



Adak Community Development Corporation

February 19, 2019

ADF&G Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-6094 FAX

Re: Proposal 180

Dear Chairman Morisky,

Adak Community Development Corporation (ACDC) supports Proposal 180 to establish commercial red king crab and Tanner crab fisheries in the portion of the Aleutian Islands state waters between 172 and 179 degrees longitude.

ACDC further supports a number of details for management of an Aleutian Island state water crab:

- The proposed state water crab fishery should be limited to vessels less than 60 feet in length overall.
- The proposed state water crab fishery should exclude the rationalized AI king crab fisheries for Golden King Crab, as well as for Petrel Bank Red King crab (west of 179 degrees longitude).
- The proposed state water crab fishery should include all other crab species not managed under a Federal FMP and not subject of a current state management plan, including the following species removed from Federal management under Amendment 24 to the Crab FMP:
 - EAI Tanner crab
 - WAI Tanner crab
 - WAI grooved Tanner crab
 - EAI grooved Tanner crab
 - EAI triangle Tanner crab
 - AI scarlet king crab

These are the Aleutian Island "state-managed stocks for which NMFS and the Council find that the State of Alaska has a legitimate interest in the conservation and management and for which there is either no directed fishery, a limited incidental or exploratory fishery, or the majority of catch occurs in State waters." (Amendment 24 to BSAI Crab FMP May 2008, pg. v)



PO Box 1943
Adak AK 99546

Attachment A

Excerpts from “POLICY ON KING AND TANNER CRAB RESOURCE MANAGEMENT” (#90-04-FB, March 23, 1990)

“The following management measures are available as tools to be used in order to carry out the policies on king and Tanner crab management. Individual measures should be applied as necessary in areas and fisheries depending on available information and fishery characteristics”

Size Limits *“To provide for protection against over harvest on stocks **where harvest rates are unknown or difficult to regulate, size limits are set to increase the probability of mating prior to harvest.**”*

Sex Restrictions. *“Harvest of king and Tanner crabs is limited to **males only** in an attempt to provide full fertilization of females and increase the chances of reproductive success”*

Fishing Seasons. *“Biological seasons should be set to minimize the harvest of king and Tanner crabs during times surrounding the annual mating, molting, and egg hatching periods and for a sufficient time after molting to allow safe handling and acceptable product quality”*

Guideline Harvest Levels (GHL) *“A preseason estimate of the level of allowable king and Tanner crab harvest is established for each fishery. For those fisheries **without surveys or historical catch information** adequate for estimating the population size, the GHL will be set based on historical fishery performance, **catch**, and population trend.*

Inseason Adjustments *”Inseason adjustments may be made to the guideline harvest level and length of the fishing season. Information upon which such adjustments are based may include: (1) overall fishing effort; (2) **catch per unit of effort and rate of harvest**; (3) relative abundance of king or Tanner crabs; (4) achievement of guideline harvest level (GHL); (5) proportion of soft-shelled crabs and rate of dead loss; (6) general information on stock condition including adequacy of reproductive stock*

Other Measures. *“To meet the goal and policies for management of these fisheries, it may be necessary for the Board to adopt additional regulations ... **gear limitations**, and other measures.”*

Gear Types. *“Fishing for king and Tanner crabs is limited to **pots**, ring nets, or diving gear depending on area”*



- The proposed state water crab fishery should include Red King Crab only in state waters between 172 and 179 longitude. 5 AAC 34.616 "Adak District red king crab harvest strategy" contemplates the use of the commissioner's authority to open an AI state waters RKC fishery (*"In the Adak District in the waters of Alaska in the Adak District, the commissioner may open, by emergency order, a commercial red king crab fishery only in the waters of Alaska in the Adak District."*)
- The proposed state water fishery should be managed under a "size, sex, and season framework. To the extent possible, this management strategy should allow for retention of all legal sized male crabs of any of the species identified above in a multispecies crab fishery.
- The proposed state water crab fishery should include pot limits.

ACDC believes that the "POLICY ON KING AND TANNER CRAB RESOURCE MANAGEMENT" (#90-04-FB, March 23, 1990) provide a framework and the latitude for applying the proposed management strategy to the identified species. (See attached excerpts from the document as attachment A.)

The proposed conservative management approach to development of these un-utilized crab fisheries "without surveys or historical catch information" and which have been closed for many years or even decades would allow a slow paced fishery to evolve utilizing in-season information.

Benefits of Proposal 180

The proposed crab fishery would complement the existing state water cod GHF fishery which is primarily harvested by under 60' pot boats.

It would give harvests in the under 60' fleet a new opportunity for income that would not reduce income from any other harvesters since there is currently no fishery. It could potentially extend the amount of time harvesters base their fishing activity out of Adak.

It would benefit the community of Adak by providing new processing opportunity to extend operation and utilization of the processing facilities. This could potentially allow for an increased portion of the processing labour force who are residents of the community.

In summary, Proposal 180 is an action with no losers, and with potential wins for small boat harvesters, remote fishery dependent AI communities, and processors.

Thank you for considering our comments.

Sincerely,

Rick Koso, President
Adak Community Development Corporation



Current Seasons:

See - 5 AAC 35.510. Fishing seasons for Registration Area J *"In the Western Aleutian District, pots may be operated to take Tanner crab only during a season opened by emergency order from 12:00 noon November 1 through 12:00 noon March 31"*

See - 5 AAC 34.610. Fishing seasons for Registration Area O *"The commissioner may open and close, by emergency order, a season for male red king crab in the Adak District under 5 AAC 34.616, beginning 12:00 noon August 1 and ending no later than 11:59 p.m. February 15"*



Statewide Finfish Proposals

Comments:

We support Proposal 161 to add new section to fisheries regulation to require weekly reporting of salmon harvest by all permit or license holders. During conservation times when Sockeye or King Salmon runs and strength are low, requiring weekly reports will help ADFG to manage fisheries better. The Department will know on a weekly basis how many fin fish are being harvested on a weekly basis.

Comments:

We support Proposal 162. See comments under Proposal 161.

Comments:

We oppose Proposal 165 to allow de-registration of a sport fishing guide vessel prior to Dec. 31st to subsistence fish. Guides can catch fish for other people, if they wish to do so. A regulation to allow guides to take friends and extended family out isn't necessary.

Comments:

We oppose Proposal 169 to repeal and readopt the *Policy for Statewide Salmon Escapement Goals*. Current policy for BEG, SEG and OEG is working fine, new regulation does not need to be created. We support regulatory EG policy that is in place, a lot of work has been done to create this regulation, new regulation isn't warranted, "don't fix it, if it isn't broken".

Comments:

We oppose Proposal 171 to modify criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries. A statewide regulation for allocation of fish in non-subsistence use areas isn't necessary or needed. Personal Use fisheries are just attempting to have a priority over fisheries. This statewide proposal is a round-about method of attempting to get subsistence in non-subsistence areas.

Comments:

We oppose Proposal 173 to define ecotourism as an activity that includes demonstration of fishing techniques, capture of fish and shellfish species that are released unharmed, and/or education and interpretation of the demonstrated fishery to their clients. We do not support a statewide definition to allow businesses to show fishing techniques or to release fish or to show or educate or interpret fishing to clients. Creating a regulatory definition to allow businesses to show how fish is cut, harvested, handled and educated clients on fishing isn't needed in regulations.



Comments:

We support Alaska Board of Fisheries Finding on the religious and ceremonial use of King Salmon for all Alaska Native People. Ahtna people also have a rite that is observed in honor of the first salmon harvested each summer. We take a bath with a tiny drop of blood in the bath water before the salmon is eaten with fresh willow leaves. It is to ensure that we show respect to the salmon and to harvest more salmon, and to keep ourselves healthy. It is a cultural practice and rite to honor returning salmon.

Many other Alaska Native People have similar rites and cultural practices regarding salmon. Salmon is a resource that is highly regarded by Alaska Native People. Salmon provides essential nutrients to our bodies, provides food for future use, is intrinsic to our identity as Alaska Native People, and our way of life.

Submitted by:

*Storia Stickwan
for Linda Rte*

CT Committee Chair

Date: February 14, 2019

Submitted By
Akcinia Kulikov
Submitted On
2/20/2019 11:23:12 AM
Affiliation

Phone
9073996816

Email
kulikov.a.r.k@gmail.com

Address
P.O. Box
Homer, Alaska 99603

I am a single mother of 7, we commercial fish, sport fish, and dipnet. In this day and age where technology is pretty amazing why is there not a better system for keeping track of how many fish people take from the rivers. There are people that catch their limits and come back the next day to fish again. There are people dipnetting that are not ALASKA RESIDENTS, who take fish home down to the lower 48 and sell them. I personally have seen tourists yelling at a clerk at the counter to give them dipnetting card. Give every Alaska resident family per household a card like a debit card with whatever limit they are allowed. Put a toll booth where they have to swipe their card before they can leave the river with their fish. Just like commercial Fishermen, they have to deliver everything and anything they take home has to be counted as home pack. Everyone should be responsible and declare their fish properly. To put the blame on one fishery is ridiculous. If commercial fishing is shut down then all the rivers will be plugged with fish and it will destroy the spawning beds, that is something that all children in ALASKA are taught in Elementary school. You don't have to be a scientist to know that too many carrots in your carrot garden and your carrots will be thin and weak.



February 20, 2019

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

RE: Alaska Bering Sea Crabbers comments on Proposal 180

Dear Board of Fisheries:

The Alaska Bering Sea Crabbers (ABSC) oppose Proposal 180 for commercial state-waters red king and Tanner crab fisheries in the Aleutian Islands near Adak for vessels under 60' length overall as stated in the original proposal. If Proposal 180 is considered, ABSC recommends that the Board of Fisheries further define the area and species as described below in Section 1 to not impact the well-established Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. In addition, ABSC has conservation and economic concerns for the red king crab stocks in the area as described further in Section 2. Finally, ABSC notes concern over process as this proposal is brought up out-of-cycle which makes it difficult for broad participation by crab stakeholders.

The Alaska Bering Sea Crabbers is a trade association representing independent crab harvesters in the Bering Sea and Aleutian Islands. Our members commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear and hold approximately 70% of the quota in the BSAI Crab Rationalization Program. The BSAI Crab Rationalization Program is both a federal and state fishery, jointly managed by the State of Alaska through the Board of Fisheries and the Alaska Department of Fish and Game (Department or ADFG), as well as federally through the National Marine Fisheries Service (NMFS or NOAA Fisheries).

ABSC understands the need to ensure Alaska's coastal communities remain vibrant and generally supports providing opportunity for the community of Adak, as was done at the start of the Crab Rationalization Program by allocating the community of Adak 10% of the golden king crab quota as a community protection measure. However, we request that the Board of Fisheries consider community interests while balancing the sustainability of the crab resource and the needs of the well-established Crab Rationalization Program which also supports Alaska's coastal communities, Alaska residents, and the Alaska economy.

1 Proposal 180 Further Defined to not impact the Crab Rationalization Program

ABSC recommends that Proposal 180 be amended to not impact the well-established Crab Rationalization Program by NOT including crab species and areas managed under the Crab Rationalization Program. Specifically, in the Aleutian Islands west of Scotch Cap Light (164° 44' W longitude), Proposal 180 should NOT include red king crab west of 179° W longitude and, should the scope of the original proposal change, nor should it include golden king crab or any other species managed under the Crab Rationalization Program as defined in federal regulation at 50 CFR 680, [Table 1 to Part 680](#) (listed below) by fishery and geographic area.



TABLE 1 TO PART 680—CRAB RATIONALIZATION (CR) FISHERIES

Fishery Code	CR Fishery	Geographic Area
BBR	Bristol Bay red king crab (<i>Paralithodes camtschaticus</i>)	In waters of the EEZ with: (1) A northern boundary of 58°30' N. lat., (2) A southern boundary of 54°36' N. lat., and (3) A western boundary of 168° W. long., and including all waters of Bristol Bay.
BSS	Bering Sea Snow crab (<i>Chionoecetes opilio</i>)	In waters of the EEZ with: (1) A northern and western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and (2) A southern boundary of 54°30' N. lat. to 171° W. long., and then south to 54°36' N. lat.
EAG	Eastern Aleutian Islands golden king crab (<i>Lithodes aequispinus</i>)	In waters of the EEZ with: (1) An eastern boundary the longitude of Scotch Cap Light (164°44' W. long.) to 53°30' N. lat., then West to 165° W. long., (2) A western boundary of 174° W. long., and (3) A northern boundary of a line from the latitude of Cape Sarichef (54°36' N. lat.) westward to 171° W. long., then north to 55°30' N. lat., then west to 174° W. long.
EBT	Eastern Bering Sea Tanner crab (<i>Chionoecetes bairdi</i>)	In waters of the EEZ with: (1) A western boundary the longitude of 166° W. long., (2) A northern boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and (3) A southern boundary of 54°30' N. lat.
PIK	Pribilof red king and blue king crab (<i>Paralithodes camtschaticus</i> and <i>P. platypus</i>)	In waters of the EEZ with: (1) A northern boundary of 58°30' N. lat., (2) An eastern boundary of 168° W. long., and (3) A southern boundary line from 54°36' N. lat., 168° W. long., to 54°36' N. lat., 171° W. long., to 55°30' N. lat., 171° W. long., to 55°30' N. lat., 173°30' E. lat., and then westward to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
SMB	St. Matthew blue king crab (<i>Paralithodes platypus</i>)	In waters of the EEZ with: (1) A northern boundary of 62° N. lat., (2) A southern boundary of 58°30' N. lat., and (3) A western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
WAG	Western Aleutian Islands golden king crab (<i>Lithodes aequispinus</i>)	In waters of the EEZ with: (1) An eastern boundary the longitude 174° W. long., (2) A western boundary the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and (3) A northern boundary of a line from the latitude of 55°30' N. lat., then west to the U.S.-Russian Convention line of 1867.
WAI	Western Aleutian Islands red king crab (<i>Paralithodes camtschaticus</i>)	In waters of the EEZ with: (1) An eastern boundary the longitude 179° W. long., (2) A western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and (3) A northern boundary of a line from the latitude of 55°30' N. lat., then west to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
WBT	Western Bering Sea Tanner crab (<i>Chionoecetes bairdi</i>)	In waters of the EEZ with: (1) An eastern boundary the longitude of 166° W. long., (2) A northern and western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and (3) A southern boundary of 54°30' N. lat. to 171° W. long., and then south to 54°36' N. lat.

2 Concern regarding Western Aleutian Islands Red King Crab

ABSC has some conservation and economic concerns for the red king crab stocks¹ in the Western Aleutian Islands west of 171° W long. The commercial red king crab fishery in the Western Aleutian Islands has been closed since the Crab Rationalization Program was implemented in 2005 due to concern over the health of the stock (2017 Crab Stock Assessment and Fishery Evaluation (SAFE), [Assessment of Western Aleutian Islands Red King Crab](#), Daly. Hereafter called "SAFE"). Recent cooperative pot surveys of the area in 2015 near Adak and in 2016 on Petrel Banks show the

¹ This section focuses only on red king crab stocks because that is the only stock with overlap between Proposal 180 as originally stated and the Crab Rationalization Program. In the Western Aleutian Islands, only red and golden king crab are part of the Crab Rationalization Program; Aleutian Islands Tanner crab is not rationalized. Proposal 180 is specific to red king and Tanner crab.



red king crab stocks in the Western Aleutian Islands continue to be very depressed and are not at levels to support a commercial fishery (*Cooperative Red King Crab Survey in the Adak Area, 2015. Hilsinger et al. [Fishery Data Series No. 16-18](#)*, and *SAFE, p. 1-36 & 10-20*).

The stock assessment and resulting overfishing level (OFL) and acceptable biological catch (ABC) determinations are for the entire Western Aleutian Islands red king crab stock west of 171° W long, as described in the *SAFE p.10-2*. While red king crab west of 171° W long is considered one stock, it is managed in two districts (east and west of 179°W long.). The portion of the stock west of 179° W long. is part of the Crab Rationalization Program (near Petrel Banks and called Western Aleutian Islands red king crab under federal management as shown in 50 CFR 680, [Table 1 to Part 680](#)) while the stock east of 179° W long. is not included in the Crab Rationalization Program. In March 2014, the Alaska Board of Fisheries split the Western Aleutian Islands red king crab stock in to two districts for state management purposes. In addition, they created a state harvest strategy for Adak District red king crab in Registration Area O that provides a fishery for either state waters or in state and federal waters between 171° and 179° W longitude dependent on the harvestable surplus of crab as specified at 5 AAC 34.616 (*SAFE, p. 10-10 & 10-11*).

