysis. There may have been errors in recording the extent of individual beds during the surveys with some beds being overestimated in size and others underestimated. Also, there may have been errors in identifying *Macrocystis* beds. Some *Nereocystis* beds may have been included in the survey, resulting in an overestimate of *Macrocystis* area. Conversely, some *Macrocystis* beds may have been identified as *Nereocystis* beds, resulting in underestimation of *Macrocystis* bed area. Without performing multiple surveys over a single area, it is impossible to estimate these sources of error. A more accurate and efficient method of estimating the area covered by *Macrocystis* needs to be developed. Aerial photography from belly or wing mounted cameras using infrared film would eliminate errors in canopy area estimation and has been used in British Columbia (Foremen 1975) and in Alaska (M. Ridgway, Oceanus Alaska, personal communication).

The error estimates for total biomass were obtained from a combination of the estimates for frond density and frond weight. Frond density estimates made up about one third of the error estimate for total biomass while the frond weight estimates accounted for the remaining error. The disparity between the error contributions of frond density and frond weight indicate that relatively more effort should be devoted to sampling frond weight. A more efficient approach would be to have fewer transects per bed (about 5), sample more beds, and sample about 30 more fronds for weight and length. However, the precision of the sampling was within 22% of the mean with 80% confidence intervals, indicating a reasonable estimate of the total kelp biomass in the surveyed area.

For the two small beds examined, the biomass estimated by scuba surveys was higher than the harvested biomass. Part of this difference was due to handling the fronds in the process of weighing, resulting in the loss of an unknown amount of material. Only the canopy at Point Ildefonso was harvested, so some of the estimated biomass was left on the sea bottom. With these sources of error, the harvested biomass may have been within the range of variation of the estimated biomass. More beds need to be surveyed and harvested to determine if the scuba surveys consistently overestimate the available biomass.

Estimating the amount of kelp desirable by the ROK fishery proved difficult. The quality of kelp blades is mainly dependent upon blade width and blade health, defined by the absence of holes, tears, and debris. In addition, fronds with a high proportion of desirable kelp blades are selected over other fronds. Since blade and frond quality can only be assessed by field sampling and the estimates for the proportion of desirable kelp reflects sampling from only four beds, the precision of the biomass of desirable kelp was quite low (±68%). More beds need to be surveyed to make more accurate estimates of desirable biomass.

Blade morphology is dependent upon wave exposure and currents (Druehl 1978, Hurd et al. 1997), so it may be possible to predict the quality of blades in kelp beds if the exposure of the bed is known. The water flow regime for any particular area depends upon many factors including the fetch, bottom topography, local land masses, and the wind regime. It may be possible to sample blades and fronds in a variety of kelp beds varying in exposure and relating the blade morphology to a derived exposure index. The health of kelp blades also seems to be indirectly dependent upon water flow. Both grazing and fouling seems to be greater in protected areas. Waves may limit the activities of herbivores (Menge and Sutherland 1976) and prevent fouling organisms from colonizing. Thus, in very protected waters, as at Port Real Marina, kelp blades may be wide but their quality may be low due to severe grazing and

fouling. At the exposed Eagle Island site, few grazers or epiphytes were observed on the sampled kelp blades.

The canopy area of kelp beds declines in winter and reaches a maximum in late summer (Harrold and Reed 1985, Foster and Schiel 1985, Dayton 1985, Watanabe and Harrold 1991). Thus, kelp canopies increase in area during the spring months. The extent of kelp canopies increased by an average of about 82% from March to April. The canopy available for harvest in March is about 55% of that available in April. Since the Sitka Sound herring typically spawn in March, the kelp available for herring ROK is much less than that available for later herring fisheries.

The estimate of bed surface area, obtained in March, is surely a conservative estimate of bed area in April. Because the March estimate was used in the calculation of total biomass in April (using April estimates of average frond density and mass) the total biomass estimate must be regarded as conservative.

Effects of Harvesting

The effects of harvesting kelp have been examined in numerous studies. Of the studies surveyed here, five were done in *M. pyrifera* beds in California (Miller and Geibel 1973, Kimura and Foster 1984, Barilotti et al. 1985, Barilotti and Zertach-Gonzalez 1990) and Chile (Santelices and Ojeda 1984), and two were done in British Columbia in *M. integrifolia* beds (Druehl and Breen 1986, Coon and Roland 1980, Coon 1982). Of these seven studies, all but one (Coon and Roland 1980, Coon 1982) suffer serious flaws in experimental design. None of the remaining six studies were replicated and each harvest treatment was represented by a single area or bed and compared to a single control area. All but one of these unreplicated studies were guilty of pseudoreplication (Hurlburt 1984) by applying inferential statistics to replicate samples within one experimental unit. The remaining study (Druehl and Breen 1986) did not use statistics in their study and differences were judged by intuition and experience. The results of these studies are frequently contradictory. For example, harvesting kelp has shown increases, decreases, or no change in kelp growth, holdfast growth, frond production, and plant survivorship. Hence, the results must be interpreted with extreme caution.

Of the studies that examined recruitment, all found that recruitment increased when kelp was harvested. The only significant effect observed in this study was a decrease in the average length of fronds in harvested areas. The lack of significant results in this study does not necessarily indicate that there was no effect of harvesting, but may be a result of low replication of treatments. Also, the experiment has only been monitored once, two months after harvest, so any long-term effects have not been determined. This experiment implemented the maximum harvest possible under current regulations, and the lack of detectable effects indicates that the more limited harvest done by the ROK industry may have little effect on kelp beds. These experiments need continued monitoring and expansion to estimate potential long-term effects of harvesting on kelp bed and associated communities.

CONCLUSIONS

This study has provided some preliminary answers to the questions of 1) how much kelp is available and desirable for harvest, and 2) what are the effects of harvesting on kelp beds and associated communities? There appears to be enough kelp available in the surveyed area to support all Sitka Sound herring purse seine permit holders harvesting ROK with the following assumptions. There were more than 225,225 tons of kelp identified in this study. There are 51 permit holders in the Sitka Sound purse seine herring fishery. If each were permitted to conduct an ROK operation and if each harvested 5 tons of kelp (hypothetical amount based upon the test fishery), then the total kelp harvested would be 255 tons. Total *Macrocystis* harvests to support other ROK fisheries in Alaska (Craig, Hoonah Sound, Prince William Sound, and Nome) were 25 tons in 1998, and as high as 44 tons in 1992. If harvests for all of these fisheries, plus the Sitka fishery, were to occur in one season, the total harvest would still be less than 300 tons. This represents about 0.1% of the biomass of *Macrocystis* in the surveyed area. If the kelp harvests are not concentrated in any one bed or area, there is a low probability of depleting the kelp resource. In addition, the effects of the most severe harvesting allowed are apparently minimal. A more complete survey should be performed to survey all of the *Macrocystis* resources in Alaska. If a good photographic system is developed, a thorough survey should be practical. In addition, kelp density should be monitored yearly on a few representative kelp beds to ascertain yearly fluctuations in kelp density. Kelp beds often have dramatic yearly changes in abundance that are related to El Nino events (Dayton et al. 1984, 1992, Dayton and Tegner 1984, Tegner and Dayton 1987, 1991).

Increasing the demand for high quality kelp may result in conflicts among users for more desirable kelp. Of the 225,225 tons of kelp surveyed only about 14% of this kelp was deemed desirable to the ROK industry. A total harvest of 300 tons would represent about 1% of the estimated amount of desirable kelp available; however, the estimate for the amount of desirable kelp is very uncertain. The low estimate of desirable kelp is about 10,000 tons, and the maximum potential harvest is 300 tons, resulting in a potential harvest of 3% of the desirable kelp. If this harvest is concentrated in a small number of areas, as it has been in the past, users may find desirable kelp hard to locate and conflicts may occur among users. The estimate for the amount of desirable kelp needs to be improved. This can be accomplished by visiting more beds to sample more blades. It appears that the width of kelp blades does not vary at a site over the season, so a kelp bed can be evaluated at any time during the spring and early summer.

We observed few lasting effects of harvesting on kelp beds. This experiment was limited in scope and duration and should be monitored, continued, and expanded in spring of 2000. The effects of harvesting the same bed every year as well as harvesting only once need to be assessed. In addition, the effect of harvesting on the kelp bed community needs to be evaluated. Given the high growth and production rates of *Macrocystis* elsewhere (Lobban 1978a, 1978b, Coon 1982, Wheeler and Druehl 1986, Jackson 1987), it is anticipated that kelp recovery from harvesting should be completed by the end of summer for harvests in March or April.

Based upon the preliminary results of this study, there was sufficient kelp in March 1999 to support the currently proposed Sitka Sound ROK fishery assuming total harvests would be in the neighborhood of several hundred tons. Conflicts between users may occur over access to high quality kelp, but these conflicts may encourage harvesters to locate currently unused high quality beds. The effects of harvesting on kelp and associated communities appears minimal or negligible, but this needs to be verified by further research.

Open Pounds and the Traditional Subsistence Fishery

The photo below was taken during the 1998 experimental fishery. Subsistence users set their hemlock branches near the open pounds. The pounds were anchored and tied in such a way as to not impede subsistence activities from taking place. There is concern that more pounds fishing will impede the subsistence fishery but there will still be plenty of area to suit the needs of both user groups.

There are plenty of fish available to both open pounds and subsistence users. Using the 27% conversion ratio from the ADFG report, 185 tons of herring can produce around 100,000 pounds of spawn on kelp (SOK). The current amount necessary for subsistence (ANS) for the Traditional fishery is between 136,000 and 227,000 pounds. Using the same conversion for SOK and comparing to the current ANS the total amount of herring needed to meet ANS would be between 250 and 420 tons. The amount of herring required for the upper end of ANS represents less than 1% of the forecast biomass in 2015. Also, the SOK fishery would not remove additional herring from the biomass increasing opportunity for subsistence needs to be met. Put simply, there is plenty of fish and area for everyone to coexist.

Herring Spawn-on-Kelp

An Update of Market Variables Affecting Demand in Japan

Jumbo No.1 Product

Seasoned Product

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1. Executive Summary

This report provides a concise review of market and economic factors influencing the current and future demand for BC Spawn on Kelp in the Japanese market.

The world's second largest economy is undergoing 'moderate' deflation for the first time in 40 years. This was before the calamitous events of and since September 11 this year.

Key feature that will affect demand for BC Spawn on Kelp (SOK) are:

- Higher priced food products are under pressure to deliver value, quality and supply consistency
- In the face of poor economic conditions, high debt and consumer purchasing shifts, several of the major sales channel members and sectors for food products in Japan are suffering declining sales and profitability.
- Seafood consumption in Japan appears to be holding its own against dramatic increases in beef and pork sales over the past decade (at least) as Japan strives to adopt more western eating habits.
- Japan's customary gift giving seasons remain intact, but 'givers' are seeking lower priced goods and are purchasing gifts for more occasions.
- BC's SOK production remains in a market leadership position, but faces pressures to deliver more consistent quality. The US and Russia are the two countries that could significantly increase production.
- Few reprocessors of SOK in Japan dominate the 'front end' distribution
- The total supply of SOK to Japan is relatively small and must be inventoried to permit rear round supply, resulting in limited attention to market growth in consumption.
- Price of imported SOK appears to be both a function of classical supply and demand as well as the appetite of the importers (trading companies and reprocessors) to attain annual market share goals
- Very little if any BC or Canadian 'branding' is carried forward to the end user in Japan.

Opportunities and recommendations include:

- Japan is the market of choice for any increased BC production in future
- The market can absorb more product and if increases are modest over time, may result in minimal price declines, if any, and increased consumption across all sales channels
- Production of thinner SOK could offer an opportunity to increase sales due to higher perceived value; new production techniques may be required

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- BC producers and primary processors need to improve quality consistency in concert with buyer requirements – work with the market players, they are BC's only customer!
- ROK is a relatively healthy convenience food and can be promoted as such
- A super premium quality product, fresh light brine or no brine ROK could be tested for a high end application, delivered by air freight, in-season
- The Japanese market is complex and tradition bound – don't try to outsmart the market; work with market 'partners' for a win-win strategy to increase sales and consumption, should the need arise
- Carrying forward BC/Canadian identification and possible producer 'branding' to the end-user should be investigated as both a defensive and offensive strategy
- The BC SOK industry stakeholders should consider maintaining its market leadership through supply and market expansion to avoid being beaten to the punch by Alaskan and/or Russian competitors
- Resources should be found to investigate other markets for BC SOK, as a defensive strategy.

2. Project Scope

The focus of this report is to provide an overview of the most important economic and demographic drivers of demand and consumption for seafood, and Spawn-on-Kelp (SOK) specifically, from the perspective of this consultant.

The report presents a compendium of market information to incorporate into a broader assessment of the SOK industry being proposed by E. Blewett & Associates in their assignment for Fisheries & Oceans Canada.

An extremely tight time frame permitted for this project limited the number of market and SOK production contacts and their feedback; therefore the results are presented on a best efforts basis.

Opportunities and constraints of increasing consumption of SOK are described and Conclusions and Recommendations are presented.

3. Current and Market Situation

❖ Japan Economic overview

Japan's economy has been in difficulty for some time and has just entered its fourth recession in 10 years. Japan is the world's second largest economy yet

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has the unenviable record of currently having the highest public debt (which includes massive bad debts at the nation's banks) in the western industrialized world.

In March, 2001, the Government of Japan admitted a state of 'moderate' deflation of its economy, for the first time in the last 40 years.

Prior to September 11, 2001, the world's powerhouses of the US, Europe and Japan were struggling to lift out of a global meltdown. Since that time, all indicators are pointing negative.

Experts say that Japan's woes are deeply rooted; business and industry needs an overhaul, but they caution that now is not likely the time to tackle painful reforms, given the severity of the economic slump in Japan, as well as with its major trading partners.

Some significant economic indicators in Japan, relevant to this report, are:

- Consumer prices and consumer spending has fallen for three consecutive years
- Japan's retail industry is undergoing restructuring pressures: Mycal, Japan's 4th largest retailer, filed for bankruptcy protection in September, one of the largest corporate failures in Japan's history.
- Job cut fears are softening consumption, particularly on high priced goods, causing an upswing in personal savings
- Hopes for Japan's economic recovery, both broad and related to its consumers appetite for high priced goods, is closely linked to the condition of the US economy.
- The consumer trend to a more Western diet is ongoing, particularly among the nations' young and those with higher disposable income. Many of the more traditional Japanese products (including food products), are declining.

❖ Sales channel trends

Due to the economic conditions outlined above, the retailing sector is exhibiting structural changes. Discount chains are strengthening their presence, while foreign retailers such as Costco and Carrefour are continuing their aggressive entry into the Japanese market and thus, are accelerating the severity of competition in the retailing sector.

Hardest hit have been the general merchandise sector, which includes supermarkets, which saw a 5.3% decline in total sales versus the previous year. Convenience stores are still flourishing but sales and operating profit appear to have peaked or are weakening.

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In the foodservice sector, take-out lunchboxes and delis are becoming a driving force due to the changes in people's lifestyle and consistent with the savings minded Japanese consumer attitudes.

It is indicated in several industry reports (e.g. DFAIT Japan Fisheries Market Report, May 2001), weak economic conditions are seeing declining consumption at higher priced restaurants and sushi bars.

On a brighter note, there is an increasing trend to eating out dining at chains and independent restaurants specializing in 'revolving belt' sushi outlets (Nihon Shinbun Kyokai [NSK], October 21, 2001).

Japan's heritage of gift giving continues. It is customary to give gifts to business associates, colleagues, friends and family members. Some notable characteristics of gift giving in Japan are:

- Historically, the two key gift giving periods are summer season called "Ochugen" and a winter season called "Oseibo".
- Poor economic conditions have seen a decrease in terms of both the number of gifts given and their value, particularly during the winter season. Despite this trend, gift giving is still a large 'industry' ($US 90 billion in 1999), with food products composing approximately 20% of this total.
- There is a trend to give more gifts more often (at other times of the year) and on more occasions.
- Typically, gifts are of higher quality and traditionally high image brand names have been important.
- Seasonal gifts are sold primarily through speciality wholesalers to upscale Department Stores, upscale Retail stores and speciality gift stores. Increasingly, the convenience store sector has started carrying a limited selection of gift items.

❖ Seafood consumption trends

Seafood consumption in Japan remains among the highest in the world and continues to rely heavily on imported products ($US 16 billion), with Canada's share in 12th place (547 million, 3.4% of seafood imports).

Seafood imports by Japan will likely continue to increase in volume in future years due to declining domestic fishery and aquaculture supplies as well as high seas catches. The changing appetites of Japanese consumers for convenience foods and healthy eating can continue to be fulfilled by seafood products as producers, reprocessors and the retail/HRI sectors satisfy these demands through new product development and branding programs.

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❖ Beef, pork and poultry trends

Consumption of beef, pork and poultry have increased dramatically in Japan during the past 10 years consistent with the changes in demographic makeup and an appetite for western foods. Time trends in food intake, indicate an increase in meat consumption of 13% compared to 3% in seafood consumption (1990-1997, Japan National Survey by Ministry of Health and Welfare)

The recent mad cow disease scare in Europe has spread to Japan. Short term impact is seeing a dramatic fall off in beef consumption. To date, no increase is seafood consumption has been noted (Bill Atkinson News Reports, Oct. 22, 2001)

❖ Roe-on-Kelp production & consumption trends

Production and Price trends:

- According to DFAIT/Ni-Ka Online, imports of herring Spawn-on-Kelp decreased substantially (by 32.6%) in terms of volume from 869 mt in 1999 to 586 mt in 2000. A sharp decline in imports from the United States from 329 mt in 1999 to 34 mt in 2000 was the major reason for this decrease in the total import. Reflecting the decrease in the quantity, the average import price for both Canadian and US products has recovered slightly from 1,876 yen per kg (C.I.F.) in 1999 to 2,118 yen per kg in 2000 for imports from Canada and from 1,357 yen per kg in 1999 to 2,160 yen per kg in 2000 for imports of the US.
- **Note**: there are some interpretation questions in these statistics that remain unresolved. For example, the US fishery statistics indicate production from both Alaska and San Francisco was 236 mt In 1999 and 87 mt. in 2000 (0 from Alaska). Comparing these figures to those above indicates possible carryovers in production within the US, or inaccurate import statistics. Similar analysis has not been tested in other years or for other countries production versus import statistics.
- Embassies and Fisheries Departments were contacted in countries that have prior SOK production (Finland, Iceland, Sweden, Norway, Atlantic Canada, S. Korea and Russia). Responses are as follows:
    - Atlantic Canada: Newfoundland had reserved a quota of 200 mt for 1999/2000, but reports no landings in recent years. More information may be forthcoming.
    - Russia: embassy staff report no knowledge of a fishery for this product, more information may be forthcoming, but statistics are poor, particularly for exports.

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- S. Korea reports no knowledge of production
- Finland, Iceland, Sweden and Norway have yet to respond
- Note: time may provide insights to the lack of information, but it appears that export statistics of this product are not readily available, or perhaps non-existent due to small production quantities in these countries.

