

January 11, 2025

Dear Chair Carlson-Van Dort and Board Members,

My name is Tele Aadsen. I'm a second-generation salmon troller, co-owner of the F/V *Nerka* and Nerka Sea Frozen Salmon. My father-in-law began self-marketing the *Nerka's* troll-caught king & coho salmon in 1998; my partner and I took the helm of this small family business in 2015. I'm proud to promote the unparalleled quality of Alaskan hook-&-line-caught salmon and represent sustainable fisheries to America's seafood lovers. With this commitment to responsible management,

I SUPPORT Proposals 109 & 110
I OPPOSE Proposals 108 & 113

With these, I encourage the Board to support 3 primary management objectives:

- Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.
- Authorize in-season management by ADFG to ensure the sport allocation is not exceeded.
- Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

Southeast Alaska's troll fishery provides more resident jobs than any other fishery, with 85% of troll permits held by residents and representing all 35 Southeast communities. I haven't been an Alaskan resident since childhood, but I *have* been an Alaskan troller since 1984. My partner was also raised in this fishery. Economically and culturally, we are deeply vested in contributing to our home port community, gifting king salmon heads (a traditional Lingit food) to local elders and donating salmon to Sitka's Fish to Schools program and other locals who lack the physical means or ability to fish for themselves. Working with restaurants, grocers, and seafood markets throughout the Pacific Northwest and across the country, I get to serve as an Alaskan salmon ambassador, educating consumers on our sustainable fishery and affirming their support for Alaska's wild seafood. With a recent spike in attempts to defame fisheries, including Washington's Wild Fish Conservancy lawsuits and British Columbia's bid to revoke Alaska's Marine Stewardship Council (MSC) certification, it's been all-hands-on-deck for Alaska's salmon advocates.

Praising Alaska's fisheries management, my words ring increasingly hollow. The unchecked, exponential growth of the non-resident sport sector is a clear conflict. How to tout the troll fleet's limited entry, in the stark absence of equal caps to the number of sport boats or permits? When the sport sector exceeds their own allocation and the troll fleet pays the price with our historic August opening (as happened in 2023 and 2024), how to explain that inequity to consumers?

A direct impact example: In losing 2024's August opening, trollers had a total of eight days to keep king salmon. My partner and I missed the fish for the first few days, placing further urgency on the remainder of the opening. On a typical year – that is, with July and August openings – I'd supply our customers October through April. This year, I turned away potential new sales to meet long-time customers' needs... and was still out of kings by mid-December. An obvious economic blow, our experience mirrors our fleetmates'. Losing quota to mitigate the sport sector's overage ensures significant financial hardship throughout the troll fleet and Southeast communities. Consistently among the top three most valuable fisheries in Southeast Alaska, the troll fishery has an annual regional economic impact of \$85 million - ~44% of which comes from kings. Additionally, failure to maintain the 80/20 allocation and enact in-season sport management jeopardizes consumer commitment to wild Alaskan seafood... and Norway, Chile, and New Zealand are all too ready to provide a farmed alternative.

In opposing Proposals 108 & 113, & supporting Proposals 109 & 110, I respectfully urge the Board to work toward these three management objectives:

- Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.
- Authorize in-season management by ADFG to ensure the sport allocation is not exceeded.
- Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

Thank you,

Tele Aadsen
F/V *Nerka* & *Nerka* Sea Frozen Salmon, co-owner



Adventure Alaska Southeast

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

Dear Members of the Alaska Board of Fisheries,

My name is Luther Jenson and I own and operate Adventure Alaska Southeast in Thorne Bay Alaska. Thank you for your attention to public comments, and for considering the enormous impacts that the development of this King Salmon management plan will have on my business and its employees as well as our communities across Southeast Alaska.

I started working at Adventure Alaska when I was 14 years old. I worked at the lodge every summer through highschool, and paid my way through college with this summer job. Upon graduating from the University of Alaska Fairbanks, I returned to Thorne Bay permanently and took over management of the lodge. I'm so grateful for the opportunities that this industry has provided for me as well as for our employees, as it is one of the few ways that we're able to support ourselves while living here in our cherished home of Southeast Alaska.

The following is a list of the proposals we support and oppose, as well as a few that we would abstain from commenting on:

Support – 108, 122, 123, 131, 134, 159-163, 193, 206-208, 211

Oppose – 104, 106, 107, 109-111, 114-120, 125-130, 140, 141, 164, 203, 205, 209, 210

Abstain – 105, 113, 121

We support proposal 108 from SEAGO, which adds a sport harvest cap not to exceed 25% of the troll/sport allocation on any given year. We strongly oppose and have serious concerns about other king salmon management proposals which suggest in-season management, a hard cap at 20%, reduced annual limits for non-residents in the early season, and a reduction of sport allocation over time.

Our business is absolutely dependent on sufficient non-resident access to king salmon in the early season. The 3 fish non-resident annual limit in early season is critical for our survival, and the current allocation is the absolute bare minimum that we need. We can not function with any less. There is not enough access to other species of fish during this time of year, and non-residents will simply not travel across the country and spend the incredible amount of money that they do in our communities, if this limit is reduced in June and early July. A reduction in the annual limit will result in an approximate 25% loss of income for our business, and puts us at risk of going out of business altogether.

In this current year, 2025, we have 22 groups totalling 75 people booked in the last two weeks of June and the first week of July. These are some of the hardest weeks to book, and we have spent incredible effort and resources over the years to book these trips. If the annual king salmon limit for non-residents is reduced in the early season, I will be forced to offer people their deposit back, and the majority will almost certainly cancel their trip. I will not disclose the actual figure that these trips amount to, but for illustrative purposes, \$225,000 is a very reasonable industry average. A reduction in the early season annual limit by one fish, would be a maximum of 75 less king salmon harvested by guests at our lodge. This means that those 75 king salmon are worth \$3000 each, and that accounts for only the income to our business. It is clear and worth noting that a single troll caught king salmon will never generate this magnitude of income to our local economies. The grocery store, liquor store, aviation companies, and many more businesses will also lose significant income. If we lose access to those fish, we could lose our business and our livelihoods.

Our business employs an average of 15 people during the summer and 5 people all year long. Only one of these employees is a non-resident. The rest reside in Thorne Bay year-round and either help support, or entirely support their families with this income. We employ 5 to 7 highschoolers annually, who are not only saving for post secondary opportunities, but are also learning about work, industry, and responsibility.

Please consider the economic impact that this will have for our communities as a whole. In 2024, our company contributed 12.96% of the total sales tax revenue for the City of Thorne Bay. This figure is for our business alone. There are many lodge and charter outfits in Thorne Bay, and across Southeast Alaska that make their own significant contributions to municipal revenue. In the spring of 2024, the manager of the Alaskan & Proud Thorne Bay Market reached out to me requesting our entire summer schedule for incoming lodge guests. He stated that the influx of people and increased business traffic was too overwhelming without notice, and that he needed our schedule so that he could staff the store appropriately. This one example is a clear indicator of just how significant an impact these incoming visitors have on our local economy. Most of our guests travel to the island using Seawind Aviation, but also use services from the Inter Island Ferry Authority, and Island Air. They purchase gas and conveniences from The Port in Thorne Bay, they frequent the Riptide Liquor store in Thorne Bay, as well the Strictly Local and the Alaska Gifts shops in Craig. The list goes on and on, describing the financial contribution that the sport fishing industry brings to our communities. It is integrally woven throughout our local economy, and is a pulse, without which our communities would become ghostly and lifeless.

Section 1 of Article VIII in the Alaska State Constitution states that *“It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.”* If the troll fleet loses access to 2%-7% in any given year, an individual will lose a percentage of opportunity to that similar magnitude. If the sport industry loses early season access to king salmon in that maintenance effort of a hard 20% cap, our businesses and communities as a whole will suffer devastating economic impacts. Even a reduction in the non-resident annual limit by just one fish could result in a 30% loss of income to the charter industry. The impacts of these few percent in allocation are not at all the same to the sport vs commercial industries.

Please consider the history of the fishery, and that there are many years that sport fish harvest is far below the 20% allocation. For example, the sport caught harvest was only 13.9% of allocation in 2022. We are operating with the absolute bare minimum harvest opportunity in the early season. We struggle to take any advantage of opportunity during June and early July even given the existing king salmon regulations that have been in place for the last several years, especially with the continually added restrictions on halibut, lingcod, and rockfish. Any decrease in access to king salmon during the early season will be absolutely crippling. There is simply not enough alternative opportunity during this time. A 20% cap of sport allocation with in-season management is not enough in years of low abundance.

If non-residents faced reduced king salmon limits, they will simply not participate in a significant portion of our seasonal fishery. The effects of this will ripple throughout our entire season, and we will feel the consequences of this for years to come. This absolutely should not come at the expense of resident anglers who rely on this resource for food and recreation, but rather can be accommodated by proposal 108, which addresses the needs of all users, and provides reasonable access to the fishery for residents and non-residents as well as the sport and commercial industries, through allocation and management strategies that best serve Alaskans and all stakeholders.

I strongly urge the board to consider these points, and to criticize any proposals that will cripple our economy and hurt Alaskans through a hard 20% sport cap or reduced annual limits for non-residents. The sport industry will struggle to bear any more restrictive burden than it already does while it sustains our communities in Southeast Alaska. Thank you for considering the weight and implications that these decisions have upon our local economy, and for your efforts in stewarding resources for the residents of Alaska and all stakeholders.

Sincerely,
Luther Jenson, GM

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ALASKA CHARTER ASSOCIATION

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January 14, 2025

Alaska Board of Fisheries
 Southeast Alaska and Yakutat Finfish & Shellfish Meeting
 January 28 – February 9, 2025
 Ketchikan, Alaska

RE: Proposals 230 and 231

Dear Chairperson and Board Members,

I am writing in support of Proposals 230 and 231 being considered at the Southeast Alaska and Yakutat Finfish and Shellfish Meeting referenced above. I believe establishing a commercial fishery for *Beryteuthis Magister* (*B. Magister*) Armhook Squid has the potential to provide significant benefits to sport and commercial anglers, and their respective communities, in Southeast Alaska.

From a commercial and economic perspective, a directed fishery for *B. Magister* may provide an alternative for commercial fishermen, and the communities they're connected to, that are struggling with low abundance and depressed prices for currently targeted finfish species. It could help provide some stability in an industry that has experienced drastic, adverse changes in several sectors within recent years.

Furthermore, establishing a directed fishery would simplify the permitting process for participants and allow harvest levels that would be commercially viable for domestic consumption and international export. The information I have suggests existing protocols and harvest limits for commercial use of this resource are cumbersome and discourage participation.

Having a directed squid fishery may also have a positive impact on other commercially targeted species populations. It's well known that squid are voracious predators, generally having short life spans and high nutritional needs to accommodate a rapid growth rate. There is evidence that *B. Magister* preys on economically important juvenile fish, including salmon. More research is needed to determine the extent and impact of this predation. However, any predation on juvenile fish adds to the list of challenges and obstacles to their survival. A directed fishery would help manage squid populations and reduce predation.

ADF&G staff are opposed to these proposals, commenting, "The department does not have a stock assessment program for magister armhook squid and lacks the biological information needed to establish a management plan that would result in a sustainable fishery." Perhaps, in the best interests of fisheries management, it makes sense to determine stock levels of a predatory species and the implications of those levels on other species.

While salmon and halibut stocks in Alaska have seen alarming declines over an extended period, it's likely that squid populations in Southeast Alaska have been increasing significantly. The following is excerpted from an article in Oceanographic Magazine.

“A new study, published in the journal Marine and Coastal Fisheries, has found that the rising amount of ocean heatwaves, triggered by climate change, has a direct effect on the population numbers of the squid species Doryteuthis opalescens which primarily was known to inhabit the warmer waters off Baja California.

According to the study, the population numbers of the species have significantly increased between 1998 and 2019 along the Pacific coast, with Washington seeing a 39-fold increase in squid populations and Oregon recording a 25-fold increase. . . .

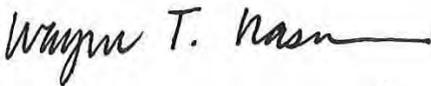
The study comes after a separate report by the US National Oceanic and Atmospheric Administration (NOAA) last month stated that southeast Alaska is seeing more individuals of the species, also linking the increase to climate change. “It gives credibility to the possibility that they are establishing a population in Southeast Alaska under large-scale sustained warming,” John Eiler, Alaska Fisheries Science Centre biologist, said.”

Following is an excerpt from ADF&G's comments on the proposals.

“In Southeast Alaska, market squid (Doryteuthis opalescens) and magister armhook squid have been historically observed and increased abundances appear to be correlated with warmer water such as El Nino events.”

Given the results of the study and ADF&G's own comments, I think it's imperative that a stock assessment is done, *B. Magister's* impacts on other species be studied, and a commercial fishery be established at this time to facilitate participation, manage stock levels, and capitalize on current trends and market conditions. It seems the potential benefits far outweigh the investment of ADF&G resources needed to adopt these proposals.

Respectfully Submitted,



Wayne T. Nasu
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January 14, 2025

Alaska Board of Fisheries
 Southeast Alaska and Yakutat Finfish & Shellfish Meeting
 January 28 – February 9, 2025
 Ketchikan, Alaska

RE: Written Comments

Dear Chairperson and Board Members,

The Alaska Charter Association is a statewide organization comprised of recreational charter fishing operators, associated businesses and guided anglers with a mission to protect the rights and conserve the marine resources of Alaska’s recreational saltwater anglers. Our members operate hundreds of charter vessels and supporting businesses in the recreational sector in Southeast Alaska (SEAK) and Southcentral Alaska.

Following is a table listing BOF proposals and ACA’s position regarding those issues. The ACA has elected to only take positions on those proposals pertinent to, or having an effect, on resources supporting our industry. Further comments on the KSMP proposals follow the table below.

Summary of ACA positions on proposals for SEAK salmon, groundfish and shellfish. Alaska Board of Fisheries Meeting – Ketchikan, AK January 27 – February 9, 2025.

Proposal No.	ACA Position	Issue
108	Support	KSMP – Modify management and allocation provisions.
109	Oppose	KSMP – Modify structure of the plan by removing management tiers.
110	Oppose	KSMP – Manage sport fishery in-season to achieve the annual king salmon alloc.
111	Oppose	KSMP – Modify management provisions and target allocations for sport fishery.
112	Oppose	KSMP – Modify sport allocation and provisions for management.
113	Support	KSMP – Modify provisions and increase king salmon sport allocation to 25%

114	Oppose	KSMP – Reduce nonresident annual limit in low allocation management tiers.
115	Oppose	KSMP – Reduce nonresident annual limit to one fish in all tiers.
116-117	Oppose	KSMP – Reduce nonresident annual limit to 2 fish < July 1 and 1 fish > July 1.
118	Oppose	KSMP – Nonresident annual limit never to exceed 3 kings.
119	Oppose	KSMP – Close nonresident sport king fishery 2 days per week.
120	Oppose	KSMP – Close nonresident sport king fishery on weekends.
121	Neutral	KSMP – Extend sunset provisions in KSMP.
104	Oppose	Allocate 5,000 king salmon to subsistence fishery and establish provisions.
105	Support	Modify sport fishing regulations in EEZ per MSA.
106-107	Oppose	Prohibit nonresidents possessing fish caught in EEZ from possessing or off-loading those fish in state waters.
122	Oppose	Prohibit removal of king salmon from the water when retention is not allowed.
123	Oppose	Prohibit netting or handling king salmon when catch-and-release fishing.
124	Neutral	Prioritize resident sport fishing opportunity in SEAK king salmon action plan.
125-126	Neutral	Close sportfishing for king salmon in District 14A when stock of concern exists.
130	Oppose	Allow for remaining troll king allocation after winter and spring troll fisheries to be harvested during a single summer troll opening beginning July 1.
131	Support	Establish criteria for multiple limited harvest troll fishery in August to occur.
132-133	Oppose	Establish a minimum size limit for king salmon of 26.5” in spring troll fisheries.
140	Oppose	Sport fishing may only use single barbless circle hooks from April 1 – June 14.
141	Oppose	Prohibit use of bait in sport fisheries from April 1 – June 14.
159	Support	Establish resident priority king salmon bag limits in sport hatchery harvest areas in Wrangell Narrows-Blind Slough THA.
164	Support	Establish resident priority king salmon bag limits in sport hatchery harvest areas near Juneau.
169	Oppose	Allow use of two rods in conjunction with two downriggers or hand troll gurdies during king salmon troll openings.
198	Support	Increase resident Sablefish bag limit from 4/day to 6/day in sport fishery.
203	Oppose	Establish unguided nonresident lingcod limits with priority over guided nonresident limits.
206	Support	Reopen yelloweye sport fishery for residents.
207-208	Support	Allow retention of DSR by nonresidents with annual limit.
209	Support	Establish provisions for resident priority within EO authority for pelagic rockfish.
210	Support	Reduce bag limits for pelagic rockfish in SEAK.

Proposal 108 - This proposal retains existing static daily bag limits for nonresident anglers in tiers (c-f) allowing commercial trollers to harvest over their 80% allocation in high abundance tiers and allows sport anglers to harvest over their 20% allocation (up to 25%) in low abundance tiers.

It is necessary to occasionally allow sport harvest to exceed its allocation. 20% has never been enough allocation to support an uninterrupted resident fishery and a sustainable nonresident sport fishery in times of low abundance. In addition, if the sport harvest is never allowed to exceed 20%, it will result in a de facto allocation shift to the troll fleet as there will be times when the sport harvest is below 20% and the troll harvest exceeds 80%.

This proposal prioritizes resident sport anglers and provides a mechanism for the department to reduce nonresident bag limits if the 9-year average sport harvest exceeds 22% without reducing resident bag limits. Restrictions on the nonresident harvest will remain in place until the average sport harvest returns to 20%.

Proposal 113 – The ACA supports this proposal to adjust the sport allocation from 20% to 25% while leaving existing static nonresident bag limits in place during all abundance levels. This would allow trollers to harvest over their allocation in times of mid to high abundance and would give the allocation necessary for a sustainable sport fishery during times of low abundance including uninterrupted fishing for residents unless reduction is necessary for conservation measures. Based on historical allocation and harvest, this would likely result in an average split ranging from 20/80 to 25/75 over time.

Proposals 122-123 – The ACA opposes these proposals that prohibit netting or removing king salmon from the water when fishing in areas closed to king salmon. In many SEAK waters throughout the summer, king salmon is closed due to stocks of concern or for allocative purposes while silver, pink and chum salmon may be retained. Not all anglers can identify salmon in the water and Kings may be unintentionally netted if the anglers mistake them for other salmon. These proposals would be difficult to enforce and would criminalize anglers accidentally netting King salmon. Education and best practices would be a better approach.

Summary

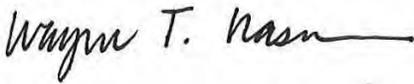
The charter fleet has been able to operate on low king salmon allocations by preserving a 3-king annual limit in June when there are no other salmon available. A 2-annual or 1-annual king limit in July is also imperative to sustain our mid-summer fishery. It is remarkable that the sport industry has done so well with so few fish but that is because there has always been ample opportunity.

In 2018-2019 we faced the lowest king salmon abundance index in two decades but were still able to maintain a 3-king annual limit in June and 1-king in July, which kept us viable. If opportunity is eliminated or is too low to attract clients, then this fishery and our businesses fail. Sport anglers fishing inside waters are already dealing with stocks of concern king closures through June 15.

The primary difference between commercial fishing and charter fishing is that nonresident sport anglers are willing to pay a premium to come to Alaska and harvest fish themselves. Adding value to our resources should be paramount when the economic impact of that value gets spread throughout our communities. This is the best economic model for Alaskans to get the highest value for our resources.

In Southeast Alaska, the resident/nonresident sport fishery catches approximately 18% of the king salmon, 9% of coho salmon and less than 1% of the remaining salmon species. If anyone is exploiting salmon runs, it's clearly not sport anglers. Fortunately, the ADFG does an excellent job of managing fisheries to give priority to subsistence users and residents anglers first, especially for stocks originating from local streams and rivers.

Respectfully submitted,

A handwritten signature in black ink that reads "Wayne T. Nasu" followed by a horizontal flourish.

Wayne T. Nasu
Executive Director
Alaska Charter Association
wayne@alaskacharter.org

Submitted by: Brad Elfers
Alaska Fly Fishing Goods

Community of Residence: Juneau

Proposal 156

Opposing

My business, my customers and the community of Juneau are all highly dependant on Dipac salmon returns which are funded by chum production. Please do not cut chum production as this would have wide ranging unintended consequences.

Dipac's coho and king returns to Juneau are a huge part of what drives my sport fishing retail business. Local as well as visiting shore-based anglers enthusiastically participate in these fisheries. Along with coming to my shop and buying flies, tackle and gear to do this, these anglers are filling their freezers with high quality protein. Many of them do not have access to a boat so a local, shore based fishery is hugely important. They can go out and catch coho and king with very little cost and this is a great advantage in a place where the cost of living is high.

Regarding my business, when Dipac lost two years of coho due to a winter landslide, my shop revenue during August and September of those years dropped by over 20%!



January 14, 2025

To: Southeast and Yakutat Finfish and Shellfish Board of Fish

I am writing this letter on behalf of my company, Alaska Glacier Seafoods in Juneau, AK, and on behalf of our community of local fishermen. The past few years have been unbelievably challenging for both fishermen and processors alike. Across virtually all species and products, we have experienced dramatic market turmoil combined with unpredictable and worsening catch rates in many fisheries. As we are all aware, processing facilities are downsizing or going out of business, and many fishermen are finding it no longer economically viable to continue. We believe with strong conviction that Alaska needs to provide any and all viable fishery opportunities to both fishermen and processors to help protect the future of our industry.

It is for these reasons that Alaska Glacier Seafoods strongly opposes Proposal #242, and strongly supports Proposal #243. While we and our community have enjoyed the opportunity to recreationally harvest Red King Crab, we do not believe that a limited commercial fishery would dramatically impact the community's continued ability to access this resource. Furthermore, given the high market value of RKC, we believe that even a relatively low GHF commercial fishery would provide much needed support to local fishermen and processors, who have in recent years been struggling to remain solvent.

Thank you for your time and consideration.

Sincerely,

Jim Erickson

Owner/Vice President
Alaska Glacier Seafoods



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alfafishak@gmail.com

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Re: [King Salmon Management Plan Proposals](#) (groundfish and other salmon are below)
Submitted online via: <https://boardoffisheries.adfg.alaska.gov>

I. Introduction

I submit the following comments on behalf of the Alaska Longline Fishermen's Association (ALFA) regarding management of Southeast Alaska's Chinook (king salmon) fisheries. ALFA represents commercial fishermen and businesses from nearly every community in Southeast Alaska who participate in, or otherwise support and benefit from the commercial fishing economy. Many of ALFA's members participate in the directed Chinook troll fishery a seine as well as gillnet salmon fisheries which have smaller but significant Chinook allocation.

ALFA advocates for salmon conservation, supports science-based fisheries management and works to safeguard the health of the marine and freshwater environments that support salmon and other marine life. ALFA markets wild, sustainably caught Alaska seafood, including Chinook salmon, under the Alaskans Own label throughout Alaska and the U.S. to fund its Seafood Donation Program and Fishery Conservation Network.

The King Salmon Management Plan, as interpreted by ADF&G, allows nonresident anglers to catch Chinook in excess of the sport allocation, negatively impacting and destabilizing both the local troll fishery and resident angler sport fisheries. The combined overage in 2023 and 2024 exceeded 30,000 fish. There have been both long-term and recent increases in non-resident angler harvest along Southeast Alaska's outer coast driving these overages as well as increases in nonresident angler effort in many Southeast Alaska regions. Modifications to the King Salmon Management Plan must both provide the Alaska Department of Fish and Game ("ADF&G") with the authority to manage non-resident harvest inseason and the direction to do so when excessive harvest by nonresidents threatens to impact either resident sport fishers or the commercial troll allocation.

ALFA recognizes that existing proposals may change before or during the meeting as proposers will submit record copies. **ALFA requests that Board: (1) maintain the fixed, 80/20 allocation between the sectors and make clear that the sport allocation is an annual harvest limit rather than an average achieved over time; (2) uncouple the commercial fishery and sport allocations so that nonresident anglers cannot "borrow" fish from the troll quota and (3) preserve uninterrupted resident sport fishing opportunities by authorizing inseason management.** Our rationale follows.

II. Description of the King Salmon Management Plan and Proposals

The Pacific Salmon Commission sets the Southeast Alaska Chinook quota for all sectors pursuant to the U.S.–Canada Pacific Salmon Treaty and the Board of Fisheries makes management decisions for the Southeast Alaska Chinook fisheries.¹ Regulations establish an “annual harvest allocation” of the all-gear catch limit. The regulatory scheme dates back to 1992, when the Board responded to sudden and rapid growth in guided non-resident Chinook harvests by developing a fixed allocation.² First, drift gillnet and seine fisheries receive 7.2 percent of the all-gear catch limit and there is a set-aside of 1,000 Chinook for the Yakutat set gillnet fishery.³ The net allocation comes “off the top.” The troll fishery has an eighty percent allocation of the remaining Chinook and the combined nonresident and personal use resident sport fisheries have a twenty percent allocation.⁴ The King Salmon Management Plan directs the Alaska Department of Fish and Game (ADF&G) to implement specific management actions according to stay within the annual allocation.⁵

The 2019 Pacific Salmon Treaty agreement reduced the all-gear catch limit.⁶ The Board then modified the King Salmon Management Plan several times.⁷ In 2019, the Board added the authority to use inseason management measures to reduce the chance of exceeding the sport allocation.⁸ In 2022, the modifications directed ADF&G to set bag and annual limits at the beginning of the season with no inseason adjustments.⁹ The hope was that this approach would attain the sport allocation on average over time because the sector would exceed its allocation during years of lower Chinook abundance and fall short during years of higher Chinook abundance.¹⁰ Although undefined, the idea behind this was that the troll fishery would absorb the overage or benefit from the underage.¹¹

This plan expires in July 2025, in large part to enable review of plan performance.¹² ADF&G has managed the last two seasons pursuant to the 2022 plan modifications. There were overages in 2023 and 2024 of 17,107 and 13,351 fish.¹³ This result is unacceptable for commercial trollers, who, at roughly \$70 a fish, donated \$2.2 million worth of fish, or \$4.4M including 1st wholesale (loss to SE processors many of which are small community based processors) to the nonresident angler sector with no path available to timely recover that loss. The result is also untenable for resident sportfishermen. Many reside in Southeast

¹ Tydingco, T. et al. 2024. Special Pub. No. 24-19.

² Finding of the Board of Fisheries. Southeast Alaska Chinook Salmon Allocations. Finding #93-142-FB (Previously Finding #93-04-FB).

³ 5 §AAC 29.060.

⁴ 5 §AAC 29.060.

⁵ 5 §AAC 47.055.

⁶ Tydingco, T. et al. 2024. Special Pub. No. 24-19.

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

Alaska communities adjacent to inland waterways where stock of concern restrictions in May and June prevent them from fishing. Meanwhile, non-resident anglers fishing during late spring on more abundant Chinook stocks migrating past the outer coast are taking a greater proportion of the total quota shared by both sectors.

A. King Salmon Management Plan revisions should prevent the non-resident angler sector from “borrowing” troll allocation

ALFA recognizes that existing proposals may change before or during the meeting as proposers will submit record copies. Because of the sunset provision, the Board will have to make some type of change. ALFA requests that Board: (1) maintain the fixed, 80/20 allocation between the sectors and make clear that the sport allocation is an annual harvest limit rather than an average achieved over time; (2) uncouple the commercial fishery and sport allocations so that nonresident anglers cannot “borrow” fish from the troll quota and (3) preserve uninterrupted resident sport fishing opportunities by authorizing inseason management. Inseason management could have prevented what happened during the 2024 fishery, when excessive non-resident harvests during May and June caused a late season closure that disproportionately impacted residents.

1. Description of Chinook salmon management proposals

There are 16 proposals related to Chinook salmon at this meeting that would modify the sport fishery.¹⁴ Most of them request changes to the King Salmon Management Plan. Proposals 114-120 seek to reduce nonresident angler harvest by lowering their annual limit or implementing day of the week closures. ALFA notes that both ADF&G and the North Pacific Fishery Management Council (NPFMC) have documented increasing trends in nonresident angler *effort* and changing spatial distribution of guided nonresident fisheries. These proposals all address one major problem with the current plan - the 3 fish non-resident annual limit is too high at current levels of nonresident angler effort and Chinook abundance. In 2023 and 2024, driven by nonresident angler harvests, the sport fishery exceeded its allocation by over 30,000 fish.¹⁵

Three proposals (109, 110 and 111) maintain current plan structure and offer different approaches to managing increasing effort in nonresident sport fisheries in the context of lower all-gear catch limit scenarios.¹⁶ None of them are complex. The proposals prescribe different management measures at different levels of harvestable Chinook abundance.¹⁷

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ For example, proposal 109 would amend the Southeast Alaska King Salmon Management Plan and set fixed bag and possession limits that seeks to hold the sport fishery to its 20 percent allocation. Subsections (c), (d), (e) and (f) set management measures that are similar to the status quo when the the sport allocation exceeds 32,191 Chinook and subsections (g)-(i) apply progressively more restrictive measures at lower levels of Chinook abundance. Subsection (m) specifies that the department shall manage the fishery so as to avoid closures for residents, unless needed to comply with the Pacific Salmon Treaty. Proposal 111 creates a management target of 19 percent for sport at

The rationale for Proposal 109 explains the problem that all of three of these proposals seek to solve – the growing impacts that increasing nonresident angler effort is having on other fisheries. These impacts run counter to the objectives that caused the Board to develop the plan in 1992. Importantly, the proposer explains that Pacific Salmon Treaty Chinook quotas will remain at lower levels for some time. This scenario means that, in the absence of a hard cap, guided non-resident anglers would continue to exceed their allocation as occurred in 2023 and 2024.

There are two proposals that re-allocate Chinook from the troll fishery in order to increase the numbers of fish taken by non-resident anglers. Proposal 113 seeks a direct, uncompensated re-allocation and increase to the combined personal use resident sport fishery and guided non-resident sport fishery. Most of this re-allocation would accrue to non-resident anglers, at considerable cost to Southeast Alaska’s coastal and rural fishing communities. ALFA strongly opposes Proposal 113. Proposal 108 seeks to “borrow” troll quota rather than take it, but the end result would be the same. ALFA also strongly opposed Proposal 108, as explained below.

2. Payback provisions are not realistic given current Chinook abundance trends and sector harvest levels

Proposal 108 from Southeast Alaska Guides Organization would add a new subsection 5 AAC 47.055(b)(4) allowing for an inseason transfer from the troll fishery of up to 5 percent of the troll allocation each year, in theory, “incorporating give and take from the troll fishery.” The reasoning behind Proposal 108 is that during years of low Chinook abundance nonresident anglers would want a larger allocation that they would “pay back” by harvesting less than their allocation during years of higher Chinook abundance. The proposer asserts that it is difficult to manage sport fisheries to a specific allocation, and that sport fisheries are unable to harvest their allocation in years of higher abundance.

Abundance Index	Sport Quota	Abundance Index	Sport Quota
1.0	23,465	1.6	51,765
1.1	27,960	1.7	54,815
1.2	32,456	1.8	57,866
1.3	39,562	1.9	60,917
1.4	42,378	2.0	63,967
1.5	45,194	2.1	67,024

The table to the left shows the sport allocation at Pacific Salmon Treaty abundance tiers.¹⁸ The table below, excerpted from the ADF&G sport fishery analysis, shows the abundance index, sport allocation, and tiers for the previous decade of management under the 2009 Treaty agreement, which reduced the all-gear Chinook

catch limit by fifteen percent.¹⁹ Two things stand out from the data: (1) abundance indexes

higher abundance thresholds but raises it to between a 20 and 22 percent allocation at lower abundance thresholds.

¹⁸ Source: Tydingco, T. et al. 2024. Spec. Pub. No. 24-19. Table 4.

¹⁹ *Id.*, Table 3.

were generally low, making timely “payback” of nonresident overages to the troll fleet unlikely;²⁰ (2) nonresident anglers were able catch the sport allocation at all but the very highest abundance levels. In all but two years, the abundance index was lower than 1.7, establishing a sport allocation close to or lower than 50,000 Chinook.²¹ The average sport fishery catch during that decade (2009-2018) was 49,142 fish.²² 2014 and 2016 were the only years when the abundance index exceeded 2.0.²³ The sport fishery harvested over 147,000 Chinook in those two years.²⁴ When using more recent decadal averages, the average annual harvest is even higher: approximately 56,283 Chinook from 2011-2020 and 52,588 Chinook between 2014-2023.²⁵

Year	Troll Allocation/Catch	Sport Allocation/Catch	Abundance Index/Troll Sport Combined Quota
2009	161,637 / 159,126	40,409/48,120	1.33 / 218,800
2010	163,864 / 177,982	40,966/44,315	1.35 / 221,800
2011	218,060 / 220,787	54,515/53,944	1.69 / 294,800
2012	197,272 / 191,553	49,318/37,722	1.52 /266,800
2013	129,862 / 134,580	32,466/43,304	1.20 / 176,000
2014	325,411/ 340,015	81,253/73,951	2.57 / 439,400
2015	175,149 / 251,086	43,787/65,174	1.45 / 237,000
2016	263,197 / 266,172	65,799/59,503	2.06 / 355,600
2017	154,881 / 123,691	38,720/44,125	1.27 / 209,700
2018	106,477 / 101,469	26,219/21,243	1.07 / 144,500

The 2019 Treaty agreement made additional cuts to Alaska’s share of the coastwide Chinook resource, further lowering the amount of fish to share between sectors. As shown below, since 2019, abundance indices have been below 1.5 every year.²⁶ Prior to the 2022 modification of the King Salmon Management Plan, ADF&G was able to manage the sport

²⁰ The proposal does include a new Subsection (n) that would in theory “pay back” the allocation in future years based on a nine-year rolling average. This feature increases the complexity of the management plan and further, future payback in the distant future would be of small consolation. Fishing business owners cannot make boat payments and repairs based on uncertain payback provisions applicable to future seasons.

²¹ Tydinco, T. et al. 2024 Spec. Publ. No. 24-19, Table 3.

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*, Table 5.

fishery within its allocation.²⁷ After those modifications went into effect, the sport fishery exceeded its allocation in 2023 and 2024 by over 30,000 fish.²⁸

Year	Troll Allocation/Catch	Sport Allocation/Catch	Abundance Index/Combined Quota
2019	103,376/103,067	25,844/24,496	1.07 / 129,220
2020	151,514/165,406	37,879/30,561	1.13 / 189,393
2021	151,514/155,590	37,879/36,935	1.28 / 189,393
2022	197,113/187,613	49,278/34,166	1.16 / 246,391
2023	152,154/ 136,579	38,039/55,129	1.15 / 190,193
2024	156,143/143,955	39,036/52,759	1.44/105,179

The 2022 revisions to the King Salmon Management Plan caused the overages – ADF&G interpreted the plan to authorize the agency to transfer an open ended amount of the commercial allocation to the sport fishery.²⁹ The 2023 abundance index yielded a sport allocation of 38,039 Chinook.³⁰ Nonresident annual limits were 3 fish through June 30, 2 fish from July 1-15 and 1 fish after July 16.³¹ On August 6, 2023, ADF&G announced that the troll allocation had 25,000 Chinook remaining.³² However, the sport fishery had exceeded its allocation by an estimated 15,000 Chinook.³³ ADF&G announced that the King Salmon Management Plan required the agency to subtract the overage from the troll allocation, leaving the fleet with a harvest of only 10,000 fish, less than half its remaining allocation.³⁴ The sport harvest reached 55,129 fish, taking 17,090 fish over the allocation and 29 percent of the two sector’s combined catch limit.³⁵

The 2024 abundance index yielded a sport allocation of 39,036 Chinook.³⁶ Nonresident limits were identical to 2023: 3 fish through June 30, 2 fish from July 1-15 and 1 fish after July 16.³⁷ The estimated sport harvest was 52,387 fish, 13,351 fish over the allocation and 26.8 percent of the all gear catch limit.³⁸ Again, in August, ADF&G issued an

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.*

³² ADF&G. 2024. Advisory Announcement, August 6, 2024.

³³ *Id.*

³⁴ *Id.*

³⁵ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

³⁶ ADF&G. 2024. Advisory Announcement, August 6, 2024.

³⁷ *Id.*

³⁸ *Id.*

announcement stating that sport fishery overages would preclude the troll fishery from harvesting their remaining allocation 15,000 treaty Chinook.³⁹

However, in accordance with Allocation of King Salmon in the Southeastern Alaska-Yakutat area (5 AAC 29.060) and the Southeast Alaska King Salmon Management Plan (5 AAC 47.055) any underage or overage in the Southeast Alaska sport fishery is added to or subtracted from the commercial troll allocation of Chinook salmon. The current Chinook salmon harvest projection for the sport fishery indicates the sport fishery will exceed the 2024 preseason allocation by an estimated 14,000 Chinook salmon. Following this reduction, the remaining annual troll allocation does not provide a sufficient harvest target to open a competitive second summer commercial troll fishery Chinook salmon retention period. However, if there is an adequate number of Chinook remaining on the all-gear treaty allocation, a limited harvest troll fishery may open.

ADF&G subsequently closed the non-resident and resident Chinook sport fisheries effective August 26, 2024 through September 30 because the charter overage threatened to exceed the combined troll/sport catch limit.⁴⁰

Revisions to King Salmon Management Plan need to prevent these events from recurring. There should be clear direction to ADF&G to implement inseason management as necessary to preserve both resident sport fishing opportunity and maintain the troll allocation. Inseason management requires inseason harvest projections and responsive adjustments.⁴¹ In 2021, ADF&G was able to use inseason management to hold the sport fishery to its allocation of 37,879 king salmon.⁴² The agency assumed that there would be lower angler effort in the aftermath of the COVID-19 pandemic and began the season with a 4 fish nonresident annual limit.⁴³ There were high harvest rates, and by late May ADF&G estimated that fishery would exceed its allocation and lowered the annual limit.⁴⁴ The estimated sport fishery harvest was 36,935 fish, and right on target with the allocation (19.5 percent).⁴⁵

3. Nonresident angler effort is expanding and destabilizing Southeast Alaska resident commercial and sport fisheries

ALFA will explain at the end of this comment letter why the Board needs to work with ADF&G and the legislature to explore measures, such as limited entry for Chinook sport fishing guides and boat rental businesses, that would best stabilize all Southeast Alaska Chinook fisheries. That said, with regard to King Salmon Management Plan measures, the key issue is increasing nonresident angler effort – and changes in the spatial and temporal

³⁹ *Id.* On August 29, the Department issued another advisory announcement, allowing the troll fishery to harvest 4,000 fish from its allocation, or 12 per permit.

⁴⁰ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

distribution of that effort. The Board’s regulatory Sustainable Salmon Policy recognizes that effective management must address new or expanding fisheries, particularly for fully allocated wild salmon stocks.⁴⁶ Thus, the development of fishery management plans must consider new or expanding fisheries, as well as data uncertainties and existing harvest patterns.⁴⁷ The Board’s Policy for Mixed Stock Salmon Fisheries, also a regulation, similarly recommends restricting new or expanding fisheries that heavily harvest mixed stocks, particularly fully utilized and allocated stocks.⁴⁸

Pacific Salmon Treaty Chinook management measures are similar to the Board’s salmon management plans in that they assign conservation burdens and harvest opportunities for mixed stock fishery participants.⁴⁹ Board findings in support of the Policy for Mixed Stock Fisheries included direction for management actions to be “fair and proportional,” and recognition that existing fisheries fully utilize the salmon resource and need stability.⁵⁰ The Board also thought the policy should not pass the burden of allocating mixed fish stocks to the department in-season – which is exactly happened in 2023 and 2024, and would recur under Proposal 108.⁵¹

The Board’s findings explained that the assessment of expanding fisheries should consider the behavior of fishers, such as increases in effort or spatial distribution occurring over more than a single year.⁵² An “expanding fishery” is one “in which effective harvesting effort has recently increased significantly beyond historical levels.”⁵³ A “new fishery” is with “new units of effort or expansion of existing effort toward new species, areas, or time

⁴⁶ 5 AAC 39.222(c)(3).

⁴⁷ 5 AAC § 39.222(a)(2).

⁴⁸ Alaska Board of Fisheries. 1993. Findings on Policy for Mixed Stock Salmon Fisheries. Finding # 93-145-FB (Previously Finding #:93-07-FB Mixed Stock Policy Finding. March 16-20, 1993, adopted as 5 AAC 39.220, Policy for the Management of Mixed Stock Salmon Fisheries).

⁴⁹ *Id.*

⁵⁰ *Id.*

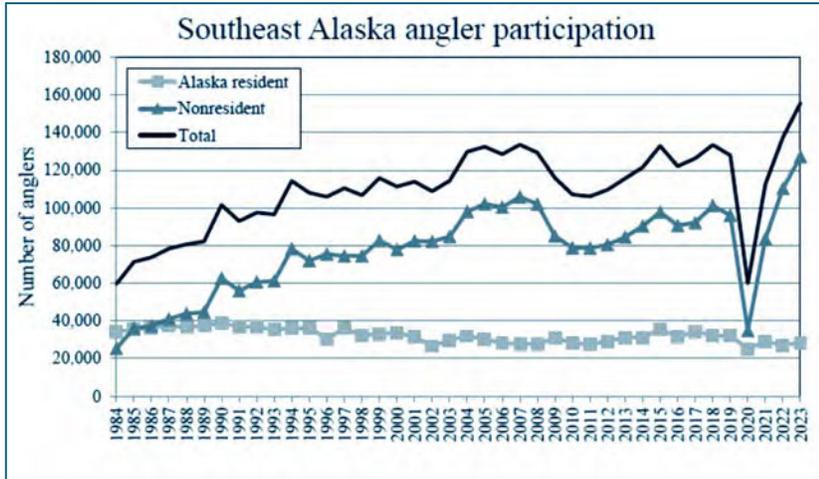
⁵¹ *Id.*

⁵² *Id.*

⁵³ 5 AAC 39.222(f)(11)

periods, results in harvest patterns substantially different from those in previous years.”⁵⁴ ALFA submits that recent trends demonstrate both “new” and “expanding” fisheries.