The WAI red king crab fishery west of 179° W longitude has been managed since 2005/06 under the Crab Rationalization program (50 CFR Parts 679 and 680). The WAI red king crab fishery in the area east of 179° W longitude was not included in the Crab Rationalization program (Baechler and Cook 2014). In March 2014 the Alaska Board of Fisheries established two red king crab management districts in state regulations for the Aleutian Islands west of 171° W longitude (the Adak District, 171° to 179° W longitude; and the Petrel District, west of 179° W longitude) and some notable differences in regulations exist between the two districts. The red king crab commercial fishing season in the Adak District is August 1 to February 15, unless closed by emergency order (**5 AAC 34.610 (a) (1)**); the red king crab commercial fishing season in the Petrel is October 15 to February 15, unless closed by emergency order (**5 AAC 34.610 (a) (2)**). Only vessels 60 feet or less in overall length may participate in the commercial red king crab fishery within the state waters of the Adak District (**5 AAC 34.610 (d)**); no vessel size limit is established for federal waters in the Adak District or for state or federal waters in the Petrel District. Federal waters in the Adak District are opened to commercial red king crab fishing only if the season harvest level established by ADF&G for the Adak District is 250,000 lb or more (**5 AAC 34.616 (a) (2)**); there is no comparable regulation for the Petrel District. In the Adak District, pots commercially fished for red king crab may only be deployed and retrieved between 8:00 AM and 5:59 PM each day (**5 AAC 34.625 (g) (2)**) and the following pot limits pertain: 10 pots per vessel for vessels fishing within state waters (**5 AAC 34.625 (g) (1) (A)**); and 15 pots per vessel for vessels fishing in federal waters (**5 AAC 34.625 (g) (1) (B)**). In the Petrel District there is no regulation pertaining to periods for operation of gear and a pot limit of 250 pots per vessel (**5 AAC 34.625 (d)**). See also “6. Brief description of the annual ADF&G harvest strategy,” below.



5 AAC 34.616. Adak District red king crab harvest strategy. (a) In the Adak District, based on the best scientific information available, if the department determines that there is a harvestable surplus of

(1) red king crab available in the waters of Alaska in the Adak District, the commissioner may open, by emergency order, a commercial red king crab fishery only in the waters of Alaska in the Adak District under 5 AAC 34.610(a)(1);

(2) at least 250,000 pounds of red king crab in the Adak District, the commissioner may open, by emergency order, a commercial red king crab fishery in the entire Adak District under 5 AAC 34.610(a)(1).

(b) In the Adak District, during a season opened under 5 AAC 34.610(a)(1), the operator of a validly registered king crab fishing vessel shall

(1) report each day to the department

(A) the number of pot lifts;

(B) the number of crab retained for the 24-hour fishing period preceding the report; and

(C) any other information the commissioner determines is necessary for the management and conservation of the fishery, as specified in the vessel registration certificate issued under 5 AAC 34.020; and

(2) complete and submit a logbook as prescribed and provided by the department.

Because the Western Aleutian Islands red king crab stock shares a common OFL/ABC, ABSC has economic concern that Proposal 180 could impact the Crab Rationalization Program in the future by foregoing opportunity should the fishery ever return to harvestable levels. Management of the rationalized Western Aleutian Islands red king crab fishery and the non-rationalized Adak District red king crab fishery are separated by a management line at 179° W long. ABSC is concerned that with the shared OFL/ABC between two management areas east and west of 179° W long., the Adak District red king crab fishery harvest could come off the top before providing any remaining crab to the rationalized Western Aleutian Islands red king crab fishery near Petrel Banks. This would harm the Crab Rationalization Program by potentially foregoing opportunity for which the rationalized fishery has demonstrated historical participation. We understand some work has been done through the North Pacific Fishery Management Council process, most recently in 2016, to consider removing Adak District red king crab from the federal BSAI King and Tanner Crab Fishery Management Plan which could provide options for addressing a shared OFL/ABC.

In closing, ABSC understands the need to provide opportunities for Alaska's coastal communities and urges the Board of Fisheries to balance such considerations with the other industries on which Alaska relies, including protecting the Crab Rationalization Program. Thank you for considering comments from the Alaska Bering Sea Crabbers to further define Proposal 180 to not impact the Crab Rationalization Program and to address conservation and economic concerns for the Aleutian Islands red king crab stock. We are available to answer any questions you may have and will be at the upcoming March Board of Fisheries meeting.

Sincerely,

Jamie Goen
Executive Director
Alaska Bering Sea Crabbers
absc.jamie@gmail.com

Submitted By
Scott Kent
Submitted On
2/20/2019 2:08:39 PM
Affiliation
AKCRF

The Aleutian King Crab Research Foundation (AKCRF) has appreciated the opportunity to exchange ideas with ADFG Westward Region staff during their development of a new Aleutian Islands golden king crab (AIGKC) harvest strategy. As the primary stakeholder group, we have continued to be attentive to changes in AIGKC stock status, progress with the assessment model, cooperative research opportunities in our fishery, as well as challenges to successful fishing operations. We see this effort to connect assessment model outcomes to a more quantitative and flexible harvest strategy as more consistent with other Alaskan crab stocks and an important step towards improved management.

The complex and iterative process of the simulation exercise and risk analyses required a high degree of coordination among department staff. Further, AKCRF supported the technical assistance of Dr. Steve Martell to provide help with assessment model and simulation coding, working closely with Dr. Shareef Siddeek. Over the last several months, we have helped to facilitate information sharing for updates on many technical details, harvest strategy options and to provide advice back to the department on our preferences. We note the high degree of transparency to account for stakeholder input and in general, there has been agreement on results and recommendations. We acknowledge that policy choices still remain, and would encourage the Board to closely consider our preference for options that seek a level of fishery stability and optimal harvest while still meeting or exceeding conservation requirements. Lastly, we know that harvest strategies are dynamic. As further model development occurs, along with new survey and fishery information, revision to proposed harvest strategy options in the future may be warranted. In support of this, we have continued with our commitment to a cooperative industry survey which has been underway in the EAG (4 seasons) and is now extending into the WAG.

We have reviewed the 13 proposed policy options for the Eastern Aleutian (EAG) and Western Aleutian (WAG) golden king crab that account for trade-offs in conservation and economic performance. The 30-year forecast simulation based on 500 replicates provided a large amount of information to be translated into usable policy options. The exercise had a number of different iterations which involved drilling down into exploitation ramp rate options, treatment of bycatch and the capping of catch calculations within the simulations. The consideration of several risk and performance elements related to OFL, ABC, average retained catch, CPUE, the probability of a fishery closure, among others are presented in the department's summary paper. The clarity of results in the end provided robust options to inform policy evaluation. We agree with the approach that considers each policy in three parts; 1) a lower bound to open the fishery of 25% of the long term average of mature male abundance, 2) a mature male exploitation ramp (moderated by abundance) ranging between 10% and 30%, and 3) a maximum exploitation rate on legal male abundance of 25% applying to both areas. We agree with the department's approach to exclude policies that reflect the "too high or too low" extremes in this exercise, which allowed for narrowing the set of choices in each area. The narrowed set of choices have basically focused on ramp maximum rate options while keeping the minimum fishery opening threshold and the maximum legal male exploitation static.

For the EAG, we support the department and agree with the choice that conservation risks weighed against economic criteria lead to a recommendation of policy 3 – which optimizes the tradeoff between catch and catch stability. The terms for this EAG policy 3 are a 15% mature male abundance ramp maximum and a 25% legal male abundance cap. The department's review of average exploitation rates (GHL/MMB) reflects that a 15% EAG ramp is near the 10-year mean exploitation rate and below the longer term rate. For the WAG, the department is recommending a range of ramp maximums from 15% to 20% (policies 3, 4, or 11) and notes that ramp maximums that exceed 20% are not recommended "to minimize probability of negative population effects." While we acknowledge this range and rationale, we would support that 20% is an appropriate ramp maximum to optimize catch and meet conservation concerns. To that end, WAG policy 4 with terms of a 20% mature male abundance ramp maximum and a 25% legal male abundance cap is preferred. Our preference of the higher WAG ramp value from the department's recommended range is further supported by two points; 1) WAG fishing grounds are expansive and the post-rationalization fleet leaves a portion of the area unfished – therefore effective exploitation of the WAG stock may be lower, and 2) the department's review of average exploitation rates (GHL/MMB) reflects that a 20% WAG ramp is below the 10-year mean exploitation rate (23%) and further below the longer term rate.

As a final note to the Board, AKCRF is now affiliated with the Bering Sea Fisheries Research Foundation (BSFRF) to collaborate on common ground projects. The department's summary paper acknowledges this with a broader collaboration with BSFRF and other research partners. We know the Board is aware of a similar exercise for Bering Sea Tanner crab which you will be hearing more about soon.



Dear Members of the Alaska Board of Fisheries,

We have a commercial fishing set net operation located on North K-Beach. In March 2017 the BOF passed a 600 ft fishery on North K-Beach to help harvest surplus Kasilof sockeye. This 600 ft fishery consists of **29 Beach nets**, 9 family commercial fishing operations. During the 2017 BOF, the original North K-Beach 600ft fishery (prop 136) was **passed 7-0 vote** on 2/28/17. The following day on 3/1/17 the 600ft fishery in the Kasilof with hours exemption (prop 101) was passed. I believe the North K-Beach hours exemption was an oversight that took place during the 2017 BOF as it had not been discussed at all during deliberation.

During the 2017 season, this fishery was not used one time. The Kasilof River exceeded the BEG of 160,000-340,000. North K-Beach fisherman had many conversations with ADF&G in season to figure out why this fishery was not used. ADF&G stated there was a lot of confusion on this fishery and were unsure about the hours. In March 2018 North KBeach fisherman decided to put in an ACR to help clarify the confusion. At that meeting Board member Ruffner states, "I have stated my intent of the proposal several times on the record, I was looking for an option that would help you stay within the escapement goals and not have to resort to using the special harvest terminal fishery".

During the 2018 season, this fishery was used twice. During the two 600ft openers North K-Beach was successful in catching sockeye while minimizing our King salmon harvest to three. The Kasilof River exceeded the BEG and the OEG and the special harvest terminal fishery was used. Aligning with Board member Ruffner's intent on this fishery, if North K-Beach hours were **exempt** exactly like the Kasilof 600ft fishery this fishery could have been used more often and most likely would have been able to stay out of the special harvest terminal fishery.

Since 2017 North K-Beach fisherman has continually come to the Board of Fish for some clarification on this fishery and hopefully **Proposal 181** will help ADF&G clarify the use of this 600ft fishery. The last two seasons North K-Beach fishermen have lost the ability to harvest an available surplus which has resulted in exceeding escapement goals and significant economic loss.

I have attached a map showing the locations that are exempt from hours and our location where hours count.

Thank you for your time,

Amber & Travis Every
360 Dolchok Ln
Kenai, AK 99611



Latitude and Longitude are based on the North American Datum: 1983 (NAD 83), which is equivalent to the World Geodetic System: 1984 (WGS 84).

Submitted By
Amber and Travis Every
Submitted On
2/20/2019 12:54:22 PM
Affiliation

Dear Members of the Alaska Board of Fisheries,

We are completely opposed to KRSA proposal #171. KRSA has been an organization who's goal has been to hurt the setnet community. There is no problem with Alaskans getting their dip net fish. As you can see this fishery has steadily increased in participation and harvest. UCI commercial fisherman have put more fish to the mouth of the Kenai River than ever before. We have had some of the highest escapement for sockeye in the last 5 years. I hope you are able to see through KRSA antics that this is not really about getting more fish to the dip net fishery or to Alaskans but it's about hurting our setnet community once again.

Thanks for your time,

Amber and Travis Every

**ALASKA BOARD OF FISHERIES
STATEWIDE FINFISH
MARCH 9-12, 2019**

**Alaska Board of Fisheries Proposals
WRITTEN COMMENTS**

BY

The Bristol Bay Economic Development Corporation

February 20, 2019

Board Meeting: March 9-12, 2019

Name: Gene J Sandone

Affiliation: Bristol Bay Economic Development Corporation (BBEDC)

Contact Phone: 907-631-6033

Email: gjsandone@gci.net

Address Line 1: PO Box 1464

Address Line 2

City: Dillingham,

State: Alaska

Zip: 99576

Do you consent to your contact information being included on printed copies of your comment? Yes

TABLE OF CONTENTS

TABLE OF CONTENTS.....	3
Harvest Reporting.....	4
PROPOSAL 161 – 5 AAC 01.XXX, 5 AAC 75.XXX, 5 AAC 77.XXX. New Section. Require weekly reporting of salmon harvest by all permit or license holders	4
Proposed by: Ralph Lohse.....	4
Recommendation: OPPOSE.	4
PROPOSAL 162 – 5 AAC 01.XXX - 5 AAC 77.XXX. New section. Require biweekly reporting of all sport, personal use, and subsistence king salmon catch.....	5
Proposed by: Cordova District Fishermen United.....	5
BBEDC Recommendation: OPPOSE.	5
Policy/Allocation.....	7
PROPOSAL 169 – 5 AAC 39.223. Policy for statewide salmon escapement goals. Repeal and readopt the Policy for Statewide Salmon Escapement Goals	7
Proposed by: Jeff Fox.....	7
BBEDC Recommendation: OPPOSE.	7
PROPOSAL 170 – 5 AAC 39.222. Policy for the management of sustainable salmon fisheries. Amend the Policy for the Management of Sustainable Salmon Fisheries to include management targets	9
Proposed by: Jeff Fox.....	9
BBEDC Recommendation: OPPOSE.	9
PROPOSAL 171 – 5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries.....	10
Proposed by: Kenai River Sportfishing Association	10
BBEDC Recommendation: OPPOSE AS WRITTEN; SUPPORT WITH SUGGESTED LANGUAGE	10
Nushagak Coho Salmon Management Plan.....	14
PROPOSAL 182 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.	14
Proposed by: Alaska Board of Fisheries	14
BBEDC Recommendation: SUPPORT AS AMENDED	14

Harvest Reporting (Proposals 161, 162)

PROPOSAL 161 – 5 AAC 01.XXX, 5 AAC 75.XXX, 5 AAC 77.XXX. New Section. Require weekly reporting of salmon harvest by all permit or license holders

Proposed by: Ralph Lohse

Recommendation: **OPPOSE.**

Proponent Issue Statement: The need for timely data necessary to make effective decisions in the management of the salmon resources in the State of Alaska.

What would this proposal do?

This would require all holders of a State of Alaska commercial, charter, subsistence, or personal use permit or license to report the number, species and location of salmon taken in the State of Alaska weekly (unless a shorter time period is required by regulation) by phone, by e-mail, or on an ADF&G provided report form or commercial fish ticket.

Current regulations for commercial and subsistence fisheries:

5 AAC 39.130. Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels; transporting requirements

5 AAC 01.015. Subsistence fishing permits and reports

BBEDC COMMENTS: BBEDC OPPOSES Proposal 161 with respect to commercial and subsistence fishing.

It appears that this proposal seeks to make salmon fisheries more efficient by gathering more timely information on harvest. However, in most cases, the total run size is not known until after the season. BBEDC comments are in opposition to the additional reporting of commercial- and subsistence-caught salmon by permit holders.

Reporting of the taking of salmon by commercial fishermen is currently extremely timely and well regulated. Additional regulations are not necessary and would be duplicative. For every commercial sale of salmon, a state fish ticket is generated by the buyer. This information is reported to the department in a very timely manner, usually within 48 hours of the sale. Requiring each commercial fisherman to report his catch would be duplicative to the current process, burdensome to the commercial fisherman, and would result in reporting that is less timely.

BBEDC firmly believes that additional regulations on the reporting of salmon catches taken under subsistence regulations are not necessary. Subsistence fisheries occur throughout the state with many occurring in remote areas. Subsistence fishing permits are required in most areas to

fish for salmon under subsistence regulations. Additionally, in most cases, the subsistence fishing permit limits the number of salmon that can be taken and also stipulates a time-certain reporting requirement. However, if needed, the reporting times on the permit may be modified by the department, dependent on the need for the harvest information. However, in all cases, to manage runs more efficiently, the total run must be known. In most cases, accurate inseason assessment of salmon runs is not completed inseason but based on post-season assessment, usually by aerial survey. This proposed regulation would be burdensome, duplicative and unnecessary. It would be especially burdensome to subsistence fishermen who spend the fishing season at fish camp. Further, in most cases and for most species, the relatively small subsistence salmon harvest is inconsequential to the overall salmon harvest.

PROPOSAL 162 – 5 AAC 01.XXX - 5 AAC 77.XXX. New section. Require biweekly reporting of all sport, personal use, and subsistence king salmon catch.

Proposed by: Cordova District Fishermen United

BBEDC Recommendation: **OPPOSE**

Proponent Issue Statement: A lack of in season data on chinook salmon catch numbers by sport, personal use, and state subsistence users.

What would this proposal do?

This would require all personal use, sport, and subsistence fishermen to report their catch numbers to the department within 14 days of harvesting chinook salmon through the ADF&G website or other appropriate methods provided by the department.

BBEDC COMMENTS: **BBEDC OPPOSES Proposal 162 with respect to subsistence fisheries**

It appears that this proposal seeks to make king salmon fisheries more efficient by gathering more timely information on subsistence, sport and personal use harvests. However, in most cases, the total run size is not known until after the season, if at all. BBEDC comments are in opposition to the additional reporting of subsistence-caught king salmon by subsistence fishermen.