➢ A significant buyer of BC, Alaska and San Francisco SOK that I spoke to indicated no recent production from Iceland, Sweden, Norway or S. Korea. He did indicate, however, that:

- Finland produced 26 mt in 1999, 12 mt in 2000 and none reported to date in 2001.
- Russia produced 42 mt in 2000 and none reported to date in 2001.
- Russia has been encouraged to develop a fishery and has produced limited and intermittent quantities in recent years. Poor weather, ice, inadequate resources and training have impeded development of a fishery there, to date.
- The San Francisco fishery is of limited herring biomass, so there is little likelihood of increase SOK production in future.
- The area with the largest potential to increase production, outside of BC), is Alaska. Much of the herring roe fishery in Alaska is frozen in the round and exported to Japan and China for processing into brined roe for Japan. The prices received by herring roe harvesters in Alaska is significantly below what could be obtained if they transferred their quota to SOK. Alaskan fishery regulators would support this, but some of the existing herring permit holders are reluctant to support a conversion initiative, to date.

Consumption trends

➢ Due to poor economic conditions in Japan, the traditional sales channels for this product have been shifting from high-end Japanese restaurants, sushi bars and gift items to less expensive venues. In addition:

- Poorer quality product is being processed into less expensive retail packs for department store and grocery store consumption (including seasoned products) in greater quantity than the past.

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- "Japanese trade people engaged in importing, distribution or processing hold that the development of the market in this direction will be the only way to increase (sales) prospects for this product in the Japanese market". (DFAIT Japan Fisheries Market Report, May 2001)

❖ Currency factors

BC Herring SOK is purchased in Canadian dollars. The value of the Japanese yen to the Canadian dollar during the time of purchase of SOK could influence the price paid in BC and the resulting selling prices in Japan (in Yen/kilo).

This consultant was not provided with BC selling prices to determine if this factor is 'in play' in price determination. However, analysis of the movement in the value of the dollar vs. the yen was tracked back to 1995 and average import prices of a number of seafood products in yen per kilo were examined:

- It appears that there is little, if any, relationship between the strength or weakness in the yen and the selling prices of a number of seafood products in the Japanese market (salted herring roe, Ikura, King Crab, Northern Shrimp).
- The highest prices in yen/kilo in Japan for SOK was in 1995; this was also the year in which the yen was strongest against the dollar, compared to subsequent years. This price effect may have resulted in higher prices paid to harvesters in BC.
- In Japan, other factors are believed to be of greater influence in determination of the end-user price:
  - supply and demand
  - market share goals of importers and reprocessors
  - quality of the annual 'pack' on average
  - 'in-market' factors such as inventory levels, disposable income, reduced demand for higher priced food products and reduced expenditures on eating out at high end restaurants

❖ Roe-on-kelp purchasing dynamics

BC SOK permit holders are restricted to an 8 ton quota. Permit holders are also required to weigh their product after brining and are given a 6% overage allowance for brine uptake.

It was reported to this consultant that a 'scandalous' practice that has gained in popularity is to obtain an official weight prior to brining, then brine the product and boost the weight. This allows the 'real' quota to be exceeded. However, to maintain maximum roe quality, the product must be brined as soon after harvest as possible. The delay in brining caused by the aforementioned practice decreases quality. It was reported that this practice is generally carried out with

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the knowledge of all parties. Japanese buyers have difficulty in detecting quality deterioration due to 'sampling error' at time of inspection of sample lots.

❖ Dominance of few re-processors

Few Japanese reprocessors exist for SOK. Current information indicates that Taniya continues in a dominant position (estimated at 70%) in reprocessing and supplying to all sales channels in the Japanese market.

Despite this dominance, other reprocessors vie for market position and influence the price paid to trading companies/importers in any given year. It was reported that the major historic buyer of SOK, Taniya continues to be the major force today.

❖ Channel player health

The distribution system in Japan from raw material purchase (BC SOK) to trading company to re-processor to wholesalers and major channel players has not been simplified for this product – the health of each segment makes a difference to the operation and health of the whole.

The Japanese food retail and food services sector is both in transition and under serious price and profitability stress due to the weak Japanese economy, high debt and shifting consumer purchasing behaviour. Current reports of business failures and poor financial performance are common

Change will be the 'constant' over the near future, at least. If the sales channel members responsible for sales of SOK were to experience serious financial difficulties or were to shift their product focus, further price erosion could take place.

❖ Supply size

The supply of SOK is relatively small compared to other seafood imports and food products in Japan. This low volume characteristic results in a reluctance by channel players below and including the reprocessors to spend much time and/or marketing funds on channel expansion, regional distribution expansion or internal promotion. This relationship if further aggravated, under current economic conditions, by the positioning of SOK (BC's in particular) as a high priced/luxury product.

❖ SOK Branding

There is very little if any producer/exporter brands or country of origin labelling of SOK being carried forward to the end-user in Japan. (Note: on the cover of this

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report is a photo of seasoned ROK, (Cheena brand), which shows a display window in the shape of a Canadian flag. It is not known if this product is marketed in Japan – Cheena has gift shops in Vancouver, catering to Japanese tourists).

Brands are extensively used by reprocessors, importers, food distributors and retailers in Japan that form the basis of building awareness, preference and consumer promotion activities.

4. Opportunities and Recommendations

4.1. Market Expansion: Japan or beyond?

Any market expansion strategy, in this case to expand consumption/sales, would either focus on methods to expand existing market(s) or expand current or future distribution into new markets

A marketers' primary analysis of these options would focus on cost and benefit of the alternative strategies. Typically, the cost of developing a new market(s) would be far higher, complex and time consuming (years) than an existing market.

Primary reasons to look to new markets for SOK would be due to:

- Major impediments to market expansion in current market including economic factors (e.g. negative price elasticity which would see dramatic declines in price if supply were increased)
- Market research that indicate probable or defined interest to purchase by buyers and/or consumers in new markets (we haven't done this research beyond a few phone calls!)

It is my recommendation to focus on the Japan market, at least in the short term, to increase the market position of BC SOK or if required, to increase consumption.

Good or bad, there is a single market 'heritage' of consumption in this market aside from limited consumption of this product in other countries by Japanese expatriates and some eating establishments and gift shops catering to tourists and 'adventurous' diners.

- Quick investigation I did of consumption in nearby Asian countries turned up nothing (e.g. sushi bars in Korea that cater to Japanese tourists/business people do not currently offer roe-on-kelp – this despite that Korea eats many different fish roe products). Further investigation might prove this market to be of some potential, who knows!

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4.2. Supply and price relationship appears to be 'economically' elastic, with limits

Information from interviews suggest that an increase in supply of uniform 'high' quality SOK from BC, if in small increments, should not see a significant decrease in prices received.

Should this be achievable, the market can be grown without negative impact on prices received by BC producers.

4.3. Supply is very small in total in a large market

Despite the current price sensitivity to higher price goods in Japan, the quantity of SOK in the Japan seafood scene barely hits the radar screen.

Some observers believe that there is plenty of room for Japan market expansion of SOK across all sales channels, including the higher priced gift and upper end restaurant/sushi bar sectors.

Further, in order to present marketing and promotion opportunities for sales channel members in Japan, increased supply would be required, particularly as year round supply is essential to retaining consumer loyalty and purchase.

4.4. Retail marketing of SOK has been limited by limited supply and price

Marketing of SOK at the retail supermarkets has been limited, mainly due to price and the margin requirements of retailers. This channel has/is being used for lower priced product and seasoned product but has hardly been touched due to high historic prices and limited supply. This channel requires consistent and substantial supply to obtain shelf space and maintain 'listing's' or 'rental space' within the store.

If an economical production method could be developed to produce SOK with thinner roe coverage, it would be possible to offer less expensive product to this major consumer sales channel.

4.5. Japan's image of Canadian food products is positive

Japanese consumers have a high regard for 'western' and Canadian products, though price and quality have become increasingly important.

In order to differentiate BC SOK, a branding opportunity is presented to identify Canadian production.

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4.6. BC SOK is variable in quality

Despite quality grades set by BC processors and purchased by Japanese buyers after inspection, it was reported that quality is inconsistent within the set grade standards.

More stringent quality guidelines at time of inspection and purchase in BC could be implemented to improve quality consistency and reduce reprocessor costs of misgrades and grading in general in Japan.

4.7. Health and time-conscious consumers are increasing

Japan is tracking other western industrialized consumers in paying increasing attention to healthy foods that are easy and quick to prepare (e.g. low(er) fat and salt, microwaveable, etc.)

SOK fits the bill. It is effectively ready to eat. Brined herring roe by comparison is more time consuming to prepare and has to be soaked, washed and is typically re-seasoned prior to eating.

These features could be positively promoted.

4.8. Fresh-by-air SOK – possible?

High-end restaurants in Japan pay very high prices for the freshest products. Though I'm not aware if it has been attempted, it would be feasible to transport fresh product with little of no brine added to Japan via air cargo without suffering significant quality loss.

This would only be possible during the production season and likely for a limited quantity, but this may offer an additional 'top-end' channel to operate in (e.g False Pass/Copper River Sockeye – the first of the season).

4.9. Don't try to outsmart this market

One might be temped to look at expanding consumption and/or to increase price of SOK by leapfrogging the distribution system, jump in with BC producer branded product and market product directly to the highest priced sales channel.

Don't! Money down the drain.

It is my conviction that the best means to create a winning marketing strategy in a foreign land with a product like SOK, is to work with trusted 'partners' in Japan to co-devise the most sensible and cost effective marketing strategy. The plan

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must be win-win for all parties if it is to succeed and may indeed require some adjusting on the production and fishery management side in BC as well.

4.10. Beat 'em to the punch – keep BC's market leadership

BC is the market leader of SOK in Japan.

BC has seen eroding market share of its once leading 'wild' seafood products. SOK is an interesting product as a wild resource is utilized to produce finished product attributes that can be controlled and manipulated similar to true aquaculture practices.

It was described to me that both Alaska and Russia have the potential to increase production of SOK, given adequate resources and dedication. This may be a 'soft' challenge. If BC doesn't rise to the challenge, someone else may facilitate the growth of our competitors.

Renwick & Associates Consulting
6749 Seaview Road
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ROK Marketing Questions and Answers

There have been market studies for roe on kelp (ROK) but the studies were completed over a decade ago. The market conditions surrounding herring roe products, both sac roe and ROK, have not changed much since these reports were written. In order to provide updated information a longtime broker of herring roe products was contacted. The following are questions and answers from the discussion:

How much of a market would be available for this "new" ROK product?

In 2004, there was an abundant supply of ROK coming out of BC/SE AK. I think in 2005 it was around 800 ton total supply. That volume was a real challenge for both seller and buyer. The sales prices were quite low and allowed for entry into new consumption markets. ROK became something that was accessible at pubs and such places versus something that was so expensive as to be served only at weddings and high end sushi bars.

New consumption channels arose and the 800 tons of supply did not appear so daunting as indeed the carryover inventory the following year was not as severe due to increased consumption.

The advantage ROK has over Herring Roe is that the image of ROK is not as heavily wedded to New Year's season consumption. As well, the combination of kelp with herring roe seems to be more appealing to some consumers than herring roe by itself. I seem to notice more sushi menus offering ROK in a visible manner versus herring roe.

Also, the supply of ROK is much smaller than Herring Roe. The Herring Roe market is sometimes said to be around 10,000mt. The supply of ROK tends to be in the 300mt to 500mt range. Total supply is much less than Herring Roe and increasing the supply of ROK, in terms of overall supply, is a much smaller number and should be easier to deal with - especially if we are talking about ROK being a staple of the sushi market which is a very robust and successful market in Japan.

The sushi market utilizes the thinner coverage production. The sushi restaurant market in Japan is thriving. (4,010 sushi restaurants in 2014)

The one thing I would caution is, the market for raw materials to use as sushi toppings is relatively deep - but it is price sensitive.

To come back to your question, I think there is market space for additional ROK product but it will be price sensitive in the short term. I would think that as the popularity and demand for ROK increases, gradual price increases are possible as long as supply does not have the wild swings that we have seen in the past.

The large harvest of 2005 then reduced harvests in 2006 and 2007 whereby in those two successive years the price doubled each year but the market shrank to match the available supply.

Would the additional product produced in Sitka be a detriment or complement to the products currently produced in SE roe herring fisheries?

Anything that decreases the availability of sac roe going to the Japanese market would be positive for the market. Allocating available resources from sac roe to ROK should be a net benefit. We are currently going through a period of suffocating oversupply on the sac roe side. This year's ROK supply was also quite abundant, being at least double of the year previous and this has had a deleterious impact on pricing but as mentioned previously the overall volume of ROK is much different than herring roe and poses different and I would say less daunting challenges. Let's remember that the supply of ROK really only comes from BC and SE AK whereas herring roe comes from more sources and in greater volumes. (Let's not forget herring roe also comes from Atlantic Ocean sources)

Thus, even though we had a sudden surge in ROK production this season that was over double of last season's harvest the volume is still manageable with the market taking a longer term view on consumption such as 18 months versus 12 months. Once again, the scale of volume we are talking about is much different for ROK versus Herring Roe. (2014 estimated harvest: Herring Roe – 8,400mt / ROK – 600mt)

What is the long term outlook for sac roe and ROK products?

The long term outlook for herring roe is stable consumption with we would hope growth due to the available supply of herring roe. Recent history would suggest that we will not see explosive growth in herring roe consumption. Closed Pound ROK or Open Pound ROK will likely be viewed the same in the market and would be compared by current quality attributes which assign value.

Is it safe to assume that if the sac roe price increases then the egg on kelp market would also see a corresponding increase?

Although they are different products per se, there is a linkage between the pricing of herring roe and ROK since they are similar products. This year would have been a good test case to see what kind of price differential would be possible had the harvest of ROK been limited. But, it is generally thought that the pricing of the two products cannot be vastly different.

Will adding ROK in Sitka will not be a detriment to already existing ROK fisheries in SEAK.

The history of ROK pricing may make this difficult. Because the ROK market is small in terms of volume and buyers, the price is quite sensitive to volume when the volumes are limited. The past 10 years have seen some volume swings and foreign exchange movements that have led to a wide range of pricing for SE AK ROK. The current context of high volume and the comparative weakness in the yen will make it hard to take the position that additional ROK from Sitka will not soften the market further. (although it looks like there are resource issues in Hoonah, Ernest Sound and Tenakee which may make SE AK ROK a scarce commodity even with a Sitka ROK fishery)

The market will not be taken away. There is room for market expansion, although the near term impact may be lower pricing until the market adjusts to the increased volume.

ELDERWOOD TRADING CO., LTD.

276 Newport Drive, Port Moody, B.C., Canada V3H 5C9
Tel: (604) 461-4555, Fax: (604) 461-4542

TO WHOM IT MAY CONCERN

Subject: Sitka Sound Roe Herring Open Pound Fishery

I have been invited to provide testimony on the subject of SOK production in Sitka Sound. I would consider it a privilege. It is my sincere hope that the views expressed here may promote healthy discussion and perhaps, lead to the adaptation of policies which will benefit all in the industry.

I have been involved with SOK for the past 20 years. During those 20 years, my company has gained valuable knowledge and experience into the workings of the SOK market. In 1999, we purchased 260 tons of SOK from California, B.C., and southeast Alaska, including Sitka.

It is my understanding that if the full potential of roe herring is utilized, Sitka may one day become the leading SOK-producing region of the world. I have heard concerns expressed that such increase in supply would disturb the delicate balance of supply-and-demand and produce a negative impact on the already fragile market, and bring hardship to the existing permit holders of SOK. These are legitimate concerns and one must not take them lightly.
However, I am of the opinion that, reducing the supply to keep the price up can work only under certain market conditions - but not now. In the present market climate, it will only mean repeating the same mistake that already has led the SOK industry to its current predicament.

To explain further, first let us examine the reasons for the current downturn in the SOK market. In my opinion, the present difficulty is in large part due to reaction to excessively high prices of the past.

To elaborate on this point, I have attached two graphs following.
The dollar values used are the mean average prices for closed pound SOK from B.C. They show a dramatic price increase that peaked in 1995, only to be followed by an equally precipitous price drop, which continued unabated to 1999. The expression, "Where the mountain is high, the valley is deep", encapsulates the essential behavior of the SOK market.

Graph 1 shows the combined supply of SOK from all the North American production areas. Here the rising prices up to 1995 seem to correspond with decreasing supply. In the same token the declining price curve from 1996 coincides with increasing supply for that period. Here, a superficial examiner of this graph may jump to a hasty conclusion that this is the evidence of increased supply driving down the prices. However, he must be cautioned not to be so hasty.

Graph 2 shows same price curves. However, it is different from Graph 1 in that it shows only the closed pound production from B.C. and southeast Alaska. Here the supply of thick product was fairly consistent through the same period of great price upheaval.
Granted, there was a sizable supply increase in 1997. However, during the years that followed the declining price curve continued despite supply reached a plateau.
It is reasonable to conclude, then, that it was not the over-supply that affected the price of SOK, but some other factors were at work.

The single most important factor that has been driving the price down, in my opinion, is the economic recession in Japan. During the bubble economy years that lasted until early 1990's, Japanese consumers displayed great appetite for luxury. Consumption of expensive foods, including SOK, rose to record levels, and as those commodities became objects of speculation, the prices soared. But as the bubble burst, realities of economic recession set in, and the consumers backed off.

Take for example the kazunoko (herring roe) market. Despite the fact that the 1999 supply of kazunoko was the lowest in twenty years at less than 10,000 tons, the year-end gift kazunoko market plummeted. Conversely, lower-priced kazunoko in the form of consumer pack fared relatively well. Total consumption appeared to have been at par with supply.

The same situation manifested itself with SOK. Movement of thick SOK (jumbo & No.1 from B.C. and Alaska) was extremely sluggish, and the prices were down to record low levels. Thinner product, on the other hand, sold well, because prices were low enough to appeal to consumers.
These examples show that the market is constantly evolving, and that how important it is to stay in tune with the consumers' needs.

There are four main ingredients to successful marketing. They are:

- Healthy demand
- Consistent supply
- Reasonable price
- High quality

Of these, a healthy demand has to be ranked as the highest importance. If the high prices of recent years have alienated the consumers away, what the SOK industry must accomplish now is to find way to recapture the lost customers and generate new demand. Aside from making the product more appealing in terms of both price and presentation, the key is to make SOK accessible to a greater number of consumers. The task of generating demand is not a difficult as it may seem. For SOK possesses inherently superior product appeal. For instance, nine of ten people who actually tasted SOK will show a decided preference for SOK over kazunoko. This is an evidence enough that there is a huge potential for an untapped consumer market for SOK.

However, the size of the market can only be as big or small as the volume of supply. In this sense, the very limited supply that gave SOK the exclusivity in niche market is a fundamental weakness that prevent it from acquiring wide popularity. This point is clearer when one compares the supply of SOK against herring roe. In 1999, the total supply of herring roe was 10,000 tons, while SOK was just over 500 tons, barely 1/20th of kazunoko. This means that only a very few consumers had ever tasted SOK. Indeed, the majority of Japanese are even aware of its existence. The solution, then, seems to be to increase supply, while maintaining reasonable price and quality.

To this end, proposed alternative harvesting in the form on SOK in Sitka can make a significant contribution, especially if the open pound method is used. In the market where thick product by closed pounds dominates, thinner product by open pound will provide just enough diversity. It is possible that, instead of competing, producers of open pound and closed pound SOK can complement each other. By having the ability to offer rich variety of product, the SOK industry collectively will enjoy a greater chance of success in the task of opening wider market, and cultivating the greater demand in the process.

In conclusion, I believe that, if managed properly, open pound SOK fishery in Sitka Sound offers a promising alternative for better utilization of available resources. Even though critics may have legitimate reasons to worry about the over supply, benefits far outweigh the detriments. Perhaps, in consideration to existing permit holders the initial quotas should be set at a moderate level, but with mechanism to increase gradually as more demand is generated.