As shown to the left, the number of anglers in Southeast Alaska has grown four percent a year over the past four decades, driven by growing numbers of nonresident anglers.⁵⁵



In 1987, nonresident anglers caught 28 percent of the Southeast Alaska sport Chinook harvest.⁵⁶ By 1994, the nonresident angler share jumped to 68 percent.⁵⁷ ADF&G subsequently used annual limits to reduce the proportion taken by nonresidents to 55% between 1997 and 2010.⁵⁸ However, the nonresident fishery, its harvest and proportion of the harvest has grown since 2010.⁵⁹ Both in recent

⁵⁴ 5 AAC 39.222(f)(24)

⁵⁵ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19. Figure 3. Number of resident and nonresident anglers who fished in Southeast Alaska, 1984–2023.

⁵⁶ *Id.*

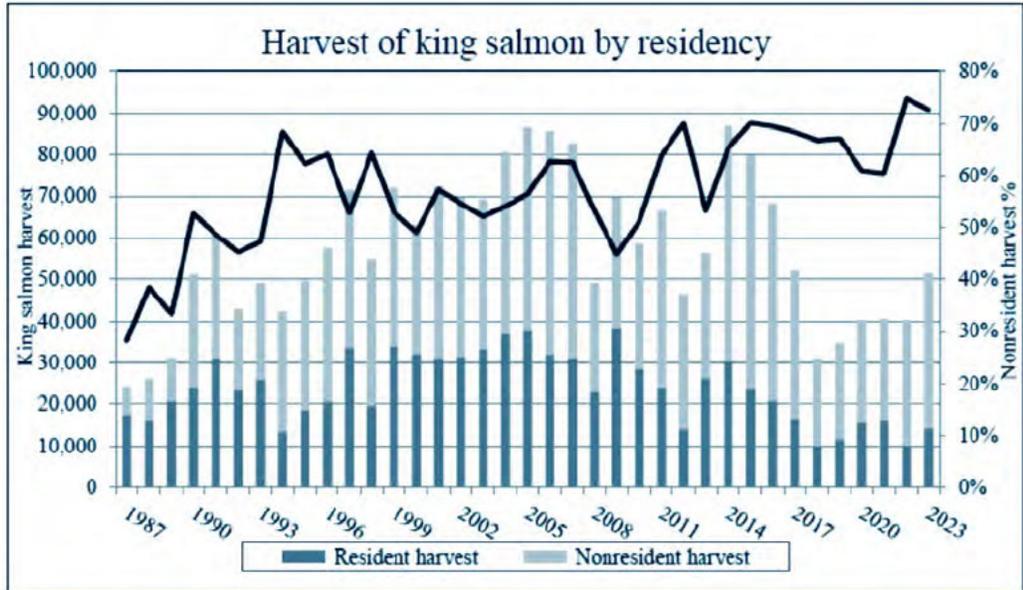
⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.*

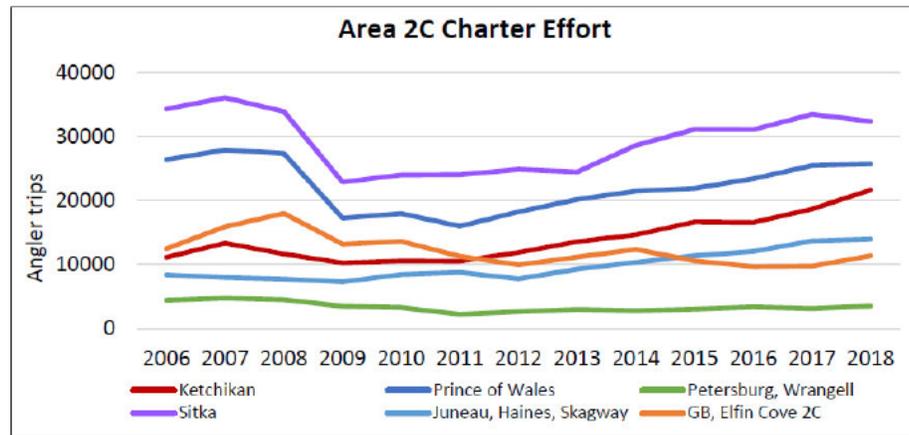
years (2019-2023), and over the past decade (2014-2023), nonresidents have taken, on average, two-thirds of the sport harvest.⁶⁰

As shown to the left, the proportion appears to be worsening, implying that resident anglers fishing inside waters subject to stock of concern restrictions are bearing the brunt of the conservation burden.⁶¹ Most of the sport fishery harvest (82%) has shifted to outer coast sport fisheries off Sitka and Prince of Wales Island between mid-May and mid-July.⁶² In



2023, 82 percent (127,152) of the 155,584 anglers were nonresidents.⁶³

As shown in the graphic to the left, the National Marine Fisheries Service (“NMFS”) has documented the same trend –



more angler trips, every year.⁶⁴ As shown in the table below, with the exception of the 2020 COVID-19 pandemic year, the number of charter angler days alone (excluding the recent rise in unguided non-resident angler effort) is reaching all-

time peaks.⁶⁵

⁶⁰ *Id.*

⁶¹ *Id.* Figure 7.–Estimated harvest of king salmon by resident and nonresident anglers in Southeast Alaska, 1987–2023, as determined from the Statewide Harvest Survey (SWHS).

⁶² *Id.*

⁶³ *Id.*

⁶⁴ NPFMC. 2019. Agenda Item C8 Unguided Halibut Rental Vessels. December 2019. Fig. 2-14.

⁶⁵ NPFMC. 2021. Initial Review Draft Regulatory Impact Review for a Proposed Regulatory Amendment. Charter Halibut Recreational Quota Entity Funding Mechanism. Agenda Item D3, April 2021.

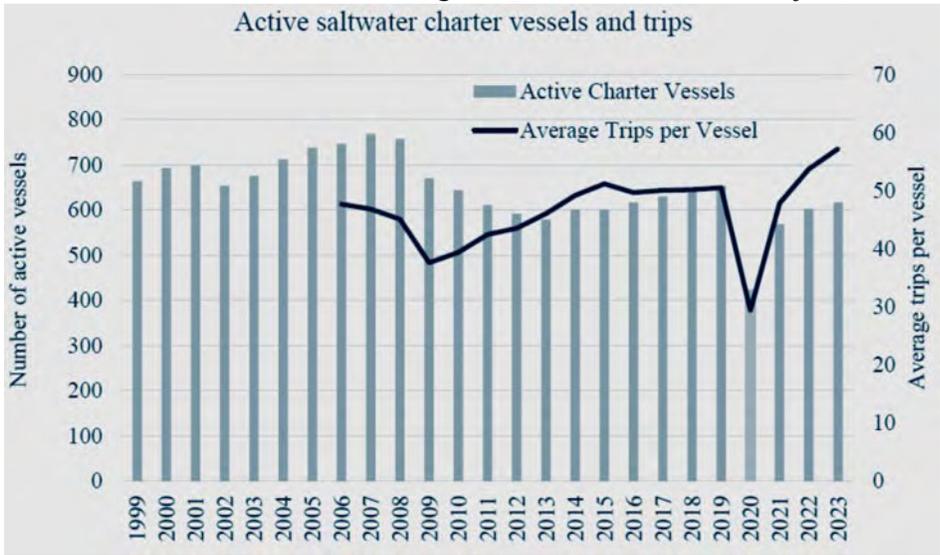
Table 12 Area 2C charter angler-days (effort) 2006-2020

Year	Area 2C angler-days by subarea						Total 2C
	Ketch	PWI	Pburg	Sitka	Jun	GlacB-2C	
2006	11,148	26,409	4,441	34,298	8,445	12,499	97,240
2007	13,359	27,906	4,754	36,066	7,990	15,912	105,987
2008	11,672	27,369	4,528	33,928	7,766	18,002	103,265
2009	10,283	17,273	3,489	22,883	7,314	13,186	74,428
2010	10,595	17,981	3,283	24,027	8,472	13,625	77,983
2011	10,552	16,015	2,257	24,038	8,771	11,301	72,934
2012	11,886	18,242	2,675	24,881	7,803	9,976	75,463
2013	13,582	20,180	3,029	24,470	9,288	11,206	81,755
2014	14,680	21,491	2,839	28,638	10,375	12,390	90,413
2015	16,685	21,931	3,071	31,113	11,391	10,613	94,804
2016	16,595	23,440	3,373	31,093	12,069	9,694	96,264
2017	18,686	25,466	3,133	33,481	13,729	9,786	104,281
2018	21,671	25,708	3,538	32,394	13,993	11,396	108,700
2019	21,002	24,412	3,194	33,057	14,674	10,414	106,753
2020	5,646	13,101	2,003	17,113	4,522	5,439	47,826

Increased effort can occur in various ways, whether more anglers, more trips or longer trips.⁶⁶ What is most critical to the current context is not necessarily the number of boats or businesses- but how much longer the season is, whether the fleet has shifted to more productive fishing areas, and fishing intensity.

⁶⁶ NPFMC. 2019. Initial Review Draft Regulatory Impact Review for Proposed Regulatory Amendment to the Federal Regulations Implementing the Pacific Halibut Fisheries Off Alaska. Unguided Halibut Rental Vessel Registration. Agenda Item C8 Unguided Halibut Rental Vessels. December 2019.

As shown to the left in figure 5 from ADF&G’s analysis, even if the number of active



charter vessels had been stable during non-pandemic years, the number of average trips per vessel is on the rise.⁶⁷ Of these active vessels, the average number of trips taken annually per vessel has steadily increased since 2009 from 38 to 57 in recent years.⁶⁸

Increases in nonresident king salmon stamp purchases provide further evidence of increasing nonresident angler effort targeting Chinook salmon. Non-resident anglers in Southeast Alaska purchased 30,844 one-day king salmon stamps and 20,123 three-day king salmon stamps in 2013.⁶⁹ Six years later, in 2019, non-resident anglers purchased 40,197 one-day stamps and 25,831 three-day stamps.⁷⁰

These growing number of nonresident anglers have shifted fishing effort to outer coast areas (Yakobi Island and Cross Sound near Glacier Bay, Sitka and Prince of Wales Island) where average harvests have increased, peaking during the 2010s.⁷¹ These areas have higher access to more productive fishing grounds with larger numbers of Gulf of Alaska king salmon migrating to spawning grounds elsewhere in the Pacific Northwest.⁷² Ketchikan, Petersburg-Wrangell and Juneau Chinook harvests have declined since 2011.⁷³ Since 2018, and through 2024, regulations have prohibited Chinook retention between April 15 and June 14 in these areas, which also have a higher proportion of resident anglers.⁷⁴

This same dynamic occurred with a similarly popular sport and commercial species, Pacific halibut. Between 2004 and 2010, guided non-resident catches of halibut exceeded their guideline harvest every year, even as the National Marine Fisheries Service and the

⁶⁷ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19. Figure: Number of active saltwater charter vessels and average number of annual trips per vessel in Southeast Alaska as determined from saltwater logbook and vessel registration program, 1999–2023.

⁶⁸ *Id.*

⁶⁹ NPFMC. 2021. Charter Halibut Recreational Quota Entity (RQE) Funding Mechanism.

⁷⁰ *Id.*

⁷¹ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

⁷² *Id.*

⁷³ *Id.*

⁷⁴ *Id.*

North Pacific Fishery Management Council made an effort to impose limits.⁷⁵ Charter halibut harvests grew at nearly seven percent a year between 1998 and 2006.⁷⁶ Active vessels, number of trips, total clients and average numbers of clients peaked between 1998 and 2006.⁷⁷ This growth raised management concerns about the stability, economic viability and diversity of other resource users and well-being of halibut-dependent communities.⁷⁸ In the early 2010s, halibut fishery managers did what the Board should do now – establish a mechanism that maintains that fishery within its allocation.

Another factor the Board should consider is the common local and general knowledge of growth in unguided nonresident fisheries using rental vessels (also known as “bare boat charters”).⁷⁹ The NPFMC has received comments and testimony identifying significant shift toward more unguided nonresident sport fishing activity that has a negative impact on other fishery sectors.⁸⁰ Management measures for halibut in part have incentivized sport fishing businesses to offer non-guided vessel rentals for unguided fishing experiences.⁸¹

Although comprehensive data are not available, research done by NPFMC staff showed that there are at least 56 businesses renting boats in Southeast Alaska that offer at least 243 rental boats.⁸² While some may be used for purposes other than sport fishing, these businesses tend to concentrate in areas of increasing angler effort - Prince of Wales Island has the largest number of businesses offering unguided rental vessels.⁸³ There are several business models. The most common business model is sport fishing lodges that offer a mix of guided and less expensive, unguided fishing options.⁸⁴ There are multiple lodges that do not offer guided fishing activities but offer boat rentals included in the lodge package – for fishing or other activities.⁸⁵ Some of them advertise as “unguided fishing lodges” focused on fishing and located in Icy Strait and around Ketchikan.⁸⁶ There are 17 businesses that just rent vessels.⁸⁷

There is significant data uncertainty that warrants careful management of the nonresident sector. The only available data source, other than the internet, is the Alaska Department of Motor Vehicle (DMV) database, which allow vessel rental companies to

⁷⁵ NPFMC. 2013. Regulatory amendment for a Pacific Halibut Catch Sharing Plan for the Charter Sector and commercial setline sector in International Pacific Halibut Commission Regulatory Area 2C and Area 3A. Final Environmental Assessment Regulatory Impact Review/Initial Regulatory Flexibility Analysis. November 2013 (hereinafter NPFMC. 2013. EA/RIR/IRFA).

⁷⁶ *Id.*

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ NPFMC. 2019. Regulatory Impact Review, Agenda Item C8 Unguided Halibut Rental Vessels.

⁸⁰ *Id.*

⁸¹ *Id.*

⁸² *Id.*

⁸³ *Id.*

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ *Id.*

register their vessels as rentals – or as pleasure boats, making it impossible to generate more than a basic estimate of the number of boats.⁸⁸ The data do not distinguish between rental vessels are owned by a sport fishing business or those owned by another business for another purpose.⁸⁹ What is clear is that unguided halibut harvests have been on the rise since 2011 in areas adjacent to halibut fishing grounds.⁹⁰

The increased use of rental vessels has not led to a decrease in charter effort.⁹¹ In fact, charter effort for halibut increased throughout Southeast Alaska from 2011-2018, except in Glacier Bay where it remained stable.⁹² Thus, *these vessels are additive to the existing trend of longer seasons and more trips for guided nonresident anglers.*

Saltwater guides participate in ADF&G’s logbook program, but unguided angler catch estimates rely on creel surveys and ADF&G’s Statewide Harvest Survey, which is the primary means to estimate sport fishery catches. It is a mail survey asking anglers to report number of fish caught and kept in households containing at least one licensed angler.⁹³ ADF&G then uses the survey to estimate sport fishery harvests of all species.⁹⁴ This survey is no substitute for elogbook data which provides a census of guided nonresident harvests.⁹⁵ Past review have indicated higher levels of under-reporting and there are other problems, such as a significant time lapse between fishing and the survey, and geographical other errors that reduce the accuracy of survey estimates.⁹⁶ Survey estimates are also unavailable until September the year following harvest.⁹⁷

4. Conclusion

The regulatory “Policy for the Management of Mixed Stock Salmon Fisheries” recognizes that past actions have already allocated wild salmon stocks to fisheries capable of catching harvestable surpluses.”⁹⁸ Growth and inadequate regulation of nonresident Chinook fisheries has destabilized Southeast Alaska’s local Chinook fisheries. Thus, the Board should amend the King Salmon Management Plans so as to: (1) maintain the fixed, 80/20 allocation between the sectors and make clear that the sport allocation is an annual harvest limit rather than an elusive average achieved over time; (2) uncouple the commercial fishery and sport allocations so that nonresident anglers cannot “borrow” fish from the troll quota and (3) preserve uninterrupted resident sport fishing opportunities by authorizing inseason

⁸⁸ *Id.*

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

⁹⁴ *Id.*

⁹⁵ NPFMC. 2013. EA/RIR/IRFA

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ 5 AAC § 39.220(d)

management to restrict new or expanding mixed stock fisheries unless otherwise provided for by management plans or by application of the board's allocation criteria.⁹⁹

III. Allocation Criteria

The Board of Fisheries utilizes criteria set forth in Alaska Statute 16.05.251(e) when making allocation decisions.¹⁰⁰ The enumerated criteria include: (1) the history of each fishery; (2) past participation by residents and nonresidents and projected future participation by residents and nonresidents; (3) the degree to which the fishery provides local foods; (4) the availability of alternative fisheries resources; (5) and (6) the economic importance of each fishery to the economy of the state, region and local areas and (7) the importance of fishery recreational opportunities for residents and nonresidents.¹⁰¹

Southeast Alaska commercial and sport Chinook fisheries harvest coastwide mixed stocks managed under the Pacific Salmon Treaty, fish produced by regional hatchery programs, and Chinook that spawn in the Stikine and Taku Rivers when there is a harvestable surplus.¹⁰² Treaty agreements implemented every ten years have reduced access to the coastwide mixed stock component. The 1999 Treaty agreement replaced previously fixed harvest ceilings with an abundance-based approach that linked annual harvest limits to a preseason abundance index.¹⁰³ The 2009 agreement reduced Southeast Alaska's harvest by fifteen percent and the 2019 agreement implemented another 7.5 percent reduction in all but years of high Chinook abundance.¹⁰⁴

Because of Treaty cuts to coastwide fisheries, over time, Chinook harvests have declined, even though the resource continues to support viable fisheries. The 2023 total commercial Chinook catch of 186,000 fish was 64 percent lower than long-term average.¹⁰⁵ The 2023 harvests of Treaty Chinook included 136,300 fish by troll gear, 12,300 fish by net fisheries, and 55,100 fish for sport fisheries.¹⁰⁶

A. The history of the fisheries criterion favors implementing a twenty percent fixed allocation for sport fisheries

When making allocation decisions, the Board must consider the history of each personal use, sport, guided sport and commercial fishery.¹⁰⁷ The Board has interpreted this factor to require recognition of historic harvest levels and management actions that preserve

⁹⁹ 5 AAC § 39.220(d).

¹⁰⁰ See 5 AAC § 75.017.

¹⁰¹ AS § 16.05.251(e).

¹⁰² Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19.

¹⁰³ NMFS. 2024. Environmental Impact Statement. Issuance of an Incidental Take Statement under the Endangered Species Act for Salmon Fisheries in Southeast Alaska subject to the Pacific Salmon Treaty and Funding to the State of Alaska to Implement the Pacific Salmon Treaty. September 2024.

¹⁰⁴ *Id.*

¹⁰⁵ Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19.

¹⁰⁶ *Id.*

¹⁰⁷ AS § 16.05.251(e)(1).

historic fisheries.¹⁰⁸ Historically the troll fishery harvests between 85 and 90 percent of Southeast Alaska’s Chinook harvest.¹⁰⁹ In 1992 the Board established its initial allocation between the troll and sport fisheries which fixed both fisheries share at the current, rather than past proportion of harvest (83 and 17 percent).¹¹⁰ The Board departed from its practice of preserving historic allocations because of concerns about disruption to resident recreational anglers fishing for personal use and family food.¹¹¹

1. History of the Troll Fishery

The Chinook troll fishery has been part of Southeast Alaska’s economy and culture for thousands of years, dating back to when Tlingit and Haidas trolled for Chinook from canoes long before contact with EuroAmericans.¹¹² Today, multi-generational tribal trollers support their households and Southeast Alaska economy through this same traditional fishing practice, providing employment and income for many people throughout the region.¹¹³ As described by Tlingit & Haida President Richard *Chalyee Éesh* Peterson:

Our villages are in isolated locations on the coast of the Pacific and the shores of the Southeast Alaska archipelago. Few villages have road access; fishing and harvesting from the ocean and beaches is a major food source.

Troll-caught salmon is a culturally important food source and an economically critical fishery for our tribal citizens. For untold numbers of generations, our people have ventured out to troll for salmon, including Chinook salmon (king salmon). . . . Historically this was done by hook-and-line in cedar canoes. Today we use small fishing boats, but the techniques and knowledge used are based on our traditional practices. . . .

Troll fishing keeps our culture and traditions alive and gives young people an opportunity to make a living and support their families. . . .

Our young people will lose out on critical learning opportunities or may move out of region entirely if the troll fishery is no longer a viable source of income to support their families.

The 20th century Chinook troll fishery began in the early 1900s and was open all year through the 1950s.¹¹⁴ In the early 1910s, salmon trollers began to proliferate around prime fishing grounds, such as in southern Chatham Strait near Port Alexander, where a year-round community developed, serving a fishing fleet of up to 1,000 boats during the summer

¹⁰⁸ Alaska Board of Fisheries. 1993. Finding of the Board of Fisheries. Southeast Alaska Chinook Salmon Allocations. Finding #93-142-FB (Previously Finding #93-04-FB).

¹⁰⁹ NMFS. 2024. Environmental Impact Statement. September 2024.

¹¹⁰ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹¹¹ *Id.*

¹¹² Declaration of Richard Peterson, June 2, 2023

¹¹³ *Id.*

¹¹⁴ Skannes, P., and G. Hagerman. 2014. History of the winter salmon troll fisheries in Southeast Alaska. Alaska Department of Fish and Game, Fishery Management Report No. 14-38, Anchorage.

season.¹¹⁵ Fishermen rowed small boats from which they hand-reeled Chinook to meet emerging demand for cured or frozen Chinook salmon.¹¹⁶ By the 1940s, fishermen were using power gurdies to haul in the lines.¹¹⁷ Today, trollers tow two or more lines containing multiple fishing lures behind them.¹¹⁸ Individual handling of each fish results in high quality, Chinook that generate premium prices.¹¹⁹ There is usually a small crew, often comprised of family members.¹²⁰

ADF&G harvest records dating back to statehood demonstrate that the troll fishery was and remains dependent on the Chinook fishery.¹²¹ During the 1960s, 1970s and early 1980s, trollers typically caught ninety percent or more of the Alaska harvest.¹²² Annual harvests were much higher than they are now, typically exceeding 200,000 Chinook and often reaching 300,000 fish.¹²³ The average long-term (1962-2022) troll Chinook harvest, which includes Alaska hatchery fish not counted in the Treaty allocation, is 241,348 fish.¹²⁴ The overall Chinook harvest has been twenty percent lower over the past decade – 192,514 fish.¹²⁵ As harvest quotas declined during the 1980s and 1990s pursuant to Treaty conservation measures, trollers increasingly targeted cohos, with catches frequently nearing 2 million fish, with occasional years of even higher harvests.¹²⁶

During the 2010s, an average of 295 hand troll and 715 power troll permit holders were active fishery participants.¹²⁷ There is a high level of local ownership of permits and boats that makes the fishery critical to nearly every Southeast Alaska community as these fishermen provide year round and seasonal crew work and support processors, boat yards, mechanics, welders, grocers and restaurants.¹²⁸ Alaska’s congressional delegation has recognized the importance of these small, family-owned businesses, and how essential they

¹¹⁵ [Port Alexander - Southeast Conference](#)

¹¹⁶ Roppel, R. 1988. Canneries and salmon: an Alaskan saga. *Alaska Fish & Game* 20(2):6-7, 26-31.

¹¹⁷ *Id.*

¹¹⁸ Nichols, Carina. 2021. A Policy Evaluation considering the Pacific Salmon Treaty’s Impacts on the Southeast Alaska Chinook Salmon Commercial Troll Fishery. Masters Project submitted in partial fulfillment of requirements for the Master of Environmental Management Degree Nicholas School of the Environment Duke University. April 2021. Available at:

https://dukespace.lib.duke.edu/dspace/bitstream/handle/10161/22713/Nichols_Carina_MP_Final.pdf?sequence=1&isAllowed=y

¹¹⁹ *Id.*

¹²⁰ *Id.*

¹²¹ Conrad, S. & T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19. Table 5.

¹²² *Id.*

¹²³ *Id.*

¹²⁴ *Id.*

¹²⁵ *Id.*

¹²⁶ *Id.*, Table 7.

¹²⁷ NMFS. 2024. Environmental Impact Statement. September 2024.

¹²⁸ *Id.*

are to remote communities where a significant proportion of residents rely on trolling as their main source of income.¹²⁹

2. Management history of the commercial troll/sport fishery allocation: accommodating growth in nonresident angler effort

The 1985 Pacific Salmon Treaty lowered Southeast Alaska Chinook quotas but the troll fishery absorbed all of the cuts at first.¹³⁰ Prior to 1992, there were no restrictions applied to unguided resident sport fishers or guided non-resident sport fishers.¹³¹ A Treaty commission set the overall annual catch ceiling, and trollers would harvest the number of Chinook remaining after subtracting the estimated sport catch.¹³² Sport harvests at first were stable, ranging between 20,000 and 25,000 fish.¹³³ In 1985, residents harvested 16,664 Chinook, two-thirds of the total sport harvest.¹³⁴ Participation in the troll fishery was also stable because it was subject to limited entry.¹³⁵ Guided sport fishery harvests then began to increase rapidly, accounting for nearly half the sport harvest by 1990.¹³⁶ The increased effort, and lack of restrictions, further reduced troll fleet harvests, which by 1985 had taken a 23 percent cut.¹³⁷

The Board adopted the King Salmon Management Plan in 1992 and has revised it several times since.¹³⁸ The Board's 1992 action allocated eighty-three percent of the Chinook quota to commercial troll and seventeen percent to recreational fisheries.¹³⁹ The Board's goal was to stabilize the sport and commercial troll fisheries.¹⁴⁰ The Board did express concern about how increasing demand and higher catch rates by a new entrant into the fishery, the guided sport fishery, might impact resident sport fishermen.¹⁴¹ The purpose of the 17 percent allocation was to set aside enough fish to ensure resident fishers with continuing access to their historical harvest levels.¹⁴²

¹²⁹ Alaska Congressional Delegation. Amici Curiae Brief in Support of Intervenor-Defendants-Appellants' Motion for Stay Pending Appeal. *Wild Fish Conservancy v. Quan et al.* (9th Cir. Case: 23-35322, 06/02/2023)

¹³⁰ Alaska Board of Fisheries. 1993. Finding #93-142-FB (Previously Finding #93-04-FB); Tydingco, T. et al. 2024. Spec. Pub. No. 24-19; *Rutter v. State*, 963 P.2d 1007, 1010 (Alaska, 1996).

¹³¹ *Rutter v. State*, 963 P.2d at 1010.

¹³² *Id.*

¹³³ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹³⁴ *Id.*

¹³⁵ *Id.*

¹³⁶ *Id.*; Tydingco, T. et al. 2024. Spec. Pub. No. 24-19; *Tongass Sport Fishing Ass'n v. State*, 866 P.2d 1314, 1316 (Alaska 1994)(upholding the regulation against a challenge by charter boat operators and lodge owners).

¹³⁷ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹³⁸ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

¹³⁹ *Id.*; Finding #93-142-FB.

¹⁴⁰ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹⁴¹ *Rutter v. State*, 963 P.2d at 1011; Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

¹⁴² *Rutter v. State*, 963 P.2d at 1012.

Despite the new allocation, resident anglers faced restrictions in 1992 and 1993.¹⁴³ Two years later, in 1994, the Board adopted a new regulation which established the eighty/twenty percent split between the two sectors that remains in effect today.¹⁴⁴ The Board reasoned that the three percent increase was necessary to maintain access for resident anglers.¹⁴⁵ The guided non-resident fishery continued to grow, driving overall average sport Chinook harvests to 56,400 per year during the 1990s, far exceeding previous average catches of 24,500 fish (1977-1990).¹⁴⁶ Since that time, the Board maintained its emphasis on resident sport fishing opportunities, often in response to concerns that the growing non-resident sector was negatively impacting the resident sport fishery.¹⁴⁷

The 2000s presented a very different scenario than fisheries managers faced in 1992 or today – there were multiple years of higher Chinook abundance.¹⁴⁸ Sport harvests continued to increase, averaging nearly 72,400 Chinook.¹⁴⁹ The Board modified the King Salmon Management Plan several times during this decade. Similar management issues arose as are present today – whether to manage the sport fishery in-season or prescribe specific annual limits and whether to manage troll and sport fisheries separately to achieve their own allocations.¹⁵⁰

There were two proposals to increase the sport allocation of king salmon in 2006.¹⁵¹ The Board “concluded that the 80-20 allocation was equitable and that an increased allocation would have benefited nonresidents more than residents.”¹⁵² The Board also rejected multiple proposals that would allow the sport fishery to “bank” underages from a previous year, whether for the entire season or just May and June.¹⁵³ The Board recognized that these proposals would reallocate fish from the troll fishery.¹⁵⁴

3. Conclusion

ALFA requests that the Board find the fishery history criterion to weigh in favor of maintaining the eighty/twenty percent allocation between the troll and sport sectors. Both the troll and resident sport fisheries are stable, and fishery managers can restrict harvest to existing allocations. The Board can maintain the current allocation while providing for resident sport fishermen by implementing a combination of annual nonresident Chinook

¹⁴³ *Id.*

¹⁴⁴ *Id.* at 1008; Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

¹⁴⁵ *Id.*

¹⁴⁶ Tydingco, T. et al. 2024. Spec. Pub. No. 24-19.

¹⁴⁷ *Id.*

¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

¹⁵⁰ *Id.*

¹⁵¹ Crass, S. & S. Wright. 2006. Summary of Actions Alaska Board of Fisheries. Southeast and Yakutat Finfish. January 22 – February 1, 2006.

¹⁵² *Id.*

¹⁵³ *Id.*

¹⁵⁴ *Id.*

catch limits and in-season management measures that ensure increasing nonresident angler effort does not exceed the sport sector allocation.

B. Resident participation in the past and future

When making allocation decisions, the Board must consider resident and nonresident fishery participation, both past and projected into the future.¹⁵⁵ ALFA submits that resident sport fishing effort is probably stable and will remain important. The regional population is likely to remain stable or slightly diminish. As of 2022, there were over 72,200 people living in Southeast Alaska's 33 communities.¹⁵⁶ Across the state, residents in general are aging and there are low birth rates and low new-resident migration.¹⁵⁷ Alaska demographers project small population declines in most Southeast Alaska communities over the next decade.¹⁵⁸ Outmigration has driven small population declines since 2020 in all areas except Haines.¹⁵⁹

In 1992, the Board's findings noted that Alaska residents, many from rural Southeast Alaska communities, owned and fished 85 percent of the troll permits.¹⁶⁰ The Board also identified considerable continuity, with a significant number of second and third generation fishermen, many operating their business with an entire family.¹⁶¹ Thirty years later, in 2022, the proportion of active fishermen was still 85 percent - the highest level of local ownership of any major Alaska fishery.¹⁶² The fishery remains just as important to residents of smaller communities, providing earning potential where there are few other opportunities.¹⁶³ There remains a broad distribution of resident fishermen and troll landing ports throughout the region that exceeds all other fisheries.¹⁶⁴

Many communities with high numbers of active resident fishermen are remote rural and/or historical Alaska Native communities.¹⁶⁵ For these trollers, the Chinook fishery is economically critical but is much more than a business - it provides access to Chinook salmon, a culturally important food source, and enables young fishermen to enter the fishery.¹⁶⁶ Tribal members comprise a significant proportion of smaller community

¹⁵⁵ AS § 16.05.251(e)(2).

¹⁵⁶ Alaska Department of Labor and Workforce Development. 2022. Population of Alaska by Economic Region, Borough and Census Area, 2010, 2020-2022. [TotalPopulationBCA.xls \(live.com\)](#).

¹⁵⁷ Howell, D. & Sandberg, E. 2022. Alaska Population Projections 2021-2050. Alaska Department of Labor and Workforce Development.

¹⁵⁸ *Id.*

¹⁵⁹ Alaska Department of Labor and Workforce Development. 2022.

¹⁶⁰ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹⁶¹ *Id.*

¹⁶² NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁶³ *Id.*

¹⁶⁴ *Id.*

¹⁶⁵ *Id.*

¹⁶⁶ Southeast Alaska Tribal Coalition Amici Curiae Brief in Support of State of Alaska's Motion for Stay Pending Appeal. *Wild Fish Conservancy v. Quan*, Case No. 2:20-cv-00417-RAJ-MLP On appeal from the U.S. Dist. Court for the Western District of Washington (hereinafter Southeast Alaska Tribal Coalition. 2023).

residents, and many participate in the troll fishery.¹⁶⁷ Loss of fishing opportunities for these and other rural residents extends well beyond loss of income – in addition to providing jobs and food in small communities the fishery enables tribal citizens to continue to live in their ancestral homelands and maintain cultural continuity.¹⁶⁸

The troll fishery has a long history of stewardship of the salmon resource and many resident Chinook fishermen today engage in community efforts to sustain Southeast Alaska’s salmon populations.¹⁶⁹ Multiple Southeast Alaska organizations interested in the conservation and protection of freshwater and marine ecosystems recognize the importance of resident trollers for their efforts to promote conservation of the salmon resource through comment letters, public testimony and other actions to address threats posed by transboundary mines, industrial logging and other environmental threats.¹⁷⁰

Almost all hand trollers are local fishermen.¹⁷¹ The number of active hand trollers has dropped during the 21st century, but there are still a large number of participants - an average of 260 active fishermen over the past decade.¹⁷² There has been a modest drop in the average number of active power trollers, (long-term average of 754 from 1975-2022) to an average of 688 fishermen over the past decade.¹⁷³ Recent peak power troll effort occurred between 2014 and 2017, with 756, 740, 745 and 721 active fishermen, respectively.¹⁷⁴ The most recent (2018-2022) participation level has been 639 power troll permits and 211 hand troll permits on average each year.¹⁷⁵

ALFA requests that the Board find that the residency criterion weigh in favor of maintaining the eighty/twenty percent allocation. Troll participation has fluctuated over time – during the 1990s, the number of fishery participants declined because lower Chinook quotas combined with negative market conditions caused by an influx of farmed fish. As prices recovered and abundance increased during the 2000s, the fleet size grew again. The fleet currently consists of highly professional operators who catch the Chinook allocation each year – and depend on being able to do so. Fluctuations in the number of fishery participants have occurred over time, driven by price fluctuations for other species or threats to the fishery itself, such as in 2023, when a serial litigant anti-fishing group from

¹⁶⁷ *Id.*

¹⁶⁸ *Id.*

¹⁶⁹ NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁷⁰ Bristol, T., Trainor, M., Edwards, L. & A. Thoms. 2023. Letter to NOAA Fisheries Assistant Administrator Janet Coit and Regional Administrator Jon Kurland. May 23, 2023.

¹⁷¹ Stern, C., Robbins, B. & Strong, D. 2021. CFEC Permit holdings and estimates of gross earnings in the Yakutat and Southeast Alaska commercial salmon fisheries, 1975-2020. CFEC Report Number 21-4N, December 2021 (Revised January 2022). Juneau, AK.

¹⁷² Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19, Table 2.

¹⁷³ *Id.*

¹⁷⁴ *Id.*

¹⁷⁵ NMFS. 2024. Environmental Impact Statement. September 2024. Table 6-2.

the Pacific Northwest, the Wild Fish Conservancy, attempted to close the fishery with a lawsuit. Table 6-9 below shows the distribution of regional troll permit holders.¹⁷⁶

Table 6-9 CFEC Permits Held by SEAK Residents, 2023.

City	SEAK Purse	Yakutat Set	SEAK Drift	Statewide	Statewide	Total
	Seine S01A	Gillnet S04D	Gillnet S03A	Powerroll S15B	Handtroll S05B	
ANGOON	0	0	0	3	6	9
AUKE BAY	0	0	4	4	8	16
CRAIG	10	0	11	69	35	125
DOUGLAS	1	0	15	14	7	37
EDNA BAY	0	0	0	1	3	4
ELFIN COVE	0	0	0	9	2	11
GUSTAVUS	0	0	0	10	12	22
HAINES	0	0	64	19	5	88
HOONAH	3	0	3	25	50	81
HYDABURG	2	0	0	4	6	12
HYDER	0	0	0	0	1	1
JUNEAU	6	12	62	54	92	226
KAKE	3	0	0	8	10	21
KASAAN	0	0	0	1	1	2
KETCHIKAN	19	0	37	74	91	221
KLAWOCK	4	0	1	9	14	28
METLAKATLA	9	0	11	2	6	28
MEYERS CHUCK	0	0	0	3	5	8
NAUKATI BAY	0	0	0	0	1	1
PELICAN	0	2	0	15	8	25
PETERSBURG	52	1	71	62	141	327
PORT ALEXANDER	0	0	0	8	6	14
SITKA	33	10	27	272	102	444
SKAGWAY	0	0	4	0	1	5
TENAKEE	0	0	0	8	2	10
THORNE BAY	2	0	1	7	8	18
WARD COVE	1	0	5	13	18	37
WRANGELL	9	0	59	46	62	176
YAKUTAT	0	106	3	27	47	183
Total	154	131	378	767	750	2180

Source: CFEC Permit Database, 2023.

C. Importance of each fishery for providing resident opportunities for personal and family consumption

When making allocation decisions, the Board must consider the importance of each fishery in terms of providing residents with the opportunity to catch fish for personal and family consumption.¹⁷⁷ In 1992, the Board stated that residents harvesting Chinook for

¹⁷⁶ *Id.*

¹⁷⁷ AS § 16.05.251(e)(3).

personal use should face the fewest restrictions.¹⁷⁸ The Board recognized the resident sport fishery as a provider of local foods, and that commercial trollers used portions of their catch to support their households.¹⁷⁹ ALFA submits that the troll fishery is also a community food fishery, and the Board should weigh this criterion in favor of maintaining the eighty/twenty percent troll allocation with no quota borrowing provisions.

Chinook caught in commercial fisheries are critical to the year round food supply for many households.¹⁸⁰ It is particularly critical to rural communities as it comes at a lower cost compared to other protein sources shipped or flown in at prices a third to half again as much more than national price averages.¹⁸¹ Tribal fishers, for example, provide for many people beyond themselves in small remote communities, particularly elders who depend on the troll fishery for access to Chinook.¹⁸² Transferring Chinook quota away from the troll and resident sport fisheries in order to enhance nonresident Chinook catches during the spring would reduce local access to a critical protein source and could exacerbate food insecurity across rural and remote Southeast Alaska.¹⁸³

The August troll Chinook opener – lost in 2023 and 2024 because of nonresident overages – is the last opportunity of the season for many trollers to catch Chinook not just for income, but also for family and community. Many ALFA members retain significant numbers of Chinook during this opener for smokers and for freezers so that they can consume salmon during winter months. The Board should find that the food consumption criterion weighs heavily in favor of making changes to the King Salmon Management Plan to ensure that nonresident anglers do not again close this fishery by “borrowing” quota. This type of “loan” takes fish out of local freezers.

D. Availability of alternative fishery resources

When making allocation decisions, the Board must consider the availability of alternative fishery resources.¹⁸⁴ In 2022, Chinook comprised 43 percent of the fishery ex-vessel value, followed by coho at 29 percent and chum at 27 percent.¹⁸⁵ In 2023, Chinook was by far the most valuable salmon species, at \$6.85 per pound, and the Chinook harvest ex-vessel value was worth more to the fleet than chum and coho harvests combined.¹⁸⁶

The troll fishery does not have a viable alternative to Chinook, a premium product generating the highest prices of any salmon species because of its intrinsic high quality, large filet sizes, and high fat content.¹⁸⁷ Chinook often comprise nearly half of the overall ex-

¹⁷⁸ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

¹⁷⁹ *Id.*

¹⁸⁰ NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁸¹ *Id.*

¹⁸² Southeast Alaska Tribal Coalition. 2023. Declaration of Frederick Phillips.

¹⁸³ NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁸⁴ AS § 16.05.251(e)(4).

¹⁸⁵ NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁸⁶ Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19. Table 10.

¹⁸⁷ NMFS. 2024. Environmental Impact Statement. September 2024.

vessel value in the troll fishery.¹⁸⁸ For many individual trollers, the proportion of income generated from Chinook is even higher.¹⁸⁹ Each opening is crucial – the loss, for example, of family income earned during a seasonal opener such as the August fishery can create hardships well past the fishing season for families that end up having less money and food than they need to support themselves the rest of the year.¹⁹⁰

Year ¹⁹¹	Chinook	Chum	Coho
2011	242,560	702,901	1,313,888
2012	209,061	426,520	1,201,520
2013	149,485	1,054,265	2,392,138
2014	355,426	199,707	2,245,272
2015	269,813	424,231	1,246,195
2016	276,043	164,944	1,387,055
2017	129,237	403,488	2,150,880
2018	107,303	530,550	938,443
2019	108,616	269,600	973,881
2020	169,838	79,451	752,152
2021	162,886	704,235	850,034

As shown to the left, chum and coho harvests fluctuate extensively from year to year, increasing the importance of having a stable Chinook fishery with two summer openings.¹⁹² The long term (1989-2019) troll coho harvest average was 1.7 million fish.¹⁹³ The highest recent harvest was 2.1 million in 2017, but trollers harvested less than 1 million coho per year from 2018-2020, with a 750,000-fish catch in 2020 being the lowest since 1988.¹⁹⁴ The lower coho catches are not because of lack of effort; rather, abundance has been lower in recent years. The table below illustrates the importance of Chinook in 2022 and 2023.

Year ¹⁹⁵	Chinook value	Chinook Harvest	Coho value	Coho Harvest	Chum value	Chum Harvest
2022	\$14,500,000	196,690	\$9,600,000	854,000	\$9,000,000	1,000,000
2023	\$10,700,000	143,000	\$8,800,000	1,053,076	\$1,500,000	357,000

¹⁸⁸ *Id.*

¹⁸⁹ Southeast Alaska Tribal Coalition. 2023. Declaration of Jim Dybdahl.

¹⁹⁰ Declaration of Richard Peterson, June 2, 2023

¹⁹¹ Conrad, S., and T. Thynes. 2024. ADF&G, Fishery Management Report No. 24-19, Tables 5, 7 and 9.

¹⁹² NMFS. 2024. Environmental Impact Statement. September 2024.

¹⁹³ Hagerman, G., Vaughn, M. & Priest, J. 2021. Annual management report for the 2020 Southeast Alaska/Yakutat salmon troll fisheries. Alaska Department of Fish and Game Management Report No. 21-17, Anchorage, AK.

¹⁹⁴ *Id.*

¹⁹⁵ NMFS. 2024. Environmental Impact Statement. September 2024.