BBEDC firmly believes that additional regulations on the reporting of king salmon catches taken under subsistence regulations are not necessary. Subsistence is the priority use of the resource. Normally, subsistence fishermen take only what they need, and their harvest of king salmon does not vary substantially with run size or from year to year.

Subsistence fisheries for king salmon occur throughout the state with numerous subsistence fisheries occurring in remote areas. Area-specific regulations and management plans have been enacted based on the escapement and subsistence needs. These plans also include allocation criteria that divides the remaining harvestable surplus to commercial, sport, and in some cases, personal use fisheries. The recent decline in king salmon run numbers has eliminated directed commercial king salmon fisheries in many areas of the state, including Bristol Bay. However, to

more efficiently manage king salmon fisheries, so that harvest is maximized, the total run size must be known. Many king salmon stocks are not monitored inseason and managers must rely on test fisheries, catch per unit effort rates, aerial survey counts, and other ancillary information to judge run strength. In some cases, the size of the run is not known until a post-season assessment is completed. Accordingly, in most cases, accurately knowing the inseason harvest without knowing the total run probably will probably not affect management.

Subsistence fishing permits are required in most areas to fish for salmon. In most cases, the subsistence fishing permit limits the number of salmon that can be taken and also stipulates a time-certain reporting requirement. However, if needed, harvest reporting times may be modified by the department, dependent on the need for the harvest information. In the more remote areas of the state, subsistence permits are not usually required. Harvest information is obtained mainly through post-season surveys and possibly some qualitative inseason subsistence reports. Requiring subsistence fishermen to report their catch every 14 days is not only unnecessary, it is obtrusive to the subsistence way of life. In most cases, this proposed regulation would be burdensome and duplicative. It would be especially burdensome to subsistence fishermen who spend the fishing season at fish camp.

Policy/Allocation
(Proposals 169, 170, 171)

PROPOSAL 169 – 5 AAC 39.223. Policy for statewide salmon escapement goals. Repeal and readopt the Policy for Statewide Salmon Escapement Goals

Proposed by: Jeff Fox

BBEDC Recommendation: **OPPOSE**

Proponent Issue Statement: The Policy for statewide salmon escapement goals, 5 AAC 39.223 is not serving the fishing public or the state very well and needs to be rewritten and simplified.

What would this proposal do?

This proposal would:

1. direct the department to develop Biological Escapement Goals (BEG) with an escapement goal range that produces 90% of MSY, regardless of data quality, when return information is known. BEGs will be set without consideration to allocative impacts.
2. establish the BEG range that will be the primary management objective.
3. eliminate Sustainable Escapement Goals (SEGs), Sustainable Escapement Thresholds (SET), and Optimal Escapement Goals (OEGs);
4. establish a Management Target (MT) for those stocks which only escapement is collected (specific return information is unknown). MTs will be set without considerations to allocative impacts.
5. direct the department to manage for maximum sustained yield (MSY), where possible. This proposal seeks to maximize yield for all salmon fisheries.
6. direct the department to produce an escapement goal report 3 months in advance of the proposal deadline for each area, including MT for escapement; and.
7. allow the Board, after public input, to approve or recommend changes to the department's report and goals or targets, if necessary.

BBEDC COMMENTS: BBEDC OPPOSES Proposal 169.

BBEDC opposes this proposal as written. The proposal is attempting to largely address an area-specific issue (Cook Inlet) with substantial negative consequences in other areas of the State. As just one example, if adopted, the proposal has the potential to substantially disrupt the Bristol Bay sockeye salmon fishery and tens of millions of dollars annually.

The Board initiated an evaluation of alternative escapement goal policies for Bristol Bay sockeye salmon in December 2012 and completed the analysis in March 2015. This work documented that MSY-based escapement goals in Bristol Bay are not likely to lead to either maximum yield, nor maximum economic value of the harvest in the state's most valuable sockeye salmon fishery. This is in part due to occasionally large runs produced by MSY escapement are often difficult to fully capture the benefits from. In addition, despite a very long time series of return data MSY

escapement goals to some systems are not well defined. For some river systems, MSY escapement goals would result in complete seasonal closures of fisheries that have provided sustained high annual catches for over one hundred years. SEGs and OEGs are useful management targets that the Board and the Department can use to maximize the benefits from fisheries in Alaska.

The scientific reports generated by this study follow:

Cunningham, C.J., JL Wang, R Hilborn, CM Anderson, and MR Link. 2015. *Analysis of escapement goals for Bristol Bay sockeye salmon taking into account biological and economic factors*. Prepared for Bristol Bay Science and Research Institute. Available: <https://www.bbsri.org/escapement-goal-analysis>

Wang, JL, CM Anderson CJ Cunningham, R Hilborn, and MR Link. 2019. *Does more fish mean more money? Evaluating alternative escapement goals in the Bristol Bay salmon fishery*. *Canadian Journal of Fisheries and Aquatic Sciences*, 2019, 76(1): 153-167, <https://doi.org/10.1139/cjfas-2017-0336>

Cunningham, CJ, CM Anderson, YJ Wang, and MR Link. 2018. *A management strategy evaluation of the commercial sockeye salmon fishery in Bristol Bay, Alaska*. *Canadian Journal of Fisheries and Aquatic Sciences*, <https://doi.org/10.1139/cjfas-2018-0133>

BBEDC opposes the elimination of the SEGs and OEGs. BBEDC believes that these types of escapement goals serve valuable purposes in the management of salmon stocks around the state.

BBEDC opposes the apparent proposed changes to escapement goal establishment responsibilities. This would blur the line between science and allocation. Currently, the department is responsible for establishing scientifically-based and defensible BEGs, SEGs, and SETs. However, BBEDC believes that the determination of the SET is problematic. The Board allocates the harvestable surplus among users. Additionally, the Board, with assistance from the department, is currently authorized to set OEGs, which may include, but are not limited to allocative considerations.

In the situation where the public reasonably disagrees with the department recommended escapement goals, the Board should facilitate, and has facilitated a process, where the department, interested public, and industry can work together to address concerns and possibly agree on an outcome. This has been done on at least two occasions in the past where disagreements over escapement goals have occurred. Regardless, BBEDC accepts and supports the department's final decision on establishing SEGs and BEGs. The establishment of an OEG is the Board's prerogative and must be established during publicly-notified Board meetings.

BBEDC opposes the elimination of the Board-established OEGs. BBEDC believes that OEGs are sometimes valuable tool the Board can use to ensure reasonable opportunity for commercial, sport, and subsistence fisheries.

BBEDC supports, in concept, the submission by the department of the area-specific escapement goal report prior to the proposal submission date for the associated Board meeting. Currently, the report is due two weeks before the start of the associated Board meeting. Additionally, BBEDC also believes that the submission of the department's comments on proposals should be submitted at least two weeks in advance of the public on-time comment deadline. BBEDC believes that the earlier submission of the department comments on proposals would facilitate the public to make more informed decisions and provide more useful comments.

PROPOSAL 170 – 5 AAC 39.222. Policy for the management of sustainable salmon fisheries. Amend the Policy for the Management of Sustainable Salmon Fisheries to include management targets

Proposed by: Jeff Fox

BBEDC Recommendation: **OPPOSE**

Proponent Issue Statement: The sustainable fisheries policy is cumbersome, confusing and misleads the public as to what the board and department are managing the salmon fisheries to achieve. The current policy has numerous prescriptions which neither the board nor department follow, which need to be removed. In addition, this policy and the escapement goal policy are in need of changes to put side boards on the board's authority as well as ensure that the department is following the guidelines established in these board policies. This proposal and a companion proposal for 5 AAC 39.223 seek to eliminate this undue discretion and standardize all goals statewide, eliminate OEG's, SET's, in-river goals and SEG's which are replaced with a new term, "Management Target", which must be developed using the state's own guidelines set out in Fisheries Manuscript No. 14-06, An evaluation of the Percentile Approach for Establishing Sustainable Escapement Goals in Lieu of Stock Productivity Information by Clark et al.

What would this proposal do?

This proposal would direct the department to manage salmon fisheries for Maximum Sustained Yield (MSY) by meeting Biological Escapement Goals (BEGs) for BEG-salmon stocks, salmon stocks where stock-specific age class harvest and escapement data are available. It also directs the department to manage for potential MSY, or at least sustained yield, for salmon stocks where stock-specific age class harvest and escapement data are not available. A Management Target (MT), which is an escapement goal determined for stocks that do not have stock-specific harvest and escapement data, will be determined for these stocks based on the percentile method, as described in Clark et al. (2014) for establishment of Sustainable Escapement Goals (SEGs). These salmon stocks will be referenced as MT-salmon stocks.

BBEDC COMMENTS: **BBEDC OPPOSES Proposal 170.** BBEDC agrees that this policy needs to be reevaluated and updated. However, BBEDC believes that the elimination of entire multiple sections of this policy is not in the best interest of the state at this time nor can it be done at a single Board meeting. BBEDC suggests that a reevaluation of this policy take place, in conjunction with **5 AAC 39.223. Policy for statewide salmon escapement goals,** in a scientific committee-type forum. BBEDC envisions this forum to include, but be not limited to, Alaska

Department of Fish and Game scientists, and other scientists involved in fishery management and escapement goal determination.

Clark, R. A., D. M. Eggers, A. R. Munro, S. J. Fleischman, B. G. Bue, and J. J. Hasbrouck. 2014. An evaluation of the percentile approach for establishing sustainable escapement goals in lieu of stock productivity information. Alaska Department of Fish and Game, Fishery Manuscript No. 14-06, Anchorage.

PROPOSAL 171 – 5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries.

Proposed by: Kenai River Sportfishing Association

BBEDC Recommendation: **OPPOSE AS WRITTEN; SUPPORT WITH SUGGESTED LANGUAGE**

Proponent Issue Statement: Modify criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries. The statute that provides the Board with direction for allocation of fisheries resources was adopted in 1989. The Board subsequently complied with the statute by adopting it in regulation, essentially by reference, in 1991. No action has been taken to amend or improve the regulation since that time.

Current Regulations:

The Board adopted in regulation criteria for the allocation of fishery resources in 1991 and placed the regulations in the general sections for commercial fish (5 AAC 39), sport fish (5 AAC 75) and personal use (5 AAC 77).

5 AAC 39.205. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries

Before adopting regulations that allocate fish among personal use, sport, and commercial fisheries, the board will, as appropriate to particular allocation decisions, consider factors such as those set out in AS 16.05.251(e).

5 AAC 75.017. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries Before adopting regulations that allocate fish among personal use, sport, and commercial fisheries, the board will, as appropriate to particular allocation decisions, consider factors such as those set out in AS 16.05.251(e).

5 AAC 77.007. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries Before adopting regulations that allocate fish among personal use, sport, and commercial fisheries, the board will, as appropriate to particular allocation decisions, consider factors such as those set out in AS 16.05.251(e).

What would this proposal do?

This proposal would incorporate 3 new sections into the specific regulations, (b), (c), and (d) and specifically list the criteria by importance in Section (d) which only applies to nonsubsistence use areas.

Section (b) suggests that the Board follow an “adaptive management process”. The proposal then goes on to describe the “adaptive management process”. This adaptive management process calls for the periodic re-evaluation and updating of the management goals and objectives to ensure they are relevant to current conditions and needs.

Section (c) states that while historical use may be taken into consideration when reviewing and making an allocation decision, this criterion alone shall not be determinate.

Section (d) applies to non-subsistence use areas, as described in **5 AAC 99.015. Joint Board nonsubsistence areas**. Under the allocation process, AS 16.05.251 (e) provides for the Board to allocate fishery resources among personal use, sport, guided sport, and commercial fisheries. AS 16.05.251 (e) states that the board shall adopt criteria for the allocation of fishery resources and shall use the criteria, as appropriate, to particular allocation decisions. The criteria, in no particular order, may include factors such as:

- (1) the history of each personal use, sport, guided sport, and commercial fishery;
- (2) the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;
- (3) the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;
- (4) the availability of alternative fisheries resources;
- (5) the importance of each fishery to the economy of the state;
- (6) the importance of each fishery to the economy of the region and local area in which the fishery is located;
- (7) the importance of each fishery in providing recreational opportunities for residents and nonresidents.

However, new section (d) goes further and instead of stating that the criteria may include only those factors, as those listed below. This proposal directs the Board to consider specific criteria based on its importance in the list, with 1 having the most importance and 7 having the least importance. It effectively limits the Board to consider only those criteria and their relative importance, as listed below:

- (1) The importance of each fishery for providing residents the opportunity to harvest fish for personal and family consumption;
- (2) The number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;
- (3) The importance of each fishery to the economy of the region and local area in which the fishery is located;
- (4) The importance of each fishery to the economy of the state;

- (5) The history of each personal use, sport, guided sport, and commercial fishery with emphasis on the previous 20 years;
- (6) The importance of each fishery in providing recreational opportunities for residents and nonresidents;
- (7) The availability of alternative fisheries resources of similar characteristics.

COMMENTS: BBEDC OPPOSES Proposal 171 as written.

BBEDC opposes Proposal 171, as written. BBEDC believes that Proposal 171, as written, distorts the intent of AS.16.05.251 (e). Although section (d) states that it is to be applicable to nonsubsistence areas, it does not explain or present the rationale of setting importance or priority to each of the criteria for allocation of resources within nonsubsistence use areas. Additionally, there is no rationale for treating nonsubsistence use areas differently. This should be explained in the problem or issue statement. The proposer should specifically state the problem or the issue and how the proposed regulation would address the problem or issue.

Note also that the current regulation states that the resource allocation decision may include the listed criteria. This proposal not only lists the criteria by importance or priority, it essentially limits the factors the Board may consider. Some explanation is necessary for the limit on factors. The proposer should also explain the rationale for listing some factors as more important than others.

Allocation decisions have been made by the Board that have been based on using all seven criteria, or more, with no stated or implied individual criteria importance. BBEDC believes that if the Board treats nonsubsistence use areas differently than other areas of the state in setting allocation criteria, a possibility exists of distorting all previous allocation decisions made by the Board. If Proposal 171, as written, is adopted, it may require the Board to revisit every allocation decision both between regions and within regions.

Specific objections to each section follow:

Section (b) All regulations and management plans are accessible every 3 years for the public and agencies to address. BBEDC believes that the allocation situation described in this proposal, is not different than any other plan that allocates resources to different user groups. . This section serves no purpose

Section c): “Historical Use” History is a factor in all 7 of the criteria.

Section (d) “Order of Importance”. The Board, agencies and the public have used the Board’s Criteria for allocation not in a hieratical order, but as they fit the situation as outlined in the statue. To use otherwise would be to fit a square peg in a round hole.

The following substitute language clarifies the intent of AS 16.05.251 (e) in regulation by taking language from the statue and putting into regulation. An additional benefit is that it makes the criteria easier to find.

Proposal 171: Substitute language:

5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries.

Before adopting regulations that allocate fish among personal use, sport, and commercial fisheries, the board will, as appropriate to particular allocation decisions, consider factors such as those set out in [AS 16.05.251\(e\)](#). **The Board of Fisheries shall use the listed criteria, as appropriate, to a particular allocation decisions. The seven criteria bulleted below ae not in any order of priority or importance.**

- the history of each personal use, sport, guided sport, and commercial fishery;
 - the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;
 - the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;
 - the availability of alternative fisheries resources;
 - the importance of each fishery to the economy of the state;
 - the importance of each fishery to the economy of the region and local area in which the fishery is located;
 - the importance of each fishery in providing recreational opportunities for residents and nonresidents.
-

Nushagak Coho Salmon Management Plan (Proposal 182)

PROPOSAL 182 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

Proposed by: Alaska Board of Fisheries

BBEDC Recommendation: SUPPORT AS AMENDED

Proponent Issue Statement: Modify the Nushagak River Coho Salmon Management Plan to provide additional fishing opportunity when the department projects the sustainable escapement goal range of 60,000–120,000 coho salmon will be achieved,

Current regulations:

(c) If the total inriver coho salmon return in the Nushagak River is projected by the department to be less than 120,000 but at least 70,000 fish by August 25, the commissioner shall close, by emergency order, the directed coho salmon commercial fishery in the Nushagak District by August 1; and

Suggested Language:

5 AAC 06.368 Nushagak River Coho Salmon Management Plan.

(c) If the total inriver coho salmon return in the Nushagak River is projected by the department to be less than 90,000 [120,000 BUT AT LEAST 70,000] fish by August 25, the commissioner shall close, by emergency order, the directed coho salmon commercial fishery in the Nushagak District by August 1; and

BBEDC Comments: Support as Amended:

BBEDC believes that the inriver run size projection trigger of 120,000 coho salmon is too restrictive on commercial and sport fisheries for the Nushagak coho salmon stock. Current regulations prohibit a commercial fishery when the projected inriver run size to the Nushagak River on August 1 will be less than 120,000 on August 25. Below this projection trigger, sport fisheries are also restricted. BBEDC recommends changing the 120,000 trigger to 90,000 salmon. This inriver run projection will allow a commercial fishery to be prosecuted when at a run size of 90,000 or more and eliminates the restriction to the sport fishery. It also ensures that the escapement goal of 60,000 to 120,000 salmon will be met and will not substantially affect the reasonable opportunity for subsistence fishers to catch coho salmon.