Thank you for the opportunity to voice my opinion. It is my sincere hope that the new management plan for SOK in Sitka Sound will be formulated with the greatest care for the future benefit of all.

Respectfully yours,

Ed Furumori

PC244

Submitted by: Nancy Keen
n/a

Community of Residence: Haines

I support the following proposals:

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I oppose the following proposals.

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I am Lingít. I am a Herring Protector.

We have been stewarding the land since time immemorial and we will continue to fight for our inherent right to traditional foods.

January 14, 2025

Alaska Board of Fish
SE and Yakutat Finfish & Shellfish Meeting
Ketchikan, AK January 28 – February 9, 2025

Dear Board Members,

I support proposal 108.
I oppose proposal 110.

I am a year round resident of Ketchikan and full-time employee of Chinook Shores Lodge, a sportfishing/charter business in Ketchikan.
My husband is also a full-time employee at Chinook Shores Lodge and 100% of my yearly income comes from working at our lodge.

Our fishing season runs from June 1st- October 1st. In addition to selling fishing trips to non-residents, we also rent our boats to locals, including our local employees, who utilize our boats for access to sport fishing to fill their family's freezers.

I have been working in the sportfishing industry in Ketchikan since I was a teenager, and have now been in the industry for over 10 years. Last year we employed 15 people, 14 of them locals, and several of them were local highschoolers. The local kids we hire have a unique and valuable opportunity to work in a fishing industry that also provides transferable skills and knowledge (customer service, public speaking, business operations, networking etc.). Oftentimes the local kids we hire stay with us all throughout highschool and college as it is a great way to save up money while they work on their degrees, and occasionally some are interested in getting their 6-pack licenses and running their own charter business one day. The sportfishing industry is extremely important to our community, and especially young people who want to stay in Ketchikan and make a living here long-term.

While I understand the troll industry's concerns about losing king salmon fishing opportunities, historically they have benefitted from being able to mop-up any king salmon the sportfishing industry has left on the table in high abundance years. It seems unfair that they would then force us to a hard 20% limit with in-season management in low abundance years.
The sportfishing industry business model is much different than that of the commercial industry. It is important to remember that sport businesses are extremely vulnerable to in-season management and sudden closures. Our customers book up to a year in advance and lose confidence in our industry when regulations are changed on them once they get up here. In June especially, sportfishing businesses in our area need to be able to market king salmon trips to our customers. Our lodge has a 4 night minimum stay in order to be profitable. Shorter trips create more turnover, and more associated costs for us. In June the only salmon trips we are able to market are for king salmon, and a 1/day 3 fish annual limit is already pushing it when trying to sell a 4-5 day fishing package. In July, silver salmon and halibut start moving into our area and we are able to get by with further reduced king salmon limits.

I support proposal 108 because it is a fair compromise that protects both the troll industry and the sportfishing industry. If the sport fishery is under allocation the troll fishery will continue to benefit from mopping up the excess, if the sport industry is over allocation the troll industry acts as a buffer. The 9-year average (2016–2024) sport harvest is currently 19.97%

of the combined sport/troll allocation (RC2, p115). Proposal 108 is not seeking to steal quota from the troll industry, it is simply trying to make sure sportfishing businesses like ours can stay operational in June and are protected from the uniquely damaging impacts of in-season reductions/closures. The already slim 3 king annual limit for nonresidents in June is absolutely crucial to our business.

Thank you,
McKinley Kellogg

PC246

Submitted by: Mark Kennard
Community of Residence: juneau

Please see my choices of whether I support or do not support a proposal. I have left many of the proposals blank as I am not familiar with those areas.

KETCHIKAN
FISHING EXPEDITIONS

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

Dear Members of the Alaska Board of Fisheries,

I am Aaron Ramirez, the owner of Ketchikan Fishing Expeditions located in Ketchikan, AK. I want to thank you all for taking the time to read this letter and the many others I'm sure you are currently receiving. I have been guiding fishing charters out of Ketchikan for over a decade and have an appreciation for our fishery and wildlife that only comes from spending days, months, and years on the waters surrounding Ketchikan. I appreciate you hopefully understanding my point of view when it comes to some of the stated proposals that will affect me and my family, dozens of other charter operations, and the greater Ketchikan and State economies.

Sport King Salmon

Support: 108, 122, 123

Oppose: 104, 109, 110, 114, 115, 119, 120, 127

General Sport

Oppose: 140, 141

Ground fish

Support: 193, 211

Oppose: 203, 210

I support proposal 108 as it is asking for a meager increase in the allocation slotted for the sport fishery that will benefit dozens,if not hundreds of businesses locally. May and June are notoriously hard to keep busy for the charter fleet in recent years and further restrictions would only exacerbate the issue. Hotels, airlines and transporters, rental car businesses, restaurants, fish processors, cab and transportation workers, and many other businesses all rely heavily on our short summer season to make their business profitable. A huge amount of the guests in town that keep the wheels turning are non resident fisher men and women. Being so limited in May and June in species available and current limits has effectively eliminated those months and put an extreme amount of pressure on July and August.

My small business pours most of its revenue directly back into the local and state economies. Harbor fees, storage, licenses, fuel, tackle, bait, and city tax to name a few. It is hard to impress

how large of an impact the charter operations in Ketchikan help fuel the local and state economies. While I believe a sustainable and healthy fishery outways any economical figure I am hoping to paint a picture of how broad the impact of more limitations and closures could be. I sincerely believe there is a way to keep the commercial and sport fleet happy in proposal 108.

I ask that you please read these letters with an open mind and take into account the impact further restrictions will have on the owners, captains, deckhands, and dozens of other workers who rely on a sustainable and healthy fishery.

Sincerely,

Capt. Aaron Ramirez

Ketchikan Fishing Expeditions
https://alaskafishingexcursions.com/
(907)617-9106

KETCHIKAN GATEWAY BOROUGH

Resolution No. 3101

A Resolution of the Assembly of the Ketchikan Gateway Borough, Opposing Proposal 156 to the Alaska Board of Fisheries, Limiting Fish Stock and Production in the Southeast Alaska Fish Hatchery System

RECITALS

A. **Whereas**, Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests and supporting commercial, sport, subsistence, and personal use fisheries across the state, which are vital to communities such as Ketchikan Gateway Borough; and

B. **Whereas**, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources on which coastal communities like Ketchikan Gateway Borough depend; and

C. **Whereas,** a reduction in hatchery production would not only diminish the availability of salmon for commercial but would also limit access to salmon for subsistence, personal use and sport fishers, thereby directly impacting food security, cultural practices, and recreational opportunities in communities like Ketchikan Gateway Borough; and

D. **Whereas,** Alaska's salmon hatchery program is responsible for supporting approximately 4,200 jobs, $219 million in labor income, and $576 million in economic output annually, benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon; and

E. **Whereas,** the Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in generating economic stability, providing jobs, and supporting local communities through hatchery operations; and

F. **Whereas,** Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these

organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

G. **Whereas,** the current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts proposed by Proposal 156; and

H. **Whereas,** Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups; and

I. **Whereas,** Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management;

NOW, THEREFORE, IN CONSIDERATION OF THE ABOVE FACTS, IT IS RESOLVED BY THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH as follows:

Section 1. The Ketchikan Gateway Borough strongly opposes Proposal 156, scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental economic and social impacts on Alaska's hatchery programs and the communities they support.

Section 2. The Ketchikan Gateway Borough reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Ketchikan Gateway Borough's economy, community well-being, and sustainable fishery practices.

Section 3. The Ketchikan Gateway Borough calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

Section 4. Effective Date. This resolution shall be effective upon adoption by the Ketchikan Gateway Borough Assembly.

ADOPTED this 2nd day of December, 2024.

Rodney Dial, Borough Mayor

ATTEST:

Kacie Paxton, Borough Clerk

APPROVED AS TO FORM:

Glenn Brown, Borough Attorney

Ketchikan INDIAN COMMUNITY

RESOLUTION: KIC 25-03

TITLE: **Declaration of Pacific Herring (*Clupea pallasi*) as a Forage Fish**

WHEREAS, the Ketchikan Indian Community ("KIC" or the "Tribe"), is a federally recognized Tribal government organized under a Constitution and Bylaws (collectively, the "Constitution") ratified on October 18, 2017, and previously organized under a Constitution and Bylaws ratified on January 16, 1979, and previously organized under a Constitution and Bylaws ratified on January 27, 1940, in each instance pursuant to Section 16 of the Indian Reorganization Act ("IRA") of 1934 as amended; and

WHEREAS, the KIC Tribal Council (the "Tribal Council") is the representative Tribal Government of the Tribe; and

WHEREAS, Pacific Herring (*C. pallasii*), also known has iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource; and

WHEREAS, The Ketchikan Indian Community and its Tribal Citizens historically had a robust herring fishery within our territorial jurisdiction, but like many other regions in southeast Alaska had this fishery collapse many years ago; and

WHEREAS, Pacific Herring are considered a "Keystone Species" in the marine food web in Southeast Alaska as they predated on by salmon (*Oncorhynchus spp.*), humpback whales (*Megaptera novaeangliae*), and a variety of other species. If Pacific Herring were to be removed from Southeast Alaskan waters, it would cause a collapse in the entire marine food web in this region; and

WHEREAS, The Pacific Herring Population throughout Southeast Alaska have yet to recover to their historical abundances, especially within our territorial jurisdiction. This has had an incredible impact on our Tribal Citizens to harvest herring eggs, most of which now rely on our relatives from Sitka and Prince of Wales to fill their herring egg needs; and

THEREFORE, BE IT RESOLVED THAT, the Ketchikan Indian Community Tribal Council recognize the ecological importance of Pacific Herring within Southeast Alaska marine ecosystems and declare this species as a forage fish, which is defined by the National Oceanic and Atmospheric Administration as "small schooling species that serve as

prey for larger commercially and recreationally important fish, as well as for marine mammals and sea birds." Currently the State of Alaska does not consider Pacific Herring to be a forage fish, nor does it manage it as such. The Ketchikan Indian Community Tribal Government calls on the state of Alaska and all other governing bodies to classify this critically important species as a forage fish such that proper ecosystem-based management practices can be placed on all Pacific Herring fisheries in Alaska. This, as a result, will promote the growth of collapsed Pacific Herring fisheries and protect those that are still near their historical abundances.

CERTIFICATION

The foregoing resolution was adopted at a duly convened meeting of the Ketchikan Indian Community Tribal Council, assembled this 14th day of January, 2025 at 2960 Tongass, Ketchikan, Alaska 99901, by a vote of: 8 FOR and 0 AGAINST

NSk 1/14/2025

Norman Skan, President Date

ATTEST:

1/14/2025

Rushcelle Hull, Secretary Date

Effective: January 14, 2025 KIC 25-03			
Roll Call	Yes	No	Absent
SKAN			
BURNS	✓		
WILLARD	✓		
LEASK GUTHRIE	✓		
JOHNSON	✓		
RUARO	✓		
HAYNES	✓		
EDWARDSON	✓		
HULL	✓		

Ketchikan INDIAN COMMUNITY

RESOLUTION KIC 24-96

TITLE: A RESOLUTION OF THE KETCHIKAN INDIAN COMMUNITY TRIBAL COUNCIL OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE JANUARY 28 TO FEBRUARY 9, 2025 ALASKA BOARD OF FISHERIES MEETING

WHEREAS, the Ketchikan Indian Community ("KIC" or the "Tribe"), is a federally recognized Tribal government organized under a Constitution and Bylaws (collectively, the "Constitution") ratified on October 18, 2017, and previously organized under a Constitution and Bylaws ratified on January 16, 1979, and previously organized under a Constitution and Bylaws ratified on January 27, 1940, in each instance pursuant to Section 16 of the Indian Reorganization Act ("IRA") of 1934 as amended; and

WHEREAS, the KIC Tribal Council (the "Tribal Council") is the representative Tribal Government of the Tribe; and

WHEREAS, Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests and supporting subsistence, personal use, cultural practices, and recreational fisheries that are vital to sustaining indigenous ways of life; and

WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources upon which tribal communities rely for food security, traditional practices, and cultural continuity; and

WHEREAS, a reduction in hatchery production would limit access to salmon for subsistence, personal use, and other essential practices, thereby directly impacting the cultural traditions, heritage, and food sovereignty of tribal members; and

WHEREAS, the Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play critical roles in preserving salmon resources essential for the continuation of tribal traditions and community well-being through hatchery operations; and

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning for these organizations, potentially jeopardizing the

sustainability of Alaska's hatchery program, which has historically supported a balance between enhancing salmon availability and protecting wild stocks; and

WHEREAS, the current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts proposed by Proposal 156; and

WHEREAS, Alaska's hatchery system operates as a nonprofit model funded through cost recovery and enhancement taxes, following stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups, including tribal communities; and

WHEREAS, Proposal 156 introduces an additional oversight mechanism that would conflict with the established regulatory framework, risking the proven balance between hatchery and wild stocks that has been achieved under existing management; and

THEREFORE, BE IT RESOLVED THAT:

Section 1. Ketchikan Indian Corporation strongly opposes Proposal 156, scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental impacts on Alaska's hatchery programs and the indigenous ways of life they support.

Section 2. Ketchikan Indian Corporation reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to sustaining salmon resources critical for subsistence, cultural practices, and the continuity of indigenous traditions.

Section 2. Ketchikan Indian Corporation reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to sustaining salmon resources critical for subsistence, cultural practices, and the continuity of indigenous traditions.

CERTIFICATION

The foregoing resolution was adopted at a duly convened meeting of the Ketchikan Indian Community Tribal Council, assembled this 20th day of December 20, 2024 at 2960 Tongass, Ketchikan, Alaska 99901, by a vote of: 7 FOR and 0 AGAINST.

12/20/24

Norman Skan, President — Date

12/20/24

Rushcelle Hull, Secretary — Date

Effective: 12/20/2024			KIC 24-96
Roll Call	Yes	No	Absent
SKAN			
BURNS	X		
HULL	X		
EDWARDSON	X		
JOHNSON			X
LEASK GUTHRIE	X		
WILLARD	X		
RUARO	X		
HAYNES	X		

FROM THE DESK OF

Ketchikan's Finest Fishing Charters

January 9, 2025

Lukas Brickweg
Ketchikan's Finest Fishing Charters
21 Main Street
Ketchikan, Alaska 99901

Dear Members of the Alaska Board of Fisheries,

My name is Lukas Brickweg the owner of Ketchikan's Finest Fishing Charters located in Ketchikan, Alaska. I am greatly honored to take part in the public comments. I am deeply passionate about preserving the resources of Alaska and continuing to share world class experiences with our guests. Furthermore, your understanding of how the stated proposals will affect all the members of the Southeast Alaska fishing community and economic development sustainability.

Proposal 108 - SUPPORT

I support proposal 108as it reflects a larger allocation to the sport fishery at a time when there are few alternative species available to fish. Due to the fact that silver salmon and pink salmon aren't available until the months of July, August and September. This has acted in a way to continue to keep guests visiting Alaska for this iconic species that's both sustainable and positive for local economies.

Due to the restrictions on other species this has a created a scenario where May and June are extremely hard to book trips for because of the lack of available catches. Any changes downward to this would create a scenario where businesses would be even more challenged to cover their bottomline. As a result this would effect the local and state economies in various ways to the detriment of local citizens.

We've already had to lower the price for early season trips to no avail. Guests are educated on the restrictions in the fishery and have opted to fish in July and August. Discounted trips and buy one get one free trips simply aren't enough to attract guests to spend money on these kind of trips. Realistically they've chosen to wait until the months with multiple species available to book.

This has created an extremely stressful environment for operators to try and cover the bills because the lack of interest to fish May and June. By the time you pay for employee

salaries, city tax, boats, fuel, permits, moorage, storage and the litany of other expenses it's becomes simple math that we need at least 3-4 months of operating to cover costs. Without being able to book trips in the early months there simply isn't enough revenue to cover the overhead and keep people employed. It has become a dire situation where certainty and regulations can be openly communicated to the public and visitors in an attempt to keep the sport fishery alive.

Our business employs multiple employees directly and dozens of others indirectly in the local economy. Sport fishing operations pay a lot of money into local economies in a sustainable and positive way. This number equates to over 70-80% of gross revenue paid out into these communities. The sheer value of a king salmon caught by visitors account for a large portion of revenue in local municipalities.

These revenues drive the engine that keep all ages and demographics of the community involved in the industry with a way to make a living. Everyone from the captains, boat mechanics, fuel dock workers, city sales office, sporting good stores, restaurants, hotels, taxis, airports, rental homes and car services, and many more. It touches a lot of people and this I ask you to take into consideration when implementing the new guidelines. The sport fishing industry isn't asking for a lot in terms of allocation based on the overall size of the fishery. We're simply asking for an arena where we can run a small business that we're passionate about and love that our local community is so involved.

We consider our employees our family and everyone we work with for that matter. Which is why we are deeply passionate about working to keep this fishery sustainable. Please consider these points when making allocation decisions to consider keeping sport fishing a valuable part of Alaska's fishery management. Thank you for your efforts and for listening to the voices of our local community members.

Proposal 122 & 123 - SUPPORT

Proposal 119 & 120 - OPPOSE

Proposal 127 & 128 - OPPOSE

Proposal 193 -SUPPORT

Proposal 203 - OPPOSE

Proposal 210 - OPPOSE

Sincerely yours,

Lukas Brickweg,

Ketchikan's Finest Fishing Charters

21 MAIN STREET, KETCHIKAN, ALASKA 99901 907-617-4717 KETCHIKANFISHINGTRIPS@GMAIL.COM

PC251

Submitted by: Melissa Killinger
Community of Residence: Sitka

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

PC252

Submitted by: James King
Community of Residence: Juneau

I support proposal #241 restricting commercial harvest of Red and Blue King crab in 11a. This action creates a significant recreational, personal and economic boost to Juneau when compared to the limited financial boost to a few commercial fisherman if open to commercial harvest. Local boat supply stores, gas stations, and others benefit financially when crab openings happen. It also provides hundreds if not thousands of people with a wonderful experience which makes Juneau a better place to live.

PC253

Submitted by: Charles Haydu
Kingfisher Charters & Lodge, LLC

Community of Residence: Kingfisher Charters and Lodge, Charles Haydu

See attached letter in PDF.

Support: 108,122,123,130,134,159,160,161,162,163,193

Oppose:104,106,107,109,110,111,114,115,116,117,118,119,120,125.126,127,128,130,140,141,164.

Kingfisher Charters & Lodge

P.O. Box 1043, Craig, Alaska 99921 • (907) 826-3350

Alaska Board of Fisheries

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

Dear Members of the Alaska Board of Fisheries,

My name is Charles Haydu, my wife and I are owners and operators of Kingfisher Charters & Lodge, LLC, we are located near Craig on Prince of Wales Island. We appreciate the board taking the time to read and listen to the proposals we support and those we oppose, why and how it will affect business, our families, communities and other user groups involved.

Oppose the following proposals:

109 oppose This proposal from my understanding wants to hold the charter industry to a 20% cap. The sport industry needs some flexibility in low abundant years. The 25-year average has been at 20% some years over and many years under. In low abundance years this proposal would make early season closures difficult to operate a business. The charter industry needs stability and the 3,2,1 formula gives early season bookings the stability needed to book clients in advance. This proposal would put the charter industry and our business on uncertain ground.

110 Oppose, this proposal in low abundance years would put a June fishery in question. The numbers show that the charter industry averages 20% of its allocation over a 25-year period. This industry needs the ability to go over slightly if needed to be able to operate.