As shown in the figure below, coho and chum harvests are not viable alternative to Chinook



because of market factors.¹⁹⁶ Prices for both species were very low in 2023, at \$1.71 per pound for coho and \$0.55 per pound for chum.¹⁹⁷ In 2023, Chinook prices were up 9 percent from 2022 but prices for all other salmon species crashed.¹⁹⁸ Inventory left over from the 2022 record Bristol Bay sockeye run and large 2023 pink salmon harvests throughout Russia and Alaska were primary causes

of a market collapse.¹⁹⁹ By the end of the 2023 season, processors were offering prices as low as 20 cents per pound for chum.²⁰⁰

Reduced access to Chinook, such as the loss of the August openings, hits hard in the region because landings occur in a larger number of communities than any other fishery.²⁰¹ For permit holders, the impacts of reduced access to Chinook salmon extend well beyond the loss of annual income. Because Chinook are so critical to the fishery, less opportunity also devalues permits and vessels.²⁰² As NMFS has explained:

Current participants in rural communities in Southeast Alaska do not have the ability to easily pivot to other economic opportunities to mitigate impacts from a decline in fishery stocks or closures of existing salmon fisheries. Most vessels

¹⁹⁶ Graphics credit: NSRAA. Available at:

http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/meetings/gillnet/2023_nsraa_gillnet_task_force.pdf

¹⁹⁷ Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19. Table 10.

¹⁹⁸ *Id.*

¹⁹⁹ Working, M. 2023. "Wild Alaska salmon – an industry in a crunch." *Insight*, September 2023.

Available at: https://zacharyscott.com/wp-content/uploads/2023/09/202309_Insight.pdf

Ess, C. "Economic storm hits alaskas fishing industry 2023 salmon harvest dips, prices dive." *National Fisherman*, August 15, 2023. Available at: <https://www.nationalfisherman.com/alaska/economic-storm-hits-alaska-s-fishing-industry-2023-salmon-harvest-dips-prices-dive>;

Loy, W. "Smaller Bristol Bay sockeye catch expected." *Pacific Fishing*, November 2023. Available at: https://www.pacificfishing.com/featured_stories/1123_story1.html.

²⁰⁰ Ess, C. 2023.

²⁰¹ NMFS. 2024. Environmental Impact Statement. September 2024.

²⁰² *Id.*

are smaller and specialized, and may not be easily convertible to other fisheries that generally require larger boats or different gear types such as large pot gear.²⁰³

Further:

Of the 1,820 handtroll and power troll permits issued in Southeast Alaska, ... [fourteen percent] are held in the most rural communities with the highest percentages of Alaska Natives. Access to other livelihoods, and even different gear types for fishing, is cost prohibitive, requires years of specialized training or is simply unavailable for Alaska Native peoples who reside in Southeast Alaska's small and remote communities.²⁰⁴

In contrast, nonresident anglers have numerous other opportunities to harvest Chinook elsewhere in the Pacific Northwest in active sport fisheries off the coasts of British Columbia, Washington and Oregon.²⁰⁵ Indeed, these areas have much larger Chinook quotas for sport fishermen than Southeast Alaska.²⁰⁶ There are large marine and freshwater sport fisheries for Puget Sound Chinook.²⁰⁷ Angler effort is also on the rise on the mainstem Columbia River, nearly tripling to over 118,000 angler trips since the 1980s.²⁰⁸ Chinook harvests have been at high levels over the past decade, exceeding well over 100,000 Chinook each year between 2010 and 2017, and peaking at over 150,000 Chinook in 2015.²⁰⁹

The businesses that guide nonresident anglers have access to other fishery resources. These businesses have remained viable even with Chinook lower bag limits and day of the week closures impacting access to other high value species such as halibut. The greater availability of Treaty Chinook in non-Alaska sport fisheries suggests that guided nonresident anglers are seeking the “Alaska experience” and do not need to retain multiple Chinook per person for food. Juneau operators have remained stable even with much lower Chinook

²⁰³ *Id.*

²⁰⁴ *Id.*

²⁰⁵ *See, e.g.* Pacific Salmon Commission. 2022. Joint Chinook Technical Committee Report. Annual Report of Catch and Escapement for 2021. Report TCChinook (22)-04.

²⁰⁶ *Id.*

²⁰⁷ Kraig, E. & T. Scalici. 2022. Washington State sport catch report 2020. Washington State Department of Fish and Wildlife, Fish Science Division. Olympia, WA. July 2022.

²⁰⁸ Oregon Department of Fish and Wildlife and Washington Department of Fish and Wildlife (ODFW & WDFW). 2022a. 2022 Joint Staff Report: Stock status and fisheries for fall Chinook salmon, coho salmon, chum salmon, summer steelhead and white sturgeon. Joint Columbia River Management Staff, Oregon Department of Fish and Wildlife and Washington Department of Fish and Wildlife. Oregon Department of Fish and Wildlife and Washington Department of Fish and Wildlife. 2022b. 2022 Joint Staff Report: Stock status and fisheries for spring Chinook, summer Chinook, sockeye, steelhead and other species. Joint Columbia River Management Staff, Oregon Department of Fish and Wildlife and Washington Department of Fish and Wildlife.

²⁰⁹ Pacific Salmon Commission. 2022. TCCHINOOK (2022)-02. Appx. C. Pacific Salmon Commission. 2022. Joint Chinook Technical Committee Report. Annual Report of Catch and Escapement for 2021; Pacific Salmon Commission. 2022. Report TCChinook (22)-04.

harvests suggesting that they have adapted to changing Chinook abundance by using their vessels for other purposes during spring, such as wildlife viewing. In other words, the outer coast fisheries do not need a three Chinook annual limit but rather should adapt to 21st century fishing conditions by availing themselves of opportunities to diversify and marketing the experience rather than demanding nonresident access to multiple fish at the expense of resident commercial and sport fishermen.

When the Board established the initial allocation in 1992 it found that Chinook was the most valuable species for both commercial and sport fisheries but each had other fish species available for harvest.²¹⁰ The Board also recognized that the sport fisheries may not be as directly dependent on the number harvested.²¹¹ Trollers today have no other fish species available to harvest that will produce enough income to support their businesses on a year to year basis. The Board should find that nonresident anglers and the businesses that serve them have other opportunities, whereas the troll fishery depends on access to its allocation during the critical August opener.

E. Importance of the Fishery to the State, Regional and Local Economy

When making allocation decisions, the Board must consider the importance of each fishery to the economy of the state and to the economy of the region and local area in which the fishery is located.²¹² Alaska's Congressional Delegation recognizes that the troll fishery employs hundreds of people – and is part of a way of life that has existed for generations.²¹³ The Alaska legislature recognizes that the troll fishery has the highest level of local ownership of any major fishery in the state – 85 percent, and sustains year-round fishing, seafood processing and other fishing-related jobs.²¹⁴ It is one of the most valuable fisheries in Southeast Alaska because it generates economic impacts of \$85 million worth of economic outputs, and offers affordable entry level opportunities for new fishers.²¹⁵

1. Southeast Alaska's Commercial Fisheries and Troll Economy

Appendix A to these comments provides a detailed overview of Southeast Alaska's commercial fishing economy. It also describes the Southeast Alaska salmon economy and the unique importance of the salmon fisheries for food and financial security in the region. Salmon have been a major driver of the Southeast Alaska culture, economy and governance for

²¹⁰ Alaska Board of Fisheries. 1993. Finding #93-142-FB.

²¹¹ *Id.*

²¹² AS § 16.05.251(e)(5), (6).

²¹³ Alaska Congressional Delegation. Amici Curiae Brief in Support of Intervenor-Defendants-Appellants' Motion for Stay Pending Appeal. *Wild Fish Conservancy v. Quan et al.* (9th Cir. Case: 23-35322, 06/02/2023).

²¹⁴ State of Alaska Legislature. 2023. Legislative Resolve No. 3. Urging the United States Secretary of Commerce, the National Marine Fisheries Service, the Alaska Department of Fish and Game, and other federal and state agencies to defend the state's fisheries, including the Southeast Alaska troll fishery.

²¹⁵ *Id.*; NMFS. 2024. Environmental Impact Statement. September 2024.

thousands of years. Many Southeast Alaskans continue to use historical fishing locations for personal- and community-use food fisheries.²¹⁶

Southeast Alaska is one of the most important fishing regions in Alaska, with more full-time fishery workers than any region other than the Bering Sea.²¹⁷ Juneau, Ketchikan, Petersburg and Sitka are consistently among the top 40 fishing ports in the U.S. based on landing volume and value.²¹⁸ In any given year, Craig, Haines, Wrangell and Yakutat may also be among the top 100 fishing ports by value.²¹⁹

In general, resident participation in Southeast Alaska fisheries is high. Residents own 2,655 fishing vessels – one-third of Alaska’s fishing fleet and more than any other region in the state.²²⁰ There are roughly 4,400 resident commercial fishermen (vessel owners and crew).²²¹ Petersburg (3rd, \$49 million), Sitka (4th, \$41 million), Juneau (8th, \$20 million) and Ketchikan (10th, \$16 million) are four of the top 10 fishing communities in Alaska in terms of resident earnings.²²² The top competitive strength is the high quality of Southeast Alaska seafood products, which include most of the Alaska harvest of Chinook salmon.²²³

Commercial fisheries are critical to nearly all Southeast Alaska’s 33 communities. Many of the more remote communities are historical fishing villages. In historical Alaska Native communities, residents of Yakutat and the Hoonah/Angoon Borough depend on commercial fishing.²²⁴ In the region’s three largest communities – Juneau, Ketchikan and Sitka – commercial fishing is a primary private sector small business generator and employer.²²⁵ The “mid-sized” Southeast Alaska communities of Haines, Petersburg and Wrangell are commercial fishing towns where over 1,000 individual resident fishermen,

²¹⁶ Fall, J. A., Turek, M. & Naves, L. 2009. Overview of amounts reasonably necessary for subsistence uses of salmon in Southeast Alaska. Division of Subsistence Special Publication No. BOF 2009-03, Anchorage, AK; Fall, J. A., Godduhn, A., Halas, G., Hutchinson-Scarborough, L., Jones, B., McDavid, B., Mikow, E., Sill, L.A., Wita, A. & Lemons, T. 2019. Alaska Subsistence and Personal Use Salmon Fisheries 2016 Annual Report. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 446, Anchorage, AK.

²¹⁷ McKinley Research Group. 2022. The economic value of Alaska’s seafood industry. January 2022. Available at: <https://mckinleyresearch.com/project/economic-value-of-alaskas-seafood-industry-2022/>.

²¹⁸ United Fishermen of Alaska. 2023. 2022 commercial fishing and seafood processing facts. Available at: <https://www.ufafish.org/fishing-facts/>.

²¹⁹ *Id.*

²²⁰ McKinley Research Group. 2022.

²²¹ McDowell Group. 2020. The economic value of Alaska’s seafood industry. Prepared for: Alaska Seafood Marketing Institute. Available at: https://www.alaskaseafood.org/wp-content/uploads/McDowell-Group_ASMI-Economic-Impacts-Report-JAN-2020.pdf.

²²² McKinley Research Group. 2022.

²²³ Rain Coast Data. Southeast Alaska by the numbers 2023. Prepared for: Southeast Conference. Available at: <https://www.seconference.org/wp-content/uploads/2023/09/SE-by-the-numbers-2023-Final.pdf>. Alaskans Own. Available at: <https://alaskansown.com/pages/seafood-species>; Seafood Producers Cooperative. Available at: <https://alaskagoldbrand.com/>.

²²⁴ United Fishermen of Alaska. 2023.

²²⁵ *Id.*

including crew, rely on a fleet of roughly 700 vessels.²²⁶ In most of these communities, at least ten percent of the population participates in commercial fisheries, with higher proportions in Petersburg, Sitka, Yakutat and the smaller remote communities.²²⁷

The troll fleet is diverse, including hand trollers (who use hand-powered downriggers or fishing rods), power trollers who sell iced fish to shore-based processing plants and tenders, and catcher-processors (small freezer boats, which harvest fish and freeze them at sea).²²⁸ Although the troll fishery is Southeast Alaska’s smallest salmon fishery by volume, the fishery’s ex-vessel value makes it the second highest value commercial fishery in Southeast Alaska.²²⁹ The troll fleet is the second largest fleet in Alaska, next to Bristol Bay, and the largest fleet in Southeast Alaska.²³⁰ Between 2011 and 2020 an average of 715 power trollers fished each year.²³¹ On average, from 2011-2020, 599 of the 715 active permits were local to Southeast Alaska.²³² These local fishermen earned \$28.5 million on average of the fisheries average \$33.3 million ex-vessel value (2013-2022).²³³ As shown below, Chinook also generate critical value for local processors:²³⁴

Year	2018	2019	2020	2021	2022	5 year avg.
Wholesale Volume	3,648,370	4,187,673	1,564,415	2,157,531	2,406,403	2,792,878
Wholesale Value	\$17,410,253	\$11,947,704	\$13,786,498	\$21,707,171	\$21,207,902	\$17,211,906

Trollers harvest mostly Chinook and coho salmon – roughly two-thirds of the regional harvest of both species.²³⁵ Since 1975, coho and Chinook salmon have comprised 51.4 percent and 43 percent of troll harvest value, respectively.²³⁶ Troll Chinook harvests averaged over 200,000 fish per year during the 2010s and were much lower than the 2000-2009 annual average of over 250,000 fish. The main reasons were declines in Alaska stocks and new restrictions under the Pacific Salmon Treaty limiting harvests of stocks from the Pacific

²²⁶ United Fishermen of Alaska. 2023.

²²⁷ *Id.*

²²⁸ Hagerman, G., Vaughn, M. & Priest, J. 2021. Annual management report for the 2020 Southeast Alaska/Yakutat salmon troll fisheries. Alaska Department of Fish and Game Management Report No. 21-17, Anchorage, AK.

²²⁹ NMFS. 2024. Environmental Impact Statement. September 2024.

²³⁰ City and Borough of Sitka. 2023. Resolution No. 2023-02. A resolution of the City and Borough of Sitka supporting the Southeast Alaska troll fishery

²³¹ Conrad, S. & Thynes, T. 2022. Overview of the 2021 Southeast Alaska and Yakutat commercial, personal use, and subsistence salmon fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 22-05, Anchorage, AK.

²³² Stern, C., Robbins, B. & Strong, D. 2021.

²³³ *Id.*; Conrad, S., and T. Thynes. 2024. Table 11; Alaska Commercial Fisheries Entry Commission. 2023. Southeast Alaska Salmon Permit & Fishing Activity by Year, State, Census Area, or City, 2022. Available at: https://www.cfec.state.ak.us/fishery_statistics/earnings.htm.

²³⁴ NMFS. 2024. Environmental Impact Statement. September 2024.

²³⁵ *Id.*

²³⁶ Stern, C., Robbins, B. & Strong, D. 2021

Northwest, which transit Southeast Alaska waters.²³⁷ ADF&G regulations intended to protect Southeast Alaska transboundary river stocks have limited both the areas and the seasons for spring and winter troll fisheries, reducing harvests and effort.²³⁸

2. Troll value to local and regional economies and community culture

Salmon fisheries are key to Southeast Alaska’s community identity and heritage, and provide a critical protein source that supports the health and wellbeing of residents.²³⁹ It is typical for a troll business to be a multi-generational family run business.²⁴⁰ The Board has long recognized the degree of dependence of many Southeast rural communities on income from the troll fishery.²⁴¹ According to NMFS, the troll fishery is “a pillar of the economy for many Southeast Alaska communities where there limited alternative economic opportunities.”²⁴²

There are numerous small, rural communities where much of the population relies on trolling as a primary or sole source of income and thus crucial for community resilience.²⁴³ Salmon trolling has long been one of the mainstays of Port Alexander’s economic existence.²⁴⁴ Residents of Prince of Wales Island Census area communities (Craig, Klawock, Thorne Bay, Coffman Cove, Hydaburg, Metlakatla and Kake) landed seventeen percent of the resident troll Chinook harvest and fifteen percent of total troll Chinook harvest value.²⁴⁵ Trollers from other communities frequent many of these ports weekly to deliver fish, refuel, purchase groceries and use other support services.²⁴⁶

The City of Pelican, where five of six City Council members and thirty percent of the residents are trollers, illustrates how essential the fishery is to small rural communities and their way of life.²⁴⁷ Pelican receives fifty percent of the raw fish tax for fish landed at the local plant – 10 percent of annual local revenue.²⁴⁸ That revenue supports schools, utilities, local infrastructure and other essential needs.²⁴⁹ Trollers from other communities rely on Pelican as a seasonal port where they deliver fish, pay moorage and purchase fuel, gear and food, supporting a substantial proportion of the local workforce, including forty processing

²³⁷ Hagerman, G., Vaughn, M. & Priest, J. 2021.

²³⁸ *Id.*

²³⁹ NMFS. 2024. Environmental Impact Statement. September 2024.

²⁴⁰ *Id.*

²⁴¹ Finding of the Board of Fisheries. Finding #93-142-FB.

²⁴² NMFS. 2024. Environmental Impact Statement. September 2024.

²⁴³ *Id.*

²⁴⁴ City of Port Alexander. 2023. Resolution 23-02. A resolution to support the Southeast Alaska Troll Fisheries

²⁴⁵ City of Craig. 2023. Resolution 23-03. A resolution advocating on the Wild Fish Conservancy Lawsuit.

²⁴⁶ NMFS. 2024. Environmental Impact Statement. September 2024.

²⁴⁷ Declaration of Patricia Philips. *Wild Fish Conservancy v. Rumsey et al.* Case No. 2:20-cv-00417. W.D. Wash. Filed October 14, 2022.

²⁴⁸ *Id.*

²⁴⁹ *Id.*

workers.²⁵⁰ The impacts of losing access to the August troll Chinook opening would occur throughout Southeast Alaska and hit hardest in these smallest communities and in Alaska Native communities.²⁵¹

According to NMFS:

...[T]he commercial troll fishery has an “outsized impact on Southeast Alaska tribal participants and their families, and their communities. Lingit and Xaadas people have called Southeast Alaska home since time immemorial, and salmon has been the foundation of culture the entirety of that time. Tribal citizens of the Central Council of Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) have fished the waters of Southeast Alaska for more than 10,000 years and continue to do so, including as commercial troll fishermen. Lingit, Xaadas and Tsmysen people used hook-and-line from their canoes when fishing for Chinook salmon. In some cases, four generations of one family have supported their household and the Southeast economy through a hook-and-line fishery. Now, many citizens of the tribe depend on the commercial troll fishery for their livelihood, with some Alaska Natives earning 60% to 70% of their income from the commercial troll fishery.”²⁵²

Multiple tribal governments have cited the importance of the extended seasonal opportunities to harvest Chinook, significant numbers of local permit holders, economic contributions to community well-being, and the need for job stability as cost of living increases in rural communities.²⁵³

Larger communities with more diversified economies also depend on substantial revenue from the troll fishery.²⁵⁴ For example, Sitka is a home port for nearly a third of the troll fleet (including vessels owned by residents of Washington State and other Alaska

²⁵⁰ *Id.*

²⁵¹ NMFS. 2024. Environmental Impact Statement. September 2024 (adding that “[s]almon fisheries are a lifeline for rural livelihoods, freezers and connectiveness across the region where families take great pride in being able to harvest and consume salmon”).

²⁵² *Id.*

²⁵³ Klawock Cooperation Association. 2023. Resolution 23-18. A Resolution of the Klawock Cooperative Association opposing the Wild Fish Conservancy Lawsuit to close 2023/winter/summer commercial troll fishery in Southeast Alaska; City and Borough of Yakutat, Alaska. 2023. Resolution 23-392, A resolution of the City and Borough of Yakutat, Alaska Assembly supporting the Alaska troll fishery; City of Hoonah. 2023. Resolution No. 23-02-02. A resolution supporting the Southeast Alaska Troll Fishery and urging the National Marine Fisheries Service and the Alaska Department of Fish & Game to commit the necessary resources to defend Alaska’s fisheries; Organized Village of Kake. 2023. Resolution No. 2023-04- Organized Village of Kake opposing The Wild Fish Conservancy Lawsuit to close 2023 winter/summer commercial troll fishery in Southeast Alaska; Sitka Tribe of Alaska. Tribal Council Resolution 2023-035. Encouraging State and Federal Action to Protect Commercial Troll Access to Chinook Salmon in Alaska waters.

²⁵⁴ NMFS. 2024. Environmental Impact Statement. September 2024.

communities).²⁵⁵ Trollers land forty percent of their total catch in Sitka.²⁵⁶ Sitka's 184 active permit holders earned \$12.6 million in 2022.²⁵⁷ Trolling contributes to the economy all year long, sustaining year-round fishing, processing and support sector jobs.²⁵⁸ The troll fishery's economic impact in Sitka alone is \$34 million per year.²⁵⁹ The region's other two largest communities, Juneau and Ketchikan, also identify the fishery as an important component of their local commercial fishing economies.²⁶⁰

The mid-sized central Southeast Alaska communities of Wrangell and Petersburg also have significant dependence on the troll fishery. Petersburg residents hold twenty-two percent of the Southeast Alaska troll permits.²⁶¹ 133 unique troll permit holders landed salmon there in 2021.²⁶² Salmon trolling has a total economic impact of \$4.25 million annually.²⁶³ Similarly, Wrangell has also cited the longer Chinook season as a major contributor to its economy and identifies the troll fishery as a key component of the community's \$27 million dollar, 581 job seafood economy.²⁶⁴

Transferring Chinook from the troll fishery to nonresident anglers would cause more harm than just direct loss of revenue from troll Chinook catches. Fewer downstream dollars from fishermen's earnings (fuel and grocery purchases, repairs, restaurant and other purchases) would flow into Southeast Alaska communities.²⁶⁵ Southeast Alaska resident harvests, as well as harvests by non-resident fishermen who function as locals during the season, significantly benefit local economies through spending on fuel, groceries, vessel repair and maintenance, and gear. This boosts local economies, with indirect employment and wage income that circulates through various other industries.²⁶⁶ These fishery economic

²⁵⁵ City and Borough of Sitka. 2023. Resolution No. 2023-02. A resolution of the City and Borough of Sitka supporting the Southeast Alaska troll fishery

²⁵⁶ *Id.*

²⁵⁷ *Id.*

²⁵⁸ *Id.*

²⁵⁹ *Id.*

²⁶⁰ City of Juneau. 2023. Resolution of the City and Borough of Juneau, Alaska. Serial No. 3023(b). A resolution of the City and Borough of Juneau opposing the Wild Fish Conservancy lawsuit and protecting the Southeast Alaska Troll Fishery from Closure; City of Ketchikan. 2023. Resolution No. 23-2874. A resolution of the Council of the City of Ketchikan, Alaska opposing the Wild Fish Conservancy lawsuit and protecting the Southeast Alaska Chinook salmon troll fishery from closure, and establishing and effective date.

²⁶¹ Borough of Petersburg. Petersburg Borough Resolution #2023-02. A resolution supporting the Southeast Alaska Troll Fishery and urging the National Marine Fisheries Service and the Alaska Department of Fish & Game to commit the necessary resources to defend Alaska's fisheries.

²⁶² *Id.*

²⁶³ *Id.*

²⁶⁴ City and Borough of Wrangell, Alaska. Resolutio No. 02-23-1756. A Resolution of the Assembly of the City and Borough of Wrangell, Alaska supporting the Alaska Trollers Association against a lawsuit to stop the Chinook salmon fishery in Southeast Alaska.

²⁶⁵ NMFS. 2024. Environmental Impact Statement. September 2024.

²⁶⁶ Watson, B., Reimer, M.N., Guettabi, M. & Haynie, A. 2021. Commercial Fishing and Local Economies. Institute of Social and Economic Research, University of Alaska Anchorage. Anchorage, AK.

multiplier effects on local economies are indispensable to a diverse range of businesses. Each dollar in resident fishery earnings generates \$1.54 in total community revenue and over seven jobs per \$1 million dollars in fishery earnings.²⁶⁷

3. Adverse economic impacts of August closure resulting from a quota transfer

During the summer season, fishery managers target a troll harvest of 70 percent of the annual summer Chinook salmon troll allocation in an initial opening beginning July 1st, which the agency manages in-season and closes once the harvest target is attained.²⁶⁸ The second opening typically occurs in August, sometimes extending into September.²⁶⁹ The second opening is a critical component of the troll season, and often is a fishers' last chance to earn income needed to make it through the winter into the next season. In other words, the several million-dollar loss incurred by fishermen and larger loss incurred by processors over the last two years due to the closure of the August troll Chinook fishery is significant in terms of community impacts. The nonresident anglers would have come to Alaska during May and June regardless of whether they could catch two or three Chinook, meaning that the loss of Chinook fishery income to Southeast Alaska communities was unnecessary and wasteful. The Board should find that the economics criterion weighs in favor of maintaining the eighty/twenty percent allocation and preventing nonresident anglers from "borrowing" troll quota so that the critical August opener is restored.

IV. Other considerations: increasing outside scrutiny of Alaska's Chinook fisheries and avenues toward limited entry for sport fish guides

It is a central tenet of sustainable fisheries management that each sector within a multi-participant fishery needs to stay within its conservation-based quota. This is of heightened importance at this time because of outside scrutiny of all Alaska Chinook fisheries. As previously mentioned, an anti-fishing group, the Wild Fish Conservancy, filed a lawsuit in 2020 seeking to shut down Southeast Alaska's troll fisheries based on a technical error in a NMFS environmental analysis.²⁷⁰ Although the lawsuit targeted only the troll fisheries, the ramifications could have closed all Southeast Alaska Chinook fisheries – and perhaps other fisheries targeting other salmon species.²⁷¹ The 9th Circuit eventually ruled against the Wild Fish Conservancy.²⁷²

This same group, however, has also recently filed a Petition to Designate Evolutionary Significant Units and List Alaskan Chinook Salmon (*Oncorhynchus tshawytscha*) under the Endangered Species Act. As NMFS recognized, the petition contained "numerous factual errors, omissions, incomplete references and unsupported

²⁶⁷ *Id.*

²⁶⁸ NMFS. 2024. Environmental Impact Statement. September 2024.

²⁶⁹ *Id.*

²⁷⁰ *Id.*

²⁷¹ *Id.*

²⁷² *Id.*

assertions and conclusions.”²⁷³ The errors were serious and it is unclear why NMFS issued a “positive 90-day finding” on the petition, which triggers a status review process during which NMFS will consider whether or not an Endangered Species Act listing is warranted – a process still ongoing as of the date of this comment letter.

ALFA has conducted “oppositional research” related to the Wild Fish Conservancy. The group has filed over twenty lawsuits in Washington State alone over the past two decades – against NMFS, the Washington Department of Fish and Wildlife, Washington Department of Ecology, and even against Pacific Northwest tribes seeking to restore Chinook populations in recently undammed rivers.²⁷⁴ The common theme of all these lawsuits is the group’s opposition to marine commercial, traditional tribal and sport fisheries and the use of hatcheries to provide harvest opportunities for these fishers and mitigate the impacts of past habitat loss or degradation on Chinook abundance.

Now that this group has set its sights on Alaska, it seems very important manage all fisheries within conservation-based quotas. Indeed, when the Board initially established the troll/sport allocations, it recognized that “management by fixed allocation to achieve a specific number of chinook harvested inseason will be less disruptive to US Canada Treaty negotiations” by assuring a match actual and projected sport catches and harvest and preventing overages that risk non-compliance with the Treaty.²⁷⁵ An additional concern is that allowing nonresidents to catch a higher proportion of Treaty fish on the outside coast during the spring means there is a shift in stock composition of harvested fish as well.

ALFA also requests that the board begin to explore limiting entry for the guided charter sector given the ongoing growth, exacerbated by uncertainties in the amount of harvest of the expanding bareboat rental sector. During the 1970s, the number of commercial salmon fishery participants was increasing at the same time as many salmon population were lower in abundance.²⁷⁶ The Alaska Legislature established limited entry programs for most major salmon fisheries by 1975 with assistance and support from many fishers.²⁷⁷ Further, limited entry programs can include other management tools, such as vessel size or gear restrictions that can enable further control of effort if needed.²⁷⁸

The Board’s “Sustainable Salmon Fisheries Policy Checklist” has a list of questions relevant to whether salmon management planning is consistent with Alaska’s Sustainable Salmon Policy, which seeks to protect Alaska fishing community well-being.²⁷⁹ Question 3

²⁷³ NMFS. 2024. Endangered and Threatened Wildlife; 90-day finding on a petition to list Gulf of Alaska Chinook salmon as Endangered or Threatened under the Endangered Species Act. 89 Fed. Reg. 45,815, 45,817.

²⁷⁴ Unpublished data, on file with ALFA.

²⁷⁵ Alaska Board of Fisheries. 2023. Finding #93-142-FB.

²⁷⁶ Twomley, B., 2001. Commercial Fishing License Limitation in the State of Alaska: A Controversial System of Grandfather Rights.

²⁷⁷ *Id.*

²⁷⁸ *Id.*

²⁷⁹ 5 AAC § 39.222(b).

asks if there is excess fishing capacity.²⁸⁰ ALFA submits that recent growth trends combined with quota overages suggest that that capacity concerns do exist. Question 6 asks whether there are regulatory actions needed that are outside the authority of ADF&G the board that may warrant correspondence with other entities, such as the chairs or appropriate legislative committees.

V. Conclusion

ALFA strongly opposes Proposals 108 and 113, which would transfer Chinook salmon from Alaska resident commercial fishermen and communities, who rely on the troll fishery for food and income in remote, rural communities, to nonresident anglers. Nonresident anglers have ample opportunities to catch multiple Chinook salmon elsewhere in the U.S. or Canada and can still enjoy the “Alaska experience” with lower harvest levels. In 2023 and 2024, there was no August Chinook retention troll opening because of nonresident angler harvest overages, costing commercial fishermen a significant and critical portion of their annual income and opportunity to set aside food for the winter. This scenario should not recur.

ALFA recognizes that existing proposals may change before or during the meeting as proposers will submit record copies. Because of the sunset provision, the Board will have to make some type of change to the King Salmon Management Plan. ALFA requests that Board: (1) maintain the fixed, 80/20 allocation between the sectors and make clear that the sport allocation is an annual harvest limit rather than an elusive average achieved over time; (2) uncouple the commercial fishery and sport allocations so that nonresident anglers cannot “borrow” fish from the troll quota and (3) preserve uninterrupted resident sport fishing opportunities by authorizing inseason management.

Thank you for reviewing our King Salmon comments. Below are ALFA’s comments on groundfish and “other” salmon.

²⁸⁰ See also 5 AAC 39.222(c)(3)(L) (directing the board to work with the commissioner and other agencies to develop processes for controlling excess fishing capacity).



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

January 4, 2025

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

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA promotes sustainable fisheries and thriving fishing communities through research, education, and policy engagement. ALFA was founded in 1978 to rebuild stocks overfished by foreign trawl fleets and promote fixed gear access to groundfish and halibut. Since then, our membership has expanded to include trollers, seiners, gillnetters, crabbers and shrimpers. Our members are community-based small boat fishermen who proudly deliver high quality seafood to coastal Alaska ports, supporting the rural coastal economies of Southeast Alaska and beyond.

ALFA will participate fully in the Southeast Board of Fisheries process. Because the Board of Fisheries meeting overlaps with the Annual Meeting of the International Pacific Halibut Commission, ALFA outreach director Emily Scott will participate in the groundfish component, and I will attend the Salmon component. We offer these written comments on specific groundfish proposals, proposal 156 (hatcheries), and a final in-depth section on the King Salmon Management plan for Southeast Alaska.

GROUND FISH

Proposal 191: ALFA supports this proposal to improve data collection

Proposal 193: ALFA understands that mortality is unlikely to decrease significantly with the allowed use of deep-water release mechanisms in the commercial fisheries, hence changes to the full retention requirement to allow deep water release will complicate enforcement and may reduce rockfish harvest accountability. That said, we remind the Board that thornyhead rockfish DO NOT have a swim bladder and therefore do not suffer barotrauma when brought to the surface. While we defer to the Department's position on this proposal, we ask that the Board consider allowing release of thornyhead rockfish in all fisheries.

Proposal 194: ALFA SUPPORTS proposal 194 and we WITHDRAW proposal 196. Our members who fish in the SE state water sablefish fisheries consider the current escape rings

size to be too large to be economically viable, particularly in SSEI. We support the Department's proposal to change escape ring size for sablefish pots fished in NSEI and SSEI from 3 ¾ to 3 ½ inches. We note that pot gear regulations for federal waters do not specify the size of escape rings, but we defer to research conducted by the Department to arrive at their recommendation for an escape ring size of 3 ½ inch. To quote the Department comments:

“Escape rings influence selectivity and capture efficiency of sablefish in pot gear by minimizing catch of immature fish, reducing discard mortality, and maximizing catch of larger, more desirable fish. The optimal escape ring size is based on sablefish size at maturity to ensure low catches of immature sablefish while maintaining high catch per unit of effort (CPUE) of mature sablefish. Estimated length at 50% maturity (L50) of sablefish is 63 cm in NSEI and SSEI waters. Research conducted in 2019 in Chatham Strait found that small changes in escape ring size significantly altered the selectivity of sablefish and that 3½ inches escape rings maximized catch rates of mature sablefish (length greater than or equal to 63 cm) while still allowing immature fish to escape when compared to the control (no escape rings) and 2 larger escape ring sizes (Sullivan et al. 2024).²⁸¹

Proposal 196: ALFA and SEAFA jointly submitted this proposal to modify sablefish pot gear escape rings, and we now WITHDRAW this proposal.

Proposal 197: ALFA supports this proposal. Clarification of this regulation will prevent accidental violations and clear separation of the commercial, sport, and personal use fisheries will assist with regulation enforcement.

Proposal 198. ALFA is **neutral** on this proposal, but we suggest that if the Board chooses to increase bag limits for resident sport at current abundance levels, that the action include a mechanism to lower bag limits to current levels if sablefish abundance falls below existing levels. We suggest that the Board consider indexing bag limit adjustments to the allowable biological catch (ABC) for NSEI as that trigger (no directly measured abundance estimates exist for the SSEI stock). The current ABC for NSEI is slightly above 1.8 million pounds.

We would also respectfully challenge the Departments comment that the Magnuson Act prevents the BOF from setting different sablefish bag limits for resident and non-resident sport fishermen in federal waters. Our understanding from NOAA is that the state MAY set different sablefish bag limits in federal waters because there currently are not federal regulations governing sport fishing in the EEZ. This differs from State or BOF authority relative to the Chinook, where management authority has been delegated to the State for federal waters. We hope this issue is clarified prior to BOF action on this proposal.

²⁸¹ https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2_staff-comments_12-30-24.pdf Page 75

Proposal 199: ALFA supports this Department proposal to allow season opening weather delays for the DSR and lingcod fisheries. Weather delays will improve safety

Proposals 200-201 ALFA supports these proposals to improve management of the lingcod fishery.

Proposal 202: With amendment or clarification, ALFA supports this proposal. The clarification should read: "only 1 operational unit of dinglebar troll gear may be deployed from the vessel at any time." This language will facilitate enforcement of the one line provision for active dinglebar fishing while allowing fishermen to have a second line ready to deploy if the active line becomes tangled or otherwise inoperable.

Proposal 203: This proposal highlights the management challenges posed across Southeast, virtually all species, by the rapid and ongoing increase in harvest by non-resident guided and "outfitted" sport fishermen. While resident sport and the largely resident commercial fisheries have not increased pressure on the resource, the non-resident guided and outfitted (assisted unguided) has increased dramatically, creating user conflicts and threatening to displace resident sport and commercial fishermen. We encourage the BOF to develop a definition for guided and outfitted fishing, and to aggressively limit the harvest by this insatiable sector.

Proposal 206: ALFA supports this proposal to increase resident harvest of yelloweye rockfish. We note that yelloweye and demersal shelf rockfish stocks have been increasing since 2021, yet the Department has precluded both a commercial fishery for DSR and resident sport harvest of yelloweye. While we understand the importance of conservative management for these long-lived species, we find the Department's closure of the resident sportfish fishery to be overly restrictive. To quote the Department's comments on this proposal:

If adopted, the proposed resident yelloweye rockfish mortality combined with the recent levels of resident DSR (non-yelloweye) mortality is estimated to be below the sport allocation of total DSR for SEO (Figure 206-3). The magnitude of the proposed resident yelloweye fishery in SEAK is estimated to be approximately 5,800 fish (18 mt) of which 2,500 fish (8 mt) represents SEO. When combined with the recent resident DSR (non-yelloweye) mortality in SEO (3 mt), the total DSR mortality for SEO (11 mt) will remain below the sport allocation (average 41 mt from 2017-2023). This magnitude of harvest is thought to be within sustainable harvest levels for all SEAK waters.²⁸²

²⁸² https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2_staff-comments_12-30-24.pdf Page 98

As established by this figure from the Department’s comments, the non-resident sport sector is driving the increase in harvest at the expense of stock conservation and the resident angler. As is evident across most if not all SE fisheries, the non-resident guided sport and outfitted sector is destabilizing the resource and resident fisheries, whether those resident fisheries are for commercial, sport or personal use. Again, conservative management of rockfish stocks is essential, but the data indicates this limited resident sportfish fishery is sustainable and will not jeopardize yelloweye stocks.

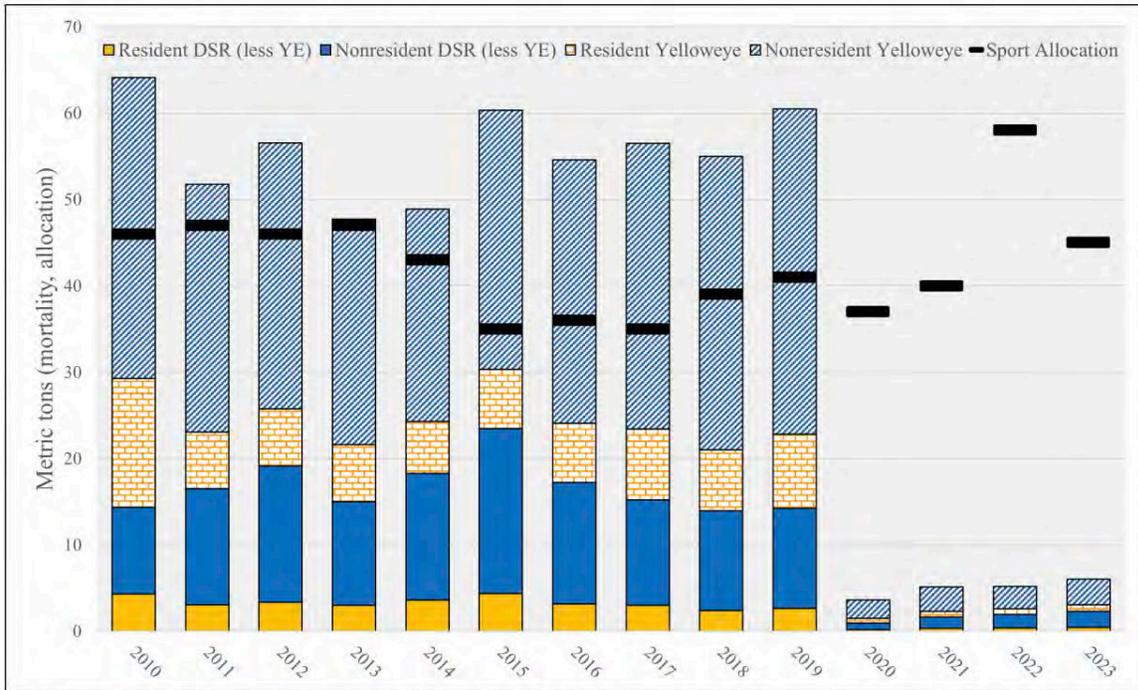


Figure 206-1.–Demersal shelf rockfish (DSR) total biomass mortality and allocation in the sport fishery from the Southeast Outside (SEO) subdistrict of Southeast Alaska, 2010–2023.

(Figure from ADFG staff comments page 98)

Proposals 207 and 208: ALFA **opposes** these proposals. Reopening the non-resident DSR fishery for non-yelloweye will place excessive pressure on non-yelloweye DSR stocks and is projected by ADFG to result in exceeding the OFL for this complex. Unless additional data suggest otherwise, these two proposals would undermine conservation of the DSR complex.

Proposal 209: ALFA supports this proposal from the Sitka Advisory Committee to provide preferential resident access to pelagic rockfish. The Department would be directed to restrict resident harvest only if the resident harvest exceeded 50% of the combined resident/nonresident pelagic rockfish harvest for 2 consecutive years. The Department did not identify a conservation concern and ALFA supports prioritizing resident access over non-resident to the pelagic rockfish complex.

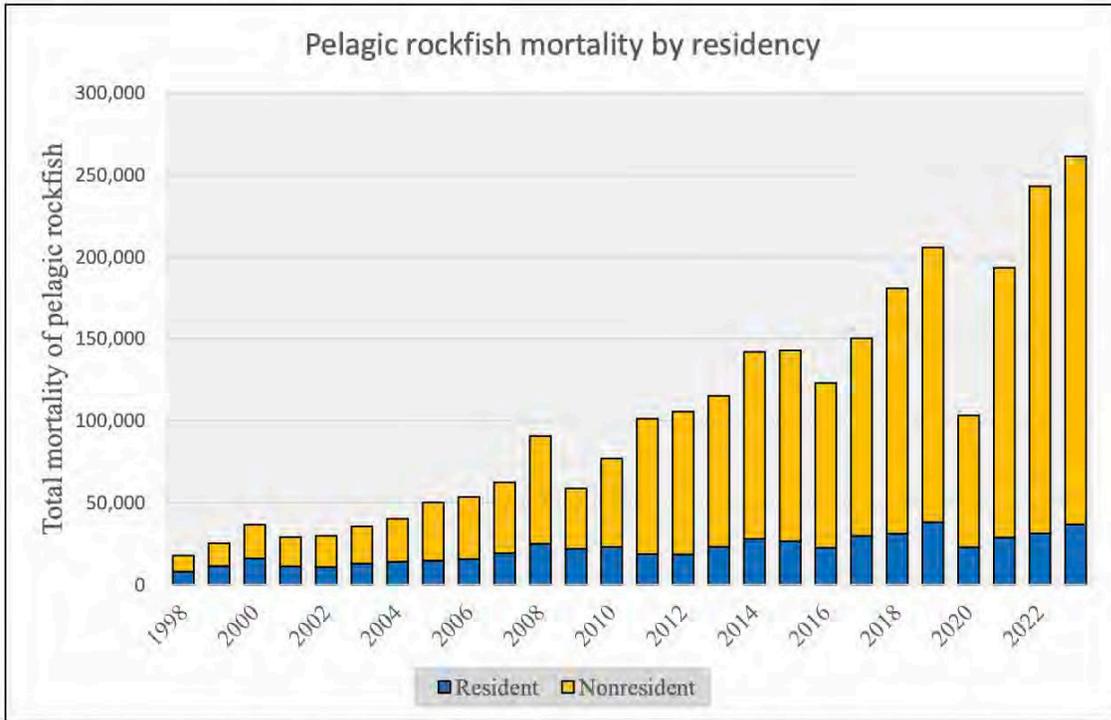


Figure 209-1.—Pelagic rockfish total mortality (numbers of fish) by residency in Southeast Alaska.