One concern that BBEDC has is with projecting the run size on August 25 by August 1. With runs occurring later in the year, the accuracy of the projection may be in question. Accordingly, BBEDC does not support the Nushagak AC recommendation of changing the trigger in 5 AAC 06.368 (c) to 80,000 coho salmon. BBEDC believes and, therefore recommends, that a more precautionary trigger of 90,000 coho salmon be substituted..

Submitted By
Brent Western
Submitted On
2/20/2019 3:08:20 PM
Affiliation

We could write a book on the reasons, but to keep it short:

We OPPOSE Proposal #171.

We SUPPORT Proposals #169 & 170.

Brent, Kirt & Tony Western

Submitted By
Chris Bourgeois
Submitted On
2/20/2019 9:09:46 AM
Affiliation
Commercial Fisherman

Phone
907-253-3123
Email
chrabby123@gmail.com
Address
PO Box 1945
Cordova, Alaska 99574

I support proposals 161 and 162 as timely reporting should be mandatory in all of the fisheries not just commercial.

I oppose proposal 171 as it is an attempt to give sport and personal use fisheries priority over commercial fisheries. ADF&G has done fine with the current system and it doesn't need to be modified.

Submitted By
Chris Every
Submitted On
2/19/2019 4:54:10 AM
Affiliation

Phone
907-394-0720
Email
cpevery58@hotmail.com
Address
37033 Minke Drive
Kenai, Alaska 99611
Alaska Board of Fish Members

I am against Proposal 171.

There are already many opportunities for citizens of the state Alaska to harvest salmon (all fish) for their personal needs.

I would think this proposal would make a board members future decisions even harder than they are currently.

This is just another proposal that KRSA has proposed to fix an imaginary problem.

KRSA continues to attack the commercial fishing industry with their proposals to fix imaginary problems, here are just a few.

1. Setnet Band Initiative
2. The rising of the Kenai River upper end escapement goal.
 - A. To high of an escape goal causes diminishing salmon returns.(2018 for example)

3. Expanded bank fishing on the Kenai River

When the Kenatize Tribe made a deal with KRSA to allow permit fishing on there land, this promotes further bank erosion and over use of an already crowded river.

I am against Proposal 171.

Please reject Proposal 171.

Chris Every

Submitted By
Chris Every
Submitted On
2/19/2019 7:49:08 PM
Affiliation

Phone
907-394-0720
Email
cpevery58@hotmail.com
Address
37033 Minke Drive
Kenai, Alaska 99611
Members of the Alaska Board of Fisheries

I support proposal 181.

This is just a housekeeping issue

The entire 600 ft. fishery should be exempt from hour restraints

This 29 net fishery on North K-Beach will allow more King Salmon to reach the Kenai and Kasilof rivers.

Please talk to me at the March Meeting.

I support proposal 181!!!

Chris Every

**CITY OF SELDOVIA
RESOLUTION 19-15**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SELDOVIA, ALASKA
ENCOURAGING THE STATE OF ALASKA BOARD OF FISHERIES TO RESCIND
THEIR JANUARY 18, 2019 DECISION TO MOVE THE UPPER COOK INLET 2020
FINFISH MEETING TO ANCHORAGE DUE TO THE LACK OF ADEQUATE PUBLIC
NOTICE AND PROCESS**

WHEREAS, in March of 2018 the State of Alaska Board of Fisheries (BOF) considered and passed Board Policy 2018-289-FB by a vote of 4-2 at their Statewide Dungeness Crab, Shrimp, and Miscellaneous Shellfish meeting, establishing a rotating schedule of the Upper Cook Inlet Finfish (UCI) meeting between the communities of Kenai / Soldotna, Palmer / Wasilla, and Anchorage beginning with Kenai / Soldotna in 2020, Palmer / Wasilla in 2023, and Anchorage in 2026; and

WHEREAS, prior to considering Board Policy 2018-289-FB, the public was adequately noticed 35 days prior to the vote through the Boards Supplemental Notice of Regulatory Actions to Be Taken on February 2, 2018; and,

WHEREAS, during the BOF Arctic / Yukon / Kuskokwim Finfish meeting held from January 15 – 19, 2019 in Anchorage the BOF voted 4-3 to move the UCI 2020 meeting to Anchorage; and,

WHEREAS, adequate public notice was not provided prior to the vote, the action was inconsistent with past BOF practices, and it did not meet the requirements of the Open Meetings Act; and,

WHEREAS, this action has the potential to erode the public trust in the BOF process; and,

WHEREAS, City of Seldovia is located on the southern portion of the Kenai Peninsula and waters of Cook Inlet; and

WHEREAS, many local residents are impacted by Upper Cook Inlet Finfish fisheries either directly or indirectly; and

WHEREAS, conducting the Alaska Board of Fisheries Upper Cook Inlet Finfish meeting exclusively in Anchorage hinders local attendance, participation and knowledge due to the expenses and time required to travel such distances; and

WHEREAS, all users of public resources are entitled to reasonable access to public meetings and processes concerning matters affecting their economy, livelihood and lifestyle; and

WHEREAS, holding the 2020 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve that access for locals; and

WHEREAS, all Alaskans deserve consistency, openness, legal compliance, and transparency when engaging with their government during any deliberative decision-making process.

NOW THEREFORE BE IT RESOLVED THAT: The City Council of the City of Seldovia encourages the State of Alaska Board of Fisheries to rescind their January 18, 2019 decision to move the Upper Cook Inlet 2020 Finfish meeting to Anchorage due to the lack of adequate public notice and process and that a copy of this Resolution be forwarded to Governor Mike Dunleavy, Board of Fisheries Chair, Reed Morisky, Board of Fisheries Members, and the Board of Fisheries Executive Director, Glenn Haight.

PASSED and APPROVED by a duly constituted quorum of the City Council of Seldovia, Alaska, this 11th day of February 2019

SIGNED: _____
Dean Lent, Mayor

ATTEST: _____
Heidi Geagel, City Clerk

DRAFT



COOK INLET FISHERMAN'S FUND

Non-profit Advocate for all Commercial Fishing Gear Types in Area H

P.O. Box 39408 Ninilchik, AK 99639 phone/fax 907-260-5614



PC012
1 of 1



Board Support: Glenn Haight

RE: BOF Statewide Proposals

Dear BOF Chairman and Board Members,

Proposal 169

Cook Inlet Fisherman's Fund represents over 400 Cook Inlet Fishermen. Recently, the board of directors for CIFF voted unanimously to support Proposal 169, regarding statewide salmon escapement goals. We agreed that having analysis of escapement goals published by ADFG ahead of time before proposal due dates and especially before BOF meetings could only lead to a more transparent BOF process. The public should be able to see that ADFG and the BOF are working toward full utilization or Maximum Sustained Yield of our salmon resource as required by Magnuson Stevens Act.

Proposal 170

Similarly, we voted unanimously to support Proposal 170. CIFF promotes the adoption of the national standards included in Magnuson Stevens Act, the first and most important of these being the requirement of MSY Management. The BOF and ADFG have done a poor job of this and have managed in ways which have resulted in lower yields and underutilization of salmon. This proposal is a step in the right direction to prohibit the BOF and the Dept. from purposefully managing in ways which cause the underutilization of our salmon resource.

Proposal 171

CIFF also voted unanimously to oppose Proposal 171. This proposal is a blatant effort to decrease the acknowledgement of people's historic use of the resource in order to allocate fish to new users. We feel that any change to these criteria should take into higher consideration these issues: 1. The number of people nationally and worldwide who are the end users of fish caught in a fishery. 2. The percent of fish mortality (including catch and release) that actually gets utilized from a fishery. 3. The ability of a fishery to achieve MSY. This proposal goes against the State Constitution and places State management even further from compliance with the national standards set out in Magnuson Stevens Act.

Sincerely,

John McCombs, President



February 20, 2019

Reed Morisky, Chairman
Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, AK 99811

RE: 2019 Statewide Finfish Meeting Proposal Comments

Dear Chairman Morisky and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is a non-profit membership organization representing over 900 family fishermen who participate in the commercial fisheries in the Prince William Sound and Copper River region. It is our mission is to preserve, promote and perpetuate the commercial fishing industry in Area E in the state of Alaska; to further promote safety at sea, legislation, conservation, management and the general welfare for the mutual benefit of all our members.

Thank you for the opportunity to comment on proposals as part of the 2019 Statewide Finfish Meeting in Anchorage, Alaska. Attached, you will find written comments prepared by Cordova District Fishermen United on behalf of the Board of Directors and members of the commercial fishing fleet in Prince William Sound and Copper River. We trust that the points we raise in these comments provide you with sufficient information to aid your final determinations. If you require further clarification on any of the points we raise, we welcome questions either during the public testimony portion of the meeting or at any other time preceding deliberations.

Sincerely,

Chelsea Haisman
Executive Director



**Cordova District Fishermen United
2019 BOF Written Comments
Statewide Finfish Meeting**

#	Proposal	Division	Position	Comments
	Subsistence (4)			
161	Require weekly reporting of salmon harvest by all permit or license holders. <i>Ralph Lohse</i>		SUPPORT	We support timely and accurate reporting for best management of the resource. We believe this information can assist managers with making in-season decisions, provide a higher quality of reporting and ensure regulations are followed. Technology is improving at a rapid pace, and we believe this is a conceivable future with the creation of an ADFG Fishing app.
162	Require biweekly reporting of all sport, personal use, and subsistence king salmon catch. <i>CDFU</i>		SUPPORT	CDFU seeks regulation that holds users accountable for their use of our fishery resources. Timely reporting is the standard for sport and subsistence hunters and also commercial fishermen, and we would like to see this standard applied statewide for Chinook. The data provided could assist with in-season management decisions, and could ensure we are consistently meeting escapement goals.
163	Prohibit the intentional waste or destruction of subsistence-caught fish. <i>Seth Kantner</i>		No Action	
164	Prohibit the intentional waste or destruction of sheefish. <i>Kotzebue AC</i>		No Action	
	Sport (3)			
165	Allow a fishing guide vessel to de-register after registration in a calendar year. <i>Alaska Charter Association</i>		OPPOSE	CDFU's concern with this proposal is that, by allowing charter vessels to participate in a subsistence fishery and bring additional SHARC card holders on subsistence trips, this proposal has the potential to lead to the unregulated commercialization of a subsistence resource. Federal regulations prohibit registered guide vessels from bringing non-family passengers on subsistence trips for valid reason, and we believe Alaska Administrative Code should be in alignment with these regulations.



Cordova District Fishermen United 2019 BOF Written Comments Statewide Finfish Meeting

166	Allow rockfish to be released at depth. <i>Seward AC</i>	Groundfish Division	SUPPORT	CDFU's Groundfish Division supports this proposal. The mechanism is being used already and is inexpensive. Most importantly, the proposal, if implemented, has the potential to maintain the resource in places of heavy sport fishing.
167	Gear for fly-fishing-only waters: Allow the use of two artificial flies. <i>Phil Brna and Mike Brown</i>		No Action	
	Commercial (9)	Div	Position	Comments
168	Seine specifications and operations. [...] Any line used to attach the seine vessel or skiff to a purse seine may not be more than 10 fathoms in length. <i>ADFG</i>		No Action	
169	Repeal and readopt the <i>Policy for Statewide Salmon Escapement Goals</i> . <i>Jeff Fox</i>		OPPOSE	<p>This proposal would significantly alter the way area biologists manage our fishery resource in many regions in the state. Changing the statewide policy is not appropriate to address concerns in one region, and would change management practices considerably, particularly in areas of mixed stock fisheries, such as the Copper River and Prince William Sound. Current management practices have produced some of the largest salmon runs on record within the last 10 years and there is no reason to change a system that is working.</p> <p>There are many stocks within Area E that do not have a BEG, and the cost to ADFG to establish these would be a burden to the department at a time when both staff and money are limited.</p>



Cordova District Fishermen United 2019 BOF Written Comments Statewide Finfish Meeting

170	Amend the <i>Policy for the Management of Sustainable Salmon Fisheries</i> to include management targets. <i>Jeff Fox</i>		OPPOSE	This proposal, and 169, does not make sense for management in Area E. Furthermore, the proposal removes language that allows for regional biologists to make management decisions with consideration to environmental change, existing harvest patterns, etc. The proposal also removes the use of in-river goals, which could have significant and unintended allocative impacts within Area E.
171	Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries. <i>KRSA</i>		OPPOSE	<p>This proposal refers to 5 AAC 99.015, which already gives the Board of Fisheries authority to make allocation decisions based on criteria listed, but gives the criteria no particular order of importance and leaves complete decision-making authority with the Board of Fisheries on allocation issues.</p> <p>The language in this proposal is more limiting than the original language, and removes to a degree, some of the Board's authority to make allocative decisions by prioritizing in regulation the order in which criteria must be considered, and therefore placing a required priority on personal use fisheries within Nonsubsistence Areas.</p> <p>Further, it holds the Board of Fisheries to an emphasis on the prior 20 year history of each fishery, as well the number of fishery participants, which neglects the fact that commercial fisheries have been limited entry since 1973, while the urban population has grown significantly in the same amount of time. Only sport and personal use fishery participation within Nonsubsistence Areas have continued to grow within the past 20 years, because commercial fishery participation has been limited by law for 46 years.</p>
172	Define bow and arrow. <i>ADFG</i>		No Action	
173	Define ecotourism. <i>ADFG</i>		No Action	



**Cordova District Fishermen United
2019 BOF Written Comments
Statewide Finfish Meeting**

179	Adopt a new Aleutian Islands golden king crab harvest strategy. <i>ADFG</i>		No Action	
180	Registration Area O red king crab management plan <i>Board of Fisheries</i>		No Action	
181	Exempt EO hours used in the NKB 600-foot fishery from weekly EO hourly restrictions <i>Gary Hollier</i>		No Action	

Submitted By

Dan anderson

Submitted On

2/20/2019 3:29:51 PM

Affiliation

Not only the Kenia but the Kasilof Dip net fishery has been and is a total blemish on what people in the outside world(lower 48) visualize alaska to be. The craziness of the circus in the river mouths is not the vision most people have that is alaska. If outside people only new of the senseless waste of our resource that goes on. From very poorly trimmed carcusses to several year old freezer burned filets laying along side of the road or in a dumpster. Very sad. Then the river degregation where this activity takes place. What should be is something that takes habitat and sustainability seriously into deep consideration. I say absolutely no to the KRSA proposal!!! Proposal 169 and 170 have the true alaska vision in mind! Look around the world at examples of humans ruining nature's wonders. Come on Alaska we're better than that. Right?

Submitted By
Dan Norman
Submitted On
2/17/2019 6:43:54 AM
Affiliation

Phone
907-350-0885
Email
akdanimal79@gmail.com
Address
36045 Reef Dr
Kenai, Alaska 99611

Board Members, I am in strong support of Proposal 181. I am a NK Beach fisherman, but my sites are offshore. I do not have the ability to participate in the 600 foot fishery, but I strongly believe that this proposal needs to pass. This proposal would create equality between the Kasilof section 600 ft fishery and the NK beach 600 foot fishery with regard to the hours able to be fished. I have seen the harvest data and it is clear that NK Beach is harvesting the same fish as SK Beach. This proposal would allow a greater harvest of Kasilof bound sockeye with the goal to stay out of the KRSHA terminal fishery. The terminal fishery is not a preferred fishery for the fisherman or the processors.

Submitted By
Dan Norman
Submitted On
2/20/2019 2:33:26 PM
Affiliation

Phone
9073500885
Email
akdanimal79@gmail.com
Address
36045 Reef Dr
Kenai, Alaska 99611

Board Members, I am in strong opposition to proposal 171. This proposal is just another attempt by the KRSA to chip away at harvest opportunity for the commercial fleet. This is an organization that makes money from creating conflict in our neighborhood. I say this as not only a commercial fisherman, but also a person who enjoys sport fishing on the river. I also had family that commercial guide on the river. There must be a balance between all user groups. The board has enough regulation in place to maintain our fish stocks. The department has the tools and authority to manage to established management goals without the additional language in this proposal.

Each district within the state is a unique problem set and there needs to be focused strategies to tackle complex issues. The current system and current regulations are able to create a working platform to address allocation issues.

Thank you

Submitted By
Darin Gilman
Submitted On
2/20/2019 9:08:35 PM
Affiliation

Proposal 171

This proposal is nothing more than an effort to circumnavigate the Non-Subsistence Areas into having priority over other groups throughout the state. The Non-Subsistence Areas created in an effort to not over exploit resources by mass population centers in the state. We are an agriculture society it is disingenuous to say that the population of Alaska can "subsist" off of the river systems that are easily accessible by the road system. I am against proposal 171 because of this merit.