111 Oppose, this proposal although trying to be flexible still keeps us short at 22% in low abundance years would give us less than the 3 King salmon needed in June. The proposal also allows up to 4 King salmon in high abundance years. We would rather hold to 3 maximum King salmon for a nonresident and have the stability we have asked for in early season.

114 Oppose, this proposal reduces annual limits in lower tiers.

115 Oppose, a 1 king limit is not acceptable for the continuation of our business.

116,117 Oppose, these proposals reduce the annual limit to 2 through June and then 1 in all tiers. These proposals would greatly reduce the number of non-resident anglers willing to come to Alaska, almost all fishermen coming to fish King salmon come for not only the sport but to catch a valuable food source for their families. In June they need 3 King salmon to make it worth their expenses.

119,120 Oppose. To close King salmon to NR sportfisherman on a weekend or during the week in June would be catastrophic to our business. We are already dealing with weekly halibut closures, rockfish closures, and reduced Lingcod limits and whatever is next on the chopping block. As for now we have been able to supplement weekly halibut closures with the GAF program which is helping keep the customers at bay. There will be a point to where nonresident sport fishermen will decide it isn't worth it to come. To have weekly shutdowns for King salmon in June with no other salmon to catch on proposed closure days would effectively shut down the charter industry for king salmon. With the cost of doing business it takes 3 months of operation to be viable and make ends meet. Families need at least 3 months of income to be able to continue to work the business and support their families.

140,141 Oppose, going to barbless hooks will increase the times a salmon could potentially be hooked since the fish will potentially get hooked and lost multiple times, causing more harm than getting the fish in the boat using barbed hooks, and then move on to other species once a limit is reached. It isn't a good way to try to minimize catch numbers.

(141), Not allowing baited hooks would force more boats into trolling which is more effective that using bait and mooching making barbless hooks a useless regulation since it wouldn't accomplish its original intent.

Supporting the following proposals:

108 support, This proposal adds necessary protections for the troll fishery to address seasonal stability and ensure an average troll harvest equivalent to 80% of the annual harvest ceiling specified by the Pacific Salmon 110 Commission. The proposal would give the sport industry the ability to maintain a 20% average and keep our business functioning in low abundance years.

122,123 support, I support these proposals as no salmon should be removed from the water but released while still in the water as it is too hard on the fish especially after fighting for its life the fish probably would not survive or little chance of it.

Many of these king salmon proposals suggest lower annual limits for non-resident anglers. Starting off the season with weekend closures or in week closures such as we now experience with halibut. With cutbacks on halibut, rockfish, and lingcod, it will greatly reduce the ability for charter operators to stay in business.

In Summary:

I have provided below a example of what one small charter & lodge business contributes to a small community on Prince of Wales Island. These are real numbers, but don't include the many expenses that a business has year around. There is a slew of bills, expenses in running a fishing lodge which continue throughout the year, even though we are only doing 3 months of business which customers come, such as insurances, boat repairs and upkeep as well as infrastructure upkeep and repairs to name a few. (*These expenses support other businesses on the island and without the charter industry many of these businesses could not continue).* Without a June

fishery we would potentially loose most of our employees as they couldn't survive on 6 weeks work and expect to support their families.

RE: Impact of one family run lodge and its benefit to the community of Craig and Prince of Wales.

Month of June with 3 Kings per person, July to the 15th with 2 Kings, a viable industry with this quota of King salmon.

Number of guests in June 144 x 3 King salmon = ----------432 King salmon harvested.

Number of Guests in July to the 15th 54 x 2= ----------108 King salmon harvested.

Total Kings (estimated harvest) ----------540.

ADF&G license & King stamps 198 guests x $60----------$11,880.00.

Package price per/angler (average) $3,400 x 198 anglers---------- $673,200.00

RT (Ketchikan – POW) Airfare Island Air Express $540 x 198 anglers ---------- $106,920.00

Payroll 7 resident families, 14 resident employees (6-week period). ----------$185,000.00

NAPA, Log Cabin Sports, JS Warehouse, Island Air Express, The Bay Company, Sampson Tug and Barge, Alaska Marine Lines, AC Thompson House, Klawock AC, Petro Marine, AP&T, Cisco, Craig Liquor, Klawock Liquor, Alaska Gifts are many of the businesses we support.

A family run fishing lodge supports Prince of Wales families.

Thank you for considering our positions on these very important issues.

Charles and Jeanette Haydu

Email: info@alaskakingfisherlodge.com

Kingfisher Charters and Lodge

PO Box 1043
Craig, AK 99921
907-826-3350
Hayduec@plu.edu

January 13, 2025

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

Dear Members of the Alaska Board of Fisheries,

I am Emily Harding, a full time employee during the summer at Kingfisher Charters and Lodge located in Craig, Alaska. I am a mother of three children, who are learning this business. I was raised in this sports fishing business, which I have began working at when I was 7 years old. I saved money from my job each summer at Kingfisher Charters and Lodge to pay for my own college degree, a Bachelors of Science in Nursing, so that I could come back and serve this small, rural community. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect my family and I, as well as the different groups of people in our region.

Support/Opposition Proposals of:

Support:

108 support: This proposal adds necessary protections for the troll fishery to address seasonal stability and ensure an average troll harvest equivalent to 80% of the annual harvest ceiling specified by the Pacific Salmon 110 Commission. The proposal would give the sport industry the ability to maintain a 20% average and keep our business functioning in low abundance years.

122, 123 support: I support these proposals as no salmon should be removed from the water but released while still in the water as it is too hard on the fish especially after fighting for its life the fish probably would not survive or little chance of it.

Many of these king salmon proposals that suggest lower annual limits for non-resident anglers starting off the season such as weekend closures or in week closures such as we now experience with halibut. When bag and annual limits for kings were better and we had better regulations for halibut, rockfish, and lingcod, mid-May through June was the easiest part of the season to book. Now it's the most difficult.

Oppose:

109 Oppose: This proposal from my understanding wants to hold the charter industry to a 20% cap. The sport industry needs some flexibility in low abundant years. The 25-year

average has been at 20% some years over and many years under. In low abundance years this proposal would make early season closures difficult to operate a business. The charter industry needs stability and the 3,2,1 formula gives early season bookings the stability needed to book clients in advance. This proposal would put the charter industry and our business on uncertain ground.

110 Oppose: This proposal in low abundance years would put a June fishery in question. The numbers show that the charter industry averages 20% of its allocation over a 25-year period. This industry needs the ability to go over slightly if needed to be able to operate.

111 Oppose: This proposal although trying to be flexible still keeps us short at 22% in low abundance years would give us less than the 3 King salmon needed in June. The proposal also allows up to 4 King salmon in high abundance years. We would rather hold to 3 maximum King salmon for a nonresident and have the stability we have asked for in early season.

114 Oppose: This proposal reduces annual limits in lower tiers.

115 Oppose: A 1 king limit is not acceptable for the continuation of our business.

116,117 Oppose: These proposals reduce the annual limit to 2 through June and then 1 in all tiers.

119,120 Oppose: To close King salmon to NR sportfisherman on a weekend or during the week in June would be catastrophic to our business. We are already dealing with weekly halibut closures, rockfish closures, and reduced Lingcod limits. As for now we have been able to supplement weekly halibut closures with the GAF program which is helping keep the customers. There will be a point to where nonresident sport fishermen will decide it isn't worth it to come.

To have weekly shutdowns for King salmon in June with no other salmon to catch on proposed closure days would effectively shut down the charter industry for king salmon. With the cost of doing business it takes 3 months of operation to be viable and make ends meet. Families need at least 3 months of income to be able to continue to work the business and support their families.

140,141 Oppose: Going to barbless hooks will increase the times a salmon could potentially be hooked since the fish will potentially get hooked and lost multiple times, causing more harm than getting the fish in the boat using barbed hooks, and then move on to other species once a limit is reached. It isn't a good way to try to minimize catch numbers.

(141) Oppose: Not allowing baited hooks would force more boats into trolling which is more effective that using bait and mooching.

In summary, the various proposals that address the king salmon fishery (specifically, the ones that would leave a much lower annual limit for non-resident anglers in the beginning of the season) would ultimately devastate the sports fishing industry in the first half of the season. This would leave multiple families and locals that rely on this income, to lose potentially half their income, which supports living in rural southeast, Alaska. This would not only include many young families, our own included, but young high school students, who rely on this lucrative money making opportunity to pay for college or have a jump start after graduation. If the king salmon fishing were cut that drastically early in the season, it could cause potentially irreversible damage to lodges that employ and support not only locals and families, but local businesses as well. Including but not limited to the grocery stores, local airlines, and small business shop owners. The trickle effect would even include schools, as taxes have been increased during the summer influx of visitors to help pay for supporting the Craig City School District specifically. Thank you for considering our proposals and taking the time to deliberate on them carefully for the best interest of all parties.

Sincerely yours,

Emily Harding

Kingfisher Charters & Lodge

P.O. Box 1043, Craig, Alaska 99921 • (907) 826-3350

Alaska Board of Fisheries

P.O. Box 115526

1255 W. 8th Street

Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

I am Nils Baeckstroem, one of the captains at Alaska Kingfisher Charters & Lodge, located on Craig on Prince of Wales Island. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me, as well as the 7different user groups in our region.

I support the following proposals	
Proposal	**Comment**
108	The only proposal that can offer stability to both sportfishermen (resident and non-resident) as well the commercial fishery. It is the only proposal that can balance allocation by using averages over several years and not a hard cap and thus eliminating in-season management. The charter industry cannot handle in-season management and at the same time offer its customers a desirable fishing experience. It is also favorable for the commercial fleet as they can still catch residual allocation from the sportfishermen when they have been unable to catch their full allocation. Our industry wishes to obtain stability, so customers know what to expect when many times they book 1-2 years in advance. The 3-2-1 system fulfills those criteria.
122/123	I support these proposals as King Salmon is a very sensitive fish. A fish should only be netted or removed from the water if it is intended to be kept and thus be accounted towards the fisherman's daily limit assuming it is allowed.

I Oppose the following Proposals	
Proposal	**Comment**
109	To hold the sportfishing industry to 20% which has been the industry average is fine. However, we do need flexibility in low abundance years. Some years it has gone over but many years we have been under. In-season management that can potentially affect limits in June will have a huge negative effect on our business and a customer's desire to fish in June will drop drastically. The current format 3-2-1 has given us stability and opportunity to offer paying customers so that they come fishing.
110	Again the 3-2-1 formula has given us the stability to offer desirable experience for paying customers. Any proposal that could affect limits in June will have a detrimental effect on our customer base. Historically, many of the years we have been under the 20% allocation, but with leniency on low abundance years.
111	Although a more flexible allocation with 22% being a hard cap, it can still affect limits in June/early July in low abundance years. For it to be desirable experience for paying customers we need the 3 kings in June as well as 2 kings early July. The stability of 3-2-1 formula, is stability that we need and that we would prefer even though in this proposal we could potentially be allowed up to 4 kings, the stability of the current format Is preferred.
114	The industry would not be able to handle the reduction of annual limits in lower tiers.
115	It is unacceptable to lower the King limit to 1 per year and would be detrimental for our business and the charter industry as a whole.
116/117	With these proposals, where non-residents would be limited to 2 kings per year in June and 1 king limit in July would have a huge negative impact on our business and industry. I would also argue with the statement that the troll fishery has a higher economic impact at a local level. Where a commercial caught king often catches 5-6$/lbs at the dock, which is being processed by mainly seasonal workers often from other countries in plants that are owned by companies that are from out of state. Whereas the charter industry can impact the local economy at a far greater length by not only supporting other local businesses such as grocery stores, marine fuel, airlines, local shops etc. But it is also able to employ far more people who most often are local year-round residents.
119/120	By closing King Salmon retention for non-residents over the weekends in June would again have a huge negative effect on our business. We have already seen it in the halibut fishery with daily closures. However, in the halibut fishery we have been able to offer GAF licenses to counter the closures which has still made it desirable for people to come fishing. The charter industry has already been hit with regulation cuts in many different fisheries such as lingcod, rockfish and halibut. Another regulation in King Salmon fishing will more than likely render us to not being able to run through the 3 months as we do now which would put the company and many other operators within the industry in jeopardy.

140/141	Regulating to barbless hooks would be very unethical to the fishery. It is a guarantee that fisherman will have to hook and lose far many more fish than now in order to catch their limit, causing more harm to the fish. Also, not allowing bait, which is the traditional way of sportfishing in SE by mooching, will only turn more fisherman to trolling as a method which is a far a more effective way of fishing. As a result, it would counter argue proposal 140 of making it harder to catch fish.

Summary:

There are many proposals in the draft that would drastically change the landscape and allocation of King Salmon between sport fisherman and commercial fisherman.

Years ago, when regulations were different, June was one of the easiest periods of time to fill up with customers. Today, we see it being one of the hardest periods of time to book. The reason for this is the many changes in regulations to many species of fish including halibut, Yelloweye and especially King Salmon. As of now, the current regulations of King Salmon are just enough to keep customers coming. Any proposals that would lower or constrain annual limits for King Salmon for sport fisherman would severely impact our industry.

Already we have had to offer several different marketing strategies in order to book the first part of the season. Some of these are “early bird” specials, 4 days of fishing for the cost of 3 days etc. Also, we have had to push and promote fishing in June verbally in discussions with customers when they consider moving their fishing trip to a later date when regulations and fishing season is more favorable.

I have been working at Kingfisher Charters & Lodge for 10 years. My In-laws started the business close to 30 years ago and we are a true family business. Currently, the business supports the life of not only the owners, Chuck and Jeanette Haydu, but also 5 other families that are all daughters and sons-in-laws, which all have children. All of us involved are truly dependent on the business to keep going for all of us to support our families. Also, it is something that we wish to pass down to our kids.

Fish are a renewable resource and need to be prioritized where it can have the most impact without losing the idea that it needs to be sustainable. If managed properly it is a renewable resource.

As an example, I did a rough estimate that our lodge, that went through approximately 190 guests from end of May through the middle of July. We harvested approximately 500 King Salmon during this time. That is the same amount of King Salmon that a commercial troller can harvest in the first couple of days of their opener. Those customers generated roughly 650 000 dollars in revenue for the company.

The conclusion is pretty simple, the same number of fish was able to support a business that employs up to 20 people, both family and local. Not to mention, the lodge supports other local businesses such as the grocery stores, marine fuel, liquor stores, airlines, smokery, marine shops, fishing stores to mention a few in order to operate. All local businesses who get support and able to thrive thanks to sport fishing. The city of Craig also benefits by being able to tax all the entities with their sales tax, not to mention the state, creating revenue in fishing licenses and salmon stamps. The financial impact at every level per King Salmon caught is far greater in sport fishing over commercial fishing. If we want to keep this resource alive and allow remote Alaskan communities to not only survive but to thrive, sport fishing needs to be prioritized and not diminished.

This should not be a discussion pitting sportfishing against commercial fishing. Instead, together we should find a balance where both industries can survive and thrive as well as keeping a sustainable fishery so that it is something to be enjoyed by generations from now.

I urge the Board to consider these points when making allocation decisions to ensure that sport fishing remains a viable and valued part of Alaska's fishery management. Thank you for your time and dedication to preserving these resources for all stakeholders.

Sincerely,

Nils Baeckstroem

Captain

Alaska Kingfisher Charters & Lodge

Submitted by: Sidney Kinney
Community of Residence: Sitka, Alaska

Members of the board

My name is Sidney Kinney. Sitka is where I was born and raised. I'm a tribal citizen of the Sitka Tribe as well as a shareholder of Doyon Native corporation. I'm a stakeholder in Sitka Sac Roe.

I oppose the following proposals – 173, 174, 175, 176, 177, 178, 181

I have participated in Sitka Sac Roe for over half my life now. Hired by my stepdad at 14 to hold corks, to coming home during spring break to deck hand, now owning my own permit and fishing alongside my husband on our 58-foot seiner.

I'm just one of 47 small business owners in this fishery trying to diversify our operation to stay afloat in our current economic situation. We aren't just up against difficult economic times but up against social media warriors throwing themselves behind causes they know little about and stamping their names on proposals and spreading false information on platforms that have become the pinnacle of how the next generation get their news.

Why would I try to over exploit my business for future years? For future generations? We plan to raise our three girls on the back deck. We are committed to showing them the importance of being stewards of the land and sea which we depend upon for our livelihoods and for our subsistence needs as well. That's why we are all here isn't it? To advocate for what we love and what resonates within each of us.

Alaska is a resource-based state. We should pride ourselves on having processes like these to insure it continues to be that way, well managed and regulated for success. Putting regulation into place to allow reasonable opportunity to harvest subsistence needs by conducting fisheries outside the core area, not allowing test setting near the core area, limiting test fishing, limiting opening, documenting sets, collecting subsistence surveys. By allowing equal split these regulations could even be better monitor and regulated. Allowing for even more opportunity for both user groups.

The data collection on this stock is the most stringently detailed of any fishery on the West coast. Abundance is at an all-time high with our average five-year spawn at 84.24 nm. We are seeing herring in Sitka Sound year-round and whales never leaving the area because of the abundance of food. I urge you to believe in the science behind the management that's been accurately depicting a stock for over half a century.

It's the departments job to allow reasonable opportunity and determine scientifically what the stock can handle, unadulterated by emotion or market demand. Strictly based on science collected and how it presents itself to past collection. ADFG's obligation is to the science and making sure opportunity is presented, which THEY and ONLY they have documented extensively for the greater portion of the last century. They do not work for the fishermen, or against the other government fund affiliations. Undermining the only credible fisheries science institution could lead to a domino effect on every other state managed fishery in Alaska. I'm hopeful people understand the gravity of kicking at the leg of the table that holds up the industry that provides probably the largest number of jobs and private revenues to

Alaska's coastal communities. The social fabric of this industry is so interwoven within our communities, within our families, within our state.

Every three years we come back to this table. My stance is as follows

I OPPOSE

PROPSAL 173

PROPSAL 174

PROPSAL 175

PROPSAL 176

PROPSAL 177

PROPSAL 178

PROPSAL 181

Thank you for your time and consideration,

Sidney Kinney

Sitka Sac Roe Permit holder

Tribal Citizen of Sitka Tribe

Sitka Resident

PC257

Submitted by: Matt Kinney
Community of Residence: Sitka

Honorable board members,

I, Matt Kinney, a Sitka based commercial fisherman am writing to express my opposition to salmon proposals 156, 167, as well as my support for 168. I also would like to add my opposition to herring proposals 173 through 178, and 181.

There is clearly no cause for concern with the Sitka sac roe herring fishery. The stock is robust, healthy, and monitored professionally. Research and models have been created systematically, and shows decades worth of history of building growing stocks, yet every three years we go through the same, "sky is falling"theatrics in an effort to take away more financial opportunity from the fishing fleet. Every three years more area is on the chopping block, and every three years it seems that we are toenailed out of a fishery that is a major part of our livelihood, and my family's history. It's not the boards job to make decisions based on emotion, or anecdotes. We live in a world that is governed by science, which we use for almost all aspects of life. Please don't abandon the facts for approval of subsistence users.

My wife and I have been subsistence harvesters in the last 5 years, and in the few times that we have gone out, we spend less than an afternoon setting branches, and have consistently brought back more than a pickup truckload of eggs on branches which we have shared with the community. All of this between herring openers, that I captain my 58 foot seine vessel during.

The idea that subsistence needs aren't being met is preposterous to me with the sheer volume of supply. It really all comes down to effort and determination.

181, oppose: here's another proposal designed to derail the herring fishery by adding a seemingly benign rule which would put the entire fishery on the fence.