(Figure from ADFG staff comments Page 109)

Proposal 211: ALFA supports this proposal to clarify rockfish overage provisions. This clarifies that all rockfish bycatch overages may be retained for personal use or donation by CFEC permit holders fishing for groundfish or halibut. Current regulations do not specify that rockfish overages may be retained for personal use. Board members may recall that ALFA worked with the hook and line fleet for a decade to map areas of high rockfish bycatch rates to assist fishermen in avoiding overages. Current low levels of halibut abundance coupled with increasing abundance of rockfish has added to the challenge of balancing halibut and rockfish catch to prescribed levels, while rockfish bycatch in the sablefish fishery has decreased significantly.

Chum and Pink Salmon

Proposal 156: ALFA **opposes** this proposal. This proposal would dramatically reduce Southeast hatchery production for chum and pink salmon without providing an adequate scientific basis to justify the quantifiable and negative economic and social impacts. While ALFA recognizes the importance of continuing to evaluate threats to wild stocks as climate change warms our oceans and rivers, the focus on hatcheries seems like a red herring. From our research, salmon stocks are far more at risk from logging and rising river temperatures, mine waste leaching, and fluctuating precipitation regimes than they are from hatchery

production. Arbitrarily reducing hatchery production also begs the question of the reduction increasing harvesting pressure on wild stocks. In short, while the resource benefits from this proposal remain largely conjecture, the socioeconomic impacts to the fishing industry and fishing communities is tangible, quantifiable, and negative.

In closing, ALFA appreciates the Board's review of our groundfish and hatchery comments. I am happy to answer any questions on our positions in advance of, or during the Southeast meetings. Thank you for your service to the State and our fisheries.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken
Executive Director

Appendix B. Southeast Alaska's Commercial Fisheries Economy

Southeast Alaska is one of the most important fishing regions in Alaska, with more full-time fishery workers than any region other than the Bering Sea.²⁸³ Juneau, Ketchikan, Petersburg and Sitka are consistently among the top 40 fishing ports in the U.S. based on landing volume and value.²⁸⁴ In any given year, Craig, Haines, Wrangell and Yakutat may also be among the top 100 fishing ports by value.²⁸⁵ Resident earnings are high-level: Petersburg (3rd, \$49 million), Sitka (4th, \$41 million), Juneau (8th, \$20 million) and Ketchikan (10th, \$16 million) are four of the top 10 fishing communities in Alaska.²⁸⁶ The top competitive strength is the high quality of Southeast Alaska seafood products, which include most of the Alaska harvest of Chinook salmon.²⁸⁷ Small-boat fishermen harvest them one at a time and promptly process and chill them for rapid delivery to a local processor or freeze them at sea.²⁸⁸

Resident participation in Southeast Alaska fisheries is high. Residents own 2,655 fishing vessels – one-third of Alaska's fishing fleet and more than any other region in the state.²⁸⁹ There are roughly 4,400 resident commercial fishermen (vessel owners and crew).²⁹⁰ These fishermen's harvests support 41 shore-based processing facilities and 2,900 full-time-equivalent processing jobs.²⁹¹ Fisheries also support 1,100 government and hatchery management jobs and significant employment in the transportation, marine and academic sectors.²⁹² Economists estimate that direct and indirect economic output from Southeast Alaska seafood, including multiplier impacts, exceeds \$800 million annually and accounts for 15 percent of regional employment.²⁹³

²⁸³ McKinley Research Group. 2022. The economic value of Alaska's seafood industry. January 2022. Available at: <https://mckinleyresearch.com/project/economic-value-of-alaskas-seafood-industry-2022/>.

²⁸⁴ United Fishermen of Alaska. 2021. 2020 commercial fishing and seafood processing facts. Available at: <http://www.ucida.org/wp-content/uploads/2021/01/2020-UFA-Fish-Facts.pdf>; United Fishermen of Alaska. 2023. 2022 commercial fishing and seafood processing facts. Available at: <https://www.ufafish.org/fishing-facts/>.

²⁸⁵ *Id.*

²⁸⁶ McKinley Research Group. 2022.

²⁸⁷ Rain Coast Data. Southeast Alaska by the numbers 2023. Prepared for: Southeast Conference. Available at: <https://www.seconference.org/wp-content/uploads/2023/09/SE-by-the-numbers-2023-Final.pdf>.

²⁸⁸ Alaskans Own. Available at: <https://alaskansown.com/pages/seafood-species; Seafood Producers Cooperative. Available at: https://alaskagoldbrand.com/>.

²⁸⁹ McKinley Research Group. 2022.

²⁹⁰ McDowell Group. 2020. The economic value of Alaska's seafood industry. Prepared for: Alaska Seafood Marketing Institute. Available at: https://www.alaskaseafood.org/wp-content/uploads/McDowell-Group_ASMI-Economic-Impacts-Report-JAN-2020.pdf.

²⁹¹ McKinley Research Group. 2022.

²⁹² McDowell Group. 2020.

²⁹³ *Id.*

For local and state governments, commercial fisheries directly contribute substantial revenue through landing taxes and fisheries business taxes.²⁹⁴ Processors' business tax revenues go into Alaska's general fund, and the legislature then appropriates up to 50 percent of the revenue back into communities where processing occurred.²⁹⁵ Also, one-half of the landing tax is return-revenue to municipalities based on landing location.²⁹⁶

Commercial fisheries are critical to nearly all of Southeast Alaska's 33 communities. Many of the more remote communities, such as Edna Bay, Meyers Chuck, Point Baker, Port Protection, Port Alexander and Pelican, are historical fishing villages. Prince of Wales Island has 202 active fishing permit holders and 438 crew – roughly eight percent of the borough population – who earn \$20.4 million in ex-vessel revenue.²⁹⁷

Historical Alaska Native communities also rely heavily on Southeast Alaska's commercial fisheries. Eight percent of the Hoonah/Angoon Borough population is active in commercial fishing.²⁹⁸ Residents own 156 boats and 234 permits, earning \$5.3 million and generating jobs for a mostly local seafood processing work force.²⁹⁹ Yakutat is among the top 70 ports in the U.S. based on the value of commercial seafood landings.³⁰⁰ Twenty percent of its population is active in commercial fishing.³⁰¹

In the region's three largest communities – Juneau, Ketchikan and Sitka – commercial fishing is a primary private sector small business generator and employer. These communities have over 2,000 permit holders and crew – and 1,475 fishing boats.³⁰² They have 17 processors which collectively employ nearly 2,700 workers earning over \$50 million in wages.³⁰³ Sitka is Southeast Alaska's top seafood port and ranks 16th in the U.S. by seafood volume and value, producing 73.4 million pounds of seafood worth \$53.5 million in 2021.³⁰⁴ Roughly 10 percent of Sitka residents are active commercial fishermen.³⁰⁵

The “mid-sized” Southeast Alaska communities of Haines, Petersburg and Wrangell are commercial fishing towns. In 2021, Petersburg was the 21st ranked port by seafood volume and 33rd by value in the U.S. It landed 44.3 million pounds of seafood worth \$38.3 million.³⁰⁶ Petersburg's active resident permit holders earned \$66.5 million from local, Gulf of Alaska and

²⁹⁴ *Id.*

²⁹⁵ United Fishermen of Alaska. 2021. Alaska Seafood Industry Taxes and Fees. Juneau, AK. Available at: <https://www.ufafish.org/wp-content/uploads/2015/02/4a-Alaska-Seafood-Industry-Taxes-Fees-021115-v1s.pdf>.

²⁹⁶ *Id.*

²⁹⁷ United Fishermen of Alaska. 2023.

²⁹⁸ United Fishermen of Alaska. 2023.

²⁹⁹ *Id.*

³⁰⁰ *Id.*

³⁰¹ *Id.*

³⁰² *Id.*

³⁰³ *Id.*

³⁰⁴ *Id.*

³⁰⁵ *Id.*

³⁰⁶ *Id.*

Bristol Bay fisheries in 2021, the third-highest fishing earnings among Alaska communities and highest in Southeast Alaska. Nearly one-quarter of Petersburg residents are active fishermen.³⁰⁷ Wrangell and Haines both rank among the nation's top 100 fishing ports in some years.³⁰⁸ In these three communities, over 1,000 individual resident fishermen, including crew, rely on a fleet of roughly 700 vessels. The fleet generated roughly \$98 million in fishing income in 2021.³⁰⁹ Seafood landed in these communities supported nearly 900 processing jobs, and created over \$14 million in wages.³¹⁰

TABLE 1: 2022 ALL FISHERY LANDINGS BY SOUTHEAST ALASKA RESIDENTS

	Borough	Active Permits	Pounds	Ex-vessel value
	Haines	80	6,295,000	\$9,470,000
	Hoonah	87	2,401,000	\$5,138,000
	Juneau	308	13,157,000	\$25,047,000
	Ketchikan	278	23,625,000	\$24,664,000
	Petersburg	604	44,561,000	\$67,797,000
	Prince of Wales	288	16,457,000	\$19,453,000
	Sitka	639	39,737,000	\$60,874,000
	Skagway	6	193,000	\$317,000
	Wrangell	204	10,006,000	\$12,597,000
	Yakutat	123	1,786,000	\$6,090,000
	All Alaska	2,617	158,218,000	\$231,447,000

Salmon (xáat in Tlingit) are the most important commercial fish species and have been a major driver of the Southeast Alaska culture, economy and governance for thousands of years.³¹¹ The location of salmon streams, particularly the most productive sockeye systems, was a major influence on the distribution of different clan territories.³¹² Each clan monitored salmon streams, measuring escapements and developing abundance thresholds that informed the timing, location, and volume of harvest.³¹³ Most of the harvests occurred

³⁰⁷ *Id.*

³⁰⁸ United Fishermen of Alaska. 2021.

³⁰⁹ United Fishermen of Alaska. 2023.

³¹⁰ *Id.*

³¹¹ Langdon, S. 2006.

³¹² Carothers, C., et al.; Langdon, S.J. 2015.

³¹³ *Id.*

between late spring and early fall at fish camps using fishing gear that included traps, spears, harpoons and gaff hooks.³¹⁴ Clans introduced salmon to previously unoccupied streams and developed late-fall chum runs.³¹⁵ They also maintained productive stream habitats by removing blockages, such as landslides, fallen trees and beaver dams, managed predators, and enhanced salmon spawning beds.³¹⁶ This management system sustained Southeast Alaska's large salmon runs for thousands of years.³¹⁷

Many Southeast Alaskans continue to use historical fishing locations for personal- and community-use food fisheries.³¹⁸ In many communities, including Angoon, Hydaburg, Hoonah, Kake and Yakutat, roughly one in every 10 residents participated in personal-use food fisheries.³¹⁹ Recent annual average harvests were 57,000 salmon.³²⁰ In 2016, over 2,000 Southeast Alaska fishermen harvested salmon for personal and community food using subsistence permits issued by the Alaska Department of Fish and Game.³²¹

These salmon runs, sustained by centuries of tribal management, today support one in 10 jobs in Southeast Alaska, where commercial, sport and subsistence salmon fisheries can produce \$1 billion in economic outputs during a strong season.³²² It is the region's most abundant and valuable harvested seafood species and comprises between 60 and 70 percent of the total seafood productivity in any year.³²³ There are five commercial salmon fisheries in the region: purse seine, drift gillnet, set gillnet, hand troll and power troll.³²⁴ They harvest all five Pacific salmon species. Since 1975, pink salmon have generated one-third of the harvest value; chum salmon and coho salmon have each generated over 20 percent; and Chinook and sockeye salmon each 13 percent.³²⁵ Purse seine fisheries catch over 70 percent of the total Southeast Alaska salmon fishery volume each year: roughly 90 percent of the

³¹⁴ Fall, J. A., Turek, M. & Naves, L. 2009. Overview of amounts reasonably necessary for subsistence uses of salmon in Southeast Alaska. Division of Subsistence Special Publication No. BOF 2009-03, Anchorage, AK.

³¹⁵ Carothers, C., et al.; Langdon, S.J. 2015.

³¹⁶ *Id.*

³¹⁷ *Id.*

³¹⁸ Fall, J. A., Turek, M. & Naves, L. 2009.

³¹⁹ Fall, J. A., Godduhn, A., Halas, G., Hutchinson-Scarborough, L., Jones, B., McDavid, B., Mikow, E., Sill, L.A., Wita, A. & Lemons, T. 2019. Alaska Subsistence and Personal Use Salmon Fisheries 2016 Annual Report. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 446, Anchorage, AK.

³²⁰ *Id.*

³²¹ Fall, J. A., et al. 2019.

³²² U.S. Forest Service. 2017. Tongass Salmon Fact Sheet. Alaska Region, R10-PR-40.

³²³ McKinley Group. 2022; McDowell Group. 2020.

³²⁴ Stern, C., Robbins, B. & Strong, D. 2021. CFEC Permit holdings and estimates of gross earnings in the Yakutat and Southeast Alaska commercial salmon fisheries, 1975-2020. CFEC Report Number 21-4N, December 2021 (Revised January 2022). Juneau, AK.

³²⁵ *Id.*

pinks and one-half the chum.³²⁶ Gillnetters harvest a mix of all five salmon species; sockeye and chum salmon have comprised, over time, three-fourths of that fishery’s value.³²⁷

TABLE 2 : SOUTHEAST ALASKA SALMON HARVESTS AND VALUE (MILLIONS OF DOLLARS) 2020-2023³²⁸

	Chinook	Sockeye	Coho	Pink	Chum	Total
Avg. Catch 2011-2020	271,468	1,074,723	2,393,262	33,811,239	10,008,115	47,532,032
Avg. Value 2017-2019	\$13.2	\$7.9	\$17.6	\$25.3	\$64.7	\$132.0
Avg. Price/lb 2017-2019	\$6.76	\$1.94	\$1.67	40.33	\$0.74	---
2020 Catch	200,277	373,458	1,102,285	7,969,459	4,656,485	14,301,964
Value	\$13.5	\$2.6	\$12.2	\$6.2	\$15.7	\$50.1
Price/lb.	\$5.65	\$1.29	\$1.74	\$0.22	\$0.45	---
2021 Catch	216,338	1,117,597	1,505,569	48,212,277	6,988,703	58,040,484
Value	\$15.2	\$11.4	\$17.9	\$48.1	\$39.6	\$132.3
Price/lb.	\$6.17	\$1.80	\$2.11	\$0.36	\$0.84	---
2022 Catch	257,103	1,161,359	1,240,499	17,557,187	9,382,534	29,598,682
Value	\$16.2	\$13.2	\$13.0	\$22.5	\$79.2	\$144.0

³²⁶ Thynes, T., Bednarski, J.A., Conrad, S.K., Dupuis, A.W., Harris, D.K., Meredith, B.L., Piston, A.W., Salomone, P.G. & Zeiser, N.L. 2021. Annual management report of the 2020 Southeast Alaska commercial purse seine and drift gillnet fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 21-30, Anchorage, AK.

³²⁷ Thynes, T., Bednarski, J.A., Conrad, S.K., Dupuis, A.W., Harris, D.K., Meredith, B.L., Piston, A.W., Salomone, P.G. & Zeiser, N.L. 2022. Annual management report of the 2021 Southeast Alaska commercial purse seine and drift gillnet fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 22-25, Anchorage, AK; Stern, C., Robbins, B. & Strong, D. 2021.

³²⁸ Stern, C., Robbins, B. & Strong, D. 2021. Alaska Department of Fish and Game harvest values summaries.

Available at:

[2021 Preliminary Alaska Commercial Harvest and Exvessel Values:](#)

[2022 Preliminary Alaska Commercial Harvest and Exvessel Values:](#)

https://www.adfg.alaska.gov/static/fishing/pdfs/commercial/2023_preliminary_salmon_summary_table.pdf.

Price/lb.	\$5.54	\$1.98	\$1.84	\$0.34	\$1.18	---
2023 Catch	184,083	882,188	1,519,610	47,645,891	15,508,87	65,737,799
Value	\$12.7	\$5.5	\$11.8	\$33.9	\$53.2	\$117.1
Price/lb.	\$6.31	\$1.09	\$1.40	\$0.23	\$0.53	--

Local vessel owners predominate in Southeast Alaska’s salmon fisheries. In 2022, over 80 percent of nearly 1,000 active vessels in the troll and gillnet fisheries were operated by Alaska residents.³²⁹ They also harvested over 80 percent of the 40-million-pound catch from the two fisheries, earning \$55 million – 85 percent of the value from the two fisheries.³³⁰ Residents of Washington State are the most significant fishery participants from outside Alaska, particularly the seine fishery.³³¹

Salmon comprises 70 percent of Southeast Alaska’s seafood value for the processing sector.³³² First wholesale value is the dollar value of processed seafood products sold by processors.³³³

In the 2023 troll fishery, 550 power troll and 152 hand troll permit holders (781 total permits) harvested 143,000 Chinook, 1.1 million coho, and 357,000 chum salmon.³³⁴

³²⁹ Alaska Commercial Fisheries Entry Commission. 2023. Southeast Alaska Salmon Permit & Fishing Activity by Year, State, Census Area, or City, 2022. Available at: https://www.cfec.state.ak.us/fishery_statistics/earnings.htm.

³³⁰ *Id.*

³³¹ *Id.*

³³² NMFS. 2024. Environmental Impact Statement. September 2024.

³³³ NMFS. 2024. Environmental Impact Statement. September 2024.

³³⁴ Conrad, S., and T. Thynes. 2024. ADF&G Fishery Management Report No. 24-19.

Submitted by: Brian Weddel
Alaska Native Sisterhood Camp 4

Community of Residence: Sitka

I strongly support Proposal 173-181,188-190. I oppose 182 &183. I would like to see herring stocks return to the numbers that were present in the 1980s.

Submitted by: Rod Arno
Alaska Outdoor Council

Community of Residence: Palmer Alaska

The Alaska Outdoor Council (AOC) is a statewide federation of thousands of Alaskans who choose to gather their own fish and game food sources as safe and economically as possible on public lands and waters in Alaska.

AOC supports Board adoption of Proposals #224 and #225. Near shore locations for Alaskans to harvest shellfish for either subsistence, personal use, or sport should have a priority over commercial shrimp harvest. Reverting the shrimp pot season back to fall will benefit Alaskans consistent with AS 16.05.251(c)(1) through (7).

AOC oppose Board adoption of Proposals #258 and #259. Again, for the same reasons as opposing Proposals 224/225, near shore waters that are easily, safely, and more economically accessible by a number of Alaskans to harvest their own fish stocks should be kept available for their use until such time as a conservation concern arises.

AOC membership want to continue to harvest their own King Salmon In Southeast Alaska waters. AS 16.05.251(c) authorizes the members of the Alaska Board of Fisheries to allocate all the harvestable surplus of King Salmon after meeting subsistence uses under AS 16.05.258.

AOC supports board actions to favor allocation of King salmon harvest to individual Alaskans who harvest their own and commercial harvest by gear types with the least bycatch and distribution of the sea floor.

AOC will participate in Committee on Proposals 104-121 in Ketchikan and review RC proposed amendments and will only speak to the board if they actually have new information.

November 20, 2024

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

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

Dear Chair Carlson-Van Dort and Board Members:

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

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

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

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

juvenile sockeye, and 4. Negative effects of juvenile pink salmon on juvenile sockeye. Not surprisingly, sea temperature was found to influence juvenile sockeye biomass (hypothesis 1), but *Calanus* copepod abundance did not explain variation in annual biomass and distribution of juvenile sockeye (hypothesis 2).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

⁵ North Pacific Anadromous Fish Commission report

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

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

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

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

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

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

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

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

⁸ Alaska Salmon Research Task Force Report NOAA 2024

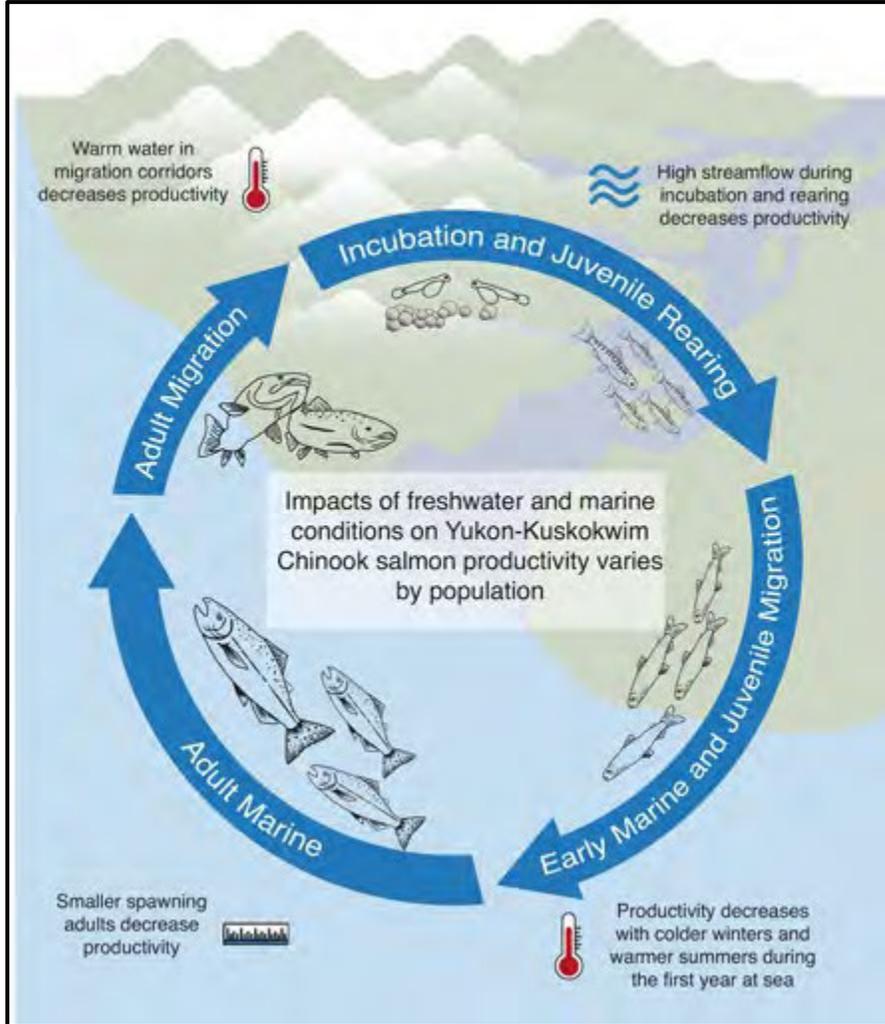


Figure 7. from **Feddern et.al.** 2024 journal article: *Body size and early marine conditions drive changes in Chinook salmon productivity across northern latitude ecosystems*

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

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

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

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

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

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

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

Douglas Island Pink & Chum
Katie Harms, Executive Director

Addendum PC 4 Upper Cook Inlet Meeting

To: Alaska Board of Fisheries
UCI Meeting February 23 – March 6, 2024

February 8, 2024

From: PNP Alaska Hatchery Group

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

Dear Chair Wood and Board Members:

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

I. Introduction

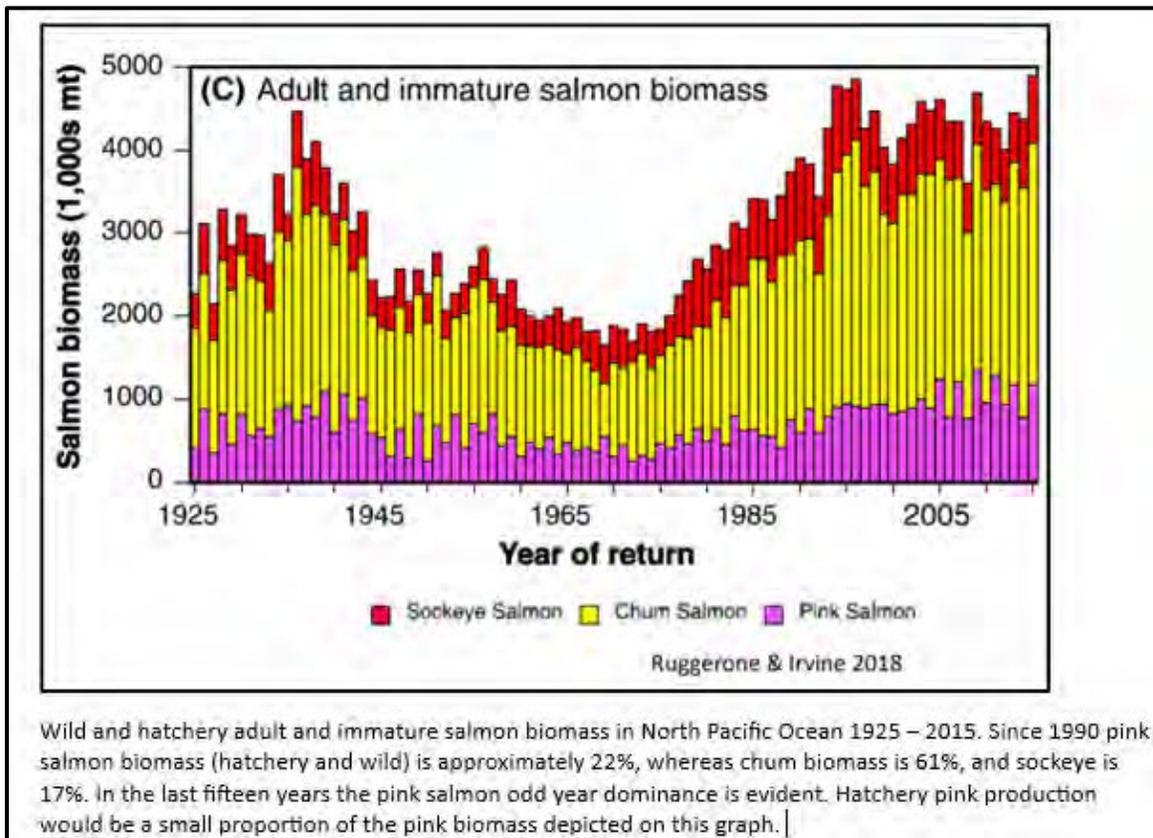
The two research papers for consideration are *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems*, Ruggerone et.al., and *Global Synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*, McMillan et.al. These papers are dense with historical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

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

Abundance vs Biomass

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

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



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

Wild Pink vs Hatchery Pinks

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

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

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

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

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

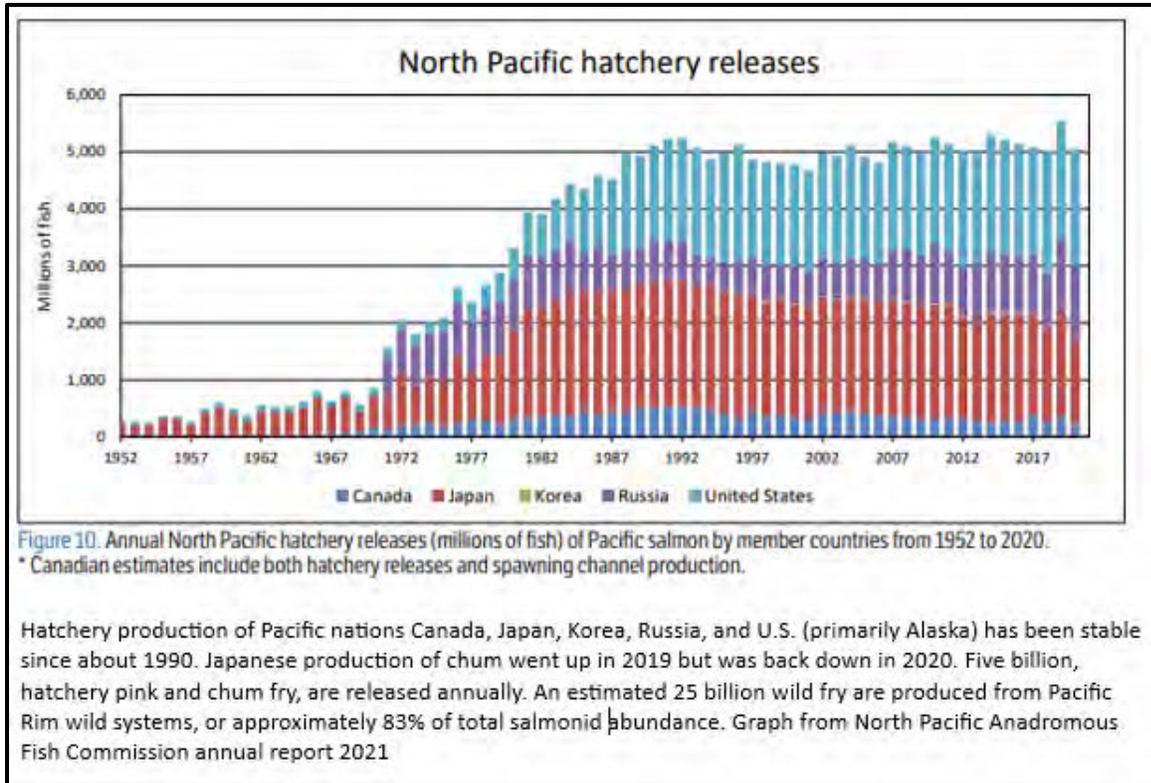
Approximately 39% of all North Pacific pink salmon, 22% of chum salmon, and 69% of sockeye salmon are produced in Alaska (combining wild and hatchery) production while most of the remaining quantities are produced by Japan and Russia. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye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

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

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

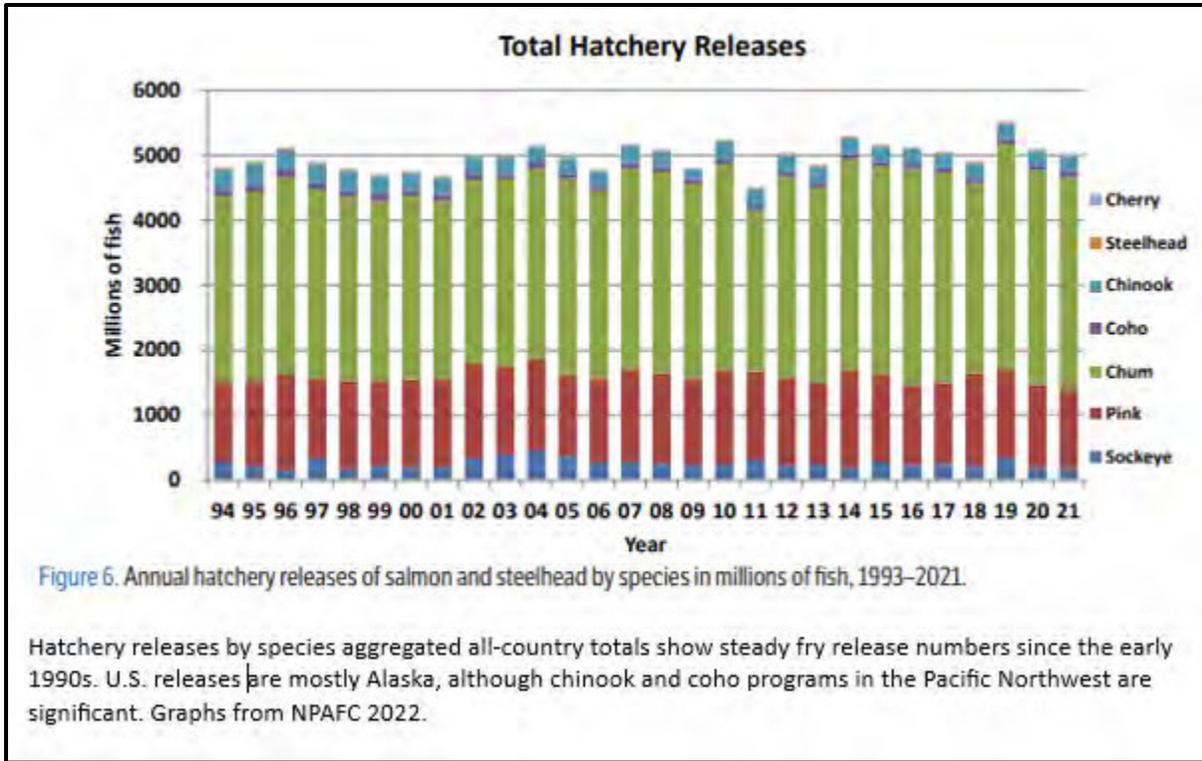
Hatchery Production by Country of Origin

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



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

⁵ <https://www.npafc.org/>



II. Review/Discussion

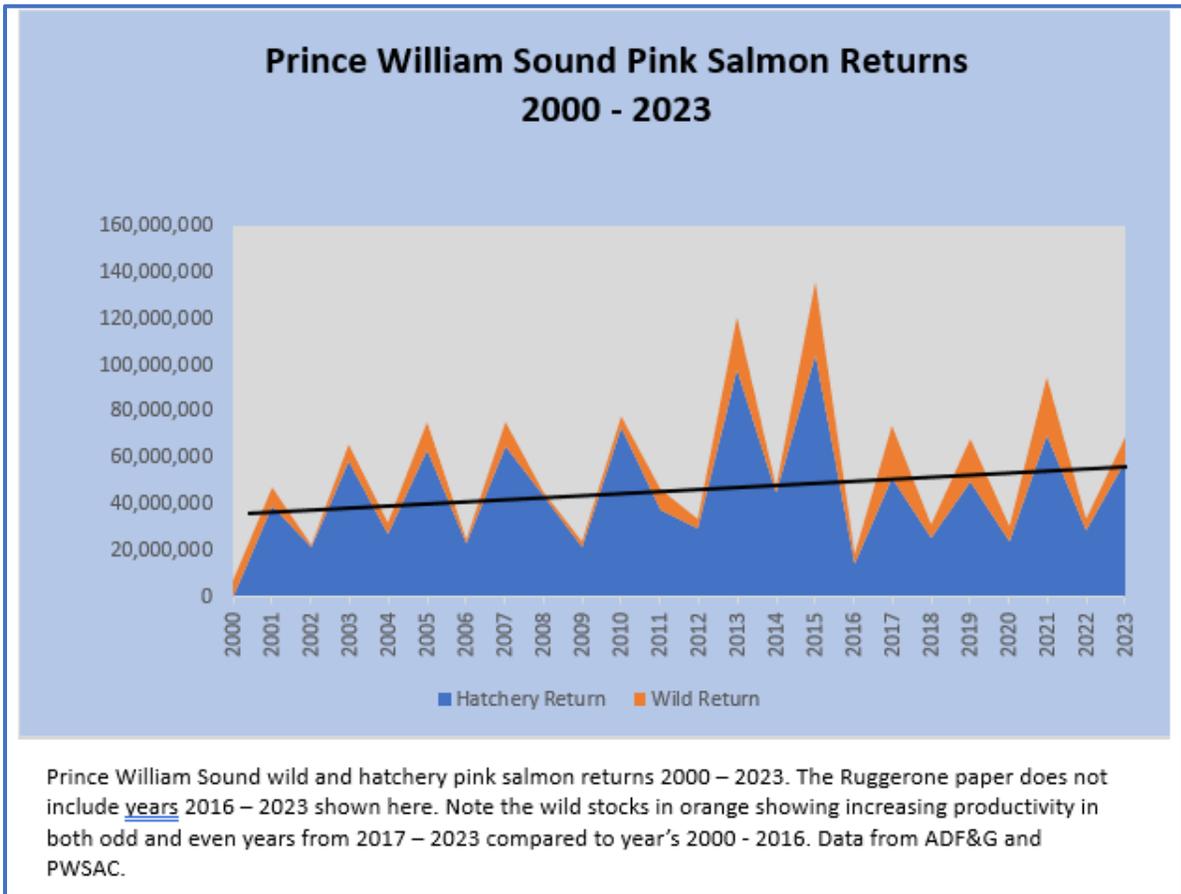
Ruggerone et.al. *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems, Ruggerone et.al.*⁶

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

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

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

pink salmon fry in the North Pacific is proportionally 85%, with hatchery pink salmon making up the remaining 15%.⁸ Therefore the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%. Unfortunately, this fact seems to be misrepresented, or ignored when the original study is discussed in the press and public forums. Regardless, major data sets, such as the one presented by Ruggerone, provide valuable insights. The paper does not argue a negative causal relationship between hatchery salmonids and wild salmonids, but rather synthesizes existing data sets to identify patterns and processes that may reveal how hatchery salmonids can potentially affect wild salmonids. To counter this notion, let's consider the actual data for Prince William Sound pink salmon. If we add Ruggerone's study to the five intervening years, wild pink salmon show an increasing productivity trend.



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

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

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

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

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

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

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

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

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

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

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

¹² <https://www.npafc.org/>

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

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

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

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

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

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

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

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

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

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

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

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

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

III. Alternative Research and Perspectives

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

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

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

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

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

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

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

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

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

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

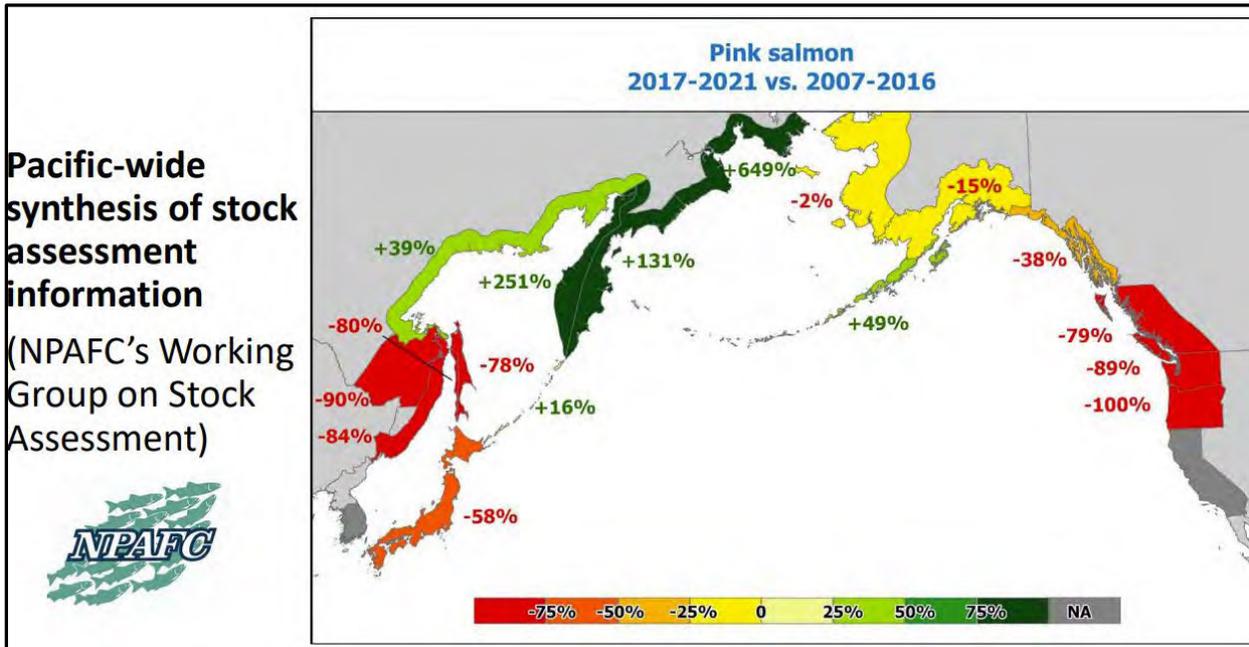
¹⁹ Howard K., Alaska Department of Fish and Game, October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research*. Presentation to Board of Fish

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

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

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

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

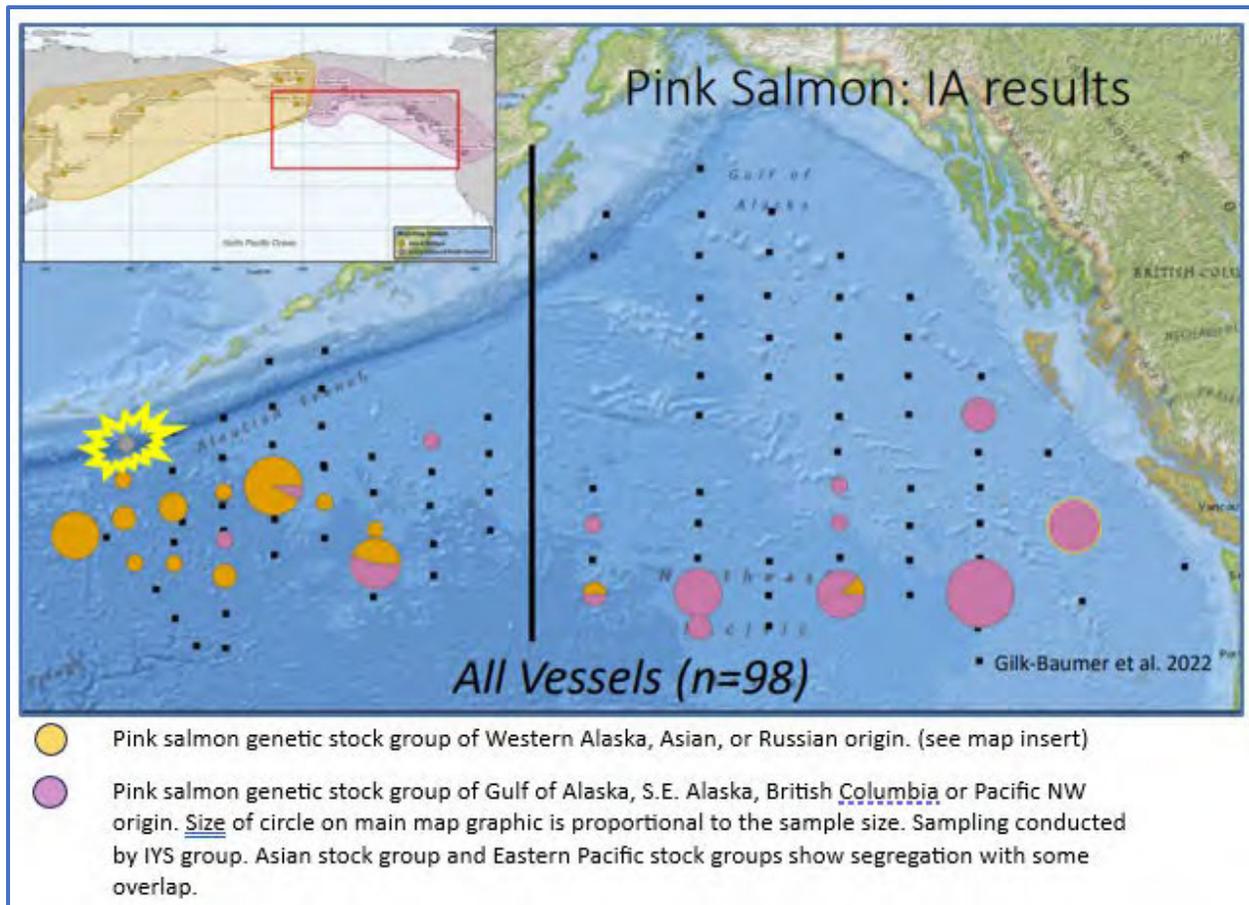


The Pacific Ocean, a vast expanse, is not uniform in terms of productivity, climate, temperature, and biological parameters. Evidence from the study of the Pacific Decadal Oscillation (PDO)²²

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From the abstract of the paper

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Orsi J., 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions³¹

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

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

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

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

Strait, a regional salmon migration corridor, in May, June, July, August, and September of 2001. These data included a temperature (1-m surface versus surface to 20-m average), zooplankton standing crop (surface to 20-m depth versus entire water column), chum salmon diet (percent weight of prey type consumed), energy densities, and weight. Known numbers of hatchery releases were used in a cohort reconstruction model to estimate total abundance of hatchery and wild chum salmon in the northern region of southeastern Alaska, given average survival to adults and for two different (low and high) early marine littoral mortality rate assumptions. **Total prey consumption was relatively insensitive** to temperature differences associated with the depths potentially utilized by juvenile chum salmon. However, the magnitudes and temporal patterns of total prey consumed differed dramatically between the low and high mortality rate assumptions. Daily consumption rates from the bioenergetics model and CPUE abundance from sampling in Icy Strait were used to estimate amount and percentage of zooplankton standing crop consumed by mixed stocks of chum salmon. We estimated that only **a small percentage of the available zooplankton was consumed by juvenile chum salmon**, even during peak abundances of marked hatchery and unmarked mixed stocks in July. Total daily consumption of zooplankton by all stock groups of juvenile chum salmon was estimated to be between 330 and 1764 g/km²d⁻¹ from June to September in the neritic habitat of Icy Strait. As with any modeling exercise, model outputs can be misleading if input parameters and underlying assumptions are not valid; therefore, additional studies are warranted, especially to determine physiological input parameters, and to improve abundance and mortality estimates specific to juvenile chum salmon. Future bioenergetics modeling is also needed to evaluate consumption by the highly abundant, vertically migrating planktivores that co-occurred in our study; we suggest that these fishes have a greater impact on the zooplankton standing crop in Icy Strait than do hatchery stock groups of juvenile chum salmon.