Submitted By
Darin Gilman
Submitted On
1/16/2019 4:11:51 PM
Affiliation

This proposal would greatly improve honest and non-erroneous reporting by holding all user groups accountable for their King salmon harvest numbers. It is much easier to remember how many fish you caught and processed in a two-week period versus having to report several months later. The data that comes in at the end of November is of little use to fish and game managers for in-season management. By requiring biweekly reporting, fish and game managers will be able to more effectively manage mixed-stock fisheries. Big game animals are treated with timely reporting; why should King salmon be treated any differently? If the state really wants to protect kings and fish for them sustainably, this is an effective step in the right direction. I am in support of proposal 162.

Submitted By
Dave Beam
Submitted On
2/20/2019 9:24:30 PM
Affiliation

Phone
9072444701
Email
girdwood52ak@yahoo.com
Address
PO Box 297
Girdwood, Alaska 99587

Dear Board of Fish Members,

I am writing this letter in support of our state wide salmon hatcheries and to oppose Proposals: 169, 170, and 171.

I have been a commercial fisherman since 1979 and make my full time home in Girdwood, AK. I started crewing on seine boats in 1980 in Lower Cook Inlet and then moved to Prince William Sound in 1983. In 1986, I bought into the gillnet fishery in Area E and worked there until I started seining in PWS in 2009 on my own seine boat. Without hatchery pinks, the Prince William Sound seine fishery would not be financially feasible. I fully support the ongoing science surrounding PWS hatchery and wild stock pinks. With three of the largest ever wild stock pink returns in the last ten years, there does not seem to be a problem with the hatchery production interfering with wild stock returns. The hatcheries are a huge asset to the State of Alaska.

Thank you,

Dave Beam

Submitted By
David & JoAnn Wichers
Submitted On
2/19/2019 7:43:42 PM
Affiliation

Phone
3609292811
Email
dnjwichers@gmail.com

Address
PO Box 1728
3347 N Wilson Road
Kenai,, Alaska 99611

TO: Alaska Board of Fisheries Members,

We are writing you to show our **support of Proposal 181.**

We are east side setnetters and have been fishing our North K-Beach set net sites with our family for 34 years. We support Proposal 181, to clarify the hour usage of the NKB 600' fishery which was passed 7-0 during the 2017 BOF meeting (prop 136).

Thank you for your time.

Sincerely,

Dave & JoAnn Wichers

Submitted By
Dennis Zadra
Submitted On
2/19/2019 10:26:01 AM
Affiliation
Prince William Sound AC

Phone
907-253-3718
Email
dennis@idohuntak.com
Address
PO Box 2348
Cordova, Alaska 99574

I support Proposals 161 and 162 because timely reporting during the season would give ADF&G more accurate information about salmon run abundance. This would be very easy to accomplish as the F&G website already has online reporting of harvest tickets and registration hunts.

I oppose Proposals 169 and 170 as they appear to be a drastic change in management.

I strongly oppose Proposal 171 as it is another attempt by KRSA to reallocate the fisheries resources.

Submitted By
Diana Riedel
Submitted On
2/20/2019 7:44:18 PM
Affiliation

Phone
9072535364
Email
dianariedel@hotmail.com
Address
po box 6
Cordova, Alaska 99574

Board of Fish

Statewide Finfish 9-11 March 2019

On-time Public Comment

Proposals 161 and 162, **SUPPORT**with recommendations:

Salmon harvest reporting across Alaska has long been less than it should be, creating an unnecessary challenge to managers to guess harvest as fisheries are prosecuted throughout the season. Although high speed internet is not universally available across the state, it is now available enough such that we can impose a higher standard for reporting the harvest of our most precious renewable natural resource, with the ultimate goal being to apply the same standard for reporting to all user groups: reporting all salmon harvested within 24 hours.

With so many of Alaska's salmon runs declining, we must make use of every piece of information available to ensure these resources are used sustainably and responsibly, and Proposals 161 and 162 are both good steps in the right direction, however we feel that at this point, approving proposal 161, and ALSO approving 162 with modification to apply a higher standard to the most threatened runs.

We recommend modification of Proposal 162 to require the reporting of any salmon harvested from a stock that has not met its escapement goal in the past six years within 24 hours. We recommend six years because that represents the longest life-cycle of any pacific salmon, so requiring 24h reporting on harvests from these stocks for six years will ensure that the progeny of the last run that failed to meet its escapement goal will be subject to this enhanced reporting requirement.

On its own, Proposal 162 is not strong enough, as it allows too much time to lapse between harvest and reporting, and does not apply to all salmon species.

Proposals 169 and 170, **OPPOSE**

The claims asserting the need to change our escapement goals are greatly inflated, and the dire nature of the results questionable, given the record returns we have experienced in many of our salmon stocks over the past 10 years. While there may be systems that could benefit from the management prescribed within these proposals, applying this management statewide to replace our existing management (widely considered to be among the best in the world) would simply be foolish.

Specifically, these proposals would leave the harvest of mixed stocks without a suitable management plan, especially if some component does not have an inseason abundance/escapement estimate. This occurs across Prince William Sound, and throughout the Copper River Spring/Summer Chinook/sockeye fishery.

Proposal 171, **OPPOSE**

Proposal 171 is completely unnecessary, reduces the ability of the Board of Fish to apply its discretion, and simply mis-states the existing statute and code to misrepresent the nature of fisheries management in non-subsistence areas.

Non-subsistence areas exist around Alaska's largest urban centers in Anchorage/MatSu, Fairbanks, Juneau, Valdez, and Ketchikan, prohibiting any subsistence harvest from occurring in these areas. The rationale is quite simple: the areas surrounding these urban centers cannot sustain the use they would receive by residents of these urban centers if subsistence activities were allowed to occur there. Any other harvest is acceptable in these areas, including personal use harvests. The proposal, as well as the outreach and campaigning of the proposer have equated the prevalence of sport fisheries in these areas as somehow reducing the access of Alaskans to food resources simply because non-residents are also eligible for sport harvests, thereby committing the logical fallacy of "Appeal to Pity." The Alaskans who reside in non-subsistence areas still enjoy all the privileges of an Alaskan resident, and are able to participate in all subsistence and personal use fisheries statewide. Essentially, Proposal 171 is demanding that fish resources come to our urban residents, rather than they travel to the resources, which is not realistic.

The proposal lists the factors the Board can consider when allocating fisheries resources as indicated in AS 16.05.251, but the proposal gives the distinct impression that this is a ranked list, and it is neither ranked, nor exhaustive. The proposal indicates the remedy is to rank these factors, and presumably make the list exhaustive, making the #1 priority "The importance of each fishery for providing residents the opportunity to harvest fish for personal and family consumption," and herein lies the rub, as this is essentially subsistence, and these are non-subsistence areas (near urban centers). Because subsistence fisheries are prohibited in these locations, personal use fisheries would become the top priority in these areas, thereby becoming *de facto* subsistence fisheries in non-subsistence areas, and turning the entire concept of non-subsistence areas on its head, and putting the resources near our urban centers in jeopardy.

Moreover, the proposals invites us to believe that the existing language in AS 16.05.251 precludes the Board of Fish from allocating fish to personal use fisheries in non-subsistence areas, and it simply does not. The Board currently has all of the authority it needs to make allocations as the proposal specifies, but the Board also has the authority to make other allocation decisions where appropriate, and we believe that this should be preserved.

There is no justification for this proposal other than that the statute was written in 1989 and it has not been modified since. This is very poor justification for essentially undermining 5AAC 99.015 which established non-subsistence areas around urban centers. Our urban centers have only grown since 1989, and fish resources around our largest cities have not expanded to keep pace, in fact many have declined. Making this seemingly arbitrary change would be an enormous mistake when the Board currently already has the authority and flexibility it needs.

Submitted By
Dyer VanDevere
Submitted On
2/20/2019 4:10:14 PM
Affiliation

I strongly oppose proposal 171. I strongly support proposals 169 & 170.

Submitted By
Emma Owecke
Submitted On
2/19/2019 7:55:03 PM
Affiliation
PWS setnet permit holder

I oppose proposals 169 and 170. Both of these proposals limit in-season management and do not allow for the regulation of unknown changes that may occur mid-season. These proposals prevent the safety and protection of returning salmon runs.

I oppose proposal 171 as it aims to prioritize user groups. This proposal forces the Board of Fish to favor select user groups before others and restrains the Board of Fish from using their own knowledge and judgment to allocate fish between user groups.

Submitted By
Eric Lian
Submitted On
2/18/2019 1:32:07 PM
Affiliation

I support proposals #161, #162, & #166 and agree with the comments submitted by CDFU. I oppose proposals #165, #169, #170, & #171 and agree with the comments submitted by CDFU.

Submitted By
Ezekiel Kinyon Brown
Submitted On
2/20/2019 8:47:18 PM
Affiliation

Dear Chairman Morisky and Members of the Board of Fisheries,

My name is Ezekiel Brown. I am a lifelong resident of Cordova, AK where I sport, subsistence and Commercial Fish. I am a first generation commercial fisherman and hold PWS salmon seine and gillnet permits. My stance on the proposals in front of you are:

Oppose: 165,169,170,171

Support: 161, 162

161: Support: There is no reason not to require timely reporting. It will be a useful tool for management as it will give them a better understanding of run strength and fishing pressure. This will also increase the accuracy of reports as people will be making them while the information is fresh in their mind.

162: Support: Our king salmon are extremely valuable not just commercially but culturally as well. It is unbelievable that we do not require accurate and timely reporting of every king salmon harvested in the state.

165: Oppose: This proposal although claiming to have no interest in commercializing the subsistence halibut fishery will do just that. The federal regulations are quite clear on the use of charter boats to harvest shark cards.

169,170: Oppose: These proposal correctly identify many issues with the escapement goal policy that need to be addressed. However, such significant alterations on the statewide level could have unintended consequences and large costs perhaps a slower implementation of some of these proposed solutions is worth considering.

171: Oppose: This is a insulting attempt to decrease allocation to commercial fisheries and should be thrown out.

Thank you for your time,

Ezekiel Brown

Submitted By
Gary Hollier
Submitted On
2/7/2019 11:00:27 AM
Affiliation
North Kalifonsky Beach Setnetter

Phone
907-252-5890
Email
glh@alaska.net
Address
36045 Reef Dr
Kenai, Alaska 99611

2/7/2019

Dear Chairman Morisky and Members of the Alaska Board of Fish,

My name is Gary L. Hollier. I have fished North Kalifonsky Beach (NKB, stat area 244-32) for 47 years.

I am in full support of prososal 181 that will be addressed at the State wide meeting March 9-12.

At the 2017 BOF meeting for Upper Cook Inlet, the BOF voted 7-0 to may open setnetting on NKB ,within 600 feet from mean high tide, when the Kaslof Section is open. Additionally at the BOF meeting in October 2018, the BOF voted 7-0, to take this issue up, as it definitely was an unforeseen consequence of a regulation.

The main reason for adopting this regulation was to let NK Beach fishermen, who fish 29 nets, harvest Kasilof stocks that were traditionally harvested on that beach. Some of the main justification was to keep the Kasilof River from exceeding its BEG and certainly stay within its OEG. If these goals, especially the OEG were not exceeded, there would be no reason to open the Kasilof River Special Harvest Area (KRSHA).

In 2018 the Kasilof River exceeded its OEG and the KRSHA was opened to fishing. If NKB would have fished more, these two events would not have happened.

When proposals are submitted, especially in Cook Inlet, it is hard to see all the ramifications.

In 2018 there were 110 permits registered in the Kenai Section. The 29 nets that fish this new directed fishery involve 10 permits. The issue as spelled out in proposal 181,ask, when the NKB 600 foot fishery is used, should those hours count against hours for the entire section.

In 2018 when the KRLRKSMP was implemented, due to catch and release implementations, up to 36 hours per week can be fished in the ESSN fishery. Twenty nine nets fished on NKB, should not impact time for the other 303 nets in the Kenai Section.

In the 600 foot fishery in the Kasilof Section those hours do not count for hours that might be fished in the Kenai River Late-Run Management Plan,(KRLRKSMP) 5AAC21.359(e)(3) and the Kenai River Late-Run Sockeye Management Plan 5 AAC21.360.

As the original proposer of this regulation, I missed this important point, as did the BOF, ADF&G, and the Department of Law.

Proposal 181 would give clear direction to ADF&G that hours fished under 5 AAC 21.310(ii), would not impact hours fished for 91% of the permit holders in the rest of the Kenai Section.

Thank you,

Gary L. Hollier

Kenai, Alaska

Submitted By
Gary Hollier
Submitted On
2/19/2019 3:28:43 PM
Affiliation
Self

Phone
907-252-5890
Email
Gh@alaska.net
Address
36045 Reef Dr
Kenai, Alaska 99611

Chairman Morisky and Members of Alaska BOF,

I oppose proposal 171, it is ludicrous to have only the past 20 years of data to be used in creating regulations by the BOF.

Thanks

Gary L. Hollier

Kenai, Ak.

Submitted By
Gilda Rein
Submitted On
2/10/2019 10:08:07 AM
Affiliation
self

To: Ak BOF MEMBERS,

I support proposal 181, which would not have hours count toward the King Salmon and Red Salmon Plans to the Kenai River.

As a former permit holder, in Cook Inlet, that fished North Kalifornsky Beach, I witnessed many days when there were small Kasilof Sockeye extremely abundant on NKB. This was a daily occurrence, yet really was prevalent when the prevailing SW winds would push the Kasilof Sockeye up on North Kalifornsky Beach.

It makes no sense to have hours fished in the 600 ft fishery on NKB, count towards hours fished for the entire Kenai Section, when those fishermen are not even fishing!

Sincerely,

Gilda Rein



100 Seawall Road, Adak, AK, 99546

February 19, 2019

ADF&G Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
(907)465-6094 FAXe

Re: Proposal 180

Dear Chairman Morisky,

Golden Harvest Alaska Seafood is a multi-species processing company operating in Adak, Alaska. Two of our more significant products are Live and processed (frozen) crab. Therefore, I am writing you today in support of Proposal 180, which would establish commercial Red King crab and Tanner crab fisheries in state waters between 172 and 179 degrees longitude.

I would like to note that there has been some concern within the crab industry about the impact of this Proposal upon the rationalized federal waters crab fisheries in our region. It is our position that this action, if adopted, should not create any adverse impact on the TAC setting or management of the federal waters crab fisheries; and our understanding that is the intent of the proposers.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Jason Ogilvie".

Jason Ogilvie
Golden Harvest Alaska Seafood
Adak, Alaska



February 20th, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
dfg.bof.comments@alaska.gov
ATTN: BOF COMMENTS

RE: COMMENTS ON STATEWIDE FINFISH MEETING, PROPOSALS #169, 170, 171

Chairman Morisky and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in North America. Our operations are located throughout the State of Alaska including Southeast, Prince William Sound, Cook Inlet, Kodiak, Dutch Harbor, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of fisheries resources. We appreciate the opportunity to comment on Statewide finfish proposals.

Proposal #169, Repeal and readopt the Policy for Statewide Salmon Escapement Goals.

Without the benefit of ADF&G comments on this important issue, we are unable to comment fully at this time. Changes to escapement goal policies need to be carefully considered. We plan to attend the Statewide meeting and will be able to provide additional feedback at that time. However, the proposer mentions that escapement goal reviews should be available prior to the proposal deadline for the regulatory cycle under consideration. This seems like a reasonable and productive request that would help inform the public.

Proposal #170, Amend the Policy for the Management of Sustainable Salmon Fisheries to include management targets.

Without the benefit of ADF&G comments on this important issue, we are unable to comment fully at this time. Changes to escapement goal policies need to be carefully considered. We plan to attend the Statewide meeting and will be able to provide additional feedback at that time.

Proposal #171, OPPOSE - Modify criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries.

By establishing a personal use priority, it would impact existing sport and commercial fisheries that resident Alaskans utilize to help feed their families. Most Alaskans do not have the time, resources or ability to harvest their own fish. In reducing the predominantly resident commercial harvest, it would have a negative impact on the ability of Alaskans to access the resource in grocery stores, at seafood markets, and in restaurants. We support the Board of Fisheries working with ADF&G to implement conservation measures based on the facts surrounding an issue, including each user group's impact on the resource.

Alaska residents benefit when ADF&G is given the flexibility to manage fishing resources based on run strength, timing, escapement, and abundance. Establishing a personal use priority works to perpetuate the fish wars and the loser will likely be Alaska's fishing resources. Adopting a priority for a major user group can increase the expectation for harvest which decreases the likelihood of users taking responsibility for the health of Alaska's fishing resources especially in times of conservation.

In times of abundance, all Alaskans should be able to access fishing resources either by harvesting themselves, through markets, by ordering in restaurants, or by a combination of these methods as they already do. Food security in Alaska can be advanced by ensuring sport, commercial, and personal use harvesters continue to have equal status.



Icicle Seafoods extends an open invitation to any member of the board to observe salmon or other fisheries and processing operations. Thank you for the opportunity to comment, please reach out if you have any questions.