Herring spawn all in the course of a couple weeks. It's imperative that the fish are sampled, to insure optimal quality and minimize waste. With an entire sound teeming with herring, literally hundreds of thousands of tons, all maturing at different rates in different locations, we must make sets. It's irresponsible not to.

By limiting to 3 sets per day you automatically lose opportunity. Thats a given. Again, there are thousands of tons of herring distributed all over the sound and by heading back to the harbor after 3 missed sets when there are tens of thousands of tons in the area, statistics may suggest you will likely not find the quality fish and will lose days, which equate to processing capacity, which equate to lost revenue. We have a short window of time before they all spawn and the fishery is lost.

The test sets we make, in no way harm the fish, other than the bucket full that we dip out of then net before releasing our end of the net.

Jig samples are nowhere near accurate enough to hold nor deny an entire fishery on.

This proposal is death by a thousand paper cuts, 100% written to shut down a fishery under the guise of subtleties.

156, Oppose: We rely on chum salmon hatchery production, which have financially carried all gear groups of southeast Alaska salmon fishermen for the past 10 years. Decreasing hatchery production by 25% won't do anything positive for the resource, but certainly will further damage the already struggling fishing economy. Please understand the financial ramifications of creating less fish for already hungry fishermen, as well as the loss of revenue from fish tax to the communities of southeast Alaska.

167, Oppose: adding 25 fathom of additional net length at first glance seems like it would be to the benefit of fishermen, however, half of the southeast fleet aren't efficient enough to get their net back aboard in a timely manner as it is, and with the strong currents of southeast Alaska, they end up stuck inside the net of the fisherman with the next turn, causing problems, and lost fish to him. A lot of fishermen are oblivious enough to brush that aside for their own personal gain, so let's keep the net length shorter to avoid all that controversy.

168, Support: Most of the terminal harvest areas are small enough to see from one side to the other with the naked eye. So the benefit for pilot fishing is limited, however, the allowance of pilots during tha fishing days which coincide with a common property opening allows for an exploitation of a loophole. Allowing pilots to fly over common property districts to and from the THA, and report what they saw along the way. There's enough unenforceable properties as it is, with the current pilot laws. Taking away this loophole at least levels the playing field for those unwilling to bend the rules.

Thank you for all your time spent wading through these topics. I know it must be exhausting.

Best regards,

Matt Kinney, owner/operator of F/V Hukilau.

PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg

I am a subsistence, personal use, sport and commercial fisherman from Petersburg. I own a commercial Sitka Herring Sac Roe Purse Seine Permit. I have a B.S. from Oregon State University in Natural Resource Economics. I opposed proposals 173-176.

The Sitka Sound herring population is a tremendous biological success story. The reduction fisheries of the early 20th century decimated the herring resources of Southeast Alaska. After a century of diligent and sound management by ADFG, the herring resource in Sitka Sound is stronger than ever. This herring explosion has happened while Roe Herring fishermen like myself have taken a small portion of the renewable resource annually.

Recent BOF decisions have excluded the commercial fishermen from the highest quality fishing grounds in Sitka Sound. The subsistence users of Alaska have exclusive access to the best herring habitat in Sitka Sound. We commercial fishermen are left picking around the edges of the herring habitat. Yet every BOF cycle we get more and more proposals to restrict us further. These restrictions have to stop before my fishery is no longer viable.

The BOF needs to support the sound management of ADFG and recognize their success in rebuilding the herring resource while allowing minimal commercial harvest. There is no biological, economical or social justifications to support 173-176. There are plenty of herring in Sitka Sound for everyone.

The BOF needs to recognize the groups that wish to further restrict us will not be happy until my fishery no longer exists. If it is the intention of the BOF to put me out of business, then lets just get straight to it. I'll tell my two Native-American and one Philipino-American crewmen to go look for another job.

PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg AK

I am a subsistence, personal use, sport and commercial fisherman from Petersburg. I own a commercial Red King Crab Permit. I have a B.S. from Oregon State University in Natural Resource Economics. I support proposal 243 which will allow the commercial Red King Crab Fisherman access to any harvestable surplus of Red King Crab allocated to them by ADFG. This proposal was unanimously supported by the Petersburg Borough Assembly.

There is one inherent flaw in this proposal that must be addressed by the BOF before passing. At the 12/9/2024 public meeting of the ADFG King and Tanner Task Force (KTTF), the current ADFG crab management team made industry aware of this flaw. Apparently the former ADFG employee whom authored and submitted this proposal, needlessly included subsection (b) which will further restrict commercial fishermen to harvest the surplus Red King Crab annually. In fact, leaving subsection (b) in proposal 243 will subvert the whole intention of the proposal. ADFG told industry that they had just ran the numbers through the unneeded formulas in subsection (b) and told the fleet we would only have a fishery in only two additional years out of the last twelve- even though there has been a harvestable

surplus of Red King Crab available for the commercial fleet every year for the last twelve years! Needless to say this information was a complete surprise to industry. Current ADFG staff could not offer a justification or a need for the inclusion of subsection (b) in proposal 243. However, because the proposal was already submitted to the BOF, ADFG claimed they are unable to change it and remove subsection (b).

So here's the solution. The BOF has the ability to amend proposal 243 and remove subsection (b). I encourage the BOF to ask ADFG why subsection (b) was included in this proposal, if they support removing it, and what would happen if it were removed.

This BOF meeting is the time to amend proposal 243, remove subsection (b), and pass the amended proposal. Lets pass a proposal that will accomplish what all the cooperating parties intended.

PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg

I strongly oppose proposal 242. This is a completely unjust reallocative proposal.

The Red King Crab in area 11-A are fully allocated. Personal use get 60% and commercial fishermen get 40%. The personal use fishermen get to fish their share every year, while we commercial fishermen haven't had the opportunity to fish in 7 years and our businesses have suffered. Now the urban personal use fishermen want to take away our opportunity entirly. This is not fair. Our commercial Red King Crab fishery is almost entirely Alaskan- only one permit is held by a non-resident. Rural fishermen from Haines, Hoonah, Sitka, Petersburg, Wrangell, Ketchikan and yes even urban Juneau rely on this resource to support ourselves and our struggling coastal communities. We are not trying to take from the urban Juneau personal use fishermen who submitted this proposal. We are just trying to keep the minority share the BOF has already allocated us. Support your rural Alaskan fishermen and communities

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PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg AK

I support proposal 159. It was generated with support from all user groups. It replaces an outdated management plan that no longer fits the current needs of the user groups. It provides fair and equal access to all sportfishermen.

PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg AK

I do not support proposal 156. Cutting hatchery production will harm myfishing business, rural community and fishing industry. There is no proof 156 will do anything to help the Alaskan salmon resource.

PC258

Submitted by: Andrew Kittams
Community of Residence: Petersburg AK

I support Proposal 163. This proposal was also supported unanimously by the Petersburg AC. The Blind Slough THA is an anomaly in that nonresidents can keep up to 4 king salmon a day, every day for their entire stay. For example, a nonresident angler that fishes for a week at Blind Slough can leave our state with 28 king salmon! This may have been acceptable 20 years ago when there were very few nonresident anglers using the resource but now there are hundreds daily and they are taking the vast majority of the fish, leaving fewer and fewer for the residents and hatchery. This proposal will align the Blind Slough King Salmon bag limits with the rest of the state of Alaska.

PC259

Submitted by: Lance Kittams
Community of Residence: Petersburg

As a person who is from a fishing community and family I strongly oppose proposal 242.

PC259

Submitted by: Lance Kittams
Community of Residence: Petersburg

As a person from a fishing community and family I strongly support proposal 163.

PC259

Submitted by: Lance Kittams
Community of Residence: Petersburg

I do not support proposal 156. I am a crewman on a commercial salmon fishing vessel and this proposal would severely hurt me and my family. As someone who has grown up and lived in a fishing community I have experienced the fluctuations of different fish populations first hand and I have been affected by these fluctuations first hand. Proposal 156 is a baseless proposal that fails to truly account for the affect of other international salmon fisheries including Russia and Japan.

PC259

Submitted by: Lance Kittams
Community of Residence: Petersburg

As a person from a fishing community and family I strongly support proposal 243.

PC259

Submitted by: Lance Kittams
Community of Residence: Petersburg

As a person coming form a fishing community and family I strongly support proposal 159.

PC260

Submitted by: Stacy Kittams
Community of Residence: Petersburg

I am a Sitka Herring Fishing Permit Holder opposed to 173-176. The Sitka Sound herring population is healthy providing enough stock surplus to support the commercial, subsistence and personal use fisheries for these herrings. These proposals will be financially catastrophic to my business. I have a spouse and four children as well as crew members and their families who rely on this commercial fishery for their income and provides jobs for our community.

I am also a Red King Crab Permit Holder. I oppose 242 as it will take away from our family, crew and communities livelihood. I support 243 if amended to remove subsection (b). This amended proposal will ensure we have a commercial fishery when crab are available.

PC261

Submitted by: Trent Kittams
Community of Residence: Petersburg

I support proposal 243

PC262

Submitted by: David Klepser
Community of Residence: Ketchikan

#222 I oppose this as subsistence and personal use fishing during this time period is of minimal harvest and targets local residents.

#224,#225 I oppose both of these as they deal with changing shrimp season .we are only in the beginning of the 3 rd yr since the change and it has not given fish and game enough time to evaluate any benefits that was proposed in the original change.

#226. I oppose this as this fishery has had many restrictions put on it .further restrictions will place an economic hardship on participants.

#227 I oppose this proposal as permit stacking has a negative effect on small boat operators

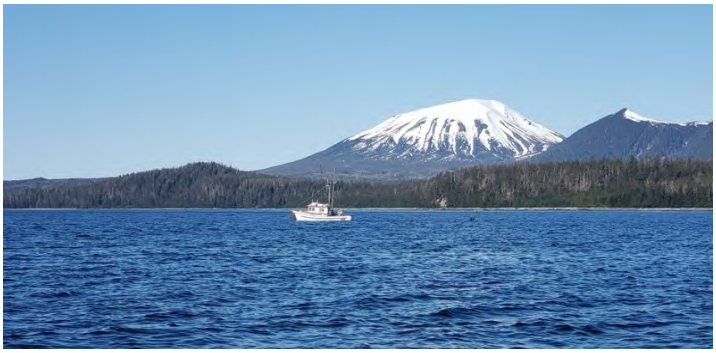
#260,#261 I oppose both of these proposals as they deal with very large areas and the premises of not in my back yard .

#156 I oppose this proposal has it would have a devastating economic effect on the commercial and sport,sport charter fleets . A reduction of 25% will also mean a reduction in employment to all hatcheries in southeast people will lose their jobs . The fallout will be far end wide effects to the Ketchikan area will include freight companies to grocery store to to direct vendors ,welder mechanics,hardware's suppliers.

Unrealized effects will be higher fishing effort on wild stocks as opportunities decrease on available hatchery produced fish .

Thank you David klepser lifetime resident and 40 year commercial fisherman

[redacted] Ketchikan ak 99901



Dear Board of Fisheries members,

My name is Denise Klingler, I have owned, and actively fished, a Power Troll permit out of Sitka, Alaska for 34 years. My husband and I have raised 2 children - who also worked on the boat with us until grown - and have been able to help support the community of Sitka through our business. We are year round residents of Sitka, Alaska and purchase all of our fuel, groceries, fishing gear, as well as paying moorage and utilities for both our house and fishing boat. Our family wants to thank you so much for the sacrifice of your time and energy as you consider these King Salmon proposals before you.

I strongly support the adoption of Proposal 132. The measurement of King Salmon from Snout to Fork of tail in the spring troll fisheries will accomplish several things. A live King Salmon can be more quickly and accurately measured ensuring a more successful release if the King Salmon is undersized. The fork of the tail is not subject to change based on rigor mortis or how the fish is iced in the hold making it easier for Law Enforcement, fishermen, and fish buyers to make sure of legal length. Fisherman will have access to hatchery King Salmon that are mature, but may be just shy of the 28" length requirement to tip of tail.

PC264

Submitted by: Iris Klingler
Community of Residence: Sitka

Greetings,

My name is Iris Klingler and I am a lifelong resident of Sitka.

I grew up commercial salmon trolling with my family, and not only are the herring an important food source for salmon, they are also extremely important to our ecosystem. Beyond this however, I have eaten herring and herring roe my entire life, as well as going out to harvest the herring roe for my elders and others in my community that do not have access to get out on the water. As the years go by the numbers of herring and areas of herring spawn have continued to noticeable decrease, this is in direct correlation with the overfishing done by the Sitka Sound Sac Roe Herring Fishery.

For myself and my family, herring are a part of my life and my community and without the herring we lose not only a huge source of subsistence food, but also the salmon and the entire ecosystem are also affected by this.

Tribal elders and many other tribal leaders have spoken out over the years about the issues that will result in overfishing in our communities, and the problems that will result in the disappearance of this resource, and time and time again they have been ignored. That is why I am in support of proposition 190 which would allow for the co-management of herring fisheries by including tribal government in the collaborative management for the good of all that use this valuable resource. This collaboration would reduce the likelihood of the herring becoming extinct, and would also allow the herring to be co-managed by those that have been stewards of the land since time immemorial.

I thank you for your time and consideration.

-Iris Klingler (Shtoo.aak)

PC265

Submitted by: Michael Knapp
N/A

Community of Residence: Juneau

I understand that Proposal 242 would make Unit 11A off limits to commercial fishing for red king crab. I SUPPORT this proposal (and others) that reduce commercial fishing operations in areas that are frequented by local sport fishermen. Thank you for your consideration. Michael Knapp (Juneau)

KODIAK REGIONAL AQUACULTURE ASSOCIATION
104 Center Avenue, Suite 205
Kodiak, AK 99615

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

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

January 13, 2025

RE: Proposal 156 – 5AAC 33.364 Southeastern Alaska Salmon Enhancement Allocation Management Plan

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association is in **opposition to Proposal 156.** We thank the Board for this opportunity to once again speak to the arbitrary and harmful nature of this proposal. KRAA works for nearly 600 commercial Kodiak salmon permit holders as well as all of the other salmon users in our region whether they be sport, subsistence, or personal use fishers. Several of our members also hold S.E. salmon limited entry permits. We continue to speak out on this issue because arbitrary modifications to hatchery programs in any region have the potential to be applied to Kodiak and thereby would compromise our ability to continue to serve the fishermen of the Kodiak Archipelago and its people. Furthermore, such a draconian cut to hatchery production in Southeast Alaska would have crippling effects on the economies and opportunities of rural coastal Alaskan communities and provide no benefit on the levels or issues contended by the proposal author.

During each of the last six years, proposals similar to proposal 156 have been submitted for the Board's consideration. As the Board has ruled six times, this proposal fails to demonstrate supportable scientific rationale for reductions to salmon hatchery production in any region in Alaska. Hatchery production-related concerns, be they identified by the Department or the public, have an established forum and procedural protocol for discussion and recommendation to the Alaska Board of Fisheries. Alaska's Regional Planning Teams provide an opportunity for all stakeholders in Alaska's hatchery programs to engage in the public process and work to resolve scientifically-based hatchery production concerns. Proposals like #156 seek to bypass the Regional Planning Team (RPT) public process. Within this process there are internal and external scientific presentations, debate on the merits of stocking programs, monitoring and review of existing programs, data collection and reporting, and ongoing research discussions that test and examine hatchery-related production in the region. The Board should take no action on

proposal 156 and, by doing so, encourage stakeholders to participate in the Regional Planning Team process.

In addition to affirming the "no action" position for proposal 156 because the proponents have failed any attempt to engage with the RPT process, KRAA also believes the proposal should not be considered because it cannot be supported by the facts. This proposal includes a broad assertion that hatchery released salmon are "over grazing" the ocean's food supply and thereby harming wild salmon. First, there is limited scientific information affirming overgrazing and certainly divergence within the scientific community regarding the ocean's carrying capacity for salmon – wild and hatchery released. On this point and others, including 1) wild stock fluctuations occur naturally, including several record wild stock returns in the presence of consistent production at present levels; 2) the fact that a 25% reduction to chum salmon in SE Alaska, though hugely impactful to the region, would be so insignificant to the ocean biomass of chum salmon as to have no likely impact on ocean conditions or competition anywhere and thus likely have no impact on chum stocks elsewhere; 3) frankly, no way to measure an impact is even suggested; 4) cuts to SE Alaska programs cannot control for the actions or productions in other states or by other nations; and 5) on its merits, the Board cannot even tie the action requested in proposal 156 to a demonstratable positive effect on S.E. wild salmon, there is more than sufficient reason to reject proposal 156.

Finally, we hope you agree that natural resource issues should be resolved on a scientific basis and not by mob appeal. Here in Alaska, we've seen media and conservation blitzes rallying folks to be anti-mining, anti-drilling, anti-hunting, anti-trapping etc. These types of "grass roots" appeals that broadly oppose an industry are typically short on scientific information and appeal to some undefined common knowledge that "it's just wrong". Since statehood Alaska has fought these initiatives with science and facts. This is what the Alaska Board of Fisheries is seeing regarding Alaska's hatchery program. Good decision making—especially in the natural resource sphere—is rarely, if ever, based on uninformed public perception. KRAA encourages the Board to not be distracted or mesmerized by anti-hatchery rhetoric which is amplified by just a few strident voices and self-interest groups, some even from outside Alaska. KRAA encourages the Board to stand up for Alaska, stand up for science, stand up for facts, and stay true to the clear record on this proposal for every region in which it has been heard and reject proposal 156 in Southeast Alaska.

Thank you for the opportunity to submit these comments.

Tina Fairbanks
Executive Director

Ken Koelsch

[redacted]

Juneau, Alaska 99801

January 12, 2025

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

I am a 56 year resident of Juneau. I am a personal use sports fisherman. I had the honor of teaching at Juneau-Douglas high school from 1969-1996 and serving as US Customs and Border Protection Port Director from 1996 until 2014. I also served the community of Juneau on the City and Borough of Juneau Borough Assembly from 1997-2003 as an Assemblyman and from 2016-2018 as Mayor. As an Assemblyman from 1997-2003, I was also liaison to the DIPAC Board. As a former Assemblyman and also Mayor and a former teacher, though it is tempting, I will not use the 100 page limit for comments.

I write in opposition to Proposal 156 which would institute a 25% cut to DIPAC chum production.

I taught with Ladd Macauley when I first arrived in Juneau and observed Ladd and the fishing community put their heart and soul into making DIPAC responsive to the community and the hatchery self-sustaining. Through the years, I have witness DIPAC through its programs grow into an essential and integral part of Juneau. The building itself is used for several community gathering and special events as well hosting and educating several thousand visitors annually. Our children and grandchildren have all gone through the school district's sea week program and every elementary school in Juneau has its field trips to DIPAC to take advantage of its aquarium and its "petting" ponds. All of us, local and tourists alike, take advantage of the education of the outside fish ladders and pens and the sheer mass of the fish return every year. As mayor, I was there when the community totems were carved, dedicated, and raised at DIPAC in honor and acknowledgement of the First Nation's fishing lifestyle and historical connection. As a mayor, assemblyman I was very aware of the employment opportunities the hatchery brings to the area and especially the opportunity for young people to begin entry level jobs there. Even as a US Customs and Border Protection Port Director, I worked with DIPAC on the Taku fisheries escapement goals and with the Taku First Nation in importing the fish caught on the Upper Taku.

Cutting the Chum program at DIPAC which helps fund other fisheries does not seem wise in a time when exploring for enhancing revenues opportunities for fisheries are being sought during this legislative session as one of its major goals. I also agree with the need to scientifically justify Proposal 156 and to address the economic loss to the affected communities in Southeast before such a measure is imposed.