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

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

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

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

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

V. Precautionary approach

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

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

VI. Concluding Remarks

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

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

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

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

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

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Northern Southeast Regional Aquaculture Association
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Southern Southeast Regional Aquaculture Association
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Douglas Island Pink & Chum
Katie Harms, Executive Director

November 20, 2024

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

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

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

Dear Chair Carlson-Van Dort and Board Members:

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

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

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

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

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

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

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

⁵ Proposals 78 & 156 paragraph five

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

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

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

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

“5 AAC 24.370 (a) The purpose of the management and allocation plan contained in this section is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups. It is the intent of the Board of Fisheries (board) to allocate enhanced salmon stocks in the Prince William Sound Area to maintain the long-term historic balance between competing commercial users that has existed since statehood, while acknowledging developments in the fisheries that have occurred since this plan went into effect in 1991.”

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

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

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

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

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

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

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

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

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

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

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

¹¹UCI Board of Fish meeting testimony February 26, 2024, 11:01 a.m. to 11:25 a.m.
<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2023-2024/uci-2/index.html?mediaBasePath=/Meeting%202022-26-24%20%282%29%20%28Feb-26-24%204-25-18%20PM%29>

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

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

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

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

¹² Critique of Synthesis Papers

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

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

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

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

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

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

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

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

No new hatchery permitted pink and chum egg production, 2019

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

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

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

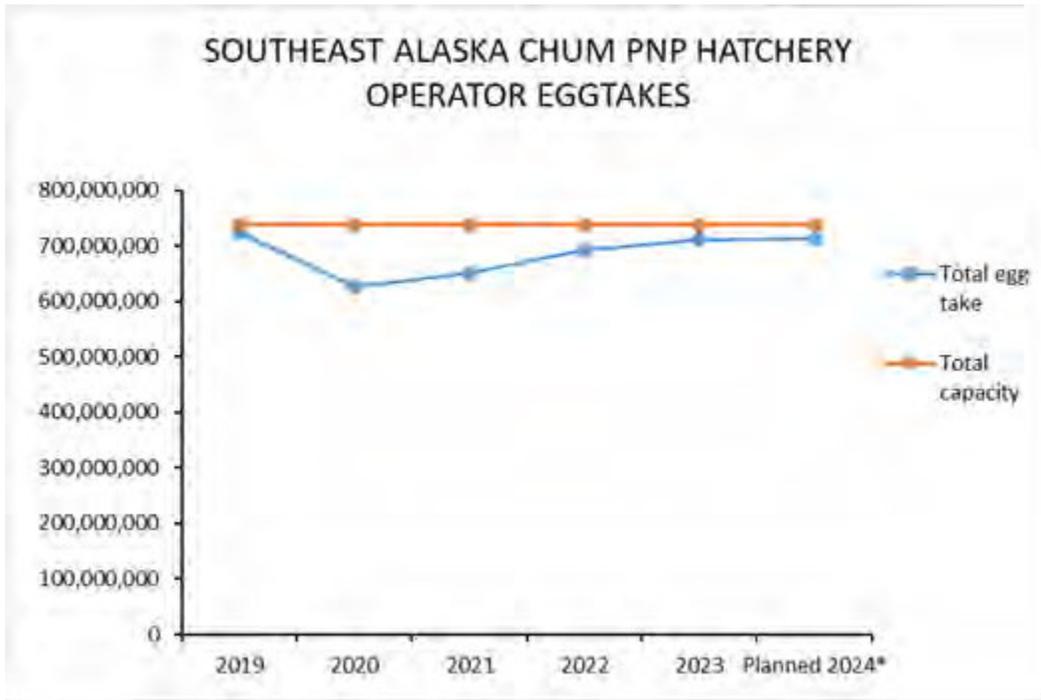


Figure 1. Southeast Alaska all hatchery facilities aggregated permitted chum egg capacity from 2019 to 2024, except Annette Island Indian Reservation (Tamgas Creek Hatchery). Note stability in permitted capacity (dotted orange line at top) since 2019 and egg take numbers (dotted blue line) which are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

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

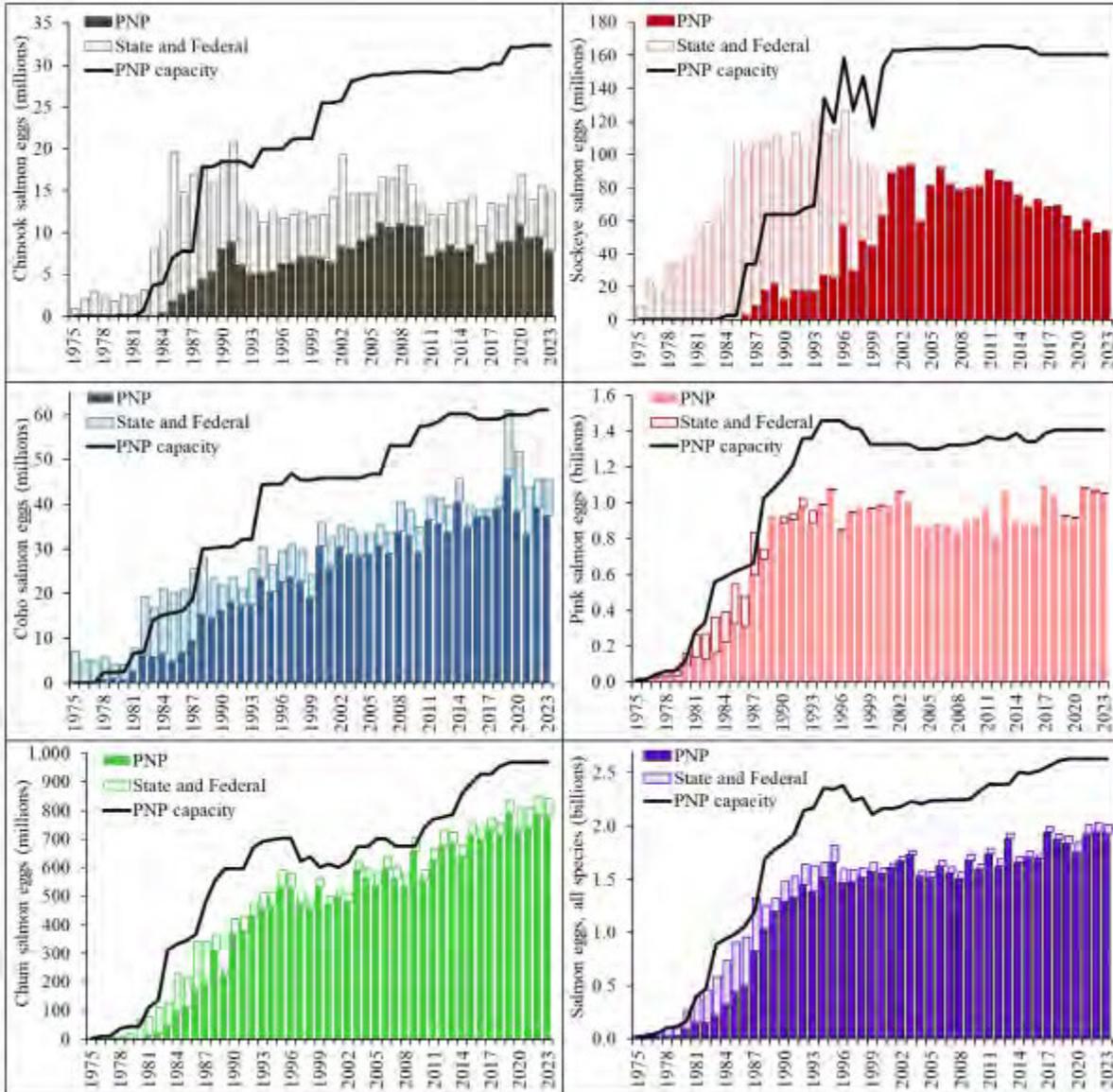


Figure 2. Graphic from Alaska salmon fisheries enhancement annual report, 2023 (pg. 24 figure 8). Bars denote hatchery salmon eggs collected by PNP, state, and federal hatcheries, and PNP hatchery permitted capacity (black line) by species and total, 1975–2023. Difference between bars and capacities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

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

Sincerely

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

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

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

Douglas Island Pink & Chum
Katie Harms, Executive Director

Board of Fisheries

October 15-16, 2018

Work Session Anchorage, Alaska

Dear Chairman Jensen and Board of Fish Members:

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

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

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

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EXECUTIVE SUMMARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

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

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

II. Trends in Harvest of Alaska Salmon

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

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

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

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

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

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

III. Ocean Conditions and Carrying Capacity

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

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

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

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

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

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

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

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

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

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

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

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

to PWS was the lowest since 1993.

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

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

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

IV. Trophic Position of Salmon in the North Pacific Ecosystem

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

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

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

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

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

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

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

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

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

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

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

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

V. Competition and density dependence versus density independent responses

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

VI. Conclusions

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

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

Authors

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

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

Figures

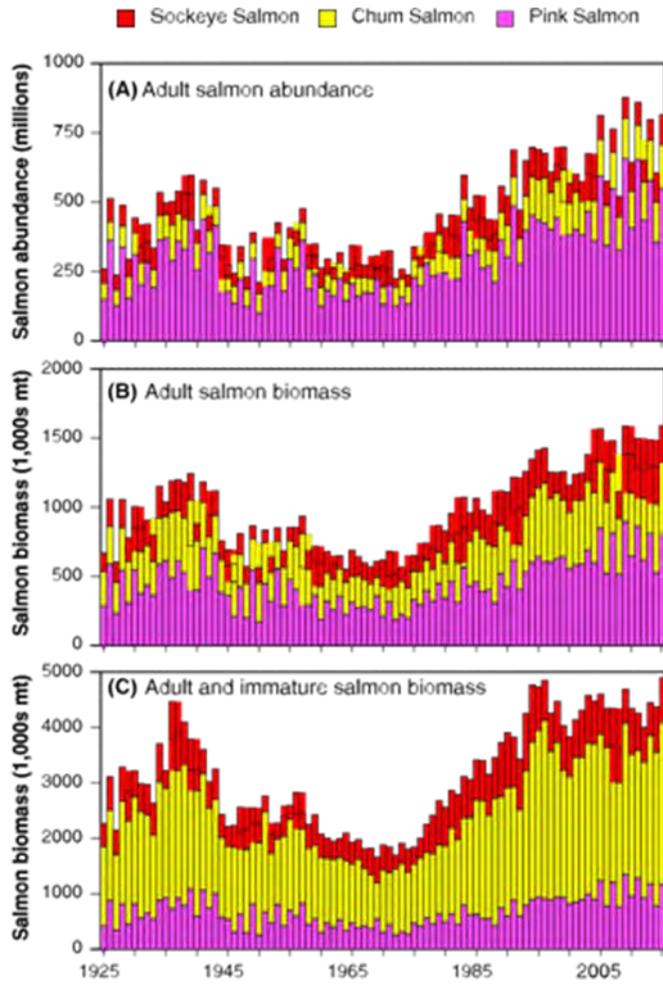


Figure 1. (A) Abundance (millions of fish), (B) adult biomass (thousands of metric tons), and (C) adult and immature biomass (thousands of metric tons) of Sockeye Salmon, Chum Salmon, and Pink Salmon in the North Pacific Ocean, 1925–2015. From Ruggerone and Irvine (2018).

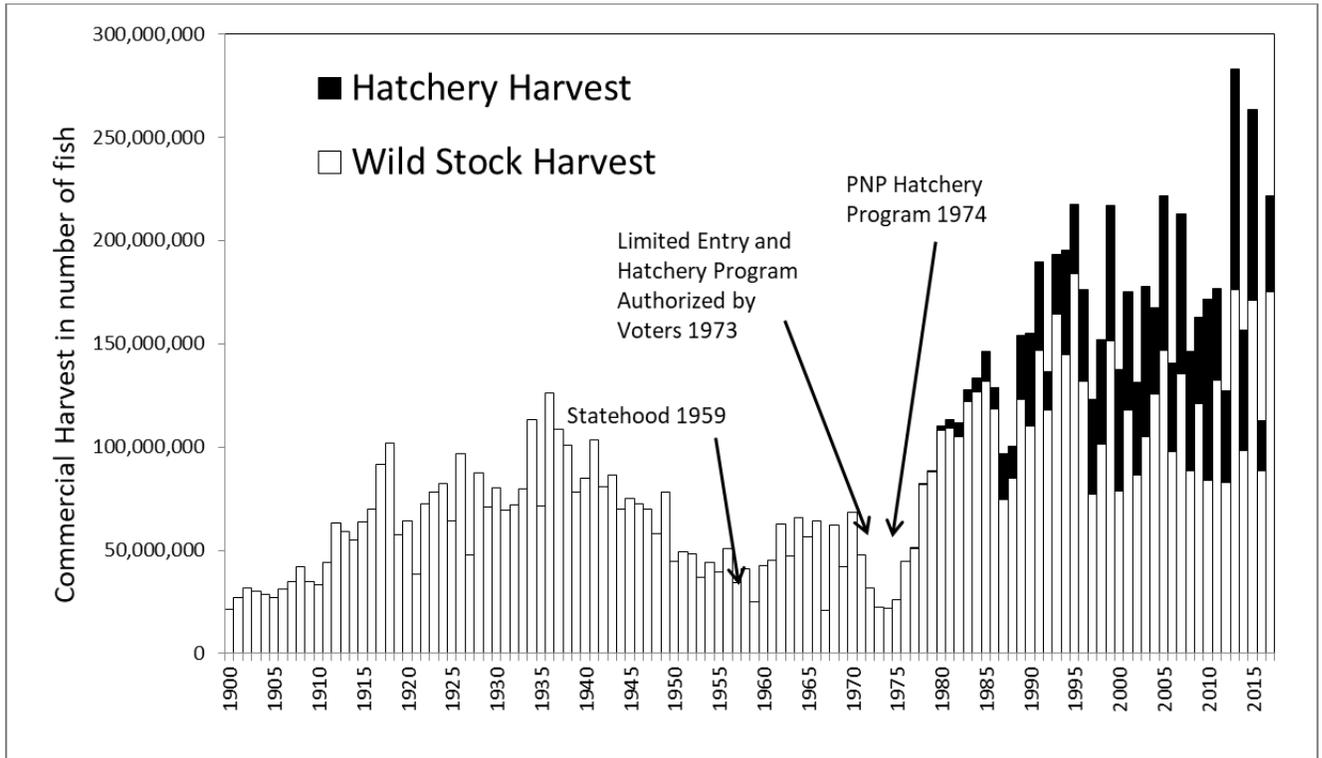


Figure 2. Commercial salmon harvest in Alaska, 1900-2017. From Stopha (2018).

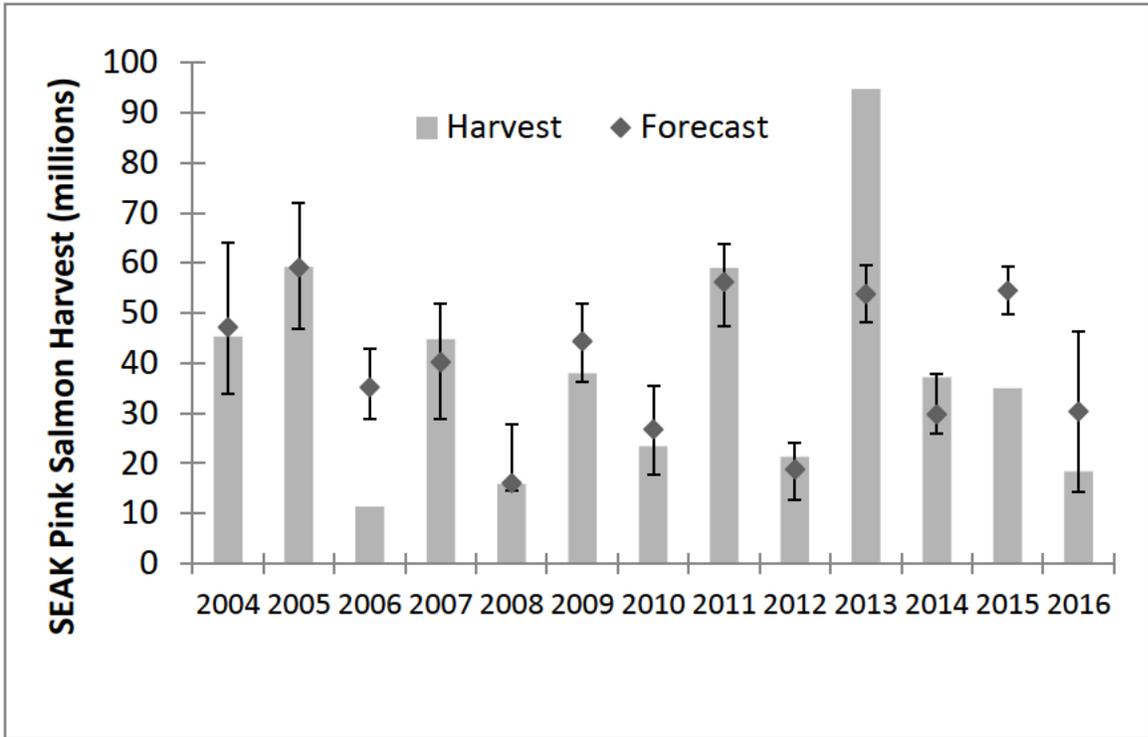


Figure 3.—Southeast Coastal Monitoring (SECM) project pink salmon harvest forecasts for Southeast Alaska (SEAK; symbols), associated 80% confidence intervals (lines), and actual SEAK pink salmon harvests (grey bars), 2004-2016.

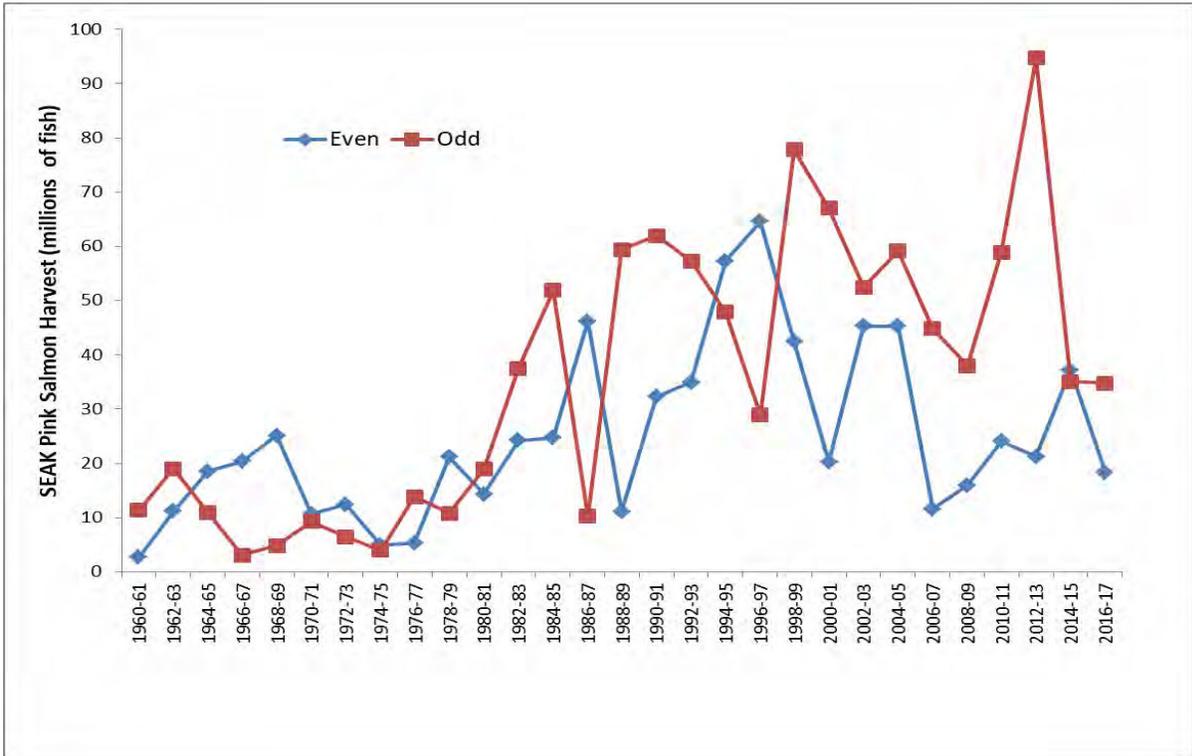


Figure 4. Even- and odd-year harvests of Southeast Alaska pink salmon, 1960-2017. Data are from Alaska Department of Fish and Game catch statistics.

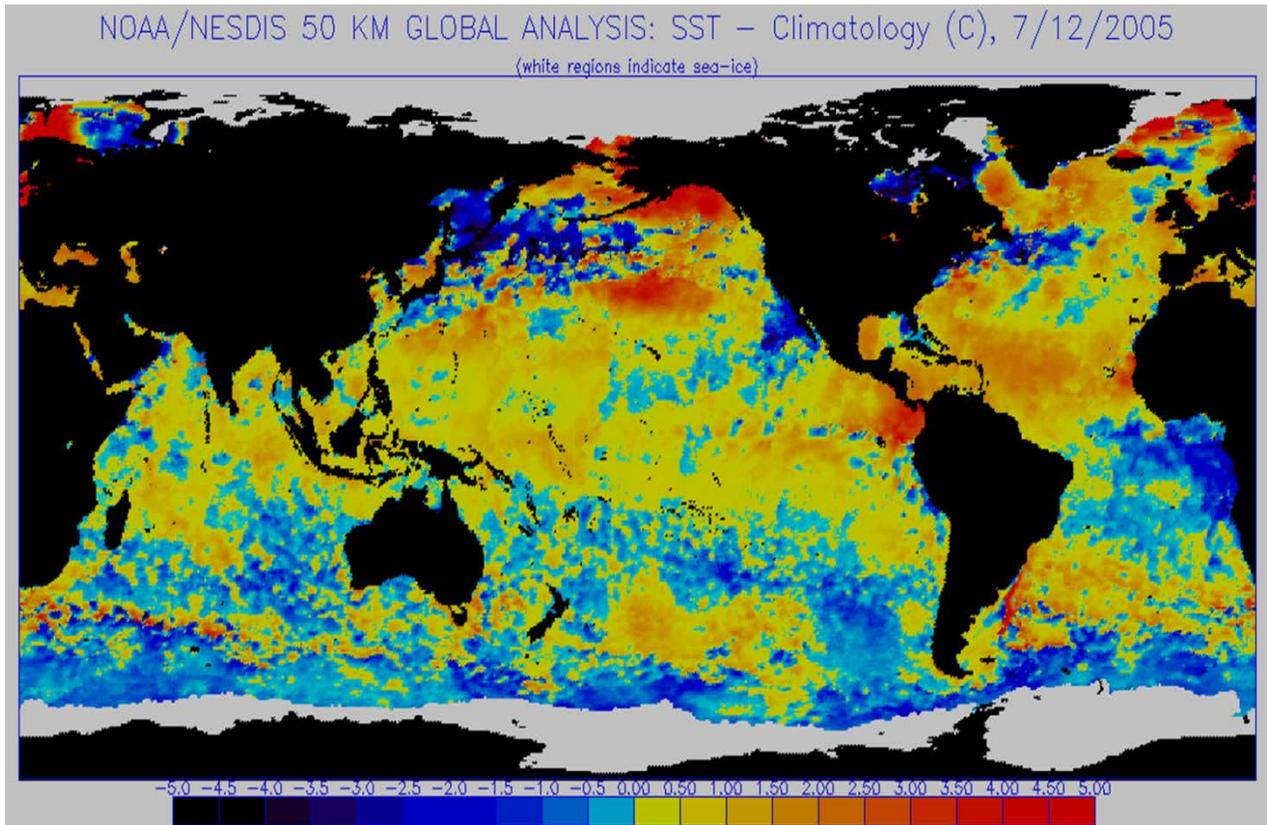


Figure 5. Sea surface temperature anomalies, July 12, 2005. NOAA Satellite and Information Service, National Environmental Satellite, Data, and Information Service (NESDIS)
<http://www.osdpd.noaa.gov/PSB/EPS/EPS.html>

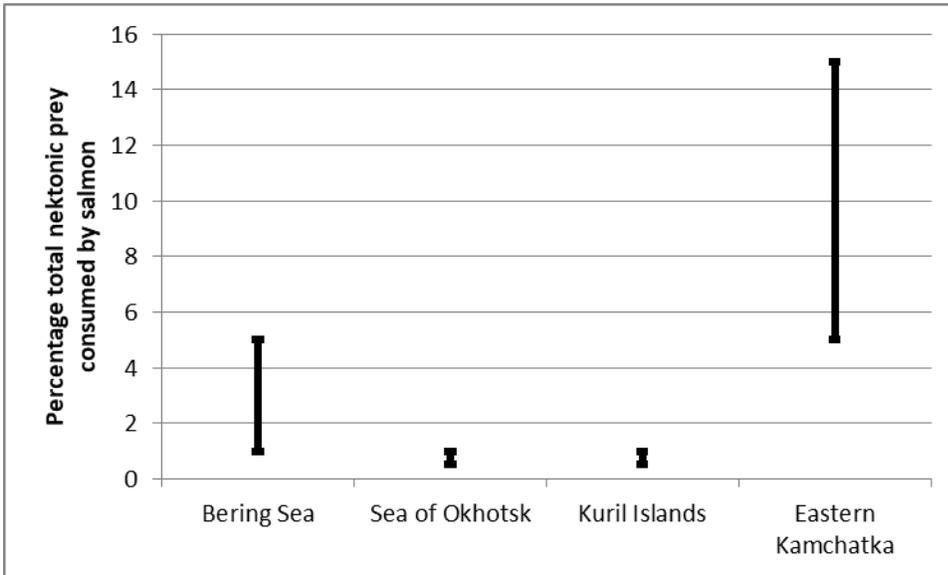


Figure 6. Percentage total nektonic prey consumed by salmon in the western North Pacific Ocean. Estimates are from Shuntov et al. (2017).

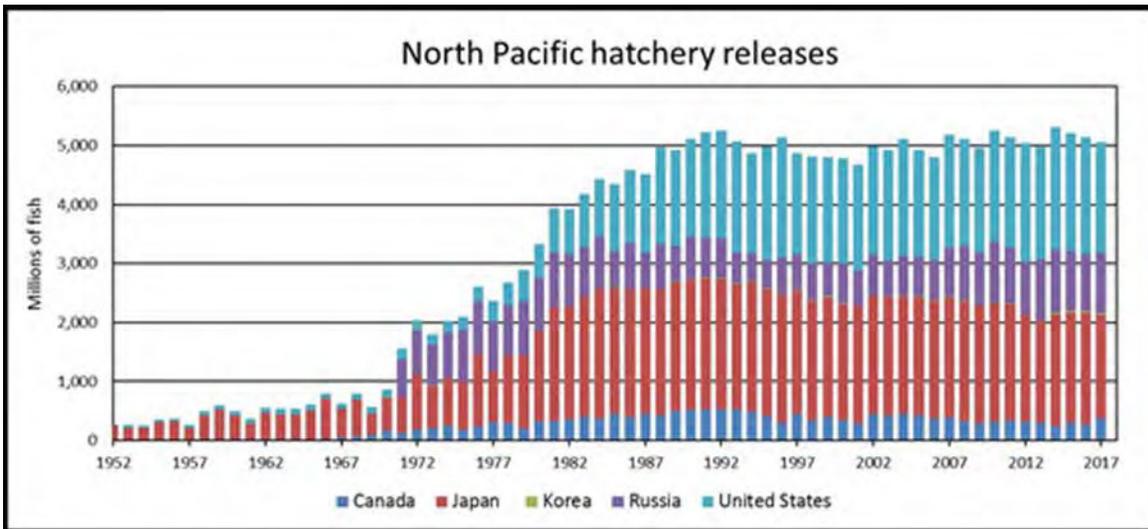


Figure 7. Hatchery releases of salmon into the North Pacific Ocean, 1952-2017. Source: North Pacific Anadromous Fish Commission.

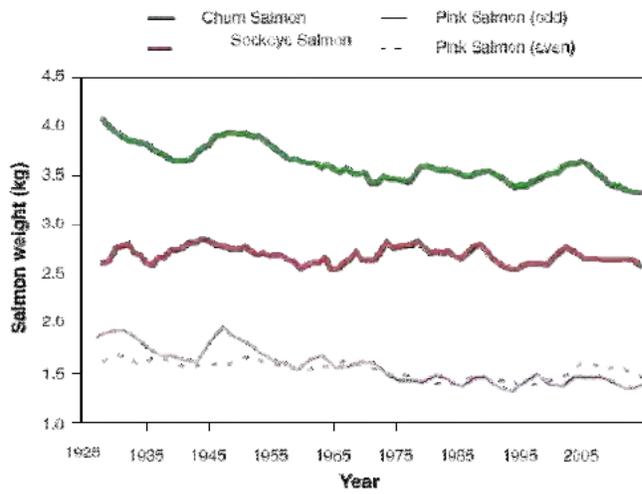


Figure 8. Average weight of pink salmon, chum salmon, and sockeye salmon captured in commercial fisheries, 1925-2015. From Ruggerone and Irvine (2018).

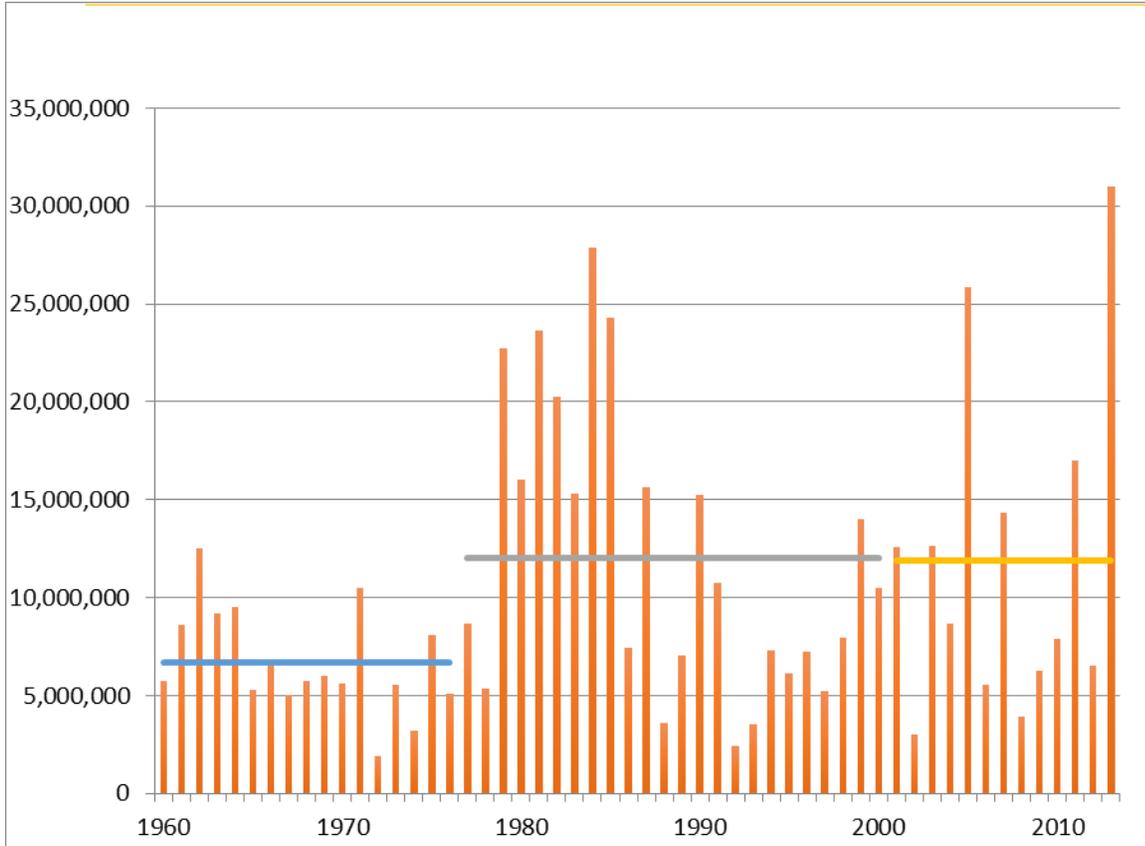


Figure 9. PWS Wild Pink Salmon Production for 1960-2013. Lines indicate average production for pre-hatchery years (1960–1976) and two hatchery time periods: 1977–2000 and 2001–2013. From Gaudet et al. (2017).

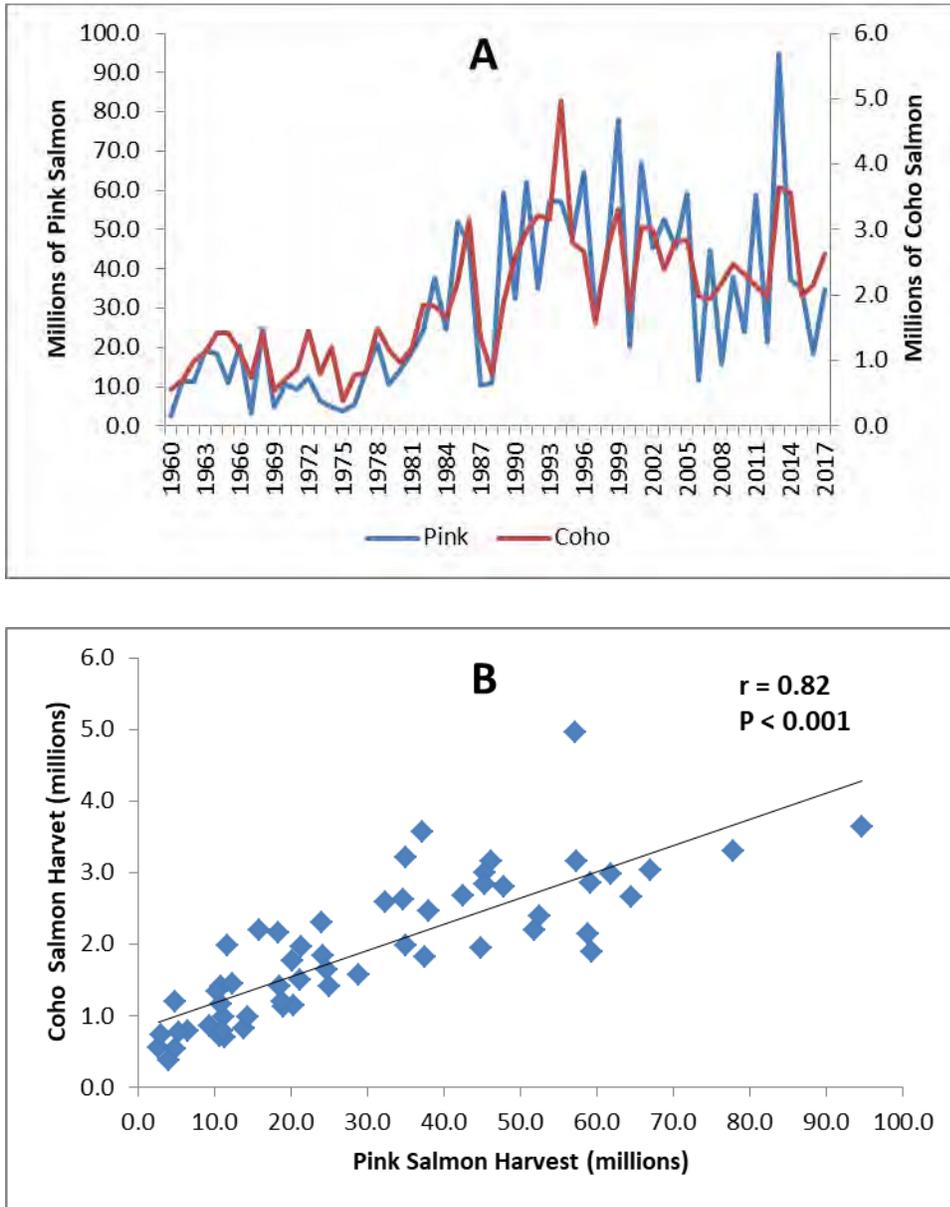


Figure 10. Commercial harvest of Southeast Alaska pink and coho salmon, 1960-2017 (A), and their correlation (B). Data are from Alaska Department of Fish and Game catch statistics.