Sincerely,

Julianne Curry
Public Affairs Manager
Icicle Seafoods
Petersburg, AK
Julianne.Curry@icicleseafoods.com
Cell 907.518.1822

Submitted By
Jack Hopkins
Submitted On
2/20/2019 7:45:51 PM
Affiliation

Phone
9074247632
Email
slackwaterjack@hotmail.com
Address
250 Eyak Drive
Cordova, Alaska 99574

I agree with Native Village of Eyak's comments as follows;

Board of Fish

Statewide Finfish 9-11 March 2019

On-time Public Comment

Proposals 161 and 162, **SUPPORT**with recommendations:

Salmon harvest reporting across Alaska has long been less than it should be, creating an unnecessary challenge to managers to guess harvest as fisheries are prosecuted throughout the season. Although high speed internet is not universally available across the state, it is now available enough such that we can impose a higher standard for reporting the harvest of our most precious renewable natural resource, with the ultimate goal being to apply the same standard for reporting to all user groups: reporting all salmon harvested within 24 hours.

With so many of Alaska's salmon runs declining, we must make use of every piece of information available to ensure these resources are used sustainably and responsibly, and Proposals 161 and 162 are both good steps in the right direction, however we feel that at this point, approving proposal 161, and ALSO approving 162 with modification to apply a higher standard to the most threatened runs.

We recommend modification of Proposal 162 to require the reporting of any salmon harvested from a stock that has not met its escapement goal in the past six years within 24 hours. We recommend six years because that represents the longest life-cycle of any pacific salmon, so requiring 24h reporting on harvests from these stocks for six years will ensure that the progeny of the last run that failed to meet its escapement goal will be subject to this enhanced reporting requirement.

On its own, Proposal 162 is not strong enough, as it allows too much time to lapse between harvest and reporting, and does not apply to all salmon species.

Proposals 169 and 170, **OPPOSE**

The claims asserting the need to change our escapement goals are greatly inflated, and the dire nature of the results questionable, given the record returns we have experienced in many of our salmon stocks over the past 10 years. While there may be systems that could benefit from the management prescribed within these proposals, applying this management statewide to replace our existing management (widely considered to be among the best in the world) would simply be foolish.

Specifically, these proposals would leave the harvest of mixed stocks without a suitable management plan, especially if some component does not have an inseason abundance/escapement estimate. This occurs across Prince William Sound, and throughout the Copper River

Proposal 171, **OPPOSE**

Proposal 171 is completely unnecessary, reduces the ability of the Board of Fish to apply its discretion, and simply mis-states the existing statute and code to misrepresent the nature of fisheries management in non-subsistence areas.

Non-subsistence areas exist around Alaska's largest urban centers in Anchorage/MatSu, Fairbanks, Juneau, Valdez, and Ketchikan, prohibiting any subsistence harvest from occurring in these areas. The rationale is quite simple: the areas surrounding these urban centers cannot sustain the use they would receive by residents of these urban centers if subsistence activities were allowed to occur there. Any other harvest is acceptable in these areas, including personal use harvests. The proposal, as well as the outreach and campaigning of the proposer have equated the prevalence of sport fisheries in these areas as somehow reducing the access of Alaskans to food resources simply because non-residents are also eligible for sport harvests, thereby committing the logical fallacy of "Appeal to Pity." The Alaskans who reside in non-subsistence areas still enjoy all the privileges of an Alaskan resident, and are able to participate in all subsistence and personal use fisheries statewide. Essentially, Proposal 171 is demanding that fish resources come to our urban residents, rather than they travel to the resources, which is not realistic.

The proposal lists the factors the Board can consider when allocating fisheries resources as indicated in AS 16.05.251, but the proposal gives the distinct impression that this is a ranked list, and it is neither ranked, nor exhaustive. The proposal indicates the remedy is to rank these factors, and presumably make the list exhaustive, making the #1 priority "The importance of each fishery for providing residents the opportunity to harvest fish for personal and family consumption," and herein lies the rub, as this is essentially subsistence, and these are non-subsistence areas (near urban centers). Because subsistence fisheries are prohibited in these locations, personal use fisheries would become the top priority in these areas, thereby becoming *de facto* subsistence fisheries in non-subsistence areas, and turning the entire concept of non-subsistence areas on its head, and putting the resources near our urban centers in jeopardy.

Moreover, the proposals invites us to believe that the existing language in AS 16.05.251 precludes the Board of Fish from allocating fish to personal use fisheries in non-subsistence areas, and it simply does not. The Board currently has all of the authority it needs to make allocations as the proposal specifies, but the Board also has the authority to make other allocation decisions where appropriate, and we believe that this should be preserved.

There is no justification for this proposal other than that the statute was written in 1989 and it has not been modified since. This is very poor justification for essentially undermining 5AAC 99.015 which established non-subsistence areas around urban centers. Our urban centers have only grown since 1989, and fish resources around our largest cities have not expanded to keep pace, in fact many have declined. Making this seemingly arbitrary change would be an enormous mistake when the Board currently already has the authority and flexibility it needs.

Submitted By
James Honkola
Submitted On
2/20/2019 10:49:43 PM
Affiliation
Mr.

Dear chairman Moriskey and members of the board. I am writing to show my support for proposals 161, 162, and my opposition towards proposals 165, 169, 170, and 171. Proposals 161, and 162 I support. Both seek to provide additional data for in season management as well as create more accountability in the fast growing personal use and sport fisheries. 161 includes all salmon species and in 2018 on the Copper River it especially highlighted how it could be useful. Due to a low return of reds a very small amount of fishing was allowed for all users. When the Gulkana Hatchery stocks returned slightly later, the fishing opportunity increased as well. Due to reporting requirements on commercial catch and fish counts at miles lake sonar, the number of Gulkana and wild stocks entering the system can be controlled and known effectively. After that point it is guesswork to determine how many fish are being harvested by the upriver users. This has resulted in Gulkana Hatchery missing broodstock/egg collection goals for the last 6 years. This hatchery has shown to be a very important resource for all users. It needs more inseason data to be managed correctly and provide the greatest benefit for all the user groups. 162 is similar to 161 and again seeks for accountability and inseason data but specifically on king salmon. King salmon are a big game fishery. In a time of worry over declining stocks across the state, they should be treated and regulated with the same accountability the state applies to other big game such as moose. When a moose is killed it needs to be reported within 24hrs and unseccesful hunts need to be reported within 15 days. People are travelling from all over the world to catch these salmon and the resource needs to be accounted for. The technology is already in place with electronic reporting now easily accessible online through the department's website. Also, the sport fish division will be releasing an app for anglers to help understand where, when, and how to fish. They noted that the app could be fully capable of having catch reporting functionality if it was seen to be useful. Proposals 165 I oppose. I realize the intent but this could lead to an unregulated commercialization of a subsistence fishery. Which i believe is why the current regulations exists already as it is written. Proposals 169,170 I oppose. These are very lengthy and seek to change the core aspects of how our fisheries are managed statewide. Changing the managment strategy statewide due to one regions struggle with management doesnt add up. Proposal 171 oppose. This proposal would give the board less authority over aspects of allocation then it currently has. The personal use and sport fisheries continue to grow while the commercial fisheries have been limited since 1973. Only looking back at the last 20 years is an attempt to not include the entire picture/history of the fisheries to give certain majority users priority allocation over other minority long standing historical fisheries. Thank you for your time.

Submitted By
James Mykland
Submitted On
2/15/2019 7:38:10 PM
Affiliation

I support proposals:

#161, timely and accurate reporting by all salmon permit and license holders is important to the management of our state's fisheries.

#162, bi-weekly reporting by sport, pu and subsistence harvest of chinook salmon is a top priority.

I oppose proposals:

#165, I oppose using a charter boat and then using it to go subsistence fishing.

#169, It seems to me, that AD&G already has the tools it needs to provide for sustainability in our statewide salmon fisheries.

#170, this proposal does not make much sense to me. ADF&G once again has all the tools it needs to keep sustainability in our salmon fisheries.

#171, The AK BOF already has the authority to make allocation decisions based on criteria listed.

This proposal does nothing to help, it only complicates an already smooth running system.

Submitted By
Jeffrey Shermna
Submitted On
2/20/2019 2:11:47 PM
Affiliation

Phone
5035102575

Email
jeffrey3330@yahoo.com

Address
213 red leaf circle
Anchorage, Alaska 99504

~~To whom it may concern;

In 2011 I came up to Alaska for the first time and absolutely fell in love with the state, especially the fishing. I knew then that I wanted to live in Alaska.

Due to work and family obligations. I did get the chance to come back up here until July of 2013. With less obligations in Oregon, I applied for work in Anchorage. By the end of September 2013 I was living and working in Alaska.

My dream has always been to have a cabin down on the Kenai. Last summer that dream was realized. I couldn't wait to get down there and get fishing! Well I got down there and the King fishing was shut off. Oh well, I thought, at least I get to hang out and catch reds next month. Well, guess what, no reds. There are no fish making it into the Kenai anymore. They are getting netted by commercial fisherman. Millions of dollars and jobs are going to be lost from lack of tourism up here. People aren't going to come up here to fish if all the species are closed. Guides will dry up with no fishing. Resorts will shut down, restaurants will close. There will be a huge domino effect.

Something has to be done about the Commercial fisherman out netting everything that comes into the Cook Inlet. I looked at the numbers that are posted on the ADF&G website. They "accidentally" netted 2658 kings while only 2855 made it up the river. They netted more reds than they let into the river for most of the season. The rod and reel fishermen, along with the dip netters, got their season closed.

Meanwhile the commercial guys were still out netting away. That is a horrible slap in the face to taxpaying residents of Alaska.

We need to set tighter limits on the commercial netters. There needs to be more regulation of them. For example maybe a weight quota; for example 500,000 fish at an average of 8 pounds per fish. So 4 million pounds. When that quota is done then so is the season. Nets up when quota is met. They can still turn in what they have onboard, at nets up. I think realistically it will end up being 4.5 million pounds.

Submitted By
Andy Hall
Submitted On
2/13/2019 9:11:56 PM
Affiliation
Kenai Peninsula Fishermen's Association

Phone
907)262-2492
Email
kpfa@alaska.net
Address
43961 Kalifornsky Beach Road
Soldotna, Alaska 99669

Mr. Chairman,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited entry permit holders. We also include other Cook Inlet (CI) gear types, crewmembers, fish processors, local businesses and general interest in our membership.

KPFA submits these comments in support of Proposal 181 up for consideration by the Board at the 2019 Statewide Finfish meeting. During the 2017 Upper Cook Inlet Finfish meeting in Anchorage, the Board deliberated on Proposal 136, which sought to create a fishery within 600 feet of the mean high tide mark on North KBeach in the Kenai Section (Statistical Area 244-32), which may be used in conjunction with openings occurring in the Kasilof section. After discussion and debate during that meeting, the Board unanimously passed Proposal 136 with a 7-0 vote. Subsequent to the meeting, the question arose regarding the hours fished during the 600-foot fishery in the Kenai Section and their application to the hours fished by the entire Kenai section. For example, if the Kenai section had a weekly compliment of 36 hours which could be used within the plan, and the Upper KBeach 600-ft. fishery were to open during that week, would those hours be deducted from the entire Kenai section's compliment of hours? After reviewing the recording of the 2017 meeting, the question of application of hours, though inferred, was not specifically mentioned. This summer, the local Department of Fish and Game Commercial Fish Biologist referred the question to the Department of Law for direction. The apparent conclusion was that if the application of hours was not specifically adopted by the Board, then the hours fished were to be attributed to the entire Kenai section hours allotted in the plan. This conclusion seems incongruous with the way the 600-foot fishery is prosecuted in the Kasilof section. Since the 2017 BOF meeting, those hours fished are NOT attributed to the entire section. When the hours fished in the Kenai section are counted towards all, it inhibits the use of this important 600-foot tool. It was stated numerous times during deliberations on Proposal 136 that they wanted to model it the same as the Kasilof 600-foot fishery, which in the 2017 BOF meeting, removed the hours restrictions when the board approved Proposal 101 at a later date in the meeting. Proposal 136 was not re-visited after Proposal 101 was passed. It is our contention that the omission of "hours used language" was an oversight by the Board when it passed Proposal 101 and then did not re-visit proposal 136. Should the Board not entertain Proposal 181 it will reduce potential use of this valuable tool intended to help harvest excess Kasilof sockeye. A further benefit, which the Board did discuss, was that by using the Upper K-Beach 600-foot option, an opening in the Kasilof River Special Harvest Area was less likely to occur. Therefore, KPFA supports Proposal 181 and urges the Board to take corrective action relative to "hours used" in the North K-Beach 600-foot fishery in stat area 244-32.

Submitted By
Andy Hall
Submitted On
2/13/2019 8:56:50 PM
Affiliation
Kenai Peninsula Fishermen's Association

Phone
907)262-2492
Email
kpfa@alaska.net
Address
43961 Kalifornsky Beach Road
Soldotna,, Alaska 99669

Opposition to Proposal 171

Mr. Chairman,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited entry permit holders. We also include other Cook Inlet (CI) gear types, crewmembers, fish processors, local businesses and general interest in our membership.

I am writing to express the Kenai Peninsula Fishermen's Association's opposition to Proposal 171 submitted by the Kenai River Sportfishing Association which would radically change the lens through which Alaska Board of Fish Members view proposals.

KPFA opposition is based on the following reasons:

1. Proposal 171 takes away Board of Fish members discretion and independence. Current regulation, in AS 16.05.251, recognizes a list of factors that a Board-member "may" take into consideration, this allows latitude for board-members to consider which factors are appropriate to which circumstances. Proposal 171 seeks to take that latitude away and to dictate the factors that the Board-member "shall" use to decide, while mandating the weight that each factor must be given. Instead of considering each proposal based upon all evidence and circumstances, board-members would be hamstrung and shackled. Further, the scheme will lead to Board of Fish decisions being litigated in court under the theory that the mandatory factors were not properly observed.
2. Proposal 171 seeks to negate Alaska's Constitution. Article VIII, Section 1-4, and 15, have a lot to say on how fishery resources must be managed. However, proposal 171 pushes those provisions aside. We do not believe that this is the correct procedure for amending Alaska's Constitution. For instance, Article 8, section 4 calls for fish resources to be maintained on a sustained yield principle. Nevertheless, Proposal 171's factors do not contain any factor for considering sustainability. Article 8, section 2 calls for conservation. Nevertheless, Proposal 171's factors suggest nothing for habitat protection. We suggest that interpretation of Alaska's Constitution belongs to Alaska's Supreme Court.
3. Proposal 171 limits itself to "non-subsistence areas" which effectively isolates Cook Inlet's commercial fishery, and hold it to a different legal standard than other commercial fisheries. Article VIII, Section 17 of the Alaska Constitution requires uniform application of law for all who are "similarly situated." Further, questions of equal protection, special privileges and immunities, and free speech are implicated. Proposal 171 seeks to block free speech and relevant history from being taken into consideration, creating a separate standard that favors one user group over another. For the purpose of managing commercial fisheries, "non-subsistence area" is an arbitrary and contrived division that violates the guarantee of fair treatment promised by Alaska's constitution.
4. Current regulation lists at its first factor, "the history or each personal use, sport, guide sport and commercial fishery." Proposal 171 seeks to do away with history by moving the recognition of 'first in time is first in right' to 5th position, in a descending priority, and then further limiting history to 20 years. While the "First in Time is First in Right" principals are not solely determinative, they have provided a foundation that has underpinned property rights, chain of title, successor in interest, stability, and prosperity, for centuries, in English Common Law, in Colonial law, in America's westward expansion, in mining law, in water law, in fishery law, in real estate law, in patent law, etc., etc., etc. . "First in time is first in right" is a concept that permeates our law because it works.

CONCLUSION

These are complex issues, and Alaska Board of Fish Members carry a heavy responsibility in trying to balance competing traditional interests and new claims on a limited resource. Each proposal should be decided by minds that are free to consider all evidence, all history, and all circumstances that are relevant and appropriate. We strongly oppose Proposal 171, because it fundamentally changes the board of fish process by limiting board member's ability to consider and deliberate on pertinent facts and information, because it prevents open discussion, because it distorts history, because it contradicts Alaska's Constitution, and finally because it is a blatant, dishonest attempt subvert a fundamentally sound and successful citizen-based resource management process for the short-term gains of one special interest group.

Kenai River Sportfishing Association (KRSA) comments on Statewide proposals

Proposal #161: Opposed, the saltwater charter logbook program, personal use permits, subsistence fishing reporting requirements, on site creel surveys and the Statewide Sport Fish Harvest Survey provide sufficiently accurate and timely information for the sustainable management of non-commercial fisheries.

Proposal #162: Opposed, the saltwater charter logbook program, personal use permits, subsistence fishing reporting requirements, on site creel surveys and the Statewide Sport Fish Harvest Survey provide sufficiently accurate and timely information for the sustainable management of non-commercial fisheries.

Proposal #163: Opposed. KRSA believes that the problem described by the author of this proposal can best be solved by education and outreach.

Proposal #164: Opposed. KRSA believes that the problem described by the author of this proposal can best be solved by education and outreach.

Proposal #165: Support.

Proposal #166: Support

Proposal #167: No Comment

Proposal #168: Support

Proposal #169: Opposed. This proposal is nothing less than an egregious attempt to dismantle the state's Escapement Goal Policy.