I write in opposition to Proposal 156 which would institute a 25% cut to DIPAC chum production.

Ken Koelsch

PC268

Submitted by: Jason Kohlhase
Community of Residence: Juneau

I am a 3rd generation commercial fisherman with a son wanting to make it 4 generations.

Our industry has been in financial distress for some time with an uncertain future. Opportunity and diversification, among others, are critical components for a successful business model. Proposals 242 and 243 speak directly to those ideas. Proposal 243 creates opportunity and 242 takes it away. While the red king crab fishery in southeast is not massive, it is another spoke in the wheel of diversity that is desperately needed for our small businesses to stay alive, generating cash flow at a time of year that is difficult to do.

We as an industry and more importantly, as a state, have to ask ourselves, do we really want a commercial fishing industry in our small coastal communities. If so, what can we do to support those fisheries for success. I strongly oppose proposal 242 and support 243.

Thank you.

PC269

Submitted by: Randall Konrad
Community of Residence: Haines

Support	Oppose
110.	242
111	156
116	108
117.	113

CASCADE CREEK
LODGE

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

Dear Members of the Alaska Board of Fisheries,

My name is Nathan Kraft and I'm a part-owner and skipper at Cascade Creek Lodge located in Sitka, Alaska. We offer multi-day saltwater fishing and lodging trips from mid May through early September every year. My wife and I live in Sitka year-round. I appreciate the opportunity to comment on a few proposals that will affect me and other small businesses in Southeast Alaska.

I support Proposals 108, 122, 123 and 134. I oppose Proposals 104, 109, 110, 111, 114, 115, 116, 117, 118, 119, 120, 130, 140, 141, 203.

I support Proposal 108. It will keep our business operational during all summer months by front loading King salmon annual limits in May and June. In season management will allow to not exceed allocation. It allows payback provisions for the troll fleet. A rolling King salmon average allocation is the only way for us to produce successful trips year after year. The non-resident King salmon limit of 1 day/3 annual for May & June is the absolute minimum we need to function. The tiered system allows us to stay within allocation with rolling averages.

I oppose Proposals 104, 109, 110, 111, 114, 115, 116, 118, 119, and 120. 3-4 days fishing and 4-5 nights lodging is where 90% of our customer demand lies. There simply is not enough demand for shorter trips, and one day charters is not sustainable. Skippers, deckhands, lodge staff, and lodge owners and their families need a minimum of ~90 fishing days to keep their businesses profitable. Our May and June customers account for ~40% of our business, and we need fish to target and sometimes retain during these time periods. 2024 sport fishing regulations in the Sitka area have allowed our non-resident anglers to retain the following: 1 King salmon/day 3/annual ≥28", 1 halibut/day ≤ 40" or ≥80", 2 pelagic rockfish/day, 1 slope rockfish/day and 1 lingcod/day 1/annual ≥30"- ≤35" (closed June 16-July 31). Any more reductions in retention or size restrictions would severely impact our ability to offer and sell trips in May & June.

With current regulations, May and early June dates are already increasingly difficult to fill. We offer discounts and spend advertising dollars to fill spots. With stringent regulations on the other fish we target, the opportunity to retain 1 King salmon per person/day with a 3 annual limit is essential. Cutting these limits down as suggested by several proposals, would have a severe financial impact on my family and our employees.

From an economic perspective, our small business along with other lodges in Southeast Alaska contribute immensely to the local economy. If our ability to harvest King salmon is decreased, it would have a detrimental cascade effect- decreasing all of our contributions to city taxes, airlines, restaurants, fuel, taxis, local shops, grocery stores, etc.

I urge the Board to review these points when making decisions. I appreciate all that you do, and time spent reading this.

Sincerely,

Nathan Kraft

Cascade Creek Lodge

PC271

Submitted by: Kurt Kvernvik
Community of Residence: Petersburg

I strongly oppose proposition 156. The hatchery programs are clearly needed to keep our fisheries economically viable.

PC271

Submitted by: Kurt Kvernvik
Community of Residence: Petersburg

I strongly support proposal #243 which was proposed by ADFG.

I own a K49 crab permit. (Tanner-Red)

#243 is a path to a yearly sustainable commercial fishery, that does not seek to harm the Red Crab sport fishery.

The ADFG proposal #243, if implemented, would be an important economic engine to all Southeast Alaska communities.

#243 would supply crew jobs, processor Jobs, support jobs and raw fish tax to communities that rely on a healthy commercial fishing industry.

#243 also removes the possibility of overharvesting the legal adult males , by implementing a Individual catch limit , which has been successful with the Alaska Sea Cucumber dive fishery .

The future of the Southeast Alaska commercial Red Crab fishery, likely rests on the passage of #243 and the rejection of proposal #242.

I am asking for your support, for the fishermen and for the rural communities of Southeast Alaska.

Pass proposal #243

PC271

Submitted by: Kurt Kvernvik
Community of Residence: Petersburg

I am 100% opposed to Proposal #242

I am a K49 permit holder (Tanner & Red crab)

If passed, Proposal #242 would all but guarantee that our SE Alaskan communities will not have the Red Crab fishery into the foreseeable future. There will be no crew Jobs,no Processor Jobs and no raw fish taxes from this Fishery if 242 passes.

I would remind the board of the intensely difficult times that the seafood industry is currently experiencing and that this proposal is designed to take away 100% of a commercially important resource, not to fairly allocate the resource.

Proposal 242 also seeks to increase the "efficiency" of the sport harvest by allowing more pots per boat while at the same time, claiming that the current ADFG management of the sport fishery is working. What impact would more "efficiency" have on the Red Crab stocks? Would the Fish and Game management plan still be working ?

I strongly support proposal # 243 which charts out the path to a sustainable Red Crab Fishery for all.

PC272

Submitted by: Melissa Lacour
Log Cabin Sporting Goods

Community of Residence: Craig

Sport fishing is a staple for POW,if the charter business struggles or fails it will effect not only them but hurt local businesses also. Reduced king salmon means less tourism. All businesses will suffer from this from grocery to gas station too my sporting goods store and many others. I do not support reduced salmon for them!

PC273

Submitted by: Tim Lacour
Community of Residence: Prince of Wales

I’m an owner of a convenience store in Klawock

I enjoy watching other people having fun and enjoying our resource here

Some of these folks that come here is not only their first time but possibly their last

I feel we are blessed to live here and we should share the experience with others

Reducing limits on fish that these people come here to enjoy might discourage them from coming here all together

I truly believe without the tourist industry my small convenience store would suffer terribly

Put a lot of thought in your limits your putting on these folks, & the rest of the people that live here & rely on tourism.

Thank you

Submitted by: Cale LaDuke
Community of Residence: Sitka

My name is Cale LaDuke. I support proposals 109 and 110 with RC comments and I strongly oppose proposals 108 and 113.

I was born in Sitka, Alaska, a rural town in Southeast Alaska and I have lived here all my life. I've been commercial fishing for 28 years and I am 43 now. Before I fished commercially, I would go out in the skiff with my uncles and catch salmon for the family. Salmon, specifically Chinook, has been a big part of my life. Chinook salmon is a way for me to make a living, but it is also a major source of food for my family.

In my family, my grandfather trolled, my uncles trolled, my brother and I trolled, and my father-in-law has a troll permit. I think it's safe to say that we are very dependent on trolling and the ability to catch Chinook salmon.

When trolling I have made commercial deliveries to many Southeast communities, including Sitka, Craig, Pelican and Yakutat. Typically, we have two openings a summer in which we get the opportunity to commercial troll for king salmon. Losing the August opening cuts that in half. That is a huge portion of my income for the year.

While I was writing this letter my three-year-old daughter came in and asked me what I was doing. I told her I was writing a letter about being a fisherman. She then asked me, "Dad, when can I be a fisherman?" Her and her six-year-old sister will be out fishing with me and their mother this summer. It will be the first time for them, and I plan on it being one time of many. But I really, really worry about the longevity of this fishery, and I have serious concerns whether or not my daughters will even have the option to be fisherwomen by the time they are old enough, if they so choose to be.

I own a limited entry statewide power troll permit, issued by the State of Alaska, and the commercial fisheries entry commission, which is required to make commercial fishing deliveries. It says "statewide," because trolling for salmon used to be a statewide fishery, but because of politics and new user groups throughout the Gulf of Alaska, trolling was limited to Southeast Alaska only. It says "limited entry" because there is a limited number of people who can participate in this fishery, unlike the charter sector. Then with the growth of the charter fleet, we the commercial troll fleet, have made sacrifices and 20% of our historic allocation has been given to the charter fleet. Now we are talking about giving them more, and that to me is not acceptable. It is absurd. I am one of hundreds of permit holders that depend on this resource to make a living and feed my family. It is absurd to me that we are even discussing giving non-resident anglers priority over residents who subsist on these fish.

It is imperative that we have in season management to protect the allocation that the troll fleet has left. We must maintain at least an 80/20 allocation, 80% troll, 20% charter. And we must prioritize Alaskan residents over nonresident sport fishers. We must get better accounting of fish being harvested by guided anglers and non-guided anglers.

This accounting can be done several ways, but it seems electronic logbooks are an easy, fast way to collect data in real time. Commercial boats use them in the longline fishery. It can be done. We must

have full accountability to properly manage this resource/fishery. We need better accounting of unguided sport fishers, and we need to keep them regulated.

I support proposals 109 and 110 with RC amendments.

I strongly oppose proposals 108 and 113.

Please consider the weight of this issue on rural communities and fishing families. Thank you for reading these letters and listening to the testimony.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Diana Lapham of Haines, Alaska. It appears that there is a movement to regulate the fishing industry right out of existence. Why?? I would be concentrating on the huge ocean trawlers and the horrible damage they are doing. They seem to have the blessing of the powers in office. I'm ashamed of how this has gotten out of control. I strongly oppose Prop 156.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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 156: Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Diana Lapham
Haines, Alaska
[redacted]

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brian Larsen and I am a commercial and personal use fisherman. I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Proposal 156 would affect the sustainability of the wild salmon population but also affect my business significantly as a commercial gill-netter and the enjoyment of recreational fishing with my family. Reducing the amount of chum and pink hatcheries by 25% will negatively affect my income, directly affecting my family and livelihood living in a coastal town of Southeast Alaska.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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.

Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Brian Larsen
Skagway, Alaska
[redacted]

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Jennifer Larsen of Skagway, Alaska. I am a commercial and personal use fisherman. Our family's income is largely dependent on the commercial salmon season in southeast Alaska. My husband is a gill-netter out of Skagway; we sell to processors and as well as have direct sales at the docks for the people of Skagway. Myself and my husband, along with our children are all involved in the fishing business.

The chum run is the majority of our catch during the salmon season, as other species have faced declines. The Chum and pink runs support families - they put food on their tables, provide an income for cloath and house families. With the increased cost of living, reducing the hatchery production is not the best option at this time, The hatcheries are supporting sustainable fishing practices as well as supporting the fishing community and countless families in Southeast Alaska. As a wife of a fisherman and a biologist by profession, the Southeast Alaskan Chum and Pink Hatchery productions

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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 156: Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Jennifer Larsen
Skagway, Alaska
[redacted]

PC278

Submitted by: John Latham
Community of Residence: Yakutat

I am in opposition of this proposal. I am a user and owner of a fishing guiding business using the Situk River. This closure proposed would absolutely effect our business. We have fished this portion of the Situk River annually for the past 50 years. I believe there are no biological studies of steelhead redds and how they are adversely affected.

There are many reasons for declines in fish numbers with all our fisheries. Lastly I am not sure all members of the Situk River Partnership were notified of this proposal.

Thank You,

John Latham

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Lawler of Naknek, Alaska and I am a commercial fisherman. Please keep in mind that hatcheries support the sport fishery without their contribution.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

David Lawler
Naknek, Alaska / Bellingham, WA
[redacted]

PC280

Submitted by: Matt Lawrie
Community of Residence: sitka

Proposal decision summary

PC281

Submitted by: Leonard Leach
Community of Residence: Coffman Cove

My name is Leonard Leach, and I write to express my strong opposition to Proposal 156.

I have been commercial fishing in Southeast Alaska since 1962, accumulating over 62 years of firsthand experience fishing for salmon from Tree Point to Lynn Canal. This extensive history has provided me with a deep understanding of our fisheries and the challenges they face.

I was a founding board member of the Southern Southeast Regional Aquaculture Association (SSRAA), which was established to enhance and rehabilitate salmon production in southern Southeast Alaska to the optimum social and economic benefit of salmon users. Over the years, SSRAA has succeeded in this mission, contributing significantly to the sustainability of our fisheries in Southeast.

At 82 years old, I continue to fish actively. For the past 20 years, I have primarily fished in District 6, located on the east side of Prince of Wales Island in Clarence Strait. In the 1960s, 1970s, and early 1980s, the gillnet fleet targeted wild sockeye along the west side of Clarence Strait, as it was the most lucrative area at the time. However, with the introduction of hatchery chum in the 1980s from Anita Bay, Burnett Inlet, and Neets Bay, the fleet shifted to the east side of Clarence Strait, fishing off the Etolin Island shoreline to capitalize on these hatchery returns.

As fishermen, we naturally gravitate toward the most economically viable options. Currently, I use 5½-inch to 6-inch mesh gear to target chum. However, if the current attacks on hatchery programs persist and Proposal 156 is implemented, I, along with others, will be forced to revert to targeting wild sockeye along the Prince of Wales shoreline using smaller mesh nets (5-inch to 5⅛-inch). This shift will undoubtedly increase pressure on local wild sockeye stocks from streams such as the Karta River, Luck Lake/Eagle Creek, and McDonald Lake.

These wild sockeye streams are heavily used by subsistence and sport anglers, and additional pressure from the commercial fleet will exacerbate the strain on these critical resources. If we are compelled to redirect our efforts toward wild stocks, it will necessitate significant changes in Fish and Game's management strategies.

Hatcheries in Southeast Alaska are meticulously managed and operate under rigorous scientific oversight. They play a vital role in reducing pressure on wild salmon populations. I urge you to let science guide these decisions and to trust in the proven success of our hatchery programs in balancing sustainability and economic viability.

Lastly, as a former longtime troller, I strongly oppose Proposals 108 and 113 because they take fish away from Southeast Alaska's resident troll fishery and hand them over to non-resident sport fishermen.

Proposal 113 is a straight-up reallocation that mostly benefits non-resident anglers at the expense of our local communities that rely on the troll fleet. Proposal 108 might call it “borrowing” troll quota, but let’s be real—the result is the same. Non-residents get more fish during a time of low abundance, and that hurts the Alaskans who’ve built their livelihoods around fishing. With three more years under a tough Treaty, all sectors are struggling to survive. Asking for more King salmon for non-residents right now completely ignores the impact on resident trollers and sport fishermen. Low abundance isn’t going away—it’s the future we need to prepare for. Conservation is key, and Alaskan fisheries shouldn’t have to suffer just to satisfy non-residents. These proposals are a bad deal for Alaskans and our fishing communities.

Thank you for considering my perspective and for supporting policies that protect the future of Southeast Alaska’s fisheries.

Sincerely,

Leonard Leach

F/V Clancy

PC282

Submitted by: Perry A. Leach
Community of Residence: Ketchikan

My name is Perry A. Leach and I oppose proposal 156. I began my commercial salmon career at the age of four fishing with my father in 1971. By the time I turned 18, I was running my own gillnetter. For the past 14 years, I have operated the salmon tender St. Jude out of Ketchikan. Our tender operation is a family-run business involving my wife and two children, and it serves as our primary source of income. Without hatchery fish, our business would likely not survive.

We primarily tender in Southern Southeast in the Tree Point district. The nearby hatchery fishery at Nakat, managed by SSRAA, has commercial gillnet openings seven days a week, ensuring there is always a tender present. Nakat produces chum salmon, and a 25% reduction in chum production would be a significant blow to our tender operation and livelihood.

I strongly oppose Proposal 156, which unfairly targets hatcheries as the cause of low Yukon River salmon returns without any scientific evidence to support such claims. While Southeast Alaska deeply empathizes with the challenges faced by communities along the Yukon, Southeast hatcheries cannot be made scapegoats for lack of salmon in their river system.

Southeast Alaska is no stranger to poor wild salmon runs. In the 1970s, we faced similar challenges, which led to the establishment of hatcheries in the region. For over 50 years, hatchery fish and wild salmon have coexisted successfully. Hatchery fish alleviate pressure on wild stocks, which might have been overexploited or diminished without hatchery support.

I want to especially urge the board to take into account the overwhelming opposition to Proposal 156 from Southeast Alaska's local Advisory Committees (ACs). These committees consist of individuals with extensive regional expertise, unlike the author of the proposal or outside ACs supporting it.

As a former member of the Ketchikan Fish and Game Advisory Committee, I understand the critical role ACs play in evaluating and submitting proposals relevant to their regions. It is concerning to see committees from distant areas, far removed from Southeast Alaska, commenting on and submitting proposals about matters beyond their jurisdiction. What purpose does an Advisory Committee serve if not to focus on issues in its own region? Imagine if Southeast ACs started weighing in on moose bag limits in Fairbanks or proposals in the AYK region—it would not be well-received.

Please respect and listen to the voices of Southeast Alaska’s local ACs when addressing matters in our region. They are the true experts on the ground.

Thank you,
Perry Leach

BOF Southeast and Yakutat 2025 Proposal Comments

On behalf of Leonards Landing Lodge, Yakutat

Proposal 105 Support

- Non res anglers pay increased license costs and support a large part of the SEAK economy, if non resident fishing participation is greatly reduced by lack of harvest opportunity it would have large financial impacts in SEAK
- Preference and increased opportunity for residents already exist in state waters
- Public waters and fish especially federal waters should be accessible to all

Proposal 115 Oppose

- A very biased anti sport fishing proposal not based on data or conservation need, forcing one group of license holding anglers to bear a significant unfair burden of regulation on public waters
- Restrictive regulations already exist for non res anglers, additional harvest opportunity for resident anglers already exists
- Non residents or sport fishing are not responsible for the down trend in king salmon numbers and EO authority exists to stop harvest if run numbers don't materialize or allotment is filled
- Additional harvest restrictions/reductions should be placed on all anglers and industries in a fair manner not single out a specific group or method
- Restricting non res harvest of kings without a conservation need across SEAK will have a significant economic impact through lodges, guides and the businesses they support
- Outside of paying lodges, guides, outfitters and a multitude of businesses in SEAK non res anglers purchase licenses, stamps and excise tax products and therefore fund a significant amount of ADFG and fisheries management, a funding stream that would be lost if they were pushed out of or excluded from the fishery.

Proposal 140 Oppose

- Circle hooks are not designed to be used on jigs and lures, sport fishermen would be unable to adhere to this regulation and effectively fish
- Circle hooks are already used for and the lodge encourages their use for bait fishing
- This would be a financial burden for most fishermen and would decrease participation resulting in an economic loss to SEAK businesses
- This would be a major enforcement burden for ADFG
- Why is this proposed only for the sport fish regs and not the commercial trolling regs?