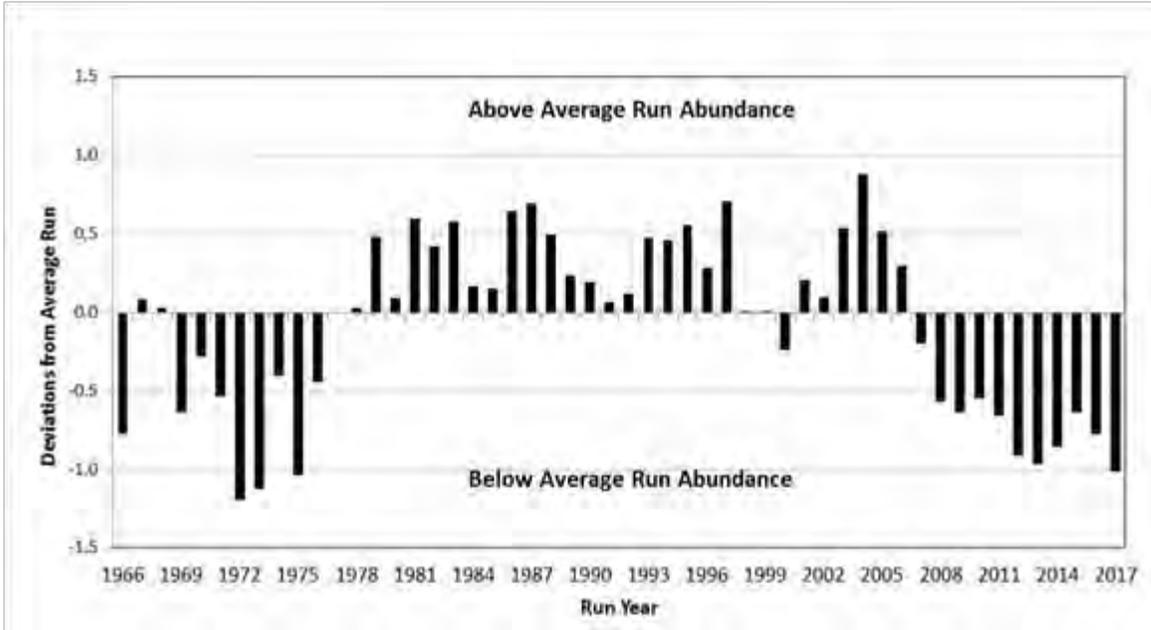


Figure 11—Average of standardized deviations from average run abundance for 21 stocks of Chinook salmon in Alaska (the Unalakleet, Nushagak, Goodnews and Kuskokwim in western Alaska; the Chena and Salcha on the Yukon River; the Canadian Yukon, the Chignik and Nelson on the Alaska Peninsula; the Karluk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

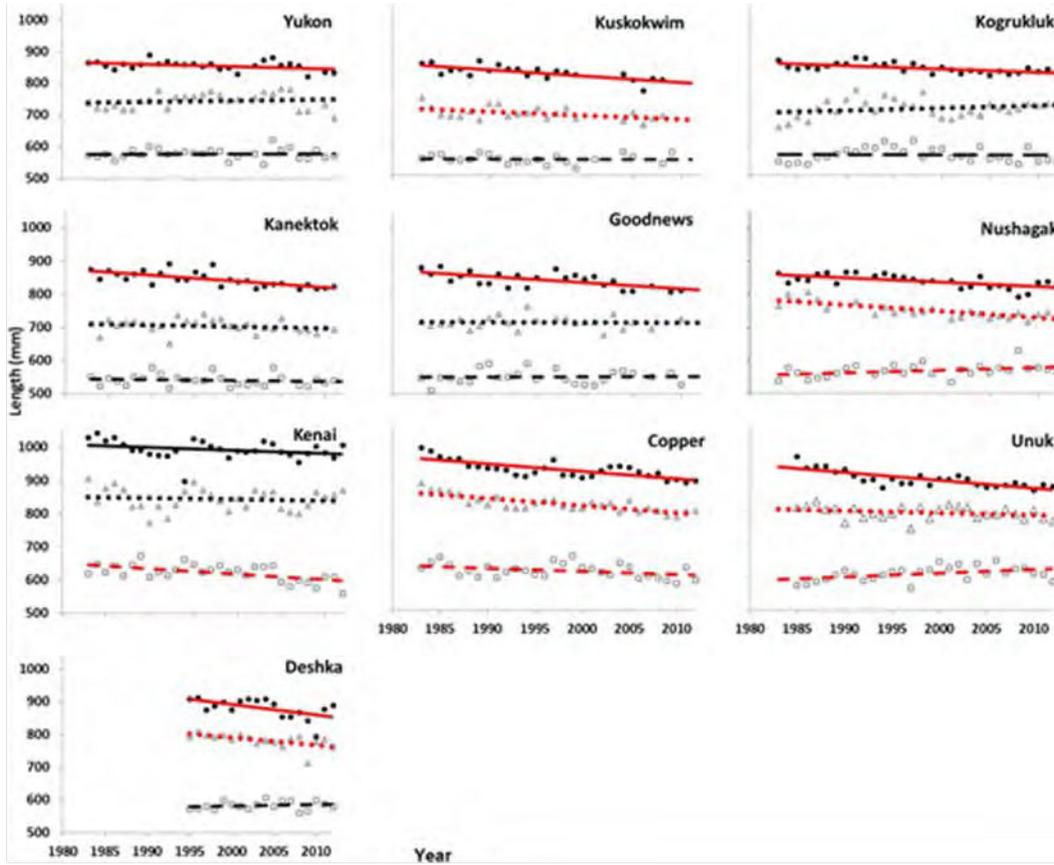


Fig 12. Linear regression of mean annual length (mm) Chinook salmon by stock, age class, and year. Closed circles and solid line = 4-ocean; triangles and dotted line = 3-ocean, open square and dashed line = 2-ocean. Red lines indicate slopes significantly different from zero ($P < 0.05$). From Lewis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

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January 14, 2025 PC10

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

Dear Members of the Alaska Board of Fisheries,

I am Jackie Yamada, the co-owner of Alaska Reel Adventures located in Juneau. Established in 1982, our family run business books anglers to Juneau on multi day lodge fishing trips seasonally. Over the past 40 years our guests have seen the changes in fish abundance along with more restrictive regulations for halibut, rockfish, salmon, black cod, shrimp and crab. The guests that continue to spend their time and resources to recreational fish in Alaska respect new regulations that they deem to be fair and beneficial for conservation. Unfortunately, as non-residents their voices are not usually heard or considered when regulatory decisions are being made, yet their dollars are a very important part of our state and local economies.

On behalf of my clients, I would like to state **SUPPORT** for the following proposals:

108 – Modification to the Southeast Alaska King Salmon Management Plan.

This proposal will continue to provide the regulatory tools that allow non-resident anglers, who book trips well in advance, to plan their trips based on their preferences to fish for King Salmon. It also modifies and addresses the concerns put forth by the troll fishery.

122 – Prohibit the removal of king salmon from the water when retention is not allowed.

123 – Prohibit netting or handling king salmon when catch-and-release fishing is implemented.

198 – Increase daily bag limit for sablefish in the sport fishery by two fish, from four fish to six fish per day.

This proposal should also consider increasing daily bag limits for non-resident anglers based on the same merits. Annual limits for non-residents would remain the same.

207 – Allow retention of demersal shelf rockfish by nonresidents.

208 – Allow retention of demersal shelf rockfish by nonresidents.

On behalf of my clients, I would like to state **OPPOSITION** for the following proposals:

119 – Close the non-resident King Salmon sport fishery for two days a week (days not specified).

I would defer to the discussions regarding the Southeast Alaska King Salmon Management Plan to resolve king salmon regulations and to provide for better escapement of king salmon to the Indigenous Peoples streams. I oppose any proposals that select day closures for non-residents only.

120 – Close the non-resident sport fishery on weekends.

Any form of day closure affects the visitor experience and local economies in a negative manner without solving conservation concerns. I would defer to the discussions regarding the Southeast Alaska King Salmon Management Plan to resolve king salmon regulations

140 – Sport fishing may only be conducted with a single barbless circle hook between April 1 and June 14.

This proposal appears to be targeting issues regarding king salmon and does not take into consideration other fisheries that are currently allowed and traditionally use two barbed hooks all season.

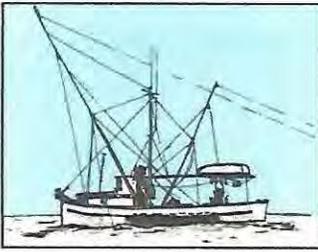
141 – Prohibit the use of bait in sport fisheries between April 1 through June 14.

This proposal appears to be targeting issues regarding king salmon and does not take into consideration other fisheries that are currently allowed and traditionally use baited hooks all season.

156 – Reduce Southeast Alaska hatchery permitted pink and chum salmon egg take level by 25%.

Respectfully,

Jackie Yamada



Alaska Trollers Association

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January 11, 2025

Art Nelson, Executive Director
 Alaska Board of Fisheries
 333 Raspberry Road
 Anchorage, AK 99518-1565

Re: Southeast and Yakutat Finfish and Shellfish meeting

Dear Mr. Nelson and Board of Fisheries Members,

Alaska Trollers Association (ATA) represents the many power and hand trollers throughout Southeast Alaska, and up to and including Yakutat. We are high-quality-per-fish operations - bringing aboard one salmon at a time - and a major economic contributor in this region since our permit holders are 85% Alaska resident. Our fishery supports many Alaskan families who reside in small towns and villages where there are few livelihood alternatives. Troll data at ADFG dates back to 1911 and ATA has been in existence since 1924.

We offer our comments on many of the proposals soon coming before your board:

<u>Proposal</u>	<u>ATA position</u>	<u>comments</u>
105	opposes	Nonresident catch limits outside of 3 miles should not be liberalized as this will further reduce the resident proportion of Treaty kings
106	supports	In lieu of allowing nonresidents to access resident king bag limits outside of 3 miles, this proposal prohibits nonresidents from offloading in the State. ATA introduced this proposal (with TSI) because it addresses a serious loophole that reduces Treaty allocation further
107	no action	This proposal is similar to 106 although it goes one step further as it prohibits possession of EEZ fish in State waters by nonresident anglers
108	opposes	Trollers have lived for decades with an ever-shrinking Treaty allocation and are limited in number by CFEC. The nonresident fishery needs to adopt meaningful mechanisms to live within its means and not receive preferential access to the resource, before the residents of the State

109	opposes	This proposal concedes the Board's authority to adopt regulations, who may or may not favor nonresidents at the expense of trollers and resident sport interests needs work. At statehood, one of the first acts by the Alaska Legislature was to create a Board of Fish and Game made up of Alaska fishermen and hunters so regulations would be made in a public forum.
110	supports amended	ATA proposal which will be succeeded by a RC or two
111	opposes	Elements of this proposal were incorporated into the ATA/TSI consensus RC to proposal 110
112	no action	This proposal has been superseded in spirit by the RC(s) of Proposal 110
113	opposes	Attempts to address the recent sportfish overharvest issues which led to reallocating fish away from traditional users. Now superseded by Proposal 110 RC(s)
114	opposes	ATA opposes any reduction in the 80/20 regime
115	supports	Reduction of the annual nonresident bag limit to one king salmon due to the continued and continuing growth of the nonresident king fishery harvest
116	no action	An early version of Proposal 110 which is now superseded by a supported RC or two
117	supports amended	The overage by the unbridled non-resident fishery requires that a one fish nonresident annual limit effective beginning June 1 is the only way to minimize closures to the historical fisheries. This was superseded by the RC which speaks to this June 1 effective date.
118	no action	Not effective in reducing nonresident harvesting
119	supports	These 2 proposals would help the build local stocks, help the resident harvesters in local communities and help the nonresident fishery stay within a 20% cap. Proposal 120 is preferred.
120	supports	
121	opposes	ADFG seeks to remove the sunset clause which would keep the SMP perpetual. ATA believes it's a good idea to keep current with the Board of Fisheries
122	supports	Prohibits the removal of kings from water if retention not allowed and will increase mortality
123	supports	Proposal 122 is stronger language than 123 and is therefore preferred.
124	no action	Gives resident sport fishers a week earlier to fish on SOC than nonresidents when thresholds reached, possibly superseded by a Ketchikan AC RC
125	supports	Closes all sport fishing in 14A April 1 to June 14 when SOC runs are incoming
126		Proposal 126 is identical to 125
127	no action	While we recognize resident sports need a more opportunity to fish, particularly in April when the non-resident is catch and release, we hesitate to increase effort on recent SOC.
128		Probably superseded by a Ketchikan RC to 110
129	supports	Proposes Yakutat king fishery split in 2 days instead of a 24-hour opening
130	supports	This proposal is intended as a backstop position in case no acceptably equitable management plan is reached at the BoF to address the "race to fish" created by the alteration of RC 178 and the consequent allocative loss of 34,000 kings in 2 years and calls for a single uninterrupted summer king troll opening beginning July 1
131	supports	This would enable more than one limited harvest fishery if troll allocation remains
132	supports amended	An amendment is needed allowing trollers to use either the overall length OR the tip to tail measurement
133	no action	Similar to proposal 132 but regional. Would conform catch size thresholds so ideally would be amended to use the overall length OR the tip-to-tail measurement

156	opposes	Seeks to reduce pink and chum production by 25% each which hatcheries say will have strong negative economic impacts throughout SE
169	supports amended	The word "manual" should be added before the work "downriggers" for clarification

While we appreciate the income provided to ADFG by the non-resident king salmon tags of harvesters, a bigger view is the sustainability of a longtime economic factor throughout our region. We are hopeful both this administration and this board will agree that tourism should not be provided preferential treatment to those of us who live and support local businesses all year here. It would be meaningful if the board recognized that having an ever-growing sector is harmful to our region and encouraged limitation of that sector in any form due to our finite and apparently shrinking Treaty allocation.

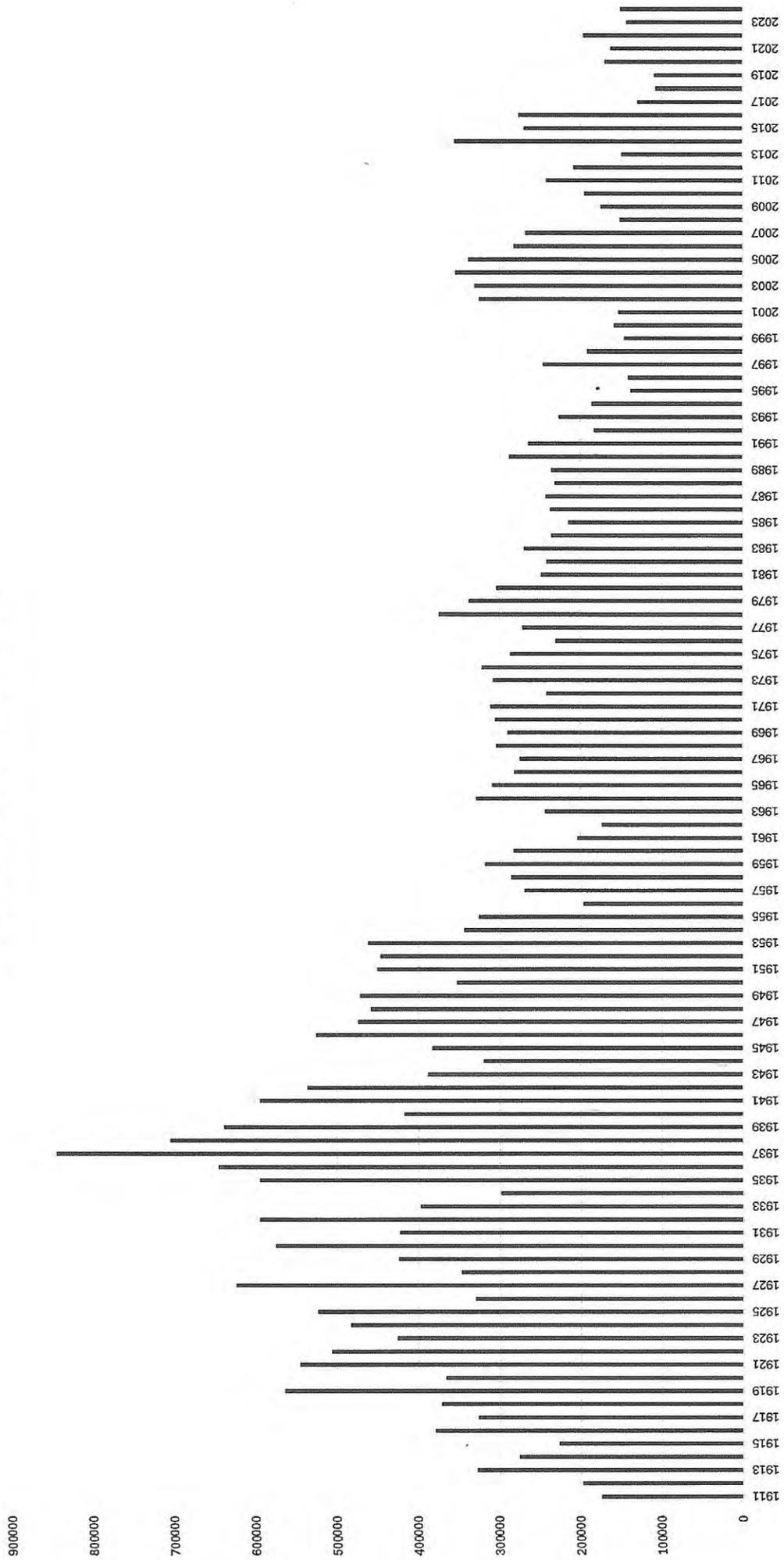
Thank you for your time and consideration.

Respectfully,



Amy Daugherty
Executive Director

SE AK Commercial Troll Chinook Total Harvest



Jan 7, 2025

**A Joint Statement on King Salmon
Management in Southeast Alaska**

By

THE ALASKA TROLLERS ASSOCIATION

And

THE TERRITORIAL SPORTSMEN, INC.

For

THE ALASKA BOARD OF FISHERIES

A WAY FORWARD:

The Alaska Trollers Association and Territorial Sportsmen represent well over 2500 resident sport and commercial fishermen and their families in Southeast Alaska. We are the two largest organized groups of residents in the region with advocacy interest in king salmon management and conservation. We come to you in an unprecedented alliance

to ask that the Southeast Alaska King Salmon Management Plan be amended to decrease the nonresident take of king salmon so that the historical allocation to the troll fleet is preserved, and so that the resident fishery won't again be closed by nonresident overfishing.

ATA and TSI met jointly in October, 2024 to begin developing a management plan that solved our problems from a resident perspective. The result of that effort is attached, and will be presented as an RC at the Ketchikan meeting, in addition to this Public Comment. The revised management plan takes into account several of the proposals you will be considering, but puts them all in one document.

The document then underwent review by several dozen committees, individuals and groups throughout Southeast Alaska. Numerous people and organizations have signed on as supporters, from Ketchikan to Yakutat. Some advisory committees, such as Wrangell AC adopted the plan unanimously. Others, such as Ketchikan AC, favored it provisionally if the plan were amended to tweak the nonresident annual limit schedule.

TSI and ATA are not married to the exact language of the plan, and in fact would equally favor the Ketchikan AC amendment. The most important point of the plan is the reduction in nonresident catch, and that can be accomplished numerous ways. Most of the remainder of the plan is housekeeping in nature.

The plan has eight bullet points that precede the regulatory language. The bullet points explain the measures in the plan. We hope this effort, which has received widespread approval within the region, can be your starting point by one of your members moving to strike all the language in the first king salmon management plan you take up and substitute it with this language. This could be an excellent starting point for deliberation or negotiation, as it resoundingly represents what trollers and resident sportsmen require to assure allocative equity.

Thank you for whatever consideration you give to this suggested course of action.

**Ryan Beason for
Territorial Sportsmen Inc.**

**Amy Daugherty for
Alaska Trollers Assoc.**

The following rewrite of the Southeast Alaska King Salmon Management Plan has its roots in the many proposals on this subject submitted by members of the public. The plan accomplishes the following:

- 1. A two fish annual king salmon limit for nonresidents prior to June 1 and one fish thereafter, unless the commissioner determines a later date in June can be provided without exceeding the sport quota of 20 percent. (From Proposal 117, and its suggested amendment)**
- 2. Moved the resident priority clause from subsection (m) near the end of the plan to subsection (b) nearer the beginning. No change to the regulation.**
- 3. Reduced the tiers from seven to two (above and below the lowest tier). Very few regulations changed from tier to tier, and the tiers added confusion. (From proposal 109).**
- 4. Eliminated averaging. This term was never defined and meant**

- something different to each reviewer. (From Proposal 109)**
- 5. Moved the two rods in winter to section (b), as it was in all tiers. No regulatory change**
 - 6. Modified subsection (i) to accommodate only two tiers.**
 - 7. Repealed the sunset. This plan comes up every three years anyway, so the sunset is unnecessary. (From Proposals 111 and 114).**
 - 8. Reinserted the words "sport fishery" where previously removed without notice. (From Proposal 110)**

5 AAC 47.055 - Southeast Alaska King Salmon Management Plan

(a) The commissioner shall establish by emergency order the king salmon sport fish bag and possession limits and all other necessary management measures based on the allocation to the sport fishery as determined by 5 AAC 29.060. The bag and possession limits and other management

measures established by the commissioner will remain in effect until March 31 of the following year.

(b) The objectives of the management plan under this section are to

(1) manage the sport fishery to attain a [AN AVERAGE] harvest of 20 percent of the annual harvest ceiling specified by the Pacific Salmon Commission, after the subtraction of the commercial net allocation specified in 5 AAC 29.060 from the harvest ceiling;

(2) allow uninterrupted sport fishing in salt waters for king salmon, while not exceeding the sport fishery harvest ceiling;

(3) minimize regulatory restrictions on resident anglers; [AND]

(4) allow for the transfer of any projected unused balance in sport allocation to the troll fishery at a date determined by the department;

(5) [*Moved from subsection (m)*]: the department shall manage the resident sport fishery so that there are no closures for residents, unless the commissioner determines that additional harvest reduction to the resident bag limits is necessary to comply with the Pacific Salmon Treaty; and

(6)[*Moved from subsection c(6)*] from October 1 through March 31, a sport fish angler may use two rods when fishing for king salmon; a person using two rods under this paragraph may only retain salmon.

(c) When the allocation of treaty king salmon to the sport fishery, as determined by 5 AAC 29.060, is greater than 19,381 [69,014] fish the commissioner may implement by emergency order the following management measures:

(1) a resident bag limit of two [THREE] king salmon, 28 inches or greater in length;

(2) a nonresident bag limit of one king salmon, 28 inches or greater in length;

(3) from January 1 through May 31 [JUNE 30], a nonresident annual harvest limit of two [THREE] king salmon, 28 inches or greater in length, unless the commissioner determines, using the best available information, that a later date in June can be selected for the annual limit reduction and still keep the sport fishery within its 20 percent quota;

(4) from June 1 through December 31 [JULY 1 THROUGH JULY 15, A NONRESIDENT ANNUAL HARVEST LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH;] a nonresident annual harvest limit of one [TWO] king salmon, 28 inches or greater in length; any king salmon harvested by a nonresident from January 1 through May 31[JUNE 30] will apply towards the one [TWO] fish annual harvest limit for the remainder of the year;

(5) Repealed / /25; [FROM JULY 16 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A

NONRESIDENT FROM JANUARY 1 THROUGH JULY 15 WILL APPLY TOWARD THE ONE FISH ANNUAL HARVEST LIMIT;]

(6) [*Moved to subsection (b)(6)*]

(d) Repealed eff. / /25. [WHEN THE ALLOCATION OF TREATY KING SALMON TO THE SPORT FISHERY, AS DETERMINED BY 5 AAC 29.060 IS BETWEEN 55,421 AND 69,014 FISH, THE COMMISSIONER MAY IMPLEMENT BY EMERGENCY ORDER THE FOLLOWING MANAGEMENT MEASURES:

(1) A RESIDENT BAG LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(2) A NONRESIDENT BAG LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH

(3) JANUARY 1 THROUGH JUNE 30, A NONRESIDENT ANNUAL HARVEST LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(4) FROM JULY 1 THROUGH JULY 15, A NONRESIDENT ANNUAL HARVEST LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JUNE 30 WILL APPLY TOWARDS THE TWO FISH ANNUAL HARVEST LIMIT;

(5) FROM JULY 16 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JULY 15 WILL APPLY TOWARDS THE ONE FISH ANNUAL HARVEST LIMIT;]

(6) [Moved to subsection (b)(6)]

(e) Repealed eff. / /25. [WHEN THE ALLOCATION OF TREATY KING SALMON TO THE SPORT FISHERY, AS DETERMINED BY 5 AAC 29.060, IS BETWEEN 42,685 AND 55,420 FISH, THE COMMISSIONER MAY IMPLEMENT BY EMERGENCY ORDER THE FOLLOWING MANAGEMENT MEASURES

(1) A RESIDENT BAG LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(2) A NONRESIDENT BAG LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(3) FROM JANUARY 1 THROUGH JUNE 30, A NONRESIDENT ANNUAL HARVEST LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(4) FROM JULY 1 THROUGH JULY 15, A NONRESIDENT ANNUAL HARVEST LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JUNE 30 WILL APPLY TOWARDS THE TWO FISH ANNUAL LIMIT;

(5) FROM JULY 16 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JULY 15 WILL APPLY TOWARDS THE ONE FISH ANNUAL HARVEST LIMIT;]

(6) [Moved to subsection (b)(6)]

(f) Repealed Eff. / /25. [WHEN THE ALLOCATION OF TREATY KING SALMON TO THE SPORT FISHERY, AS DETERMINED BY 5 AAC 29.060, IS BETWEEN 34,303 AND 42,684 FISH, THE COMMISSIONER MAY IMPLEMENT BY EMERGENCY ORDER THE FOLLOWING MANAGEMENT MEASURES:

(1) A RESIDENT BAG LIMIT OF TWO KING SALMON 28 INCHES OR GREATER IN LENGTH;

(2) A NONRESIDENT BAG LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(3) FROM JANUARY 1 THROUGH JUNE 30, A NONRESIDENT ANNUAL HARVEST LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(4) FROM JULY 1 THROUGH JULY 15, A NONRESIDENT ANNUAL HARVEST LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JUNE 30 WILL APPLY TOWARDS THE TWO FISH ANNUAL LIMIT;

(5)) FROM JULY 16 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JULY 15 WILL APPLY TOWARDS THE ONE FISH ANNUAL HARVEST LIMIT;]

(6) [Moved to subsection (b)(6)]

(g) Repealed Eff. / /25. [WHEN THE ALLOCATION OF TREATY KING SALMON TO THE SPORT FISHERY, AS

DETERMINED BY 5 AAC 29.060, IS BETWEEN 22,328 AND 42,684 FISH, THE COMMISSIONER MAY IMPLEMENT BY EMERGENCY ORDER THE FOLLOWING MANAGEMENT MEASURES:

(1) A RESIDENT BAG LIMIT OF TWO KING SALMON 28 INCHES OR GREATER IN LENGTH;

(2) A NONRESIDENT BAG LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(3) FROM JANUARY 1 THROUGH JUNE 30, A NONRESIDENT ANNUAL HARVEST LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(4) FROM JULY 1 THROUGH JULY 7, A NONRESIDENT ANNUAL HARVEST LIMIT OF TWO KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JUNE 30 WILL APPLY TOWARDS THE TWO FISH ANNUAL LIMIT;

(5)) FROM JULY 8 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JULY 8 WILL APPLY TOWARDS THE ONE FISH ANNUAL HARVEST LIMIT;]

(6) [*Moved to subsection (b)(6)*]

(h) [This subsection was (h)(4)] A resident bag limit of two king salmon 28 inches or greater in length will be established in areas where conservation management

measures have prohibited king salmon retention or closed fishing for king salmon for all anglers once they reopen.

[WHEN THE ALLOCATION OF TREATY KING SALMON TO THE SPORT FISHERY, AS DETERMINED BY 5 AAC 29.060, IS BETWEEN 19,381 AND 22,327 FISH THE COMMISSIONER MAY IMPLEMENT BY EMERGENCY ORDER THE FOLLOWING MANAGEMENT MEASURES:

(1) A BAG LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(2) FROM JANUARY 1 THROUGH JUNE 30, A NONRESIDENT ANNUAL HARVEST LIMIT OF THREE KING SALMON, 28 INCHES OR GREATER IN LENGTH;

(3) FROM JULY 1 THROUGH DECEMBER 31, A NONRESIDENT ANNUAL HARVEST LIMIT OF ONE KING SALMON, 28 INCHES OR GREATER IN LENGTH; ANY KING SALMON HARVESTED BY A NONRESIDENT FROM JANUARY 1 THROUGH JUNE 30 WILL APPLY TOWARDS THE ONE FISH ANNUAL HARVEST LIMIT;]

(4) [Moved to (h)]

(i)When the allocation of treaty king salmon to the sport fishery, as determined by 5 AAC 29.060, is less than 19,381 fish, the commissioner may implement by emergency order a closure of the nonresident fishery, or bag limit, time, or area restrictions for all anglers [THE PROVISIONS SPECIFIED IN (g) AND (h) OF THIS SECTION].

(j) The commissioner may adopt regulations that establish reporting requirements necessary to obtain the information required to implement the management plan under this section.

(k) The commissioner may, by emergency order, establish that the nonresident harvest and annual limits for king salmon under this section do not apply in a hatchery terminal harvest area.

(l) A harvest record under 5 AAC 75.006 is required for nonresidents.

(m) *[Moved to subsection (b)(5)]*

(n) Repealed Eff / /25. [THE PROVISIONS OF THIS SECTION DO NOT APPLY AFTER JULY 31, 2025.]

This rewrite is submitted by a large group of resident king salmon sport fishers and by commercial trollers. It addresses the primary concern that has been eroding the resident priority set out in the Alaska Constitution. The unrestricted nonresident fishery has to be brought back within the Board's prescribed limits, wherein ALL groups participate in conservation of king salmon.

ALASKAN & PROUD MARKETS— LOCALLY OWNED & OPERATED —

Dear Members of the Alaska Board of Fisheries,

I write to you on behalf of the Alaskan & Proud Markets and Lighthouse Grocery of Ketchikan, Alaska, to comment on proposal 108 from SEAGO, and related opposition.

I understand from several of the locally owned lodges there are significant issues and decisions being considered for the King Salmon allocation. These lodges and their guests are some of our best customers and have helped our business replace some of the lost logging and mining customers.

We appreciate the need to monitor harvest quotas for all Salmon Species especially King Salmon. We would like to share our concerns regarding reducing the non-resident annual King Salmon limits.

The individuals purchasing Non-Resident King Salmon tags are an important part of our communities economy. The majority of the Non-Resident people purchasing King Salmon Tags are making these trips special experiences, lifetime experiences or family traditions. They are spending money to travel here, lodge here, eat & drink here as well as shopping here. They tend to make the whole trip memorable and special by purchasing special products and unique gifts while they are visiting. The amount of money they spend for catching a King Salmon probably can't be justified but, the experience and the thrill of catching a King Salmon in SE Alaska is as American Express states "Priceless".

These individuals are the best marketers for the Sport Fishing Industry which indirectly means they are good at marketing for our locally owned business. The decisions being made today will directly affect the message these marketers share with their friends and family in the future. These people have choices where to go, where to fish and where to spend their hard earned money. We are hopeful their experiences will continue to include posing for a picture with a King Salmon or talking about how they lost the big one. If so I am confident they will continue to share these stories which will lead to others visiting SE Alaska so they can share in this unique and magical experience with their friends and family.

Alaskan & Proud Markets will leave the politics and resource management to the experts who work to ensure the resources are distributed fairly and adequately to support the locals and the locally owned businesses. We are sharing our thoughts and concerns to make sure all the impacts are considered while making these important decisions.

We are hopeful the local Alaskan sportfishing and lodging industry will continue to be an attractive option for those who are looking to spend time with family and friends on the back of a boat hoping to hear the sound of line stripping from their pole. That sound and the picture of them holding up a King Salmon is what brings them back. If the Alaskan King Salmon wasn't a part of this experience you will see this individual make a different decision on where to visit and post photos of.

We appreciate you taking the time to consider our thoughts and how this affects our locally owned business.

Sincerely,



Ben F Williams, President
Alaskan & Proud Markets

ALASKAN & PROUD MARKETS

— LOCALLY OWNED & OPERATED —

Dear Members of the Alaska Board of Fisheries,

I write to you on behalf of the Thorne Bay Market and Rip Tide Liquor of Thorne Bay, to comment on proposal 108 from SEAGO, and related opposition.

I understand from several of the locally owned lodges there are significant issues and decisions being considered for the King Salmon allocation. These lodges and their guests are some of our best customers and have helped our business replace some of the lost logging and mining customers.

We appreciate the need to monitor harvest quotas for all Salmon Species especially King Salmon. We would like to share our concerns regarding reducing the non-resident annual King Salmon limits.

The individuals purchasing Non-Resident King Salmon tags are an important part of our communities economy. The majority of the Non-Resident people purchasing King Salmon Tags are making these trips special experiences, lifetime experiences or family traditions. They are spending money to travel here, lodge here, eat & drink here as well as shopping here. They tend to make the whole trip memorable and special by purchasing special products and unique gifts while they are visiting. The amount of money they spend for catching a King Salmon probably can't be justified but, the experience and the thrill of catching a King Salmon in SE Alaska is as American Express states "Priceless".

These individuals are the best marketers for the Sport Fishing Industry which indirectly means they are good at marketing for our locally owned business. The decisions being made today will directly affect the message these marketers share with their friends and family in the future. These people have choices where to go, where to fish and where to spend their hard earned money. We are hopeful their experiences will continue to include posing for a picture with a King Salmon or talking about how they lost the big one. If so I am confident they will continue to share these stories which will lead to others visiting SE Alaska so they can share in this unique and magical experience with their friends and family.

Thorne Bay Market & Rip Tide will leave the politics and resource management to the experts who work to ensure the resources are distributed fairly and adequately to support the locals and the locally owned businesses. We are sharing our thoughts and concerns to make sure all the impacts are considered while making these important decisions.

We are hopeful the local Alaskan sportfishing and lodging industry will continue to be an attractive option for those who are looking to spend time with family and friends on the back of a boat hoping to hear the sound of line stripping from their pole. That sound and the picture of them holding up a King Salmon is what brings them back. If the Alaskan King Salmon wasn't a part of this experience you will see this individual make a different decision on where to visit and post photos of.

We appreciate you taking the time to consider our thoughts and how this affects our locally owned business.

Sincerely,



Rob Williams, Store Director
Thorne Bay Market

Alaskan Anglers Inn
Deep Blue Charters, Inc.
P.O. Box 274
Gustavus, AK 99826

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

Dear Members of the Alaska Board of Fisheries,

I am Scott Swenson, the owner of Alaskan Anglers Inn, LLC and Deep Blue Charters, Inc., located in Gustavus, Alaska. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me as well as the different user groups in our region.

In the past, the sport fishery has opted to allocate a larger portion of our king catch at the beginning of the season, when anglers have fewer alternative species available to fish. For example, in our area we catch few, if any, silver salmon prior to July. King salmon is pretty much the only salmon that we catch prior to July. Our business prior to July would be impacted negatively in a huge way if a management change were implemented that set a two king salmon annual limit at the season's start rather than three.

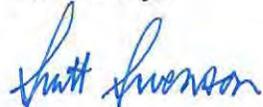
When bag and annual limits for kings were better and we had better regulations for halibut, rockfish, and lingcod, mid-May through June was the easiest part of the season to book. Now it's the most difficult. There's little opportunity left the first half of the season, and we can't afford to go any lower and expect to keep customers coming.

The City of Gustavus is a very small town and the city relies heavily on the taxes that our business generates for the city. In addition, the local businesses benefit greatly from the revenue generated from our business to them, not to mention the local employees who benefit from the employment that our business provides.

If it gets any more difficult for us to generate customers prior to July 1st, it probably won't make sense for us to open prior to July. If that were to happen, then we will have to examine whether it's even worth it for us to remain in business.

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

Sincerely,



Scott Swenson

Alaskan Anglers Inn, LLC

Deep Blue Charters, Inc.

Dear Chair Carlson-Van Dort and Board Members,

My name is Wendy Alderson and my husband and I are commercial trollers and residents of Sitka, Alaska.

My husband is a third generation commercial fisherman who grew up trolling out of Sitka. I started trolling in 1988, making Sitka my full time home in 1995.

I'm writing today to ask you to **oppose proposals 108 and 113 and support proposals 109 and 110 with RC amendments. Proposals 109 and 110** both provide for in season management to adjust bag and annual limits so the sport sector may achieve their annual allocation without exceeding it. This will insure the non-resident sport sector does not shut down resident sport or commercial troll harvest.

Thank you all very much for serving on the BOF and thank you for your commitment to your state. While none of you may be from Southeast, we still have a lot in common. One of those commonalities is the commitment it takes to call Alaska home. I have chosen to be part of the community of Sitka for 30 years. I have raised my family here, I have volunteered for boards and commissions here, and my husband and I, with our small commercial fishing business, have managed to make ends meet financially AND still live in Alaska!

Southeast, like all of Alaska, is a wonderful, diverse place. Whether you have an eighth grade education or a PHD, you are going to be sitting at the same table. We all do what we have to to figure out how to make it work in a place we love.

As a commercial fisherman there are many things we can't count on; weather, the price of fish, the price of fuel to name a few. So it's really important to be able to count on the things you know. One of the things we trollers have known since 1992 is that we will be allowed 80% of the Chinook harvest, whatever those numbers may be year to year. The bulk of this harvest generally takes place the first week or two of July, with ADFG aiming for 70% of the total allotment, with an August opener to pick up the remainder. (This is called in season management!) This fall opener is often what gets us through the winter. A last chance to make a few bucks to see you through to the next season.

For the last two years, 2023 and 2024, due to the in season sport overage driven primarily by nonresident angler harvest, the commercial troll fleet was denied the opportunity to harvest our allocated Chinook. Let me just lay out for you what that did to us financially:

We are a Frozen at Sea vessel so we produce a high end headed and gutted value added product. Our gross Chinook price per lb over the last 5 years has been between \$10 and \$12 per lb. I'll use a \$10 per lb average for convenience:

In the **2020** August opener we caught 5,900lb Chinook for a total gross value of **\$59,000**

In the **2021** August opener we caught 4,869lb Chinook for a total gross value of **\$48,698**

In the **2022** August opener we caught 5,887.5lb Chinook for a total gross value of **\$58,875**

In the **2023** August opener, which was a ONE day opener, we caught 130lb of Chinook and, since our product is frozen and it's not economical to unload 13 fish into a 1,000 fiber tote, we gave the fish to a friend who is facing hard times and needed fish for the winter (we legally landed the fish on a fish ticket first) for a total gross value of **\$0**

In the **2024** August opener we were allowed 12 fish, one per day for 12 days. We caught 132lb Chinook for a total gross value of **\$1,320**

I will be honest with you, for us the gross value of that fall opener in '20, '21 and '22 equals more than ½ our after tax income for those years. If either **Proposal 108** or **113** are passed, and a percentage of Chinook are reallocated from our historic and primarily resident troll fishery to the expanding non-resident sport fishery, affecting our bottom line like it did in '22 and '23, we will not be able to afford to stay in Southeast Alaska, and I know we're not the only trollers in this position. 85% of the troll permits are held by residents of Southeast Alaska. We are the people who keep the public schools open, who keep the grocery stores

busy during the long winters, who are committed to keeping the lights on in our small coastal communities.

Proposal 108 is a direct reallocation and while **Proposal 113** seeks to borrow troll quota, it will award the primarily non resident sport sector with allocation increases in time of low abundance. Resident fisheries should not suffer to support non-resident harvest. **Please oppose both Proposal 108 and 113.**

Thank you for your time,
Wendy Alderson

Submitted by: Drew Allen
Community of Residence: Juneau

Proposal 110 in support: The charter sector is a commercial fishery and should be managed in season like one.

Proposal 132 in support: Measuring at the fork of tail instead of tips gives a more regular result and much easier identification of length.

Proposal 133 in support: Measuring at the fork of tail instead of tips gives a more regular result and much easier identification of length.

Proposal 226 in support with amendment: I agree with a gear reduction in the fishery but only with proposal 227 included, that there can be stacked permit holders on board. This fishery had too many permits handed out when it went limited entry. These two proposals together would still allow permits to be obtained by people starting out, while hopefully reducing gear in the water.

January 14, 2025

From: Chuck McNamee,

To: Alaska Board of Fisheries

Board,

My name is Chuck McNamee. I own and operate Angling Unlimited in Sitka, Alaska. We operate two lodge buildings and nine boats in Sitka. Four of our boats are owned and operated by residents of Sitka. I began working in Sitka as a deckhand in 1993, worked my way to captain in 1996, became a partner in Angling Unlimited in 2003, and now own and run the business with my wife, two sons, and daughter. We are fully committed to the sustainability of the resources on which our business depends and to supporting the economic vitality of Sitka.

Our clients' opportunity to harvest king salmon forms a cornerstone to Angling Unlimited's viability and our ability to contribute to Sitka's economic well-being. In the months of May and June, kings are the only salmon available in our waters. Our thirty plus years of experience marketing and delivering sport fishing experiences has made it abundantly clear that without an opportunity to harvest a king, customers won't book May and June.

The long established 3 fish annual limit in May and June translates to a simple business reality that during this portion of the season all our bookings are for three days of fishing. Customers have no interest in a fourth day with no opportunity to harvest a king and no one books a two-day trip because they can't justify the travel time and cost to visit Southeast Alaska for such a brief period of time. The first half of our season is dependent on a minimum non-resident annual limit of three kings.

I encourage the board to look at the economic and employment contributions of the guided sport fishery in communities throughout Southeast. A 20% hard cap on our king allocation, especially during periods of low abundance, will generate a cascade of negative economic impacts on Sitka and all Southeast Alaska coastal communities.

I plan to attend the Board of Fisheries meetings in Ketchikan and welcome an opportunity to speak with board members.

Chuck McNamee, Owner Angling Unlimited, Sitka, AK.

Submitted by: Abigail Armstrong
Community of Residence: Wrangell

Dear Board of Fish Members,

My name is Abigail Armstrong, I am 24 and a born and raised Alaskan Native whose primary income is dependent on the Fishing industry. I have only worked in the fishing community for 6 years, but when growing up in a small native community it has always been apart of my life. I recently married a fisherman and we plan to make this our living and hope to raise and teach our children in the same way, the same type of living our Grandparents raised our parents with.

I strongly oppose proposals 108 and 113:

The 80/20 split has got to stay in place to keep this fishery reliable and sustainable for those that fish residentially. The return of “borrowed” quota is never certain for the following year.

I am all for non residents sharing in the traditions of our Alaskan culture, however when it comes at a cost to our own sustainability it is unacceptable.

I support Proposals 109 and 110:

The in season management of ADF&G is crucial for keeping harvest levels at quota. Having to stop fishing in mid season because non resident anglers have taken the priority, is quite unfair when this simply can be avoided by managing all sectors in season.

Proposal 141:

I am in support of this proposal if amended to say “in the catch and release fisheries.”

Proposal 199:

I oppose this proposal. If we were to have a closure due to weather delay, it only promotes all vessels to fish in a condensed area which would not be profitable for management or for fisherman. I would rather have the freedom to decide not to go fishing due to weather, than to be forced to compete in a condensed area where the rest of the fleet will also be.

Proposal 202:

I strongly oppose this proposal. To state that “only one operational unit of dinglebar troll gear [TROLL GURDY LINE OR HAND TROLL GURDY LINE] may be onboard a vessel or deployed from the vessel at or below the surface of the sea [IN THE WATER] at any time;“ entirely changes the way we currently operate.

202 as it stands could cause unnecessary rush as a train is quite difficult to retrieve, especially when you are not only pulling just against the water but also the drag that the catch causes. This creates unintended dangers to all crew members possibly causing injuries. For female crew members like myself, we would be at a disadvantage to retrieve the train fast enough, rendering me not as capable of accomplishing my task as a deckhand. A male crew member who naturally has greater upper body strength would be more efficient.

Only being able to hold a single train aboard a vessel would not allow us to be prepared in cases of loss of gear. Anyone who has gone dinglebar fishing knows the importance of spare gear.

On behalf of myself and generations to come, thank you for taking the time to read and consider my comments and concerns. I greatly appreciate the work you all put in to manage these matters that affect our future.



Armstrong-Keta, Inc.
PO Box 1075, Sitka, AK, 99835
Phone: (907)586-3443
Email: aki@portarmstrong.net

January 14, 2025

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

Hello,

I write to you as the General Manager of Armstrong-Keta, Inc. (AKI). I am also a born and raised Alaskan, coming from a fishing family, and raised working all sorts of jobs throughout the industry. This is home, and fishing has always (in one way or another) been my way of life.