Proposal #170: Opposed. This proposal is nothing less than an egregious attempt to dismantle the state's Policy for the Management of Sustainable Salmon Fisheries.

Proposal #171: Support. This proposal was submitted by KRSA. The problem statement creating the need for the solution suggested in this proposal is as follows: The State of Alaska through the Alaska Board of Fisheries process is not fulfilling its Constitutional obligation to maximize the benefit of the fisheries resource to the people of the State by continuing to restrict sport, guided sport and personal use salmon fisheries in the Non Subsistence Areas of the State in favor of the commercial salmon fisheries. The solution to this problem is a rewrite and weighting of the allocation criteria.

Proposal #172: Support.

Proposal #173: Support.

Proposal #179: No comment.

Proposal #180: No comment.

Proposal #181: Opposed. When originally submitted this proposal contained a number of measures designed to provide for selective harvest of Kasilof sockeye while minimizing the harvest of late-run king salmon bound for the Kenai River. These measures included reducing the number of commercial set nets fished by a permit holder, shallowing the nets by limiting depth to 29 mesh and limiting the mesh size to more clearly focus on Kasilof sockeye. Consideration of these selective harvest strategies was essential to KRSA consideration.

Proposal #182: Opposed. Recommend no action and schedule this proposal to be taken up during the regular cycle. This proposal, if adopted as written, would alter the long-standing allocation strategy for coho salmon of Nushagak River origin and in addition potentially have significant sustained yield implications since funding for extension of the Nushagak River sonar technology is anything but assured at this time. Significant actions such as these should, as a matter of good process be taken up only during the regular cycle.

Submitted By
Lisa Gabriel
Submitted On
2/18/2019 7:12:23 PM
Affiliation
Alaska Blue Harvest Seafoods

Phone
9072529524
Email
gabriel1@alaska.net
Address
2305 Watergate Way
2305 Watergate Way
Kenai, Alaska 99611

February 18, 2019

ATTN: BOF COMMENTS
Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

Mr. Chairman and Board Members,

We are Setnetters on Upper K-Beach in the Kenai Section (Statistical Area 244-32) of Upper Cook Inlet. **We are asking for your support for Proposal 181, which you will be considering at the 2019 Statewide Finfish Board in Anchorage in March.**

Proposal 181 is asking to clarify that the "hours used" in the North Kalifornsky Beach (NKB) set gillnet 600 foot fishery should be **exempt** from the weekly emergency order (EO) restrictive provision in the Kenai River Late-Run King Salmon Management Plan (5 AAC 21.359) and the Kenai River Sockeye Management Plan (AAC 21.360).

The 600ft North Kalifornsky Beach fishery was adopted in 2017 at the Upper Cook Inlet Finfish meeting in Anchorage as Proposal 136. Proposal 136 was supported unanimously by the board with a 7-0 vote.

During the 2017 fishing season, the regulation was not used. During the 2018 fishing season, it was used twice. When the regulation was used in the 2018 season, the department concluded that since the hours used during the 600 foot North K-Beach fishery were **NOT** differentiated by the board, they would count against **all** EO hours used in the current plan. So, when the 600 foot North K-Beach fishery was used, the remainder of the fishing sections were penalized by having their fishing hours reduced. This interpretation is the reason for **Proposal 181**.

During the 2017 BOF meeting, Proposal 136 was discussed very thoroughly, and several times it was stated by board members that the fishery should be used like the Kasilof Section 600 foot fishery to avoid using the Kenai River Special Harvest Area. After the adoption of Proposal 136, the board took up Proposal 101, which asked the board to **REMOVE** the "hours used" restriction in the Kasilof 600 foot fishery. The board approved Proposal 101 but did not go back and re-visit Proposal 136 to remove the "hours used" restrictions in the Kenai River 600 foot fishery.

With the restrictions in the plan, the local Department was very hesitant to use the North K-Beach 600 foot fishery in the 2018 season because it limited their ability to use the entire fishery to harvest surplus sockeye headed to the Kenai River. They used the 600 foot Kasilof fishery several times in 2018 season and still opened the Kasilof River Special Harvest Area to harvest surplus salmon headed to the Kasilof River. In 2018 with all three provisions used, the Kasilof River still exceeded the BEG and the OEG of 160,000-390,000.

We believe it was the boards intent, as stated several times during deliberations, to model the Kenai Section 600 foot fishery with the Kasilof Section 600 foot fishery, and that by the board not defining the "hours used" in the Kenai Section 600 foot fishery, their desired intent has not been accomplished. We ask that the corrective action carry forward with the approval of **Proposal 181**.

Thank you for your consideration,

Brian and Lisa Gabriel

2305 Watergate Way

Kenai, AK 99611

Submitted By
Lori Every
Submitted On
2/20/2019 1:11:05 PM
Affiliation

Members of the Alaska Board of Fisheries

I strongly reject proposal 171.

Lori Every

Submitted By
Lori Every
Submitted On
2/20/2019 1:06:37 PM
Affiliation

Members of the Alaska Board of Fisheries

I support proposal 181.

Lori Every

Submitted By
Mike Mickelson
Submitted On
2/20/2019 9:54:55 PM
Affiliation
Cordova District Fisherman United General Board Member

Phone
9072539199
Email
m_mickelson1@yahoo.com
Address
P.O. Box 1504
Cordova, Alaska 99574

Dear Chairman Morisky and Members of the Board of Fisheries

Thank you for the opportunity to comment on the proposals for the 2019 Statewide Board of Fisheries. I am a lifelong Alaska that grew up working at my families wildlife viewing and sport fishing lodge outside of Cordova, Alaska. I am a subsistence user and currently drift gillnet and purse seine in Prince William Sound. These are my personal comments.

Proposals 161-162

I support the intentions of both of these proposals. Timely and accurate reporting is already in use for many of the big game hunts around the state and these proposals both seek to apply that same logic to our fisheries. The technology is available to make these proposals a reality and the more data we can provide our managers the more accurately they can manage our valuable fisheries. Timely reporting allows managers to react quickly to abundance or scarcity benefits all users as well as the resource.

Proposals 169-170

While there are many good ideas in both of these proposals, I cannot support either one. It appears that both proposals are tailored to a specific region and are not reasonable at a statewide level. Both proposals also would be expensive to implement and with impending budget cuts to ADF&G there are much more pressing issues for the department to address.

Proposal 171

This proposal suggests that the board reallocate a fully allocated resource. To suggest that only the last 20 years are important to look at when creating fishery criteria is disrespectful to thousands of years of subsistence use. In addition, in many parts of the state commercial salmon fisheries have been in place for over 100 years. With the application of the limited entry program in the early 1970's the number of commercial fishing permits has remained static. Sport and person use numbers have increased significantly since the implementation of commercial limited entry in the 70's. While I appreciate the sentiment of planning for those anglers who can "reasonably be expected to participate in the future," at some point highly valuable fish species such as king salmon will have to be managed like trophy big game. Ever expanding numbers of sport anglers will necessitate a lottery; just like we do for the popular moose and other big game hunts.

Thank you,

Mike Mickelson

Submitted By
morgan Jones
Submitted On
2/20/2019 8:59:16 PM
Affiliation

Proposal 168

I support this proposal but believe it should be amended to allow for towline lengths up to 13 fathoms.

Modern limit seiners have decks that can be in excess of 30 feet on a straight line and more when measured from a tow post to the corner of the boat. In addition as seine skiffs get bigger, the space created between the stern of a seiner and start of the seine net mat not be large enough to accommodate a large skiff passing under a towline. This change would not alter the spirit of the regulation while it would allow easier passage of skiffs under a towline.



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

Board of Fish
Statewide Finfish 9-11 March 2019
On-time Public Comment

Proposals 161 and 162, **SUPPORT** with recommendations:

Salmon harvest reporting across Alaska has long been less than it should be, creating an unnecessary challenge to managers to guess harvest as fisheries are prosecuted throughout the season. Although high speed internet is not universally available across the state, it is now available enough such that we can impose a higher standard for reporting the harvest of our most precious renewable natural resource, with the ultimate goal being to apply the same standard for reporting to all user groups: reporting all salmon harvested within 24 hours.

With so many of Alaska's salmon runs declining, we must make use of every piece of information available to ensure these resources are used sustainably and responsibly, and Proposals 161 and 162 are both good steps in the right direction, however we feel that at this point, approving proposal 161, and ALSO approving 162 with modification to apply a higher standard to the most threatened runs.

We recommend modification of Proposal 162 to require the reporting of any salmon harvested from a stock that has not met its escapement goal in the past six years within 24 hours. We recommend six years because that represents the longest life-cycle of any pacific salmon, so requiring 24h reporting on harvests from these stocks for six years will ensure that the progeny of the last run that failed to meet its escapement goal will be subject to this enhanced reporting requirement.

On its own, Proposal 162 is not strong enough, as it allows too much time to lapse between harvest and reporting, and does not apply to all salmon species.

Proposals 169 and 170, **OPPOSE**

The claims asserting the need to change our escapement goals are greatly inflated, and the dire nature of the results questionable, given the record returns we have experienced in many of our salmon stocks over the past 10 years. While there may be systems that could benefit from the management prescribed within these proposals, applying this management statewide to replace our existing management (widely considered to be among the best in the world) would simply be foolish.

Specifically, these proposals would leave the harvest of mixed stocks without a suitable management plan, especially if some component does not have an inseason abundance/escapement estimate. This occurs across Prince William Sound, and throughout the Copper River Spring/Summer Chinook/sockeye fishery.

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

Proposal 171, **OPPOSE**

Proposal 171 is completely unnecessary, reduces the ability of the Board of Fish to apply its discretion, and simply mis-states the existing statute and code to misrepresent the nature of fisheries management in non-subsistence areas.

Non-subsistence areas exist around Alaska's largest urban centers in Anchorage/MatSu, Fairbanks, Juneau, Valdez, and Ketchikan, prohibiting any subsistence harvest from occurring in these areas. The rationale is quite simple: the areas surrounding these urban centers cannot sustain the use they would receive by residents of these urban centers if subsistence activities were allowed to occur there. Any other harvest is acceptable in these areas, including personal use harvests. The proposal, as well as the outreach and campaigning of the proposer have equated the prevalence of sport fisheries in these areas as somehow reducing the access of Alaskans to food resources simply because non-residents are also eligible for sport harvests, thereby committing the logical fallacy of "Appeal to Pity." The Alaskans who reside in non-subsistence areas still enjoy all the privileges of an Alaskan resident, and are able to participate in all subsistence and personal use fisheries statewide. Essentially, Proposal 171 is demanding that fish resources come to our urban residents, rather than they travel to the resources, which is not realistic.

The proposal lists the factors the Board can consider when allocating fisheries resources as indicated in AS 16.05.251, but the proposal gives the distinct impression that this is a ranked list, and it is neither ranked, nor exhaustive. The proposal indicates the remedy is to rank these factors, and presumably make the list exhaustive, making the #1 priority "The importance of each fishery for providing residents the opportunity to harvest fish for personal and family consumption," and herein lies the rub, as this is essentially subsistence, and these are non-subsistence areas (near urban centers). Because subsistence fisheries are prohibited in these locations, personal use fisheries would become the top priority in these areas, thereby becoming *de facto* subsistence fisheries in non-subsistence areas, and turning the entire concept of non-subsistence areas on its head, and putting the resources near our urban centers in jeopardy.

Moreover, the proposals invites us to believe that the existing language in AS 16.05.251 precludes the Board of Fish from allocating fish to personal use fisheries in non-subsistence areas, and it simply does not. The Board currently has all of the authority it needs to make allocations as the proposal specifies, but the Board also has the authority to make other allocation decisions where appropriate, and we believe that this should be preserved.

There is no justification for this proposal other than that the statute was written in 1989 and it has not been modified since. This is very poor justification for essentially undermining 5AAC 99.015 which established non-subsistence areas around urban centers. Our urban centers have only grown since 1989, and fish resources around our largest cities have not expanded to keep pace, in fact many have declined. Making this seemingly arbitrary change would be an enormous mistake when the Board currently already has the authority and flexibility it needs.

Submitted By
Pat Zurfluh
Submitted On
2/19/2019 2:03:31 PM
Affiliation
East side setnetter

Phone
907-227-3924

Email
Kristipatzurfluh@gmail.com

Address
7601 E. Indian Bend Rd.
#1006
Scottsdale , Arizona 85250

I support Proposal 181 submitted by Gary Hollier. My nets are outside of the 600 ft. area so if they are fishing in the 600 ft. area it is usually to harvest an abundance of Kasilof sockeye and should not limit fishing time for the rest of us. Please accept this proposal as written by Mr. Hollier.



To the Alaska Board of Fisheries:

SUBJ:

Proposal 161: Require weekly reporting salmon harvest by all permit or license holders

Proposal 162: Require B-weekly reporting of all sport, personal use and subsistence King salmon catch.

While the proposals are well intended, however they are simply not applicable to most of the state nor to those who have the longest record of use.

I would request the BOF to either reject both proposals or make them drainages system or area specific if there is a defined problem by the ABOF. I view both of these proposals to be ***blatantly allocative*** and suspect they are directed the Cook Inlet controversy.

As a sport fisherman since 1960, a former F&G Westward Region Fishery Biologist (retired 1997), Kodiak F&G Advisory Committee member: approx..10 yrs. Secretary, 6 years on subsistence seat, (stand in rep for Kodiak villages 20yrs). And nearly 20 years on the Kodiak/Aleutians Regional Advisory Council KARAC *these proposals unnecessarily effect on subsistence users state wide: impose an unnecessary burden, and would be impossible to collect and use in a timely manner for management.*

I appreciate what you folks have to do in you role as Fisheries Board members.

Sincerely,
Patrick Holmes
Kodiak, Alaska

Submitted By
Paul Owecke
Submitted On
2/19/2019 9:10:15 AM
Affiliation

Phone
6083869945

Email
prowecke@gmail.com

Address
W25376 Sullivan Rd
W25376 Sullivan Rd
Trempealeau, Wisconsin 54661

Thank-you Board Members for the opportunity to comment,

My name is Paul Owecke. I was employed by ADFG (FRED division)1978-1983, and have been an active permit holder in the PWS set gillnet fishery since 1983.

I oppose proposals 169,170 and 171

Proposals 169 and 170 Are requesting a radical departure from time tested successful management scenarios that have protected the salmon resources of Alaska while at the same time given balanced access to those salmon resources to many competing user groups. Current management outcomes do not warrant a departure from existing regulation.

Proposal 171 Is a blatant attempt to re- allocate the salmon resource to certain user groups. The re-allocation effort is misguided as current policy has the flexibility to maintain a balanced allocation between the competing user groups that ensures equitable access to the resource.

Respectfully yours,

Paul Owecke

Submitted By

Forest Jenkins

Submitted On

2/18/2019 10:00:52 AM

Affiliation

Prince William Sound Setnetter's Association President

Oppose Proposals 169 and 170

I oppose Proposals 169 and 170, as they both attempt to reduce the flexibility for in season managers to make decisions. The author also suggests simplifying and standardizing all goals statewide, which only further limits in season management and potentially jeopardizes the fisheries resource. It is essential that in season managers have all the available tools and flexibility to sustainably manage our fisheries resources.

Oppose Proposal 171

We oppose this proposal that ranks the criteria available for allocating fishery resources, attempting to give priority to certain user groups over others. The Board of Fish already has the criteria available for them to responsibly allocate the fishery resources. This proposal only restrains the Board of Fish from using the available factors in a flexible manner and would force the board to prioritize certain user groups over others.

Thank you for the opportunity to comment.

Submitted By
Raven Madison
Submitted On
2/20/2019 7:42:47 PM
Affiliation

Phone
9072313136
Email
raven.alayna@yahoo.com
Address
502 4th street
Cordova, Alaska 99574

I agree with the Native Village of Eyak comments as follows;

Board of Fish

Statewide Finfish 9-11 March 2019

On-time Public Comment

Proposals 161 and 162, **SUPPORT**with recommendations:

Salmon harvest reporting across Alaska has long been less than it should be, creating an unnecessary challenge to managers to guess harvest as fisheries are prosecuted throughout the season. Although high speed internet is not universally available across the state, it is now available enough such that we can impose a higher standard for reporting the harvest of our most precious renewable natural resource, with the ultimate goal being to apply the same standard for reporting to all user groups: reporting all salmon harvested within 24 hours.

With so many of Alaska's salmon runs declining, we must make use of every piece of information available to ensure these resources are used sustainably and responsibly, and Proposals 161 and 162 are both good steps in the right direction, however we feel that at this point, approving proposal 161, and ALSO approving 162 with modification to apply a higher standard to the most threatened runs.

We recommend modification of Proposal 162 to require the reporting of any salmon harvested from a stock that has not met its escapement goal in the past six years within 24 hours. We recommend six years because that represents the longest life-cycle of any pacific salmon, so requiring 24h reporting on harvests from these stocks for six years will ensure that the progeny of the last run that failed to meet its escapement goal will be subject to this enhanced reporting requirement.