Proposal 150 Support

- Increases opportunity for subsistence harvest during a long trend of high sockeye abundance

Proposal 151 Support

- If river fishery is open (escapement met) this greatly simplifies regulations and allows a harvest opportunity for non residents that is accessible
- Most species have separate fresh and salt water regulations/harvest limits
- EO still in place to keep retention closed until escapement is met
- Important to non res anglers who make trip decisions based on open fisheries or would come to target additional kings if opened

Proposal 152 Support
- Simplifies the decision making process and allows anglers to monitor opening potential with weir counts
- Data from counts is much more accurate than predictions
- When discussing and educating clients on fish counts it is far easier to explain and understand the weir count than run predictions to demonstrate why the fishery is closed or open

Proposal 153 Oppose
- Foot access on the Situk is difficult and limited. This is one of the easiest to access locations to fish for anglers who cannot hike or wade and has long been an established and pressured fishing location
- Implementing this would create a large amount of pushback from anglers and a difficult enforcement issue for ADFG with no trooper stationed here

Proposal 154 Oppose
- A closure has already been established and fish numbers do not show the need for an additional closure
- Closing this section would concentrate more anglers below the nine mile bridge.
- Hiking is the only access to this section of river, much of the lower section of river is not accessible by hiking, limits the number of anglers willing to fish here
- Long standing fishery access on public lands should not be closed unless well justified with data to show the need or results

Proposal 155 Support
- Escapement on the Situk and trends around the state show the capacity and need for additional sockeye harvest
- Limit increases have been implemented and runs are still exceeding escapement, data support increased limits
- Lodge clients have trend to book in mid July due to likely hood of increased limits, concentrating anglers during the later part of the run. Beginning with a 6 fish limit would spread anglers out throughout the season
- In Yakutat there is a large amount of AK resident participation in this fishery, mostly from other areas in SEAK as there are few accessible sockeye runs. Our lodge commonly sees AK resident anglers to participate in the Situk sockeye fishery (generally after the limit has been increased) and this regulation would increase resident and non resident opportunity

PC284

Submitted by: Scott Lesh
Community of Residence: Haines

Dear BOF,

I'm writing to you today to strongly oppose proposal 156. This proposal is based on faulty science that threatens the livelihoods of hundreds of fishermen in Southeast Alaska. We live in a time where small boat "mom-and-pop" fisheries are being baselessly challenged from every angle, all without significant cause. Wild stock hatchery chum is the back bone of our Haines fishing fleet and local economy. We've had record breaking sockeye returns in recent years and the Chilkat River kings should be delisted as a stock of concern this year. Wild stock chum salmon production in Southeast Alaska is not what is affecting the returns of these runs. Please don't rip out the backbone of our local economy. I beg you to not greatly reduce the economic opportunity and benefit of every gillnetter, seiner, and troller from Skagway to Metlakatla. To do so without any substantiated evidence, which there is none, would be the intentional nail in the coffin to most small boat fishermen in Southeast Alaska.

Thank you for your time,

Scott Lesh

PC285

Submitted by: Mike Lesmann
Community of Residence: Juneau

PROPOSAL 242 5 AAC 34.111

Strongly support

Since the commercial fishery started in 2005, neither commercial or personal use fisheries have enjoyed consistent and regular seasons. I think 11-A should return to a personal use only area for the good of the resource. Thanks for your hard work.

Comments for the Alaska Board of Fisheries
Southeast and Yakutat Finfish and Shellfish Meeting
January 28 - February 9, 2025

Dear Board of Fisheries,

I am writing to oppose Proposal 258 and Proposal 259. As the author of Proposal 258 states, fishery closures and sea otters have negatively impacted the commercial Dungeness crab harvest in Southeast Alaska. If the Dungeness population is so low that there are commercial crab closures, and in other areas sea otters are adversely impacting the commercial harvest, it doesn't make sense to increase pressure on areas like Juneau which are heavily fished by personal-use and sport crabbers. The residents of Juneau should not be forced to give up their access to seemingly healthy personal-use crab fisheries because commercial crabbing is not what it used to be in other areas of Southeast. Governor Dunleavy issued an Administrative Order promoting food security [https://gov.alaska.gov/admin-orders/administrative-order-no-338/]. I don't eat store-bought meat and it's getting harder and harder for Juneau residents to put fish in their freezers due to ongoing king salmon closures, the decreasing size of halibut, and the cost of longer trips outside of the Juneau area to catch seafood that's not also being targeted by sport charter vessels.

Additionally, I am opposed to reducing the minimum legal-size crab for Alaska residents in Proposal 258. What is the goal of that proposal? Is it to give residents the smaller crabs after commercial crabbers catch all the bigger crabs? I'd rather crab in a healthy area and shuck full-sized crab.

Proposal 259 seems like a compromise, and I'm not opposed to a few areas in Registration Area A being open October-November, but I am strongly opposed to any areas being opened to commercial crabbing along Juneau's shoreline especially those which are currently closed to commercial crabbing including Gastineau Channel, Lena Cove, Fritz Cove, Eagle Beach, Amalga, Auke Bay, Indian Cove, and Tee Harbor, which are fished heavily by personal-use crabbers. It is prudent that ADF&G study the population of Dungeness in the waters of Registration Area A and the impact of a 2-month commercial fishery before Area A or even parts of Area A are opened to the impacts of a fall commercial fishery. Additionally, I do not think there are any seasonal limits, reporting requirements, and therefore no catch estimates, nor a stock assessment for personal-use Dungeness crab, which would make it difficult to estimate the impacts of a commercial Dungeness fishery in Area A.

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I am also opposed to a few of the dates proposed in Proposal 225 about commercial shrimping. The author says: "Change the start date back to October 1. Alternatively,

September 15, September 1 and August 15 would also be acceptable dates." I support moving the commercial shrimp fishery from May 15 back to October 1, but do not support a start date earlier than October 1. There are already many personal-use shrimpers using the same areas intensely during the summer boating season. Most personal-use shrimpers have smaller, less fall weather-worthy boats than the commercial fleet, and a lot of the commercial fleet participates in other fisheries that would overlap with a shrimping season that starts before October 1.

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I support Proposal 242 to allocate 100% of red/blue king crab in Section 11-A to the personal-use fishery - 70% for summer harvest and 30% for fall/winter harvest. There are plenty of other areas for commercial boats to harvest king crab outside the immediate Juneau area of 11-A and the crab population is not robust enough for both fisheries.

Thank you for considering my comments on four proposals.

Sincerely,

Marina Lindsey

PC287

Submitted by: Michael Lockabey
Community of Residence: Wrangell

Please stop closing more and more areas to commercial crab fishing. It is clear that it is not working. The sport crab fisherman keep wanting more areas. But they don't understand how dungeness crab work they need to be harvested.

PC288

Submitted by: Stanley Lopata
Community of Residence: Sitka, Alaska

Chair and member of the Board of Fish, my name is Stanley Lopata. I am from Sitka, Alaska I thank you for your time and dedication on these difficult decisions as we all want to see Alaska fisheries as the pinnacle of management and success.

I am a commercial salmon troller who fishes year round on a 42' 1926 wooden troller. King salmon and chum make up the bulk of my income with coho, pinks, and ground fish paying for supplies. I am a U.S. army vet who fishes alone, and provides personal use fish to my family and child. I also donate fish to friends and subsistence hunt and fish.

I could write in detail just how important these management issues are but understand time is of the essence for this process.

First off I would like to maintain the 80/20 allocation between troll and sport groups without deviation to each groups needs. Secondly authorize ADF and G in season management to ensure neither group exceeds allocated fish.

Third prioritize resident sport harvest by controlling non resident harvest

I support proposals 109 and 110 as they maintain current management plan structures I strongly oppose 109 and 113 proposals.

Again I thank you for your time and would like to end with a plea to keep our 100 plus year fishery strong while enhancing king salmon habitat. All with balancing sport local as priority and sport charter groups.

PC289

Submitted by: Jack Lyons
Community of Residence: Petersburg

I oppose proposal 242 because my family and I could use the extra income from this fishery that I have not been I able to use much in the last few years. And as you know the overall fishing industry has not been that great the last few years but the price of everything to do with making a living at fishing has gone up and the fisherman needs the time and area to fish. I support proposal 243 because it will at least let me make a little income for my family.I have been crab fishing for forty some years, I believe it was the 1980-81 season and would like to have a red crab season once again. Thanks

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PC290

Submitted by: David MacDonald
Community of Residence: Juneau, Alaska

I am in favor of closing 11a & b for commercial King Crab fishing. The commercial fleet can afford to travel a little further to catch the limits. Please leave the 11 a and b to individuals that are limit on how far the can travel to catch King Crab. By doing this it provides more crab to large population.

Thank You.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Eric Macias of Ketchikan, Alaska. I am a commercial fisherman. This proposal is a horrible idea. Why would we decrease salmon hatchery production? This would only hurt small businesses, and local communities, and decrease employment opportunities. Whoever proposed this idea should be laid off from their job due to a decrease of 25% of the staff.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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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 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Eric Macias
Ketchikan, Alaska
[redacted]

BOF Southeast and Yakutat 2025 Proposal Comments

Chris Mackie on behalf of myself

General Comment- No one group, sport fishermen, guided fishermen, non residents, or commercial trollers, are solely responsible for decline in fish numbers nor should any one of those groups be forced to bare the majority of the harvest restrictions if they are needed. Restrictions should be spread amongst different groups with respect to data for harvest numbers and impact on the fishery. Increased harvest restrictions need to be based on conservation need and not bias of one group against another. General focus of all these groups needs to be on uniting against outside pressures and politics on the fishery was a whole such as the petition to list kings on the endangered species list in 2024.

Proposal 105 Support

- Non res fishermen pay increased license costs providing a large amount of funding to ADFG as well as excise tax purchases and the resulting funding returning to the state.
- Limiting non res fisheries over resident fisheries is beginning to deter non res anglers and could be a long term detrimental financial decision
- Additional/increased resident opportunities for harvest exist in state waters and personal use and subsistence fisheries
- Differences in regulations are not understood or noted by a large number of non res fishermen and can be difficult to enforce.
- It is common to see non residents go home without a filled king limit, most their time fishing is limited by trip length while residents commonly harvest dozens of fish in a season.

Proposal 106 Oppose

Proposal 107 Oppose

- This is an unenforceable and unreasonable biased reg proposed to target sport fishermen and limit fishing in EEZ waters not to provide any conservation benefit
- Places an unnecessary burden on guides/captains to meet this reg
- Regs and EO are used to control the harvest, meet conservation needs. This would not prevent harvest, just how and where it could be unloaded
- Clearly a bold move by commercial trollers to restrict access to public fish in public waters for their own selfish financial gain
- Why are there no proposals to sunset non resident troller permits or restrict non resident troller harvest?

Proposal 115 Oppose

- A very biased anti sport fishing proposal not based on data or conservation need by an individual who has had made it clear that his short term financial gain outweighs any long term conservation needs
- Restrictive regulations already exist for license purchasing non res anglers, additional harvest opportunity for resident anglers already exists
- Non resident or sport fishing is not responsible for the down trend in king salmon numbers. EO authority exists to stop harvest if run numbers don't materialize or allotment is filled
- Additional harvest restrictions/reductions should be placed on all anglers and industries in a fair manner not single out a specific group or method
- Why are there no proposals to sunset non resident troller permits or restrict non resident troller harvest?

Proposal 116 Oppose
Proposal 117 Oppose

- If harvest numbers need to be reduced to meet allocation burden should at least partially fall on residents, not only on non residents. Why blanket restrict non res at high tiers which would provide no conservation gain?
- Additional resident harvest and opportunity already exist, no res annual limit exists
- Low returns or predictions requiring additional harvest restrictions should be shared across industries and angler type
- Many locals workers, businesses, towns, ADFG rely on income from non res sport fishermen unfairly restricting non res harvest will have long and far reaching economic impacts

Proposal 122 Support with Amendment

- Support with amendment to freshwater only
- This is a common regulation and practice in other areas and states
- Debatable for salt water sometimes not possible to release without landing, no brainer for freshwater especially when escapement has not been met but the fish has been caught past the weir, any mortality reduction is a gain
- Would make it easier for guides when clients want to hold or take pics or are attempting to target a king they see while sockeye fishing- “law says it can’t come out of the water, sorry”

Proposal 123 Oppose

- See comments for proposal 122
- Not possible in many situations on saltwater to reach fish and remove hooks in the water. Likely to result in anglers still netting fish or cutting line and leaving hooks and line attached to fish
- This proposal or 122 would likely contribute very little to the survival rate of landed fish but it definitely wouldn't be a negative especially in fresh water however the bias trend continues with a duplicate proposal from trollers to increase the regulatory burden and restrictions on sport fishermen with no data to support or any conservation gain.

Proposal 129 Oppose

- There is no data showing that these fish are hatchery fish which is what this troll fishery was created to target, there is no terminal hatchery run in Yak bay
- You do not need to fill the limit every time. Just because 1000 fish are allotted and haven’t been caught doesn’t mean you need to increase openings.
- King fishery in Yak bay is more consistent and stronger than many in AK and gets less fishing effort, increasing pressure on a strong fishery with many fisheries in a major down trend is not the best idea

Proposal 132 Oppose

- Numbers and size of kings are on a significant down trend why would you lower the length allowed for retention? personally I would consider this proposal biased, shortsighted and selfish
- Data and counts would likely support the opposite of this proposal increasing the min size and/or setting a max size to exclude more mature fish from retention
- A factor at play here that should be considered for all king regulations is the increase in attention and political pressure that king salmon are getting from the non fishing community, the petition to list kings as endangered being the biggest example. Sport or commercial it doesn’t matter we need to conserve, set effective and fair regulations and pay attention to what the rest of the world sees and thinks of our actions to show support for sustainable management of fisheries commercial or sport.

Proposal 140 Oppose

- This is a very biased, baseless proposal that ignores the fact that the design of circle hooks makes them useless for almost anything but still fishing with bait (where circle hooks are already widely utilized). When trolling, casting or jigging (active fishing) the design of the circle hook would result in the hook being pulled out of the fish's mouth nearly every time. Barbless J hooks still effectively hook fish, circle hooks are not intended for, used for or designed for active fishing
- Unlikely to be followed by the majority or sport fishermen if it was enacted, there is little/no availability of circle hooks for the replacement of similar sized j hooks on lures, jigs and trolling rigs. The tackle industry would need to create and manufacture replacement hooks to meet this requirement and no anglers already have them.
- The fact that this was accepted and published as a proposal concerns me as this is basically an anti fishing regulation and presents no conservation gain
- Why was this only proposed for sport fishing and not commercial trolling as well? Cody is a troller and proposed for a selfish benefit not a conservation benefit.

Proposal 150. Oppose

- Increases presence of nets during king run. Other opportunities with less king bycatch (sport methods open all week, dip netting is not utilized) exist to harvest sockeye and EO allows for longer openings if needed.
- Longer openings could be based on king escapement numbers
- I have no issue with subsistence fishing but am wary about pressuring kings more in the situk

Proposal 151 Support

- When escapement is met having a non res limit separate from saltwater fishery allows additional harvest above the already low non res limit as well as opens opportunity for those not able to fish the saltwater
- EO still in place to keep retention closed until escapement is met
- Important to non res anglers who make trip decisions based on open fisheries or would come to target additional kings if opened

Proposal 152 Support

- Make sense from my personal observations over the last several years both on the Situk and looking at run reconstruction numbers vs predictions around the state. Would rather have the fish counted in the river than an opening based on a prediction and not have it materialize
- Simplifies the decision making process and allows anglers to monitor opening potential with weir counts

Proposal 153 Support with Amendment

- Amend to closure beginning June 15, no significant numbers of kings in the river during the first half of June, have not observed them that high in the system, no need to restrict access then
- I do not generally support access closures (hopefully this does not set a precedent) and this is one of the better access points for those who cannot hike or wade on the upper river however this closure will help disperse those who can hike and wade to better fishing locations and is one of the few large deep king holes accessible to the majority of bank anglers
- An additional benefit will be helping to reduce conflicts on the boat ramp.
- Adoption of this regulation with require a step up in enforcement actions

Proposal 154 Oppose
- Weir data does not show a need for additional closures
- My personal observations from the last 3 seasons do not show a need or a benefit to restricting access to these sections of river. Most of the anglers fishing this section are more experienced anglers compared to those utilizing the easier access points
- Steelhead spawn in all sections of the river and these closures would concentrate bank anglers into sections with the most pressure
- Access restrictions can be hard to reverse or remove even if warranted, observations and data should overwhelmingly support the need to close sections to fishing. Restrictions should provide a benefit to the species and avoid the dangerous precedent losing angler access with no or unknown benefits to the fish.
- If this restriction was implemented an amendment could be to add additional closed section(s) with openings in between or to extend the current closure to allow some fishing access above the boat accessible section and below the mouth of the lake.

Proposal 155 Support
- Has the potential to spread anglers out throughout the sockeye run instead of concentrating the bulk in mid July. Many non res sport fishermen plan trips later in the sockeye run when the limit is likely to be increased as they are primarily meat anglers.
- AK residents also travel to Yak when limits increase especially from SEAK where there is less access to larger sockeye runs so this change would benefit residents as well
- Weir is in place and counts can be used to determine if low or late escapement requires an EO to reduce bag
- Data shows even with past limit increases the escapement can handle increased harvest
- This regulation allows additional sockeye to be harvested without the use of nets and the related bycatch of kings

Proposal 164 Oppose
- There data or evidence to show the need to restrict licensed non res anglers from retaining hatchery king salmon. The majority of anglers in this fishery are resident and escapement here is not a factor
- Preference for resident anglers is already significant throughout the spot fish regulations, non res anglers are license holders already paying a much higher cost to fish in AK there is no reason to restrict their harvest of hatchery fish in a terminal fishery. If returns are low all anglers should be restricted equally
- Plenty of additional opportunities exist for residents to harvest salmon and possibly participate in personal use and subsistence fisheries
- Non res anglers fund ADFG through license dollars as well as excise taxes and the resulting funding back coming to the state. Pushing non res anglers away by reducing opportunity on terminal hatchery fish is not a sound financial decision in the long term.

Proposal 207 Oppose
Proposal 208 Oppose
- Species ID is difficult for inexperienced fishermen, will increase bycatch of non retention species
- A bonus rockfish or two is not going to change much for anglers but could have a large impact on a more fragile population as most non res anglers do not know how to use or care to use descenders
- Data presented shows this will likely result in over harvest

Proposal 210 Support
- Support as a conservative action but need to get stock assessments to verify that reduction in bag limit is needed or not

Submitter: Ceri Malein
[redacted]
Sitka, AK 99835
Phone No: [redacted]
Email: [redacted]

Submitted by: January 2021

Subject: Comments on Finfish Proposal for 2025 BOF

Subsistence

Proposal 104 Oppose

Southeast Alaska is an Alaskan maritime region. All Southeast Alaska (SEAK) communities have docks. Historically, via the King salmon sport allocation, residents always had access to **fresh** King salmon. Large Alaskan communities, like Juneau and Anchorage, are considered urban and don't have local access to subsistence areas. Increasing harvest efficiency through subsistence guarantees less availability of fresh sport fish year-round for locals. Nothing beats a fresh King Salmon

I live off the road system near Sitka, a rural community, and practice subsistence harvest regularly so, of course, I support subsistence but this proposal raises more problems than it solves. Residents of large SEAK inside water communities (~80% of SEAK population) under subsistence will have limited local access to king salmon. They already have local access under existing sport fish regulations. If the state had followed Alaska regulations (KSMP and 5AAC 39.222) and Treaty requirements in 2024, by using in-season management, last year's August closure would not have been necessary.