As an organization, AKI's mission statement is to significantly contribute salmon in an environmentally compatible way to the common property fisheries of Southeast Alaska, including commercial, sport, and subsistence users. Founded in 1980, our hatchery annually collects eggs from three species of Pacific salmon; pink (permitted for 105 million eggs), chum (permitted for 60 million eggs), and coho (permitted for 6 million eggs). Proposal 156 would potentially eliminate fisheries enhancement programs that are vital Armstrong-Ketas goal as a non-profit, with no clear benefit to wild stocks.

Armstrong-Keta, Inc. strongly OPPOSES proposal 156.

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

Sincerely,

A handwritten signature in black ink that reads "Bryanna Torgeson".

Bryanna Torgeson
General Manager
Armstrong-Keta, Inc.

Submitted by: Jeanie Arnold

Community of Residence: Wrangell

I oppose Proposal 224 to revert the commercial shrimp fishery to a fall start date. It is detrimental to the long-term health of the fishery. The shrimp harvested in the fall contain a large majority of eggs that have not had a chance to spawn.

The two-year trial period of the post-spawning spring start is insufficient to assess its true impact. Decisions regarding the season start date should prioritize the long-term sustainability of the fishery, not cater to the preferences of a select group of fishermen. Our family made an investment in this fishery and lost revenue due to the start date. If this closure happens again we will miss another season and fall behind on revenue putting our family in financial strain.

The current spring start date should be maintained.

ASHBURN & MASON P.C.

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

January 13, 2025

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

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

Re: **Public Comments of Ashburn & Mason, P.C., Counsel for Prince William Sound Aquaculture Corporation in Opposition to Proposal 156 (Comment Due Date January 14, 2025).**

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

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

INTRODUCTION

Proponent asks the Board of Fisheries (“Board”) to arbitrarily override the hatchery permitting decisions of the Alaska Department of Fish and Game (the “Department”) and “[r]educe the permitted egg intake of pink and chum salmon of each applicable Southeast hatchery for pink and chum salmon by 25%.” This proposal is a transparent attempt to

veto Department permitting decisions, which AS 16.10.440(b) expressly prohibits and override the legislature's decision to support hatchery activities.

The Proposal is also an attack on the Southeast Alaska hatcheries and the permit holders, crew, businesses, and communities that rely on a healthy and robust commercial fishing industry in Southeast Alaska. And it is entirely arbitrary. There is no stated justification for the 25 percent reduction, it is just a percentage pulled from thin air. Even worse, there is no scientifically validated evidence offered in support of the proposal whatsoever, just conjecture and the opinions of biased special interests that released hatchery fish in Southeast Alaska are the cause of fisheries declines and closures *statewide*. For example, there is no credible evidence that chum salmon in Southeast Alaska are the cause for fishery closures on the Yukon River.

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

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

Department, not the Board, regulates hatchery activities that directly impact production levels, such as the harvest of eggs from hatchery broodstock.²

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

The Proposal seeks to disrupt this well-established division of authority by interjecting the Board into the realm of production management. Specifically, the Proposal asks the Board to unilaterally reduce in an arbitrary and draconian fashion egg take levels from hatchery broodstock, which is squarely within the Department's sphere of authority and expertise, and outside the Board's jurisdiction over allocation of harvest levels. While the Proposal does not explain where the Board would derive legal authority to try and shut down hatchery operations in Southeast Alaska, the Proponent will likely rely on AS 16.10.440(b), which only addresses the Board's limited authority to enact new regulations, subject to the Administrative Procedure Act, to amend hatchery permits regarding the "source and number of salmon eggs," so long as the regulation does not interfere with the

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

³ *E.g.*, AS 16.05.251.

Department's issuance or denial of permits required under AS 16.10.400. This provision in no way grants the Board authority to override Department permitting decisions and try and shut down hatchery operations by fiat.

When this statute was enacted in 1979, the legislature's reference to "the source and number of salmon eggs" referred to the collection of *wild* salmon eggs, before the hatcheries' cost recovery operations had been fully established. Back in 1979, collection of salmon eggs from wild stocks involved the harvest of wild salmon still swimming out in the ocean. In those early days, egg take from wild salmon hypothetically could have affected the Board's allocative decisions. By contrast, hatchery egg take today is conducted entirely from returning hatchery broodstock, captured in terminal harvest areas, with little or no allocative implications.

Even if the statute could be construed to apply to eggs recovered from returning hatchery broodstock, it is an insufficient legal basis for disrupting the Department's comprehensive regulatory regime, which, by statute, includes hatchery production planning and detailed permitting requirements. Again, the Board has jurisdiction over harvest levels, and the Department has jurisdiction over all aspects of hatchery production, including egg take levels.⁴

To remove any doubt, the Department and the Attorney General's office both opposed a similar proposals to reduce Cook Inlet and Prince William Sound hatchery production by 25 percent because "the Board is not authorized to take action that effectively

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

revokes or prevents the issuance of a permit,”⁵ and because “to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions by the department for which there is specific statutory authority would upset the balance of the statutory scheme chosen by the legislature.”⁶ And the Department opposes Proposal 156 here for the same reasons.⁷

Finally, putting aside the Board’s legal authority (or lack thereof) over hatchery permitting, Proposal 156 is also procedurally infirm because it seeks to amend a regulation, 5 AAC 33.364, that has absolutely nothing to do with hatchery permitting or production. Rather, the regulation addresses “fair and reasonable distribution of the harvest of salmon from enhancement projects among the seine, troll, and drift gillnet commercial fisheries, and to reduce conflicts among these users, in the Southeastern Alaska Area.” Allocation of hatchery fish is a separate issue from hatcheries’ permitted salmon egg take levels. The reality is there is no existing Board regulation addressing hatchery permitting and releases because this is outside the Board’s regulatory purview. The Board may not adopt a proposal beyond its authority and shoehorn it into an existing regulation that is irrelevant to the proposal.

⁵ Attorney General’s Office Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023; Department Comments to Proposal 78, Prince William Sound Meeting Cycle 2024.

⁶ Department Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023; Department Comments to Proposal 78, Prince William Sound Meeting Cycle 2024, both quoting Department of Law Memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997).

⁷ Department Comments to Proposal 156, available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2_staff-comments_12-30-24.pdf (pages 215-19).

ABOUT ASHBURN & MASON AND PWSAC

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

PWSAC's founders were commercial fishers and community leaders who were responding to repeated wild salmon run failures, and the resulting economic distress throughout the Prince William Sound region in the early 1970s. Working together, the fishermen, local community representatives, the Department, and key legislators developed an innovative legal framework for the creation and operation of the state's PNPs and regional aquaculture associations.

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

DISCUSSION

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

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

1. History and Purpose of the Hatchery Program

The desire of Alaskans to manage their abundant salmon fisheries was a driving force behind Alaska Statehood.⁸ The importance of protecting and developing natural resources such as salmon is embedded in the Alaska Constitution, which directs the legislature to “provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters.” It also requires the legislature to make decisions that “provide for the maximum benefit of its people.”⁹ The Alaska Constitution

⁸ *E.g.*, *Pullen v. Ulmer*, 923 P.2d 54, 57 n.5 (Alaska 1996); Alaska Legislative Affairs Agency, *Alaska’s Constitution: A Citizen’s Guide* (5th ed. 2021) at https://akleg.gov/docs/pdf/citizens_guide.pdf (Many Alaskans concluded “that the notion of the federal government’s superior vigilance as a trustee of the public interest was really a cloak for the institutional interests of bureaucrats and the economic interests of nonresident corporations exploiting those resources (principally Seattle and San Francisco salmon canning companies and east coast mining conglomerates).”); HOUSE COMM. ON INTERIOR AND INSULAR AFFAIRS, *Act Providing for the Admission of the State of Alaska into the Union of 1957*, H.R. REP. No 85-624 (1958) (The Statehood Act “will enable Alaska to achieve full equality with existing States, not only in a technical juridical sense, but in practical economic terms as well. It does this by making the new State master in fact of most of the natural resources within its boundaries”); Univ. of Alaska Anchorage, Institute for Social and Economic Research, *Salmon Fish Traps in Alaska* (1999), at 14, at https://iseralaska.org/static/legacy_publication_links/fishrep/fishtrap.pdf (“Alaska political entrepreneurs used the [fish] trap issue to rally the citizens of the territory around the quest for statehood.”).

⁹ Alaska Const. art. VIII, § 2.

proclaims that “fish, wildlife, and waters are reserved to the people for common use,”¹⁰ and dictates that “Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.”¹¹ Further, the Constitution expressly references the goal of “promot[ing] the efficient development of aquaculture in the State,” and protecting Alaska’s economy from outside interests:¹²

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

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

¹⁰ Alaska Const. art. VIII, § 3.

¹¹ Alaska Const. art. VIII, § 4.

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

fisheries,¹³ and the state hatchery program was initiated through the creation of the Fisheries Rehabilitation & Enhancement Division (FRED).¹⁴

Under AS 16.05.020, the Commissioner must “manage, protect, maintain, *improve, and extend* the fish, game . . . of the state in the interest of the economy and general well-being of the State.” The Department is further required to: “develop and continually maintain a comprehensive, coordinated state plan for the orderly present and long-range rehabilitation, *enhancement*, and development of all aspects of the state’s fisheries for the perpetual use, benefit, and enjoyment of all citizens” and “through rehabilitation, *enhancement*, and development programs do all things necessary to ensure perpetual *and increasing production* and use of the food resources of state waters and continental shelf areas.”¹⁵ Similarly, the Department is required generally to “manage, protect, maintain, *improve, and extend* the fish, game and aquatic plant resources of the state in the interest

¹³ AS 16.43.400 *et seq.* Alaska’s limited entry fishery essentially provides that only permit holders may engage in commercial fishing. The granting of these permits, and the management of the commercial fisheries, are tightly regulated by numerous state agencies including the State Commercial Fisheries Entry Commission (CFEC), the Alaska Department of Fish & Game (ADF&G), and the Board of Fisheries (BOF). *See generally Johns v. CFEC*, 758 P.2d 1256, 1263 (Alaska 1988) (“The Limited Entry Act has two purposes: enabling fishermen to receive adequate remuneration and conserving the fishery.”).

¹⁴ AS 16.05.092. As explained more fully below, FRED no longer exists as a distinct division within the Department. However, the operation (though not the ownership) of most or all of the original hatcheries owned and operated by FRED has been transferred to the regional aquaculture associations, under long-term professional services agreements. PWSAC, for example, currently operates the Cannery Creek, Main Bay, and Gulkana Hatcheries, all of which were constructed and initially operated as FRED hatcheries in the early 1970s.

¹⁵ AS 16.05.092(1) and (3) (emphasis added).

of the economy and the general well-being of the state.”¹⁶ The Department is also generally charged to do everything possible to assist with hatchery operations.¹⁷

In addition, the legislature created the Fisheries Enhancement Revolving Loan Fund to promote the enhancement of Alaska’s fisheries by, among other things, providing long-term, low-interest loans for hatchery planning, construction, and operation.¹⁸ PWSAC has received significant support from this program over the years, particularly for capital investments.

In 1974, the FRED state-owned and managed hatchery program was expanded to include private ownership of salmon hatcheries with the passage of the Private Non-Profit (PNP) Hatchery Act.¹⁹ The Act stated that its purpose was to “authorize the private ownership of salmon hatcheries by qualified non-profit corporations for the purposes of contributing, by artificial means, to the rehabilitation of the State’s depleted and depressed salmon fishery.” Further, as noted above, a separate fisheries enhancement loan program was created in 1976 to provide state financing for nonprofit hatcheries.²⁰

¹⁶ AS 16.05.020(2) (emphasis added).

¹⁷ AS 16.10.443.

¹⁸ AS 16.10.500–.560; *see generally* Alaska Division of Investments, “Fisheries Enhancement Revolving Loan Fund Program Overview,” April 2007 at <http://www.commerce.state.ak.us/investments/pdf/FEover07.pdf>.

¹⁹ These provisions are now codified at AS 16.10.375 *et seq.*

²⁰ AS 16.10.500 *et seq.*; *see also State Commercial Fisheries Entry Comm’n v. Carlson*, 65 P.3d 851, 867 (Alaska 2003) (“The state operates a revolving loan fund to support investments in developing and operating fish hatcheries and other fish enhancement projects.”).

Over time, the State has transferred operation of some of the FRED hatcheries to other entities, including the nonprofit hatcheries operated by the regional aquaculture associations, concluding that it would be more cost-effective for these hatcheries to be operated by the regional associations. The legislature specifically authorized the subcontracting of state hatcheries in 1988,²¹ acknowledging that after 17 years of the State planning, building and operating hatcheries, Alaska sought an even more efficient way of ensuring a healthy, robust, and sustainable salmon fishery.²²

Alaska law provides that the hatcheries may only be non-profit.²³ By design, the hatcheries are allowed to recover operating and capital expenses, as well as costs for research and development and expansion of the production system, including wild stock rehabilitation work.²⁴ The system is designed to provide benefits to the common property resource users. The nonprofit regional aquaculture associations have no stockholders, owners, or members. Today, five regional aquaculture associations, from Southeast Alaska to Kodiak, including PWSAC, produce hatchery salmon for common property fisheries.

²¹ AS 16.10.480.

²² Alaska's partnership with the nonprofit hatcheries is unique. Almost all states operate hatcheries of some kind (salmon, trout, walleye, catfish, etc.), but no state operates a hatchery program like Alaska's, and no state works with private nonprofit entities to assist the state government in its hatchery programs. By way of example, California has 21 state hatcheries (<https://wildlife.ca.gov/Fishing/Hatcheries>), Oregon has 33 state hatcheries (<http://www.dfw.state.or.us/fish/hatchery/>), and Washington has 76 state hatcheries (<https://wdfw.wa.gov/fishing/management/hatcheries/facilities?county=All>), and all of these hatcheries are operated by the government.

²³ See AS 16.10.380; AS 16.10.400(a).

²⁴ AS 16.10.455.

Thus, the Alaska Constitution, combined with numerous statutes, including those creating the Department of Fish and Game,²⁵ the Limited Entry Act,²⁶ the Private Non-Profit Hatcheries Act,²⁷ and the Fisheries Enhancement Revolving Loan Fund,²⁸ together demonstrate a strong and long-standing state policy in Alaska of promoting hatchery development for the purpose of enhancing and ensuring the long-term vitality of Alaska's fisheries.

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

The Alaska Department of Fish and Game has been charged by the Alaska legislature with final authority over how many fish hatchery operations are allowed to incubate and release each year,²⁹ and to regulate all other details of hatchery operation.³⁰

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

²⁵ AS 16.05.010 *et seq.*; *see also* 5 AAC 40.100–.990.

²⁶ *Supra* note 12.

²⁷ AS 16.10.375–480.

²⁸ AS 16.10.500–.560.

²⁹ AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 AAC 40.840.

³⁰ AS 16.10.375–.480; 5 AAC 40.005–.990.

Of particular relevance to the issue presently before the Board, AS 16.10.400(g) requires a determination by the Commissioner that a hatchery would result in substantial public benefits and would not jeopardize natural stocks. The statutes also require the Department to conduct public hearings near the proposed hatcheries, and to consider comments offered by the public at the hearings before issuance of a permit.³¹

All state hatcheries are operated pursuant to a permit issued by the Department.³² Standard permit conditions include: (1) provisions that eggs used for broodstock come from a source approved by the Department;³³ (2) no placement of salmon eggs or resulting fry into waters of the state except as designated in the permit; (3) restrictions on the sale of eggs or resulting fry; (4) no release of salmon before department inspection and approval; (5) destruction of diseased salmon; (6) departmental control over where salmon are harvested by hatchery operators; and (7) hatchery location to prevent commingling with wild stocks.³⁴

Further, there is an intricate system of basic and annual hatchery plans that are reviewed annually by the Department and provide for performance reviews, and in

³¹ AS 16.10.410.

³² AS 16.10.400; 16.40.100–.199; 5 AAC 40.110–.240.

³³ AS 16.10.445. This requirement is related to regulations regarding fish transport permitting. *See* 5 AAC 41.001–.100. These regulations provide that no person may transport, possess, export from the state, or release into the waters of the state any live fish unless that person holds a fish transport permit issued by the Commissioner.

³⁴ *See generally* Steven G. McGee, *Salmon Hatcheries in Alaska – Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks*, 44 American Fisheries Society Symposium 317, 327 (2004).

appropriate cases, permit alterations.³⁵ The basic management plans include a complete description of the facility, including the special harvest area, broodstock development schedules, and description of broodstock and hatchery stock management.³⁶

Year-to-year hatchery production is regulated through the annual management plans (AMPs) approved and adopted by the Department. For example, each year, PWSAC and the other PNPs across the state work with the Department, which ultimately formulates an AMP for each hatchery. That plan, among other things, determines the number of eggs the hatchery will collect, how the eggs will be collected, the number of fish it will incubate, and how many fish will be released from the hatchery.³⁷ The AMP also addresses how PNPs will conduct their cost recovery harvest at each hatchery and addresses other specifics of hatchery operation.³⁸

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

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

³⁵ 5 AAC 40.800–.990. As noted above, there is also an extensive Regional Comprehensive Planning Program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. This process creates Regional Planning Teams who are charged to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and supplement natural production . . .” 5 AAC 40.340.

³⁶ See generally McGee, at 329.

³⁷ 5 AAC 40.840.

³⁸ McGee, at 329.

The Board of Fisheries is established by AS 16.05.221, “[f]or purposes of the conservation and development of the fishery resources of the state.”³⁹ In general terms, the Board’s duties complement those performed by the Department. Historically, the Board’s statutory authority has been understood as a mandate to allocate fisheries resources between and among the various user groups and gear types. The Board’s primary function is to: (1) establish fishing seasons; (2) set quotas, bag limits, and harvest levels; (3) determine allowable fishing means and methods; and (4) generally manage the commercial, subsistence, and sport fisheries of the state.⁴⁰ To the best of our knowledge, however, the Board has always deferred to the Department’s expertise and experience with respect to the detailed management of hatchery permitting and production levels.

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

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

Except as expressly provided in AS 16.40.120(e) [authorizing board regulations for the conservation, maintenance and management of species for which an acquisition permit is needed] and AS 16.40.130 [authorizing regulations for the importation of aquatic plants or shellfish for stock], the *Board of Fisheries may not adopt regulations or take action regarding the*

³⁹ AS 16.05.221.

⁴⁰ AS 16.05.251.

issuance, denial, or conditioning of a permit under AS 16.40.100 or AS 16.40.120, the construction or operation of a farm or hatchery required to have a permit under AS 16.40.100, or a harvest with a permit issued under AS 16.40.120.

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

The Proponent here will likely argue that AS 16.10.440(b) grants the Board the authority to upend the Department’s carefully constructed regulatory framework governing hatchery production and veto Department permitting decisions.⁴¹ As an initial matter, the plain text of the statute does not authorize the generalized across-the-board percentage reduction set forth in proposal 156. Rather, the statute’s grant of authority to the Board is very narrow and only allows the Board to “after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs .

⁴¹ AS 16.10.440 provides in full:

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

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

...” Under this provision, any Board regulation must amend a *specific permit* and only then modify a specific “*number of salmon eggs.*” It does not permit an across-the-board percentage reduction to all hatchery permits. In this way, Proposal 156 is not a well-considered amendment to a specific permit that would implement a scientifically-validated-alternate-egg-take number. Rather, it is a special interest group’s attempt to subvert the Department’s statutory permitting power through a novel application of a statute in a manner contrary to the legislature’s carefully crafted balance between the Department and Board that has served all stakeholders well for decades.

Further, any argument that this statutory provision gives the Board broad powers over hatchery egg take numbers reads it out of context and is inconsistent with its historical origins. Under Alaska law, AS 16.10.440(b) must be construed in light of the overall statutory scheme governing Alaska’s salmon hatcheries,⁴² its legislative history and intent,⁴³ and over 40 years of consistent administrative interpretation and practice, during

⁴² *E.g., Monzulla v. Voorhees Concrete Cutting*, 254 P.3d 341, 345 (Alaska 2011) (citing *In re Hutchinson's Estate*, 577 P.2d 1074, 1075 (Alaska 1978) (discussing the doctrine of *in pari materia*: the “established principle of statutory construction that all sections of an act are to be construed together so that all have meaning and no section conflicts with another”).

⁴³ *E.g., Native Village of Elim v. State* 990 P.2d 1, 5 (Alaska 1999); *Kochutin v. State*, 739 P.2d 170, 171 (Alaska 1987) (citing *Hammond v. Hoffbeck*, 627 P.2d 1052, 1056 & n.7 (Alaska 1981)).

which the Board (to our knowledge) has never attempted to use this statute as the basis for usurping the Department's traditional control over hatchery production.⁴⁴

Section 440(b) was enacted in 1979 when the hatchery system was in its infancy. Most hatchery egg take was from wild stocks, not returning hatchery fish, which is how egg take is conducted today. The thinking at the time was that salmon eggs harvested from wild stocks were still a "public resource" while the fish were swimming out in the ocean, and the harvest of wild fish for egg take had allocation implications that could potentially fall within the Board's purview. In contrast, today's egg take procedures are conducted almost exclusively from returning hatchery broodstock that are captured in the special harvest areas directly in front of the hatcheries. At that point, the hatchery salmon cease to be a public resource, and their capture and the collection of their eggs have very limited allocative implications. Further, as the Department Commissioner explained to the Board addressing a 2018 emergency petition asking the Board to intervene in hatchery permitting, "the Board's authority over the possession, transport and release of live fish had not been delegated to the department when AS 16.10.440(b) was amended."⁴⁵

⁴⁴ *E.g.*, *Marathon Oil Co. v. State, Dep't of Nat. Res.*, 254 P.3d 1078, 1082 (Alaska 2011); *Premiera Blue Cross v. State, Dep't of Commerce, Cmty. & Econ. Dev., Div. of Ins.*, 171 P.3d 1110, 1119 (Alaska 2007) (courts defer to reasonable agency determinations that implicate agency expertise); *Bullock v. State, Dep't of Cmty. & Reg'l Affairs*, 19 P.3d 1209, 1219 (Alaska 2001) (discussing that agency decisions based on "long-standing, consistent and widely known" interpretations of agency expertise should be given "great weight").

⁴⁵ Memorandum from Sam Cotton, Commissioner, to John Jensen, Chair, dated January 14, 2018, Re: Emergency Petition to the Alaska Board of Fisheries requesting the Board to reverse a department decision to allow a 20 million increase in the number of pink salmon eggs to be harvested by VFDA in 2018.

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

There are three other major changes made by the bill:

Section 2 of the bill amends AS 16.10.440(a)(b). The amendment clarifies the role of the Board of Fisheries. The role of the Board of Fisheries as envisioned by the original legislation was to regulate the *harvest* of salmon returning to the waters of the state. That role extends to regulating those fish which are returning as a result of releases from natural systems and also from hatchery releases. There are provisions in other specific locations for the harvest of salmon by the hatchery operator for sale, and use of the money from that sale, for the specific purposes as stated in AS 16.10.450. The added language clarifies that the Board of Fisheries may adopt regulations relating to the *harvest* of the fish by hatchery operators at the specifically designated locations. The Board of Fisheries in the past year or two has enacted regulations relating to those harvests for several of the private nonprofit hatcheries in the state.⁴⁶

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

The Board's traditional function has always been to allocate harvests among competing user groups, not to regulate production of fish. This legislative history, with its emphasis on "harvest," is also consistent with PWSAC's long-held belief (apparently

⁴⁶ Alaska House Journal, March 15, 1979, pp. 601–602 (emphasis added).

shared by the Department) that Section 440(b) was intended to cover egg take from wild salmon streams, not to apply to egg take from returning hatchery fish.

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

Additional evidence that the Department, not the Board, is responsible for regulating hatchery egg take can be found in 5 AAC 41.001 *et seq.* For example, 5 AAC 41.005 prohibits the release of hatchery fish without a permit issued by the Commissioner. Regulation of egg take and release of the resulting salmon fry are obviously two sides of the same coin. The regulatory scheme clearly and consistently assigns exclusive responsibility for regulating those two closely related hatchery activities to the Commissioner.⁴⁷

Given the legislative history, the 30-plus-year pattern of administrative interpretation, the anomalous language in Section 440(b) regarding regulations to “amend...the terms of a permit,” and the Department’s mandate vis-à-vis Section 445(b),

⁴⁷ *E.g.*, 5 AAC 41.090 (granting the Commissioner authority to delegate provisions under 5 AAC 41 to persons within *the Department*).

it is quite clear that the Board has little or no role in regulating hatchery production, including but not limited to egg take permit restrictions.

Moreover, regulation of hatchery production by the Board would overlap and almost certainly conflict with the comprehensive and detailed hatchery regulations that are currently in place and operating effectively. As noted above, the Department has a rigorous permitting process for new hatcheries, 5 AAC 40.100–.240. There is an extensive Regional Comprehensive Planning program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. By regulation, the responsibility of the Regional Planning Teams is to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and *supplement* natural production . . .” 5 AAC 40.340 (emphasis added). As mentioned earlier, there is also an intricate system of basic and annual hatchery plans that are reviewed annually by the Department, performance reviews, and, in appropriate cases, permit alterations. 5 AAC 40.800–.990. Production levels are carefully monitored by the Department under these regulations and adjusted if necessary for economic or biological reasons.

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

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

Proposal 156 is not new. In fact, it has been repeatedly proposed in in some form by the same proponent at almost every Board meeting over the past few years. For example, in late 2023 the Proponent introduced Proposal 43 to reduce hatchery production of pink salmon in Cook Inlet to 25% of the year 2000 production level,⁴⁸ and in late 2024 introduced Proposal 78 to “[r]educ[e] the permitted egg intake of each Prince William Sound hatchery that produced pink and chum salmon by 25%.”⁴⁹

The Attorney General’s office filed comments on Proposal 43 in Cook Inlet stating it was likely “beyond the Board’s authority, which is limited by AS 16.05.251(f) and AS 16.10.400 – 16.10.440.”⁵⁰ These comments went on to note that the Board:

[D]oes have authority to prohibit and regulate the capture, possession, transport or release of native or exotic fish or their eggs, AS 16.05.251(9), and to amend by regulation the terms of hatchery permits relating to the source and number of salmon eggs, harvest by hatchery operators, and locations for harvest, AS 16.10.440(b), *which may indirectly affect hatchery production.*⁵¹

⁴⁸ Proposal 43 for Lower Cook Inlet Board Meeting November 28 – December 1, 2023 available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI_all.pdf.

⁴⁹ Proposal 78 for Prince William Sound Board Meeting December 10 – December 16, 2024 available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/proposals/pws_all.pdf

⁵⁰ State of Alaska Department of Law Comments on Proposal 43 Lower Cook Inlet Board Meeting dated November 22, 2023 available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/dol-memo-lci.pdf>.

⁵¹ *Id.* (emphasis added).

Likewise, the Department *affirmatively opposed* both Proposal 43 and Proposal 78. Both Department comments quoted a prior Attorney General informal opinion from 1997 that “we do not believe the Board may either (1) adopt regulations that effectively veto or override a fundamental department policy decision regarding whether to authorize the operation of a particular hatchery or (2) adopt regulations preventing the department from exercising its authority to permit a hatchery operation,” and that “to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions by the department for which there is specific statutory authority would upset the balance of the statutory scheme chosen by the legislature.”⁵² The Department also favorably quoted the informal opinion’s statement that “a Board amendment that puts a hatchery out of operation might be construed as an effective revocation or denial of a hatchery permit, an action that is expressly prohibited by AS 16.10.440(b).”⁵³

Regarding Proposal 43 the Department concluded:

The department **OPPOSES** this proposal. Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment

⁵² Department Comments on Proposal 43 2023 Lower Cook Inlet Board Meeting available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/rc2_staff_comments_lci.pdf; Department Comments on Proposal 78 available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/pws/rc2_staff-comments.pdf.

⁵³ *Id.*

should be based on analysis of data and there should be clear evidence the amendment will have a positive impact on wild salmon stocks.⁵⁴

The Department likewise concluded regarding Proposal 78:

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

If the board were to adopt this proposal, there would need to be a discussion of how to apportion the egg-take cap because egg-take capacity is set on each hatchery permit. A straight 25% cut to each species at each hatchery may have unintended effects on the production of other species of salmon and may affect harvest allocation, which are a primary concern of the boards of the PNP corporations.⁵⁵

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

⁵⁴ Department Comments on Proposal 43.

⁵⁵ Department Comments on Proposal 78.

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

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

Consistent with its past position on similar proposals, the Department filed comments on proposal 156 likewise concluding it is beyond the Board’s authority.⁵⁶ Again, the Department referenced the prior 1997 Attorney General opinion to state “Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized.” The Department concluded regarding Proposal 156:

The department **OPPOSES** this proposal because the changes to Alaska hatchery salmon production envisioned by this proposal are likely to have little effect on marine competition among salmon species. The department recognizes that straying of hatchery-produced chum salmon in Southeast Alaska has impacted the ability to assess status of wild chum salmon returns in some areas and is analyzing this problem to determine whether changes to hatchery release practices could reduce straying of hatchery produced chum salmon. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks and the commissioner can amend a permit if the hatchery is not in the best interest of the public or to mitigate the adverse effects of the hatchery operation. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will reduce adverse effects on wild salmon

⁵⁶ Department Comments to Proposal 156, available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2_staff-comments_12-30-24.pdf (pages 215-19).

stocks. No evidence was provided in this proposal to support that current permitted pink and chum salmon egg-take levels adversely affect wild stocks, in or outside the southeast enhancement area.

If the board were to adopt this proposal, there would need to be a discussion of how to apportion the egg-take cap because egg-take capacity is set on each hatchery permit. A straight 25% cut to each species at each hatchery may have unintended effects on production of other species of salmon and may have harvest allocation affects, which are a primary concern of the boards of the PNP corporations.⁵⁷

In short, like the similar proposals before it, the Department likewise recognizes the legal flaws in proposal 156 as well as its substantive weaknesses.

II. PROPOSAL 156 IS PROCEDURALLY INFIRM BECAUSE IT SEEKS TO AMEND A REGULATION THAT DOES NOT ADDRESS HATCHERY PERMITTING

Proposal 156 is also procedurally improper. It seeks to accomplish its 25 percent reduction in Southeast Alaska permitting by amending (without even explaining precisely how) 5 AAC 33.364 which addresses the Southeast Alaska Salmon Enhancement Allocation Plan. The problem is this regulation contains no provisions whatsoever addressing hatchery *production or permitting*. Rather, its stated purpose and sole subject is “to provide fair and reasonable distribution of the harvest of salmon from enhancement projects among the seine, troll, and drift gillnet commercial fisheries, and to reduce

⁵⁷ *Id.*

conflicts among these users, in the Southeastern Alaska Area.”⁵⁸ There is no place in this regulation to incorporate Proposal 156’s proposal to “[r]educe the permitted egg intake of pink and chum salmon of each applicable Southeast hatchery for pink and chum salmon by 25%.”

Further, there is no current Board regulation addressing permitted hatchery production and releases, whether specific to Southeast Alaska or statewide. Given the discussion above, this is because these issues are the purview of the Department, not the

⁵⁸ 5 AAC 33.364 which provides in full:

(a) The purpose of the management plan contained in this section is to provide a fair and reasonable distribution of the harvest of salmon from enhancement projects among the seine, troll, and drift gillnet commercial fisheries, and to reduce conflicts among these users, in the Southeastern Alaska Area. The Board of Fisheries establishes the following value allocations:

- (1) seine - 44 percent - 49 percent;
- (2) hand and power troll - 27 percent - 32 percent;
- (3) drift gillnet - 24 percent - 29 percent.

(b) The department shall evaluate the annual harvest of salmon stocks from enhancement projects to determine whether the distribution of the value of enhanced salmon taken in the seine, troll, and drift gillnet fisheries in the Southeastern Alaska Area is consistent with the allocations established in (a) of this section. The evaluation of allocation percentages shall be based on five-year increments, beginning with 1985. The value of the enhanced salmon harvested each year shall be determined by the department based on data from the Commercial Fisheries Entry Commission.

(c) If the value of the harvest of enhanced salmon stocks by a gear group listed in (a) of this section is outside of its allocation percentage for three consecutive years, the board will, in its discretion, adjust fisheries within special harvest areas to bring the gear group within its allocation percentage.

(d) The department may not make inseason adjustments or changes in management in or out of the special harvest areas to achieve the allocation percentages established in (a) of this section

Board. As noted, in the past the Proponent of Proposal 156 proposed similar reductions in hatchery production in both Cook Inlet and Kodiak,⁵⁹ both times seeking to amend 5 AAC 40.820, which addressed the creation of hatchery basic management plans *statewide*.⁶⁰ In likely recognition that the Board may not amend a statewide regulation to address hatchery permitting in specific regions, Proponent changed tactics with the current proposal and Proposal 78 before it, both times seeking to amend a region-specific regulation addressing hatchery fish harvest allocation.⁶¹

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

⁶⁰ 5 AAC 40.820 provides:

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

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

⁶¹ Proposal 78 sought to amend 5 AAC 24.370, which addresses the Prince William Sound Management and Salmon Enhancement Allocation Plan

But the fundamental problem remains that there is no place in the Board regulations addressing amendment of hatchery permits. Proponent cannot seek to accomplish this result simply by shoehorning the permit amendment into an unrelated regulation. As discussed above, the Board lacks statutory authority to set egg take policy for returning hatchery fish, full stop. Here, the regulation Proposal 156 seeks to amend does not pertain to hatchery egg take. Even if the Board could amend the parameters of hatchery egg take from wild salmon via a new regulation adopted in accordance with the Administrative Procedures Act, that is not what Proposal 156 attempts to do. Proposal 156 seeks to amend a regulation that is unrelated to the Board's limited authority under AS 16.10.440(b).

Although Proposal 156 is procedurally impermissible, the larger issue is it would be untenable for two agencies to each have authority to set egg take policy for returning hatchery salmon. Stakeholders must be able to rely on the policy set by the agency with statutory decision-making authority for short- medium- and long-term planning purposes. Here, that agency has always been the Department. The stakes are too high to change the status quo for the sake of implementing experimental policy advocated for by a special interest group through a statute that the legislature intended to govern the Board's authority to regulate harvest allocation, not egg take from returning hatchery salmon.

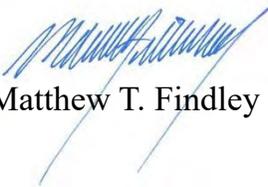
CONCLUSION

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

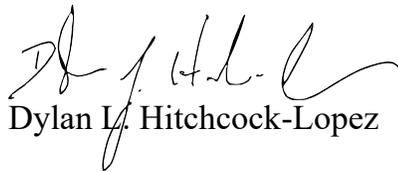
regional hatchery regime that has consistently stabilized the runs and enhanced salmon harvests throughout the state since 1974. Overall, Alaska's hatcheries have been a remarkable success and have helped the state's salmon resources to thrive and expand over the past 50 years, creating millions of dollars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

For these reasons, the Board should reject Proposal 156.

ASHBURN & MASON, P.C.



Matthew T. Findley



Dylan J. Hitchcock-Lopez

Submitted by: Sarah Asper-Smith
Community of Residence: Juneau and Sitka

I support the protection of Promisla Bay for subsistence harvesting of herring.

Submitted by: Erik Auger
Community of Residence: Ketchikan

Dear Alaska Board of Fisheries,

My name is Eric Auger, and I'm a lifelong Alaskan from Ketchikan. I've worked in the commercial fishing industry for years, including in the Red King Crab Fishery. Fishing isn't just a job; it's how I support myself and contribute to my community. It's also a critical part of the economy in Southeast Alaska.

Proposal #243, submitted by the Alaska Department of Fish and Game (ADFG), makes sense. It ensures that the harvestable surplus of Red King Crab is used effectively without exceeding sustainable limits. This proposal gives all stakeholders—fishermen, processors, and ADFG—a fair opportunity to benefit from the resource.

Extending the season to three months is practical. A longer season helps fishermen operate safely and efficiently, and it gives processors a consistent supply to work with. It's a straightforward way to maximize the economic potential of the fishery without putting the resource at risk.

I've seen how decisions made by the Alaska Board of Fisheries can either support or harm the people in this industry. Commercial fishing is one of the most important sectors in Alaska's economy, and the decisions made here have real impacts on people's livelihoods. Proposal #243 is a good example of a balanced approach that supports sustainable fishing and economic opportunity.

The Board has successfully applied similar management strategies in other fisheries, like sablefish and sea cucumbers, so there's no reason it shouldn't work here too. I urge you to approve Proposal #243.

Thank you for your consideration.

Sincerely,
Erik Auger

Submitted by: William Baghoomian
Community of Residence: Ketchikan

It will hurt the businesses

Submitted by: Todd Bailey
Community of Residence: Juneau

I would like write against proposal 156. There is no science linking the decline in Yukon river chinook salmon to the level on enhanced pink and chum being released. The proposed 25 percent reduction could have a massive negative impact on commercial fishermen, processors, and southeast communities. Hatchery programs have been important for the continued abundance of the wild salmon stocks in southeast Alaska by taking the commercial fishing pressure of the wild stocks. I am adamantly opposed to proposal 156.

Submitted by: Jason Baldwin
Community of Residence: United States

Trolling has become a scapegoat for poor management practices. Trawlers are the most negatively impactful force in the fishing industry and are only being protected by the money that their owners see and use to keep command of their regulations.

Alaska needs to admit that their once sustainable practice has failed and will do so exponentially until there is nothing left.

Submitted by: Frank Balovich
Community of Residence: Sitka

Dear Chair Carlson-Van Dort and Board Members,

My name is Frank balovich. I have lived in Sitka Alaska my whole life. I have been a commercial fishermen for some of my childhood and all of my adult life as well. I am married with four kids. My son work's with me during some of my fisheries. He is going to be 8 this year. I also have my mom who is 80 that I split some of my income with. With how hard things have been the last few years in trolling, longline, seining commercial fishermen need as help as we can these days. The charter fishing fleet has gotten back up to there historic highs of the 90s. Also with the evening expanding non resident fishing fleet involved. The non-resident/charter sector's demand for more King salmon during a time of low abundance ignores the impact of that demand on resident trollers and resident sport fishermen. Low abundance is our likely future. Conservation is Alaska's mandate. Resident fisheries should not suffer to support non-resident harvest. Non-resident effort and charter vessel trips continue to expand (50% increase in effort and a 20% increase in charter vessel trips in 2022-2023).

I request that the board please Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation. Authorize in-season management by ADFG to ensure the sport allocation is not exceeded. Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

I would like to support proposals 109 and 110 with RC amendments-- both maintain the current management plan structure and offer different approaches to addressing increasing effort in nonresident sport fisheries in the context of lower all-gear catch limit scenarios. The proposals prescribe different management measures at different levels of harvestable Chinook abundance. I also support proposals 111,112,114.

Strongly OPPOSE Proposals 108 and 113 that seek reallocation from our historic and primarily resident troll fishery to the expanding non-resident sport fishery.

Proposal 113 seeks a direct, uncompensated re-allocation and increase to the combined personal use resident sport fishery and guided non-resident sport fishery. Most of this re-allocation would accrue to non-resident anglers at considerable cost to Southeast Alaska's coastal and rural fishing communities.

Proposal 108 seeks to "borrow" troll quota rather than take it, but the result is the same, since NR sport receives an allocation increase at low abundance and low abundance is the current and likely future us.

Thank you for taking the time read this Chair Carlson-Van Dort and Board Members

Thank you

Frank Balovich

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

Dear Members of the Board of Fisheries:

My name is Frank Balovich of Sitka, Alaska. I am a subsistence, commercial, and sports fisherman.

I am owner operator of the F/V Carole D, I have four crew for the summer season of seining. I am a life long Alaskan. The NSSRA hatchery in Sitka is a huge benefit to are community fishermen. Seining is 60% of my yearly income. A lot of that money comes from the hatchery. Things are already really hard in seining. Something like this could put a lot of people out of business.

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

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Frank Balovich

[REDACTED]

Sitka, Alaska

January 10, 2025

To Whom it May Concern
 Alaska Board of Fisheries

My name is David Dentinger, I'm a manager at Baranof Fishing Charters LLC. I'm submitting this public comment on behalf of the company.

Baranof Fishing Charters takes the following positions on proposals before the Board of Fish in 2025

Support:

Proposal	Position	Reasoning
108	Support	Stabilizes troll fishery while allowing charter to harvest an average of 20%
127	Support	Opens up kings for locals with minimal impact to sportfishing allocation
134	Support	Wasting kings hurts everyone. This helps seiners be a part of the solution.
159-163	Support	Increases fishing access and opportunities for Southeast
193	Support	Protects rockfish populations by offering a chance for safe release
206	Support	Reopening justified by increasing lengths and NOAA models
207	Support	There was never good data justifying the closure of these species. Anecdotally, we see healthy populations of these every day. This opens a lot of opportunities for our guests.
208	Support	There was never good data justifying the closure of these species. Anecdotally, we see healthy populations of these every day. This opens a lot of opportunities for our guests.
211	Support	More information on the impact we're having on these species is crucial for effective management, and long-term opportunity

Oppose:

Proposal	Position	Reasoning
118	Oppose	This limits king salmon opportunity with no regard to abundance
119	Oppose	This shuts us down on kings 28% of the time, no matter the abundance
120	Oppose	This shuts us down on kings 28% of the time, no matter the abundance
140	Oppose	Requiring circle hooks effectively shuts down salmon trolling action. This proposal mentions salmon but awkwardly applies the rule to all types of sportfishing; jigging; mooching; bottomfishing
141	Oppose	The focus is on salmon, but the language is vague enough to apply to all fishing types. This effectively shuts down jigging and bottomfishing throughout SE to local residents and charters alike.
164	Oppose	This restricts charter fishing arbitrarily with no regard to abundance
203	Oppose	Grants priority to unguided non-resident anglers
209	Oppose	Limits fishing opportunities for some of the best action in Southeast.
210	Oppose	Limits fishing opportunities for some of the best action in Southeast.

There are fishing charters all over the world where guests can chase bigger fish in warmer weather than we encounter in Ketchikan. At Baranof Fishing, we believe the fishing reputations of Ketchikan and Alaska rely on the consistent *action* guests find in these waters. Our positions on the many proposals before the board are unified by our desire to maintain that consistent fishing action, safeguarding our community's world-class reputation for fishing. When we say "consistent" action, we mean fishing opportunities that are steady throughout the week, and throughout the season.