On its own, Proposal 162 is not strong enough, as it allows too much time to lapse between harvest and reporting, and does not apply to all salmon species.

Proposals 169 and 170, **OPPOSE**

The claims asserting the need to change our escapement goals are greatly inflated, and the dire nature of the results questionable, given the record returns we have experienced in many of our salmon stocks over the past 10 years. While there may be systems that could benefit from the management prescribed within these proposals, applying this management statewide to replace our existing management (widely considered to be among the best in the world) would simply be foolish.

Specifically, these proposals would leave the harvest of mixed stocks without a suitable management plan, especially if some component does not have an inseason abundance/escapement estimate. This occurs across Prince William Sound, and throughout the Copper River

Proposal 171, **OPPOSE**

Proposal 171 is completely unnecessary, reduces the ability of the Board of Fish to apply its discretion, and simply mis-states the existing statute and code to misrepresent the nature of fisheries management in non-subsistence areas.

Non-subsistence areas exist around Alaska's largest urban centers in Anchorage/MatSu, Fairbanks, Juneau, Valdez, and Ketchikan, prohibiting any subsistence harvest from occurring in these areas. The rationale is quite simple: the areas surrounding these urban centers cannot sustain the use they would receive by residents of these urban centers if subsistence activities were allowed to occur there. Any other harvest is acceptable in these areas, including personal use harvests. The proposal, as well as the outreach and campaigning of the proposer have equated the prevalence of sport fisheries in these areas as somehow reducing the access of Alaskans to food resources simply because non-residents are also eligible for sport harvests, thereby committing the logical fallacy of "Appeal to Pity." The Alaskans who reside in non-subsistence areas still enjoy all the privileges of an Alaskan resident, and are able to participate in all subsistence and personal use fisheries statewide. Essentially, Proposal 171 is demanding that fish resources come to our urban residents, rather than they travel to the resources, which is not realistic.

The proposal lists the factors the Board can consider when allocating fisheries resources as indicated in AS 16.05.251, but the proposal gives the distinct impression that this is a ranked list, and it is neither ranked, nor exhaustive. The proposal indicates the remedy is to rank these factors, and presumably make the list exhaustive, making the #1 priority "The importance of each fishery for providing residents the opportunity to harvest fish for personal and family consumption," and herein lies the rub, as this is essentially subsistence, and these are non-subsistence areas (near urban centers). Because subsistence fisheries are prohibited in these locations, personal use fisheries would become the top priority in these areas, thereby becoming *de facto* subsistence fisheries in non-subsistence areas, and turning the entire concept of non-subsistence areas on its head, and putting the resources near our urban centers in jeopardy.

Moreover, the proposals invites us to believe that the existing language in AS 16.05.251 precludes the Board of Fish from allocating fish to personal use fisheries in non-subsistence areas, and it simply does not. The Board currently has all of the authority it needs to make allocations as the proposal specifies, but the Board also has the authority to make other allocation decisions where appropriate, and we believe that this should be preserved.

There is no justification for this proposal other than that the statute was written in 1989 and it has not been modified since. This is very poor justification for essentially undermining 5AAC 99.015 which established non-subsistence areas around urban centers. Our urban centers have only grown since 1989, and fish resources around our largest cities have not expanded to keep pace, in fact many have declined. Making this seemingly arbitrary change would be an enormous mistake when the Board currently already has the authority and flexibility it needs.

Submitted By
Ron Carmon
Submitted On
12/6/2018 12:51:19 PM
Affiliation
None

Phone
9079530238
Email
Dallasak789@hotmail.com
Address
51995 arness rd
Kenai, Alaska 98611

Red salmon are plankton eaters, plankton eater, help set the pH of our oceans.

The red salmon are disappearing, the oceans pH is rising. I suggest to get a handle on this problem, we need to stop the gross abuse of our fishery, dipnet fishing, unregulated, and unenforced, and the terrible abuse of the practice of catch and release. Needs to stop.

The current level of pH, being acidic, and the warm temperatures, make me believe we need to protect these fish, at the spawning grounds.

The sport fishery so big, and effective, they need to move out to the ocean, and catch their salmon.

The rivers, hold up area, and lakes, need to be protected from this industry, please stop the dipnet fishery and the catch and release, and even move the guides to catching their fish off shore. Currently, 13 million fish taken by sport and dipnet, fishing on the Kenai peninsula Borough. The commercial fleet, gets an allocation of 1.6 million. The commercial fishery got five days, the sport fisherman get 175 summer days.

Submitted By
Roni carmon
Submitted On
10/5/2018 9:21:43 AM
Affiliation

Phone
9079530238
Email
dallasak789@hotmail.com
Address
51995 arness rd
Kenai, Alaska 99611

Board of fish: I think the red salmon plankton eaters. Are being compromised in Cook Inlet. I believe the dipnet fishery taking 7 million targeted red salmon every year. I believe it self regulated, no body really counts fish. Rick Cook, Kenai city mayor says, 110 thousand people come to the Kenai river and take 3.5 million fish. Another 3.5 million are taken from the Kaslof river. No body counts fish, no enforcement, no license, or fee collected, just a free for all for free food. I believe this run of fish, is in jeopardy, I believe, these fish help set the pH of the Pacific Ocean, science says that. I believe the spawning grounds on the Kenai river, and lakes are a womb that's being ruined. By over fishing, gasoline from boats, noise, anchors, and hooks. I believe sport fishers need to fish ocean only. No more rivers and lakes. The pH levels in the oceans, are rising, these fish are being taken, and over escapement in the rivers are unmanaged. Finally so much dipnet fish and no revenue to the state or the Borough, salmon at 25.00 a lb, is 150.00 dollars a fish. No one in the state would give away fish. They're are 273000 people on all forms of welfare, and they take home about 70000 a year in welfare checks and assistance of some kind. So giving away a state resource on top of all the welfare is just plain stupid. The welfare of our fish, is at stake here. Please do away with the dipnet fishery, please use common sense this year, and save our salmon, at the spawning grounds. The ocean dies from high pH levels, will be the result of the lack of the red Salmon.

Submitted By
Sarah Pellegrom
Submitted On
2/7/2019 10:38:50 AM
Affiliation

Dear BOF Members,

I have fished off-shore North K-Beach for years. I **DO NOT** have a problem with the directed 600 foot fishery on North K-Beach. However, the hour fished in that fishery, directed at Kasilof stocks, **SHOULD NOT** impact the hours in the entire Kenai section 244.32

I support proposal 181

Sarah Pellegrom



Figure 1.-Examples of sheefish waste in the Hotham Inlet ice fishery.

Submitted By
Shawn
Submitted On
2/20/2019 9:19:23 PM
Affiliation

Please reject Proposal 171

My name is Shawn Gimman I have lived in Cordova for 45 years while working in the electrical field and commercial and sport fishing throughout the State of Alaska . I am commenting on proposal 171 in the statewide fin fish meeting proposal book. Thank you for your time and efforts in this BOF process.

Proposal 171 is another attempt by KRSA to achieve a higher priority in management status for Personal Use Fisheries. The State has always recognized subsistence as the ultimate priority and if one is to read the intent behind the language creating a subsistence priority, it was to prevent the current scenario that we are seeing develop rapidly. The notion that an Alaskan accessing the resource for personal use should be given equal footing with a subsistence user when they live in a non-subsistence area and may avail themselves of the newly developed COMMERCIAL Personal use operations to achieve their take is standing the intent of subsistence on its head and should not be encouraged by considering this proposal with its WINDOW DRESSING OF WORDING to achieve this goal.

I believe the Board has shown that it can and will consider changes to management in a fishery as necessary with the current regulation 5AAC99015 and hopefully recognizes this proposal as unnecessary and frivolous if it were to review the facts of its past ability and actions in Allocation. In closing I have had the opportunity to witness some abuses in the PU fisheries which included non residents enjoying the privilege afforded Alaskans and we all know the Alaska Airline fresh fish airway bills are off the charts when the PU fisheries open up. Thank you for allowing me to comment and considering this matter before you. Please reject proposal 171

Respectfully, Shawn Gilman

Submitted By
Shawn Gilman
Submitted On
2/20/2019 9:37:38 PM
Affiliation

I support Proposal 161

I have always been bewildered at the indifference by ADFG staff on timely and accurate reporting. I have attended untold meetings and read a thousand management announcements over the past 40 years which focused on the need for timely and accurate data from the same staff until it pertained to Subsistence , PU, or Sport take . I believe the technology is here and the resource and residents of Alaska will benefit from this regulation. The connection created or invigorated by this regulation between the population of Alaska and her resources is invaluable . We can and should do this now approaching the year 2020.

Thank you, Shawn Gilman



Southeast Alaska Fishermen's



PC049
1 of 2

1008 Fish Creek Rd

Juneau, AK 99801

Email: seafa@gci.net

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-523-1168

Website: <http://www.seafa.org>

February 19, 2019

Alaska Board of Fisheries
Reed Morisky, Chairman
PO Box 115526
Juneau, AK 99801

RE: March 2019 Statewide Proposals

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-species/multi-gear group representing our membership involved in Southeast Alaska's salmon, crab, shrimp and longline fisheries of SE and in the Gulf of Alaska.

Proposal #169 & #170 – Comment

These proposals address significant policies of the state but it is difficult without ADF&G comments being available to fully understand all the ramifications of the requested changes as well as insuring that there are no unintended consequences. On proposal #169 the author comments in the section on the issue being addressed that the escapement goal reviews should be available prior to proposal deadline for the regulatory cycle under consideration. We support this change in the timing of the release of escapement goal and believe it would be extremely helpful in the development of regulatory proposal prior to submittal. The development of a Board committee to review the Sustainable Salmon Fishery policy and escapement goal policies might be in order and a way to address these two proposals.

Proposal #171 – OPPOSE

SEAFA opposes the priority of allocation criteria. The Alaska State statute 16.05.251 states “. . . ***shall use the criteria as appropriate to particular allocation decisions. The criteria may include such factors as***” . . . (list of seven items in statute). This language makes it reasonably clear that it was drafted by the legislature to allow the Board of Fish the flexibility to consider

the most **appropriate criteria** for the proposal under consideration. If the legislature believed that the list should have a priority order other than maintaining the sustainability of the resource first they would have stated that.

Thank you for your attention to our thoughts and concerns regarding the statewide proposals.

Sincerely,



Kathy Hansen
Executive Director

forrest@seagoalaska.org



Southeast Alaska Guides Organization
1600 Tongass Avenue
Ketchikan, AK 99901

February 20, 2019

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

Re: Proposal 166, Deep Water Release Requirement for Pelagic Rockfish

Members of the Board,

Southeast Alaska Guides Organization (SEAGO) represents the interests of charter operators, fishing lodges, and guided anglers throughout the southeast region. Our membership and the broader industry rely on sensible regulation to preserve our fisheries and allow sufficient harvest opportunities to attract customers.

In recent years, rockfish harvest has trended up for businesses and their customers in response to diminished opportunity for other species. While SEAGO encourages careful treatment of all fish to be released, we do not support a mandatory deep release of pelagic rockfish.

Unlike non-pelagic rockfish, pelagics frequently feed and are caught in the upper water column, often intercepted unintentionally, while trolling for example. These fish bare no sign of barotrauma. As articulated, Proposal 166 does not account for common sense situations where the “surf method” is a viable, non-harmful release option.

There is currently no requirement in commercial fisheries for deep release of either non-pelagics or pelagics, assumably due to the impracticality of this method when using longline or troll gear. Deep release while trolling in the sport fishery presents similar problems, and pelagics are encountered much more frequently than DSR species.

SEAGO supports the discretion of the angler or guide when making decisions about the release of black, dusky, yellowtail, widow, and dark rockfish until ADF&G assessments conclude there is a conservation issue with any of these stocks.

Respectfully,

Forrest Braden
SEAGO Executive Director
forrest@seagoalaska.org



Southeast Alaska Guides Organization
1600 Tongass Avenue
Ketchikan, AK 99901

February 20, 2019

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

Re: Proposal 171, Criteria for Allocative Decisions Among User Groups

Members of the Board,

Southeast Alaska Guides Organization (SEAGO) represents the interests of charter operators, fishing lodges, and guided anglers throughout the southeast region. Together, these groups contribute substantially to the socioeconomic wellbeing of Alaskans.

SEAGO supports the basic premise of Proposition 171, which is the need for adaptive management and a reevaluation of criteria used in the allocative decisions of the Board.

Article 8 of the state constitution mandates that “The legislature shall provide for the utilization, development, and conservation of all natural resources of the State . . . for the maximum benefit of its people”. Maximum benefit should be looked at both quantitatively and qualitatively when determining distribution of surplus in state fisheries.

Commercial harvest and export has long dominated allocative decisions by Alaska’s fisheries managers. While Alaska’s seafood exports remain one of the biggest contributors to the state’s economy by volume and have a long history as an economic driver, other uses of our fishery resources have gained in importance.

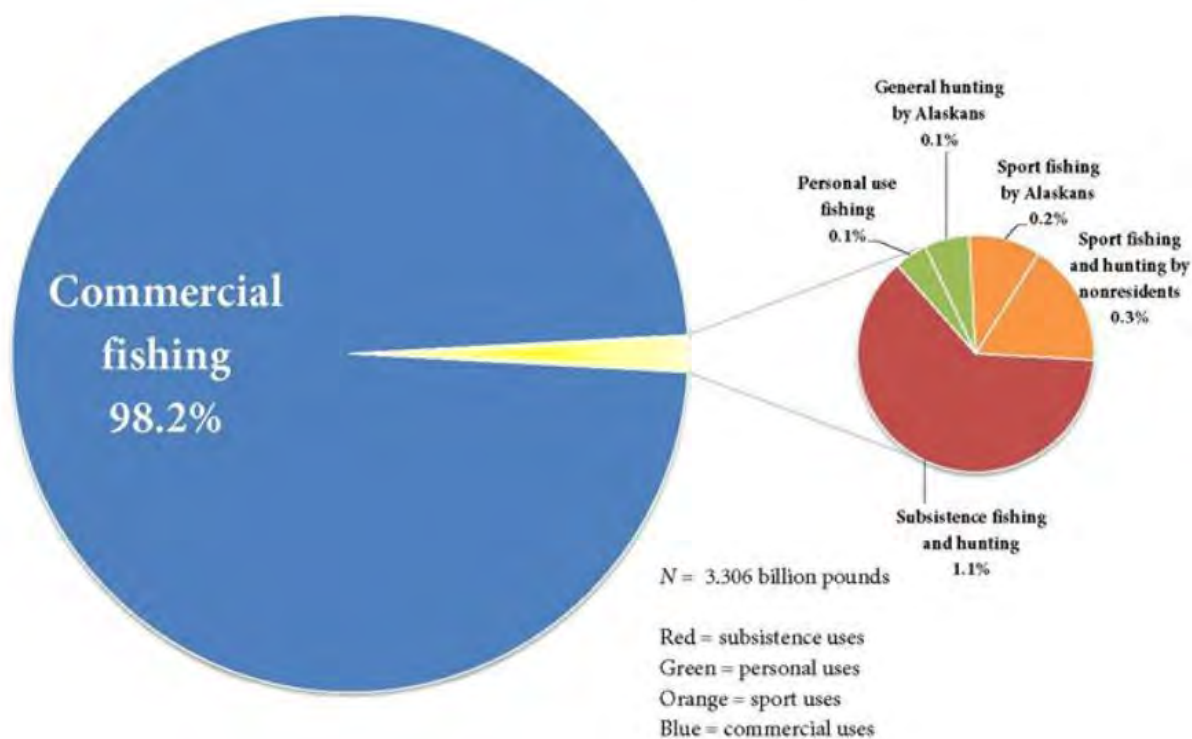
Changes in Alaska’s demographics prompt a review of the priority of personal use harvest of fin and shellfish in allocative decision making. The opportunity for Alaskans to put up food in both subsistence and non-subsistence areas of the state is an important privilege. Personal use represents less than one quarter of one percent of all state harvest, and maintaining sufficient harvest opportunity for residents merits strong consideration when ranking criteria.

In recent decades, resident and non-resident sport harvest has proven a leading generator in economic impact to the state per pound of resource utilized. The sportfishing industry contributes 1.5 billion to Alaska revenue while representing less than half a percent of total resource removals. Recreational fishing has started its climb toward full recognition as a major economic contributor and deserves careful consideration in the hierarchy of resource allocation moving into the 21st century.



Managers adapt their modeling as we gain biological insight into our fisheries. Harvest regulation is flexible to cycles in biomass and run returns. Allocation criteria need to be adaptive to the evolving landscape of Alaska's demographic and economy. Personal and sport resource use comprise a sliver of the state's overall removals. In view of their relative impact on Alaskans and their communities, we encourage the Board's review of allocative criteria with an eye toward best current distribution of our marine resources.

Who harvests fish and game? Resource harvests by use in Alaska



Source: Importance of Subsistence to Alaska Residents, Meredith Marchioni, Division of Subsistence, Alaska Department of Fish and Game.

Respectfully,

Forrest Braden
SEAGO Executive Director
forrest@seagoalaska.org