Questions

- How does this proposal for subsistence help the majority of local residents?
- When and for how long will the subsistence fishery season be?
- What stocks will a subsistence harvest be targeting?
- What will the bag limit be? What will the possession limit be? Last summer a two fish resident daily bag limit sport season closed early. Transferring a portion of King salmon quota to subsistence from other fisheries will accelerate SEAK harvest of the quota. As subsistence will be another fishery targeting the same quota.
- Subsistence is a priority fishery. What will happen when the "5,000 or 5% of the all gear quota" subsistence allocation is caught. Can other fisheries continue fishing? If it's not caught by season end, how is it possible to transfer the remaining fish to the troll fleet?
- Will this subsistence proposal provide more salmon to outside rural communities that have not been affected by SOC concern management thus further exasperating the fair distribution of King salmon throughout SEAK communities?

Most importantly, in 2020 NOAA was sued over a NEPA violation because of an imperfect Biological Opinion (BiOp) on the Alaska fisheries. The court ordered NOAA to redo the BiOp, which they did. Nowhere in that new report was a subsistence fishery studied or even mentioned. If Alaska permits a subsistence fishery without a BiOp they are guaranteeing another lawsuit.

Lastly Treaty negotiations are difficult at best. Alaska continues to come out of them with black eyes. Another federal voice (the Forest Service) at the table will likely make things harder for Alaska's negotiations.

Exclusive Economic Zone (EEZ)

The Pacific Salmon Treaty (PST) is an international agreement. It grants Alaska a percentage of salmon that are available to harvest in the Pacific Northwest. Since 1992 the PST has accepted Alaska's sports KSMP.

The federal government does not have a management plan for the EEZ. They have always accepted Alaska's KSMP.

The state sells sport fishing license at different rates to resident and non-resident. Does this distinction apply only for inside 3 miles?

Will a state license be required in the EEZ?

Can Alaska continue requiring state sport fishing license to fish in the EEZ if Alaska regs don't apply in the EEZ?

If Alaska can no longer manage a fishery by present state regulation outside 3 miles, then surely those kings should not come off Alaska's quota. Instead, it should come off the whole treaty US allocation.

If non-residents do not want to comply with Alaska regulation they should offload fish caught in the EEZ in another state.

Why doesn't Alaska law apply to all fish offloaded on state lands?

Complying to Proposal 105 statement is complying to federal overreach and giving up state rights.

Proposal 105 oppose

ADFG's suggestions on how to deal with this would be difficult to enforce.

Who is this untitled Marc Gorelnik making this proposal? Is he a Non-resident? Is he an attorney? What is his motivation to question Alaska's 32 years of the sport KSMP that distinguished resident from non-resident in the EEZ. Alaska worked hard for statehood to gain authority over our resource. Alaska should not, after 32 years be willing to give up state rights without a fight. If we give up this position it could set precedent for all resource extraction on Federal land and water (taxes?). This is an issue that requires a formal legal opinion from Alaska's Attorney General.

Against advice from ADFG I said to the Wild Fish Conservancy, "see you in court". We saw them in court and we won. Trollers didn't lose a day of fishing.

I now, say to Marc "Alaska will not willingly give up states' rights and succumb to your interpretation of the law. Bring it on. We'll see you in court".

Proposal 106 and 107 Support

If Non-residents refuse to follow Alaska's sport KSMP in the EEZ then they should have no access to Alaska's King quota in the EEZ. If Alaska agrees to Proposal 105, then close the EEZ zone to salmon harvest. ADFG state only 1% of sport harvest is in the EEZ. If this statement is true closing the EEZ to salmon harvest should not impact the sport fishery.

Sport King Salmon Management Plan (KSMP)

Ahh again you raise your ugly head. The last administration did a poor job at the 2018 treaty negotiations creating a nightmare for Alaska to produce a working sport KSMP. It has been the bane of my existence since 2019. By accepting a hard treaty quota cap in the last round of negotiations SEAK are punished if they exceed the all-gear quota by 1 fish. Through an abundance of caution there is always fish left on the table by years end. This means it's impossible for all gear groups to maintain 100% of their designated allocation even if averaging was applied. The previous treaty agreements allowed Alaska to exceed their allocation without retribution, there were years when both troll and sport were over allocation. Up until 2018 troll harvest averaged was 83.1%, sport average harvest was 21.9%. Due to the 2018 treaty reduction everyone must take a cut for conservation.

It may have been difficult for the sport sector to maintain their allotted allocation under the present KSMP. It has been a financial disaster for trollers. Attorney Luara Wolff defending Alaska in the 9th Circuit Court said;

> *"Theres huge social and cultural harms because there are multiple declarations that say if we can't fish and earn… if ½ of our income is lost we probably not fish at all it forces people into poverty or chooses to leave these very small rural communities and that is huge cascading effects. Its not just harm to some fishermen harm to isolated communities."*

Since 2022, when three stake holders, Resident Sport, Guided Charter and Trollers hashed out an agreement, Sport harvest has averaged 23% (their allocation is 20%) and caused resident harvest to close early in 2024. Since 2022 Trollers have averaged 73% of the sport/Troll allocation (Troll allocation is 80%). Since 2022 the all-gear harvest was 94%. Who eats the 5.2% that's left on the table?

The ADFG shaping of the SEAK Chinook fishery is evident by the numbers in both the Sport and troll fisheries and causes over exploitation of Kings by the sport sector in the spring when our local SOC are returning.

Below are problems regarding shaping which is extracted from staff comments to Proposal 130, please read all staff comments to proposal 130 for a greater understanding of this potentially **Dangerous** situation.

> *"The revised Southeast Alaska Biological Opinion published October 2, 2024 establishes new stock-specific limits on for king salmon stocks or stock aggregates listed as threatened under the Endangered Species Act (ESA). These limits correspond to the highest observed exploitation rate during 1999-2018, years in which the current summer retention period allocations applied. A reallocation of summer troll retention periods will alter the stock composition of the catch and may increase risk of exceeding ESA limits"*

If Canada discovers Alaska is altering our fisheries by changing allocation within gear groups or increasing effort while transboundary fish are returning, Alaska will have problems at treaty getting a fair deal. We will be setting ourselves up for bigger cuts. Shaping our fisheries will be disastrous for Alaska at the next treaty negotiations 2028.

It was in 2022 the language for no-inseason management was eliminated. This was done for house keeping as ADFG have always managed in-season. It is the corner stone of our 5AAC 39.222 and a tool treaty requires. The only time ADFG ignored in-season management was 2023 and 2024. Sport went over their allocation causing other fisheries (trollers and residents) to close early. This messed up the catch and nonretention days. This data will be used in the next BiOp and PST.

Proposal 108, 109, 111, 112, 113, Oppose

All these proposals are shaping the sport fishery. Either by changing the 20/80 split or in the case of 109 changing the historic steady uninterrupted sport harvest through the summer. 109 forces more effort in the spring by using data previous to SOC management. All other fisheries are airing on the side of conservation due to SOC management.

Please read staff comments to proposal 130 as it also applies to these proposals. These proposals mess with NOAA's BiOp (over which NOAA was sued and lost in 2020. The court ordered a revision of the BiOp. This new document was completed in Dec 2024). These proposals also will give Canada great ammunition to screw with Alaska in the next round of treaty negations.

Proposal 118, 121 oppose

Both are variations of the status quo. That the status quo is not working is demonstrated by the 21 proposals for the KSMP at this Board of Fisheries. The status quo ignores in-season management regulations. And ignores the original signed agreement of 2022 which was greatly altered in Homer 2023 against the wishes of two of the stakeholders.

Proposal 110, 115, 116, 117 119, 120 Support

A Coalition has developed between Residents and Trollers. From this coalition comes two RCs which will be submitted at the meeting. These RCs have been developed on these 6 proposals.

The KSMP is a sport management plan that effects residents. It's not a commercial plan. It will only effect trollers if the 80% troll allocation is changed which changes the Treaty baseline, a big no-no at treaty. In the RCs Trollers followed the lead of inside sport fishermen regarding bag limits who have been hurt by the changed new management plan.

TSI (Juneau sports fishermen) and ATA (trollers) rewrote proposal 110. 110 was the original March 2022 signed agreement. The RC incorporates most of Proposals 116, 117. The goal is to slow the spring fishing during SOC management to enable uninterrupted fishing for residents and charters throughout the season. Residents like the ability to access fresh fish all summer as they have always done. Fresh fish is much more tasty. Available fresh fish cuts down wanton waste caused by overfilling the freezer over concerns of potential closures. A steady fishing rate is what NOAA's new BiOp is based on.

The other RC was an amendment version of the TSI/ATA RC amended by the Ketchikan AC. Its goal is much the same but has more restrictive bag limits in the spring erring on the side of King salmon conservation. It was created in a work session between resident sport, guided sport, and ATA with ADFG in the room providing data.

I support both RC versions. They protect our local stocks, allow for uninterrupted sport fishing for residents. Charters who participated were happy with the bag limits and trollers maintain their historic 80%. This King salmon management plan dove tails with NOAA's BiOp hopefully enabling next treaty negations to operate more smoothly.

Stocks of Concern management

SOC management has been in effect since 2018. We still have rivers that are not making MSY escapement particularly the Taku and the Stikine. We want these rivers to survive. Alaska needs to make more effort in protecting these stocks.

Proposal 122, 123 Support

These Proposals refer to a catch and release fishery. It is important to treat these local stocks with the utmost respect if we want the Taku and Stikine to recover.

Proposal 125, 126 Support

District 14-A is in the entrance to the Taku River corridor for returning Chinook spawners. Its always baffled me why this area was left open when the SOC management in 2018 was adopted. The Ketchikan district, in order to protect the Behm canal stocks, all of the corridors were closed to Chinook fishing for king salmon until the peak of he runs were in the rivers. That was the correct approach. The proof is in the pudding. The Unuk is making escapement yet the Taku is not.

Proposal 130 Support

I can only support this if the BOF is unconcerned regarding shaping fisheries. Please read staff Comments on this and appreciate how these comments relate to changing the sport fishery. By taking more fish from the trollers in the late Summer to increase charter harvest during the spring when all other fisheries are conserving and erring on the side of conservation.

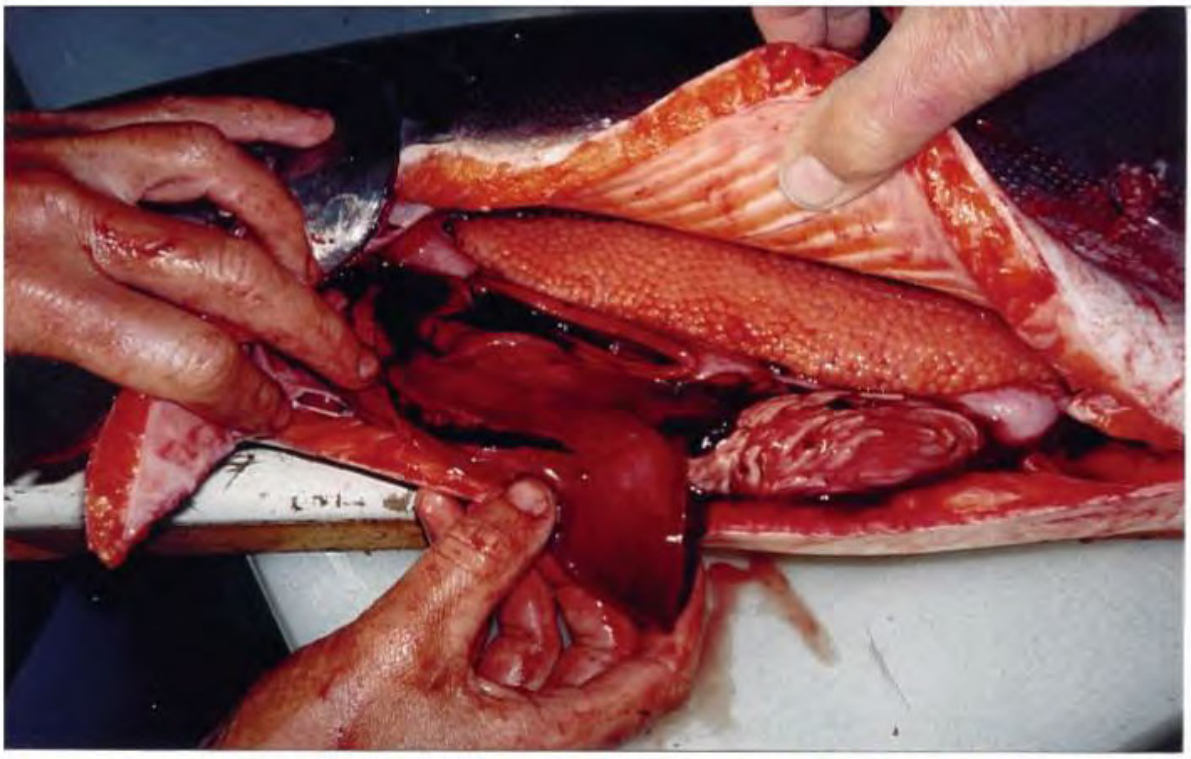
I do find it interesting that staff did not include data for 2023 and 2024. These were years when the troll fishery was shaped to allow guided sport to overharvest in the spring when SOC management is implemented. Maybe this was a mistake and this BOF will clarify regulations so troll will continue to have a healthy August fishery, sport residents will have access to a fresh king throughout the summer and Nonresidents will accept a lower bag limit in the spring.

Proposal 140, 141 Support

Double barb hooks with bait are used in the technique known as “mooching”. Mooching is promoted on many lodge web sites. Blogs state that this method guarantees successful fishing. Some claim they can catch up to 50 Kings in day using this method.

> ## *Mooching with Angling Unlimited, Sitka*
>
> *“…**Mooching is our method because it’s more fun, more effective,** and gives you the sense of achievement and learning you can only get from hooking your own.”*
>
> *Angling Unlimited*
>
> *“Salmon typically inhale a bait – they don’t nibble.” From 10 common mistakes made while mooching Angling Unlimited 12/12/16.*

Mooching requires the fish to swallow the hook which often results in internal hooking in the gut a place were it is impossible to retrieve the hook. Only once the fish is hooked internally is the fish reeled in. The photo depicts damage by mooching taken from “the American fisheries Society 2002- Hook and release mortality of chinook salmon from drift mooching”. Alaska is the only west coast state that allows mooching in all waters. Mooching needs to be restricted particularly in the catch and release fisheries. This proposal copies regulations from other states that require more conservative gear than Alaska.



Chinook salmon (female) with internal injuries to the gut, liver & heart caused by gut-hooking with a ”J” hook

Staff comments state there is no biological need for this proposal but after 7 years of SOC management the Taku and Stikine Rivers, among others, have still not recovered.

LingCod

Proposal 200 Support with trepidation

I'm uncomfortable with the extra cost but agree with ADFG that most boats are already equipped with a reporting device. I'm also concerned in over reporting. Downing tools to go and report will be difficult for small boats with limited crew. Reporting multiple times daily is time consuming.

Proposal 201 Support

I believe this will reduce other gear groups delivering excess by-catch on a dingle bar permit. This should extend the dingle bar fishery openings.

Proposal 202 Support (emphatically)

This should extend the dingle bar fishery openings. I dingle bar fished on a small boat for years but had to quit because larger boats with more crew took advantage of this loop hole. What once used to be a 15-to-20-day fishery tuned in to a one or two-day fishery. The quota never got smaller but big boats caught it faster using two lines. This loop hole enabled a minority to take from the majority.

Trolling a healthy part of South East Alaska Economy


HELEN A

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Harper Mallet and I am a commercial and personal use fisherman. This proposal would limit the amount of fish commercial fisherman catch in a year, and limit what they are able to provide for their families. Half the season I spent up there was catching hatchery fish and with this proposal that would be limited. Hatchery fish are great for salmon numbers to stay high while catches are still good, too. Win-win situation.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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.

Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Harper Mallett
[redacted]

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Christine Manning of Wrangell, Alaska. I am a subsistence, commercial, personal use, and sports fisherman. My late husband was a commercial fisherman. Raised our sons in the fishing industry. As adults, they own and operate commercial boats. Fishing is our livelihood, subsistence, and recreation. Hatcheries are vital to the longevity of this industry. And add vital and substantial value to the community and the fishing industry. Smaller communities' economic health relies on keeping our hatcheries healthy and well-stocked with eggs.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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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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.

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I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Christine Manning
[redacted]
Wrangell, Alaska

Submitted by: Rich Manning
Community of Residence: Craig, AK

My name is Rich Manning I have been an owner of Catch-a-King Charters in Craig, AK for the past 36 years. I have been a fishing guide in the Craig area for 42 years. I am in support of proposal #108 because it would allow guided non-resident sport fishermen to retain more king salmon in the early portion of our season, late May through early July. With the decreasing bottomfish limits and the increasing restrictions on them, and the lack of coho salmon during this part of the season, it is very important for us to have a 3 king annual non-resident during this time frame. It is already difficult to sell this time with a 3 king annual limit, I fear that it makes this portion of the season non-viable if it goes any lower. By the middle of July we are normally catching cohos and the importance of retaining kings is not nearly as necessary for us to keep our customers.

Catch-a-King Charters has played an important part in supporting the Craig economy for many years. We usually employ about 20 people during our summer season and approximately 60% of our wages are paid to Alaska residents. All of our repair and maintenance costs are paid locally as are the majority of our food and supply costs. We also pay more than $100,000.00 annually for boat fuel, another $50,000.00 for local utilities, and $30,000.00-40,000.00 a year for guest fishing licenses. All these purchases help our local economy. We also paid directly to the City of Craig over $70,000.00 in 2024 for sales tax, property tax, and tideland leases. There is no doubt that we are an important contributor to the City of Craig, its schools and other services.

I fear that if our ability to retain king salmon especially in the early season is reduced it will have a large negative impact on our business. This in turn will cause a significant economic impact to the City of Craig and its residents.

Thanks for listening

Rich Manning

PC297

Submitted by: Laurinda Marcello
Community of Residence: Sitka

I recommend the BOF adopt proposals which will protect the long-term viability of the subsistence harvest of herring and the ecosystem as a whole. With herring being a forage fish they are a vital part of the food web to protect for higher trophic level species.

I think given collapses of forage fishes in other parts of the world, it is prudent to make sure herring biomass is sufficient for a harvest to occur and to err on the side of not harvesting when there is any doubt in numbers.

PC298

Submitted by: Maia Mares
Community of Residence: Seattle, WA (formerly Sitka, AK)

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery. Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

I strongly support proposal 190, recognizing Tribal sovereignty and expertise in managing subsistence resources for tribal citizens by establishing a co-management framework. I strongly support proposal 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Donna Maricich and I am a commercial fisherman. Hatcheries have been the backbone of healthy fishery sustainability. But please don't dismantle this source of healthy viability. Many benefactors will be harmed by this proposal.

I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

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. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, 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.

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.

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.

Proposal 156 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 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Donna Maricich
[redacted]

PC300

Submitted by: Sandra Marker
Community of Residence: Craig, Alaska

Proposal 108 - Opposed! The Charter group of the sport fishery sector is highly unregulated. They favor the non residents and take advantage of the ability to fish for King Salmon. There needs to be in season monitoring of the sport fishery in real time.

Proposal 110 - Support. I support the RC version of 110 that was submitted by the Alaska Trollers Association. This RC has chosen the best of many proposals. I support the non tiered system for the sport fishery for King Salmon. The non tiered system if fair to everyone and is easy to interpret and understand, and protects the resident sport fishery for King Salmon.

Proposal 130 - I support this proposal for Trollers to fish 100% of their quota on July1st in one opening. No other fishery has to split their quota in two openings! In the past 2 years (2023 & 2024) the Trollers 20% remaining allocation has been taken from us. The second opening has not been guaranteed, nor will it ever be guaranteed, as long as the nonresident sport fishery sector is left unregulated.