As we review the many proposals modifying the King Salmon Management Plan, we see existential threats to charter outfits in Southeast. Reducing annual limits in low salmon abundance puts guests in a position to ask, "If I can't retain my kings at the lodge, why not fish in Cabo this year?". A future where the lodges of Prince of Wales slowly suffocate while cruise charters thrive is not one we want to see. We fear the hollowing of SEAGO through regulations that make non-cruise charter operations economically unsustainable. We refuse to accept the only way for king sport-fishing to endure in Southeast is to regulate charter companies *-and the rural communities that depend on their hiring, tax contributions, and local spending-* out of existence.

Alaska's reputation is a priceless asset. The mystique of this land drives people to cruise for a week in the rain instead of hitting sandy beaches, to fly to a remote wilderness lodge instead of their local lakes and rivers, to buy wild-caught Alaskan fish instead of the farmed alternative. That reputation has kept Ketchikan afloat through shifting economic tides. Charter operations showcase the Alaska people dream of, and everyone in the state stands to benefit keeping that dream alive.



David Dentinger

Director of Hiring and Training
Baranof Fishing Charters LLC.

Submitted by: Reed Barber

Community of Residence: Haines

Prop 250 Oppose

I believe this will weaken the Dungeness fisheries chance for continued sustainability.

It will decrease the number of large males in the reproductive cycle, reducing genetic diversity by reducing the time an individual crab has to reproduce before it may be harvested.

It complicates regulation.

It allows harvest at a reduced size/weight reducing yields for the harvester.

Prop 251 Oppose

I have seen soft shell crab throughout the entire summer and fall seasons.

Starting the season later greatly affects direct-to-consumer markets.

A shorter season allows less time for the freshest product to flow through processors to the consumer.

01/12/25

To: Alaska Board of Fisheries

From: Capt. Richard Bates

Guide at Waterfall Resort

Re: Proposals regarding 2025 Southeast Salmon fisheries

Dear members of the Alaska Board of Fisheries,

My name is Richard Bates and I am an Alaskan resident, guide and Captain at Waterfall Resort in Craig, Alaska. First, I would like to thank you for taking the time to review all of the letters and ideas around the 2025 Southeast salmon fisheries, and how to best manage such a valuable multi-user resource. The following are my thoughts and ideas regarding this topic. I will break down the topics into three categories, Support, Oppose, and Abstain.

Support:

108: Proposal 108 as authored by SEAGO. I have read the proposal and it is rooted in science with an eye towards long term stability for all user groups. 108 has historical data to support the position and is a model that accounts for all user groups.

122: I support Proposal 122 as it is in the best interest of the sustainability and survivability of the fish.

123: I support Proposal 123 for the same reasons as listed in 122.

131: I support Proposal 131 in an effort for all interested user groups have the ability to earn a living from such a valuable resource.

134: I support Proposal 134 and a penalty associated with illegal harvest which negatively effects all user groups.

159-163: I support the Blind Slough proposals.

193: I support this Groundfish deep release proposal.

Oppose:

There are numerous proposals that I disagree with. Many of the proposals speak to changing limits based not in science but rather arbitrary numbers and opinions with no data to support the proposal.

Other proposals suggest to close the fishery on multiple days of the week. Again, no data to support that kind of closure and as a sport charter Captain and Alaskan resident, my clients and I rely on an open fishery for income as well as the main reason clients have traveled from near and far is to catch a salmon or two.

Proposal 130 suggests the keep of all summer Kings in the first opener in July. Keep of all fish is a disaster in the making and very short sighted. As stated above the fishery has to be managed for all user groups and in a manner that prohibits any group from catching, "all Kings".

The total proposals opposed by me are 104, 106, 107, 109-111,114-120,125-128,130,140,141, 164,203,205,209, and 210.

I abstain from comment on proposals 105, 113, and 121.

This fishery is complex and has many user groups. While both sport and commercial users of this resource need consistent and sound management practices, there are other elements that count on a stable and available fishery as well. A short list of the industries that benefit from a stable catch rate in the sport charter sector are hotels, airlines, restaurants, ground transportation, and virtually every other tourist driven business that exists in this management area. The very reason so many businesses thrive and residents are employed at said businesses is due to the stable catchability of the resource. Without sport fishing charters many local jobs do not exist hurting the local population and elimination of millions of dollars into the Alaskan economy.

No matter the side of the argument one supports what is known is that long term management for average is very accurate. Chasing daily numbers is highly inaccurate in a best-case scenario. Eliminating a user group from the resource is not an option and hurts many facets of the economy.

A tiered limit such as the 3-2-1 system that has been in place is the most stable system supported by science and numbers. A sample of one year does not provide accurate reliable numbers of long-term viability for this fishery. Fish numbers fluctuate some years are good some, not so much. To chase a moving target on a daily basis is impossible. To manage on a long-term average based on fact rather than feeling is what will provide long term sustainability for all user groups.

As a resident who earns a living from sport charter fishing, I believe it is of paramount importance that the fishery be managed not to exclude or severely restrict any user group but rather to provide opportunity for this valuable resource that so many benefit from. I urge the board to adopt standards that that have proven accurate over the long term and not to succumb to arbitrary statements based on feelings or born from emotion.

Thank you for your time,

Richard Bates

Dear Chair Carlson-Van Dort and Board members,

My name is Patrick Baum, I am representing myself, and I am a Juneau resident. I was born and raised in Fairbanks, and have spent the last twenty years trolling in Southeast, with sixteen of those years operating my own vessels.

It's a modest living, and my small business, my way of life, is one breakdown away from failure. These last two years have been particularly challenging with the loss of our August King salmon opener due to the charter/non-resident fisherman exceeding their King salmon allocation for both years.

I'm concerned that if the historical allocation of King salmon is not maintained, myself, other trollers, the support industries, and coastal and rural communities will be severely affected.

The most important aspects of the proposed King salmon management plans are maintaining the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation, authorizing in-season management by ADFG to ensure the sport allocation is not exceeded, and prioritizing resident sport harvest within the sport allocation by controlling non-resident harvest.

Many proposals seek to protect the troll industry and the resident fisherman from the unsustainable and expanding growth of the non-resident sport fishery. These proposals, which I support, include amended versions of proposals 109, 110, 111, and 114, as well as proposal 115. Amended versions of proposals 109, 110, 111 and 114 maintain the current management plan structure and offer different approaches to addressing increasing effort in non-resident sport fisheries. Proposal 115 offers a very clear approach to ensuring non-resident fishermen do not exceed the sport fishery King salmon allocation.

Other proposals, 108 and 113, which seek to reallocate King salmon from our historic and primarily resident troll fishery to the expanding non-resident sport fishery are strongly opposed. Proposal 113 seeks a direct, uncompensated re-allocation and increase to the combined personal use resident sport fishery and guided non-resident sport fishery. Most of this reallocation would accrue to non-resident fisherman at a considerable cost to Southeast Alaska's coastal and rural fishing communities. Proposal 108 seeks to "borrow" troll quota rather than take it,

and the results are the same, since non-resident sport receives an allocation increase at low abundance and low abundance is the current and likely future reality.

The troll fleet is the second largest fleet in Alaska and the largest fleet in Southeast Alaska. The troll fleet provides affordable, entry level opportunity when compared to other fisheries in Alaska, resulting in troll permits being held by residents of virtually every one of Southeast's communities. The troll fishery provides more jobs for Alaskan residents than any other fishery and is especially important to those who live in rural communities.

The economic impact of the troll fishery in Southeast Alaska, as measured in terms of total output, is in the range of \$85 million annually, with approximately 44% of that derived from King salmon harvest.

To ensure the fishery remains available for Alaskan residents in the future, we must maintain an 80/20 allocation split between the troll fishery and the sport sector. This plan includes authorizing in-season management by ADFG and prioritizing the harvest for resident sport fishers.

Thank you for your time and consideration.

Patrick Baum

FV Deep Sea

Submitted by: Mike Bavard
Community of Residence: Juneau

Proposal 224

shrimp pot fishing season

My solution is to move the spot shrimp commercial season back its October first opening date.

Why- I have been a personal use shrimper for over 25 years, specifically in the Hobart Bay, Gambier Bay and Windham Bay areas. The existing May commercial shrimp opening literally decimates the fishery for any users for the rest of the summer. If you review the permits that are returned yearly, I believe you will see that the numbers are significantly lower because of commercial opening. Personal use shrimping pales in comparison to the commercial harvest.

Dear Chair Carlson-Van Dort and Board Members,

My name is Sara Beaver-Fujioka. I am from Sitka and am representing myself and my family. I am the widow of Tad Fujioka, a troller who had been working hard to prepare for this meeting until he died in October. Many of you knew him from his years of advocacy for wise and sustainable stewardship of the fish our communities and families rely upon. I am also the mother of our two daughters, who have deckhanded on our family's small power trollers (currently the 34' F/V Sakura) since they were in elementary school. Our older daughter literally cut her teeth on Board of Fish meetings as an infant, with Tad giving oral testimony while wearing her in a front pack that she chewed on.

I support:

- Maintaining the 80/20 allocation split between troll and sport with each sector actively managed to stay within its allocation
- In-season management by ADFG so sport allocation is not exceeded (and does not subtract from troll allocation)
- Prioritizing resident sport harvest over non-resident sport harvest when resources are limited

To accomplish these goals:

- I support Proposals 109 and 110 with RC amendments
- I strongly oppose Proposals 108 and 113 that reallocate king salmon away from trollers.

Our family's commercial fishing business depends on king salmon as a large portion of our income. King salmon generated 32% of our fishing income in 2023 and 28% in 2024; king salmon make our fishing business viable. Power trolling is a fishery that is ideal for supporting families in small rural communities like Sitka, as the capital investments for the boat and permit are lower than other fisheries and there are fishery opportunities near many small rural communities. Eighty-five percent of active trollers are Alaska residents, and there are trollers in almost every small Southeast Alaska community.

Tad chose power trolling and his small fast boat so he could catch fish during the day and come home to our family at night. It has allowed us to raise our children in rural Alaska on and by the ocean, experiencing the joy and satisfaction of working hard together to harvest fish that are delicious, nutritious, and valuable enough to pay our bills. When the girls were preschoolers, he could power troll with two totes on deck: one for the fish and one for the toddler in a lifejacket who was learning the commercial fishing life and having quality time with Dad. Besides the income, Tad made sure that the fish we caught fed our family, friends, neighbors, and elders. He regularly donated commercial troll-caught fish to the Fish to Schools program, so students in all of Sitka's schools could have high quality local fish in the school lunches. Our family's commercial fishing business also generated substantial amounts of revenue for other local businesses and sales tax for our community by sizable purchases of gas, groceries, fishing gear, skilled labor for boat maintenance and repairs, and lumber to rebuild the dock where we tie up our troller. In addition, Tad and I are members of the Seafood Producers Cooperative (SPC), which relies on troll fish as an important component of their business and contributes fish heads to community members to make foods important in local cultures.

Trollers need to continue to have consistent access to our historic allocation of king salmon in order to support our businesses, our families, and our communities. Every king counts to keep us afloat.

Thank you to all of the Board for your work to listen, understand, and steward the fish our communities rely upon.



Tad and Alexandra power trolling on the F/V Sakura



Tad, Sara, & Alexandra power trolling on our very first troller, the converted F/V Silver Point

Submitted by: Bill West
Bear Paw Charters LLC

Community of Residence: SITKA

Bear Paw Charters offers eco-tours out of Sitka and operate throughout SE Alaska. Our primary area of operation is around Baranof Island. My wife and I are ex-employees of NSRAA and worked at Hidden Falls Hatchery. Our charter operation doesn't do much fishing, but we certainly take the time to educate our clients about how the hatcheries save the wild runs and continue to employ the fishery industry and feed the world, sustainably. Our guests marvel at number the fish to return with all the fish jumping about, it's a true delight. We are strong advocates for the fish hatchery industry as we have seen first-hand the benefits. A strong fish run equals a strong economy not only for the fisherman but to local communities in immeasurable ways.

Subject: Support for Proposal #243 – Alaska Board of Fisheries

Dear Alaska Board of Fisheries,

My name is Robert Becker, and I am a lifelong Alaskan with over 30 years of experience in the commercial fishing industry. I am a captain, boat owner, and holder of a K69 permit, and I have held state-issued permits for decades. I am writing to express my strong support for Proposal #243, submitted by the Alaska Department of Fish and Game (ADFG).

This proposal is a critical step in ensuring sustainable and equitable management of the Red King Crab resource. Each year, there is a harvestable surplus of Red King Crab, and Proposal #243 provides a framework to responsibly access this resource while safeguarding against exceeding the total allowable catch (TAC). This ensures the long-term sustainability of the fishery and supports the livelihoods of fishermen across Southeast Alaska.

The proposed extension of the season to three months is a practical measure that will allow fishermen to harvest and market King Crab under optimal conditions. This change will maximize the economic value of the resource, benefiting not only fishermen but also processors and the broader Alaskan economy.

I have dedicated my life to Alaska's commercial fishing industry and understand the importance of balancing resource use with sustainability. Similar regulations have proven successful for Southeast Alaska's sablefish, herring, and sea cucumber fisheries, demonstrating both biological and economic viability. Proposal #243 reflects these proven strategies and supports the long-term health of our industry.

I urge the Board to approve Proposal #243 to ensure that commercial fishermen like myself can continue to contribute to Alaska's economy while upholding sustainable resource management practices.

Thank you for considering my comment.

Sincerely,
Robert Becker
Captain and Boat Owner, K69 Permit Holder
(907) 321-0486

Subject: Opposition to Proposal #242 – Alaska Board of Fisheries

Dear Alaska Board of Fisheries,

My name is Robert Becker, and I am a lifelong Alaskan with over 30 years of experience in the commercial fishing industry. I am a captain, boat owner, and holder of a K69 permit, and I have held state-issued permits for decades. I am writing to express my strong opposition to Proposal #242, which unfairly prioritizes sportfishing interests over the livelihoods of commercial fishermen.

The commercial fishing industry is a cornerstone of Alaska's economy, second only to oil, and supports countless families and small communities throughout Southeast Alaska, including Kake, Haines, Wrangell, Sitka, Petersburg, and Ketchikan. Allowing urban sportfishermen from Juneau, represented by the Juneau Territorial Sportsmen Inc., to take a disproportionate share of the Red King Crab resource while denying commercial fishermen their rightful access is unjust and shortsighted.

Each year, there is a surplus of Red King Crab available for harvest. Denying commercial fishermen access to this resource undermines our ability to sustain our businesses and support the processors who depend on us. It also threatens the economies of small, predominantly Native communities that rely on the success of the commercial fishing industry.

Proposal #242 further deepens the financial crisis facing commercial fishermen, who already contend with fluctuating markets and rising operational costs. More fishing opportunities—not fewer—are needed to support a struggling industry and preserve Alaska's fishing heritage. The Board of Fisheries must acknowledge that approving Proposal #242 would harm small communities and native villages while catering disproportionately to urban sportfishing interests.

I strongly urge the Board to reject Proposal #242 to protect the economic future of Southeast Alaska's fishing communities and ensure fair and equitable resource allocation for all stakeholders.

Thank you for considering my comment.

Sincerely,
Robert Becker
Captain and Boat Owner, K69 Permit Holder

Submitted by: Tisa Becker
Community of Residence: Alaska

See Attached Comments to #243, #241, #242

Submitted by: Tisa Becker
Community of Residence: Douglas, Alaska

Dear Members of the Alaska Board of Fisheries,

I am writing to express my strong opposition to Proposal 156, which seeks to reduce Southeast Alaska hatchery production by 25%. As a Southeast Alaska seiner with over 27 years of experience participating in hatchery gillnetting and seining, I have witnessed firsthand the critical role that hatchery programs play in supporting our fisheries and local communities. This proposal would have detrimental effects on the well-being of our fisheries, local economies, and the sustainability of salmon stocks in Southeast Alaska.

The Southeast Alaska salmon fishery has a long-standing history, dating back to the early 1900s. Today, it thrives thanks to careful management of wild stocks and a robust hatchery program designed to enhance fisheries while minimizing interactions with wild populations. Private non-profit hatcheries are stakeholder-driven and overseen by fishermen who uphold Alaska's mandate to protect wild stocks. These programs are a cornerstone of our region's fishing industry and a testament to sustainable fisheries management.

Key points in opposition to this proposal include:

Protecting Genetic Diversity: Hatcheries in Southeast Alaska prioritize local broodstock, collecting eggs from nearby streams to maintain genetic diversity. This practice ensures minimal impact on wild stocks and preserves the natural integrity of salmon populations.

Minimizing Wild Stock Impacts: Hatchery salmon are incidental catches in common property fisheries, which are primarily targeted at wild stocks. The only direct harvest of hatchery fish occurs in Terminal Harvest Areas.

Allocation Concerns: Southeast Alaska's fisheries operate under an allocation plan (5AAC 33.364) based on historical hatchery production. A significant reduction in hatchery output would disrupt this balance and necessitate a reevaluation of the allocation plan, potentially causing conflicts among user groups.

Economic Impacts: Cutting hatchery production would lead to job losses, reduced tax revenues, and decreased income for fishermen, processors, and local businesses. It would also undermine the viability of programs producing species like chinook, coho, and sockeye salmon.

No Evidence Supporting the Proposal: There is no substantial evidence indicating that reducing hatchery production will address concerns about wild salmon interactions. Straying is a natural phenomenon observed in both hatchery and wild stocks, and the use of locally adapted broodstock minimizes potential impacts.

Increased Pressure on Wild Stocks: Reducing hatchery salmon would force more boats into common property fisheries, increasing pressure on wild stocks and complicating management efforts.

Pacific Salmon Treaty Mitigation: Southeast Alaska has already experienced reductions in Chinook harvest levels under the Pacific Salmon Treaty. The mitigation program established to alleviate economic impacts remains vital to the survival of our fisheries and communities.

Alaska's hatchery program is built on sound scientific principles and precautionary measures that prioritize sustainability. The proposed reduction would have far-reaching consequences for all user groups and fail to achieve meaningful conservation outcomes.

I respectfully urge the Board to reject Proposal 156 and continue supporting the hatchery programs that sustain Southeast Alaska's fisheries and communities. My decades of experience in the industry have shown me the value of these programs and the negative impacts that this proposal would have.

Thank you for considering my perspective. Please feel free to contact me if you have any questions or need additional information.

Sincerely, Tisa Becker

Dear Alaska Board of Fisheries,

My name is Tisa Becker, and I am a lifelong Alaskan, born and raised in Southeast, Alaska. Commercial fisheries and sustainable resource management have been integral to my upbringing and remain a cornerstone of my values. I hold two graduate degrees, including a Master of Public Administration in Natural Resource Policy, and I am currently working on my NEPA certification with Utah State University.

I am writing to express my strong support for Proposal #243, submitted by the Alaska Department of Fish and Game (ADFG). This proposal is a well-thought-out measure that aims to support all stakeholders, including fishermen, ADFG, and processors while ensuring sustainable management of the Red King Crab resource. Each year, there is a harvestable surplus of Red King Crab, and this proposal provides a responsible framework to access our share of the resource. Importantly, it is designed with safeguards that guarantee we will not exceed the total allowable catch (TAC), ensuring the long-term health of the resource.

Extending the season to three months would also allow for the maximization of the resource's economic value. A longer season provides the opportunity to harvest and market King Crab under optimal conditions, benefiting not just the fishing community but also the broader Alaskan economy.

As a commercial fisherman, I am deeply concerned about how our industry has been treated in the past by the Alaska Board of Fisheries. Our economic importance to the state of Alaska is second only to oil, and our livelihoods depend on consistent prices, sustainable practices, and transparent records of decision (ROD). I hope that RODs are made thoughtfully, ensuring they reflect the best interests of all stakeholders and the long-term sustainability of our resources.

Proposal #243 aligns with proven management strategies already in place for Southeast Alaska's sablefish, herring pound, and sea cucumber fisheries, all of which have demonstrated biological and economic success. Approving this proposal would further support responsible resource management and strengthen Alaska's economy.

Thank you for considering my comment, and I urge you to approve Proposal #243 to ensure the future viability of Alaska's commercial fishing industry.

Sincerely,
Tisa Becker

[REDACTED]

[REDACTED]
Douglas, AK [REDACTED]

Subject: Support for Proposal #241 – Operation of Other Gear in Registration Area A

Dear Alaska Board of Fisheries,

My name is Tisa Becker, and I am a commercial fisherman who values sustainable practices and responsible resource management. I am writing to express my strong support for Proposal #241, which would allow the use of alternative gear types in Registration Area A.

Fresh bait is essential for a successful fishing season. To ensure the success and sustainability of our fisheries, it is critical that Proposal #241 be approved, allowing fishermen to utilize sustainable bait fish. Additionally, fishermen should have the option to use coil spring pots and slinky pots for bait without reducing the number of Golden King or Red King Crab pots currently permitted.

Catching bait for prescribed fisheries is an integral part of commercial fishing success and aligns with sustainable practices. Proposal #241 provides a pathway for more effective and environmentally conscious fishing operations while supporting the economic viability of Alaska's fishing industry.

I urge the Board to approve Proposal #241 to support the use of fresh, sustainable bait and the innovative gear necessary to maintain successful and responsible fishing practices.

Thank you for considering my comment.

Sincerely,

Tisa Becker

Subject: Opposition to Proposal #242 – Alaska Board of Fisheries

Dear Alaska Board of Fisheries,

My name is Tisa Becker, and I am a lifelong Alaskan born and raised in Southeast, Alaska. I hold two graduate degrees, including a Master of Public Administration in Natural Resource Policy, and I am currently working on my NEPA certification through Utah State University. Commercial fisheries and sustainable resource management have been central to my upbringing and remain critical to my values and livelihood.

I am writing to express my strong opposition to Proposal #242. It is unacceptable that sport fishermen from Juneau, represented by the Juneau Territorial Sportsmen Inc., are attempting to undermine the livelihoods of commercial fishermen across Southeast Alaska. Our industry is already facing a financial crisis, and reducing fishing opportunities further threatens the economic stability of small communities and Native villages, including Kake, Haines, Wrangell, Sitka, Petersburg, and Ketchikan.

Each year, there is a surplus of Red King Crab available for harvest, and it is unjust to allow urban sport fishermen to monopolize this resource while denying commercial fishermen their rightful share. This approach not only jeopardizes the livelihoods of fishermen but also harms processors and the economies of these small communities that depend on the commercial fishing industry.

The Alaska Board of Fisheries must recognize the disproportionate and unfair impact this proposal would have on commercial fishermen and the communities they support. Approving Proposal #242 would effectively strip opportunities from those who rely on these fisheries for their survival while prioritizing urban sportfishing interests. This is not only unjust but also detrimental to the sustainable management of Alaska's resources.

I urge the Board to reject Proposal #242 to protect the economic future of Southeast Alaska's fishing communities and ensure fair and equitable resource allocation for all stakeholders.

Thank you for considering my comment.

Sincerely,
Tisa Becker

1211 Edgemoor Dr. PC38
Sitka, Alaska
99835
January 13, 2025

~~Sitka Advisory Board
1311
Sitka, Alaska 99835
United States~~

Sitka
~~Dear Advisory Board Members~~

allow me to introduce myself. My name is Harriet B. Miyasato Mareno Beleal and my hometown is Wrangell, AK. My grandparents are A.N.B. Founding Fathers, Chester Worchington from Wrangell, Alaska + James Johnson from Kake + Klawack, AK. We now have seven generations, many very active in A.N.S. + A.N.B. I mention this to illustrate that it is of vital importance to my family and all S.E. Alaska + throughout Alaska with our Tlingit/Haida/Tsimshian/Aleut/Yupik + Unikuit native peoples that much consideration be given to protecting our herring spawning grounds (Proposal) + please weigh heavily on another proposal, being introduced by Louise Brodey that, if passed by your board, would ask of Sitka Tribes of AK.

and Sitka Advisory Board would be made co-sponsors of the herring industry with the Sitka Advisory (Fish + Game Board?). In my opinion, it is time to express our feelings on this very important issue, our herring.

As I recall, the late esteemed A.W.S. Lifetime member, Bertha Karas, had testified, a few years back, at an Ok. State Fish + Game Board meeting, that, years ago, Norway had stopped the taking of their salmon so as to replenish it. They did do this & now, Norway does have an ample supply of their salmon. Bertha was a wonderful advocate for us. God bless her.

I thank you kindly for listening to me & allowing me to give my personal testimony. Thank you for your support.

Sincerely,

Harriet Miyasato Mours Bileal
Sitka Fish + Game member Life
A.W.S. Camp # Past VP + Mem.

Submitted by: Jake Bell

Community of Residence: Haines

I am a lifelong Alaskan and commercial gillnet fisherman based in Haines, AK.

Proposal 156: I oppose this proposal. I rely on both hatchery and wild salmon stocks to support my small fishing business. This proposal does not offer clear scientific argument for reducing hatchery stocks or a well-planned approach to minimize negative economic impacts to our coastal communities. If the accepted science does come to support a reduction in hatchery stocks as a benefit to the abundance of wild stocks, then state managers could consider reducing hatchery stocks in a very thoughtful and well-planned manner, in order to support Alaskan small businesses as they deal with the economic consequences and transition to new harvesting strategies.

Proposal 165: I oppose this proposal. Starting the period on Sunday allows the canneries to begin processing fish Monday morning. Moving the gillnet start day from Sunday to Monday may help with some recreational boat traffic but will not make a difference to the more frequent cruise ship traffic and tourist traffic. I do not support the early morning start time of the opener, the existing start time and closure time of noon allows transit times to and from fishing grounds on the same day as the opening/closing. Starting in the morning and ending at night would most likely add two additional nights on the fishing grounds for fishermen transiting to/from the fishing grounds over long distances, such as Haines fishermen traveling from Haines to 15-C. Furthermore, any mechanical issue on opening day (a common day to experience a mechanical issue) gives a chance to make repairs within 24hrs and still salvage the opener.

Proposal 167: I oppose this proposal. The conditions outlined for changing this gear restriction are the same conditions experienced for all SE salmon gear groups. If there is going to be increased efficiency allowed to a given gear group than all salmon gear groups must be equally allowed to use more efficient gear types (eg. deeper gill nets). However, in the end this type of approach is a "race to the bottom" with each gear group fighting for a little bigger cut of a shrinking pie. In order for commercial salmon fishermen to survive the current market conditions, we need strategies to make our salmon more valuable and policies that support increased salmon abundance, no gear group can survive if those two things don't improve.

Proposal 251: I oppose this proposal. This later start date would have significant impact to the viability of combination salmon/Dungeness vessels, as it would push the crab start date well into heavy salmon fishing openers. For many Haines fishermen, the combo vessels are the only way to make a living wage.

Ryland Bell lifelong Alaskan and commercial salmon troller F/V KETA

Hello Board of Fish members,

Thank you for your service to the State and for your work to help with the continued prosperity of our fisheries.

I am a 39 year old Second Generation Commercial Salmon troller born and raised in Alaska based out of the rural communities of Haines in winters and fishing out of Elfin Cove in summers. I am writing to voice my support for proposals 109 &110 with RC amendments.

I am also strongly opposed to proposals 108 &113.

As an Alaskan local involved in a limited entry fishery that is over 100 years old and still consists of 85% Alaskan residents I am appalled at the idea that Sport Fish could ever be regulated without In Season Management.

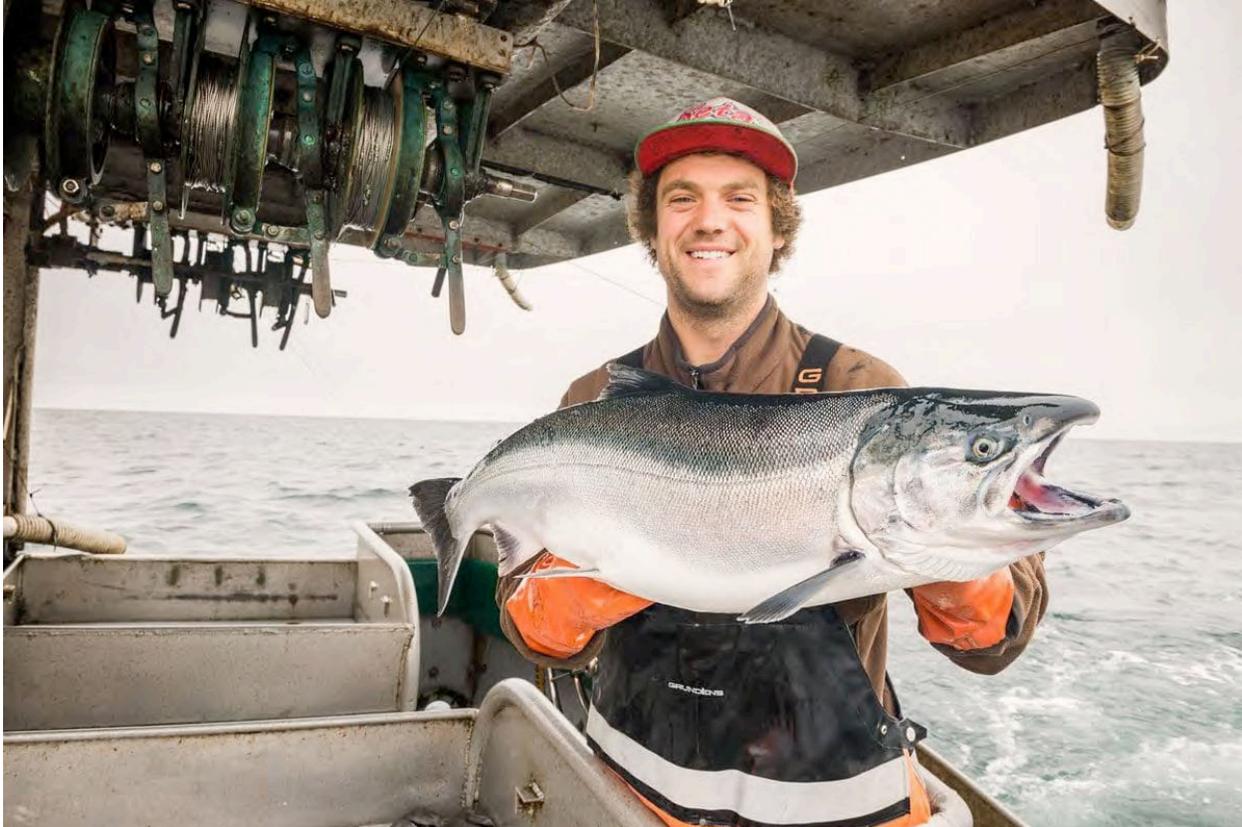
Trolling is my life and my livelihood. I feel moving forward maintaining the 80% Troll/ 20% Sport Fish and giving ADF&G the ability to manage and shut down both Troll and Sport within the summer season as needed based on allotment is crucial for the survival of our way of life. King Salmon account for 1/2 of my annual income.

The last two summers have been bleak for me with Sport Fish going over their allotment which has cut into the troll allotment, meaning the August King Salmon Troll opener has not occurred. The August King Salmon opener is historically a major boost to my profits.

I hope you can feel for a a hard working Alaskan putting it all out there day in and day out to try and make a living the way my parents taught me.

Thank you very much for taking the time to read this

Ryland Bell



Submitted by: Linda Benson
Community of Residence: Matanuska

I support Prop 179 protecting herring egg areas.

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

Dear Members of the Board of Fisheries:

My name is Lisa Bezenek of Ketchikan, Alaska. I am a commercial and sports fisherman.

Already catching fish close to town is slim. Why decrease a way to have more salmon? This doesn't make sense. I would like to keep local fishermen with fishing opportunities, so yes continue hatchery raising salmon. I am writing to express my opposition to Proposal 156, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Southeast Alaska. This proposal would severely undermine the economic and sustainability that hatcheries provide to Alaskan coastal communities.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery

regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Lisa Bezenek
Ketchikan, Alaska



Submitted by: Keith Billi
Community of Residence: Petersburg

Proposal 156. I am opposed.

Proposal 105. I support

Proposal 108. I am opposed. Any allocation of king salmon from commercial troll to the sport fishery is devastating to the small business men and women that make up the troll fleet.

Proposal 113. I am opposed for the same reasons as my opposition to 108.

Proposal 109. I support.

Proposal 110. I support.

Proposal 111. I support.

Submitted by: Alaina Birkel
Community of Residence: Deishú (Haines)

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

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

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

Dear Members of the Board of Fisheries:

My name is David Blake and I am a commercial fisherman.

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

This proposal will not directly affect me as I fish in Prince William Sound and the Copper River Flats. Even though I do not fish in Southeast Alaska, proposals of this kind without proper studies by the Alaska Department of Fisheries seem to set trends for other areas of Alaska and its established and regulated salmon hatcheries. The proposals of drastic cuts in egg take there for in hatchery production without good science effect all Alaskans as the hatcheries have far reaching effects on commercial fisheries, processing plants, coastal communities, sport and personal use fisheries. Drastic change without proper scientific studies by NON BIAS individuals with proper credentials are needed prior to any far reaching drastic actions.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

David Blake

A solid black rectangular redaction box covering the signature area.

Subject: Strong Support for Proposal 242 – Protecting Red King Crab for Personal Use in Unit 11A

Dear Board of Fisheries,

I am writing to express my strong support for Proposal 242, which seeks to make Unit 11A off-limits to commercial fishing for red king crab. This proposal is vital to ensuring the sustainability of red king crab stocks, upholding the principles of Alaska's Constitution, and prioritizing the personal use opportunities that are so critical to many Alaskans.

Legal Priority for Personal Use

Alaska's Constitution and state law establish that subsistence and personal use fisheries take priority over commercial and recreational use when resources are limited.

- Alaska Constitution, Article VIII, Section 4: Mandates the "sustained yield principle," ensuring the state's natural resources are managed responsibly for long-term use.
- Alaska Statute 16.05.258: Grants a clear priority to subsistence fisheries over other uses during times of scarcity. While Proposal 242 concerns personal use rather than subsistence, the same principles of prioritizing Alaskans' direct access to resources apply.

Implementing Proposal 242 aligns with these legal precedents and reflects the state's obligation to prioritize personal use over commercial exploitation when stocks are at risk.

Avoiding the Devastating Boom-and-Bust Cycle

Historical evidence demonstrates that unchecked commercial harvesting can lead to rapid resource depletion and long-term fishery closures. For example:

- Kodiak Red King Crab Fishery: Thrived in the 1960s but collapsed in the 1970s due to overharvesting. The fishery has been closed since 1982 and has yet to recover.
- Bering Sea and Bristol Bay Fisheries: Reached record harvests of 130 million pounds in 1980 but collapsed within a few years, resulting in economic and ecological devastation.

These boom-and-bust cycles directly stem from the intensity of commercial operations. By reallocating Unit 11A to personal use, Proposal 242 helps prevent a similar collapse and ensures sustainable management of this fragile resource.

Economic Realities and Inflation

The need for affordable, sustainable access to food has never been more pressing. With inflation driving up the costs of living, groceries, and fuel, personal use fishing is a critical way for Alaskans to provide for their families. The ability to harvest and enjoy the bounty of Alaska's natural resources is more than a tradition; it is a source of pride and a practical necessity for many.

In land locked communities like ours, which lack access to highway systems, fishing serves as an essential outlet. It allows families to connect with nature, spend quality time together, and put

food on the table without the high costs associated with purchasing seafood commercially. Proposal 242 would protect this vital connection for local residents who rely on red king crab to offset rising living expenses.

Safety and Accessibility for Local Communities

Unit 11A's proximity to shore makes it a safe and viable option for local families using small boats for personal use. Unlike commercial fishing vessels, which are equipped to travel far beyond state waters and access distant resources, personal use harvesters are limited in their range and depend on nearby fishing grounds. Protecting access to Unit 11A is critical to ensuring that local families can fish safely without taking unnecessary risks by venturing farther out.

A Personal Note

For most Alaskans, fishing is not just an activity; it's a way of life and a point of pride. The opportunity to harvest and provide for our families ourselves connects us deeply to the land and sea that sustain us. It's how we pass on traditions to our children and teach them about self-reliance and the value of hard work.

Proposal 242 isn't just about protecting a resource—it's about preserving a way of life that defines Alaska. It ensures that future generations of Alaskans, especially our youth, have access to this invaluable outlet. It keeps local communities connected, helps mitigate the financial pressures we all feel, and gives us a chance to enjoy the bounty of our state safely and sustainably.

In contrast, commercial fishing vessels have the ability to travel greater distances and access resources throughout Alaska. Limiting Unit 11A to personal use is not only a fair allocation of this resource but also a safer and more sustainable one.

Conclusion

The red king crab fishery in Unit 11A is at a critical juncture. Allowing another commercial opening risks repeating the mistakes of the past, with devastating consequences for both the resource and the communities that depend on it. By adopting Proposal 242, the Board of Fisheries can ensure that Unit 11A remains a place where Alaskans can fish safely, sustainably, and with pride for generations to come.

Thank you for considering this important proposal and for your commitment to the long-term health and sustainability of Alaska's fisheries.



With appreciation,
Rolando Blanco
Juneau, AK
[REDACTED]

PC47

Submitted by: Paul Blankenship
Community of Residence: Sitka

I oppose proposal 156. The hatcheries have been essential to my fishing operation for years. Some years it is over 50 percent of my income from seining comes from hatchery raised chums. Any reduction in production would be devastating to my business as well as many others.

PC48

Submitted by: Charles Blanx
Community of Residence: Craig

There are plenty of red crab in areas of tanner crab.

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

Dear Members of the Board of Fisheries:

My name is Angela Bowers of Sitka, Alaska. I am a subsistence, personal use, and sports fisherman.

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

With nearly 20 years of experience working in and around Southeast Alaska's hatcheries, I can attest to the vital role they play. Reducing pink and chum salmon production will harm local economies by reducing available fish for commercial, sport and personal use fisheries, lowering tax revenues, and diminishing the cost recovery funds available to operate hatcheries. Furthermore, it will reduce the number of chinook and coho salmon that hatcheries can produce, negatively impacting common property fisheries across all species.

The proposal acknowledges that more research and a review of existing science are needed. Instead of arbitrarily reducing egg take numbers, we should be looking for creative solutions based on relevant research and data in order to set sustainable, evidence-based targets. Reducing hatchery production now, without proper research, would disrupt an essential part of Alaska's economy, put our small boat commercial fishermen's businesses in jeopardy and harm our hatchery programs, introducing uncertainty into their planning and funding. The role of hatcheries in taking pressure off wild stocks and stabilizing local economies is well-documented, and this proposal fails to account for these important benefits.

Sincerely,

Angela Bowers
Sitka, Alaska



Steve Box
Worthy Seafoods Inc.
Proposal 242
Oppose

My name is Steve Box and I own a small, family-operated, fishing business in Juneau, Alaska called Worthy Seafoods. I highly oppose proposal 242 suggesting that area 11a should be closed to commercial fishing of Red King crab and only allow access to that resource for personal use.

First, there is a growing and substantial demand for access to fresh seafood sold across the dock. I have been a commercial Dungeness crab fisherman for over 10 years and have been involved in every type of commercial crabbing in SE Alaska. Myself and many other fishermen sell Dungeness crab and other types of fresh seafood to the Juneau public every summer off the dock. Not only is it a large economic value to us, it's an important part of living in a Southeast Alaska town.

King crab has the same value to the community when it's available. It's important to remember that not everyone has a boat or the opportunity to go out and get their own personal use king crab. Many people rely on getting their seafood from a local commercial fisherman across the dock. I have hundreds of regular clients who buy from us all throughout the summer. I'm constantly asked about when and where they can get king crab. I do not own a Red King crab permit, but gladly share my client list to other fisherman who are selling King crab locally when an opening occurs. Closing 11a to commercial fishing of Red King crab would limit the opportunity for many local people to enjoy King crab and the experience of buying live crab from a local fisherman. Closing 11a would only allow those people who own boats to harvest and consume this amazing, local food.

Second, this proposal eliminates the largest Red King crab stock in SE Alaska (11a) from consideration by ADF&G to determine whether a commercial fishery for red king crab will be allowed. Eliminating area 11a from the commercial GHL calculation dramatically reduces the prospects for a commercial Red King crab opening in SE Alaska.

Third, most of the best fishing grounds for Red King crab in 11a have been closed to commercial fishing for many years. Most personal-use fishermen set their pots in the areas right outside Auke Bay, around Portland Island, up in Barlow Cove and in Gastineau Channel. These areas are by far the most productive Red King crab fishing grounds in 11a and personal use fishermen already have exclusive use of those grounds. I have been fishing in the personal use fishery for many years and have first hand experience on where the king crab are and where people fish.

Thanks,

Steve Box

Submitted by: Steve Box

Community of Residence: Juneau

I am opposed to the decrease in hatchery production.

Submitted by: Steven Bradford
Community of Residence: Juneau

Proposal 164 - yes, I support. There is too much pressure from the charter industry in our limited terminal fishing area.

Proposal 192 - yes, I support. This reduces gear in the water without impacting harvest level.

Proposal 242 - yes, I support. Commercial crabbing in 11A decimated our stocks for many years and should be eliminated. There are limited opportunities for personal use king crabbing in the Juneau area and this would improve that.

Proposals 258 and 259 - no, I do not support. Reducing size limit and opening more area to commercial dungy crabbers adversely impacts personal use and would have a negative impact on the fishery.

Dear Members of the Alaska Board of Fisheries,

I write to bring to your attention extraordinary issues in ADF&G's presentation of the biomass time series for Sitka Sound herring. Specifically, I am concerned about the recent "**Simulation Study to Estimate the Unfished Biomass of Sitka Sound Pacific Herring**" (ADF&G 2024), which estimates the Unfished Biomass (B_0) of Sitka Sound herring and is intended to inform the setting of a threshold level at this meeting.

A critical review of this Simulation Study reveals significant issues related to the reliability of historical data and the methodologies employed. These issues have profound implications for current and future herring management strategies. Based on a careful review of historical reports, as well as records obtained through a recent Alaska Public Records Act request, it is evident that the Department is unable to substantiate the egg deposition figures used prior to 1991. If the Department were to re-run the Simulation Study excluding these unreliable figures, the resulting estimate for Unfished Biomass would be significantly higher, leading to a much higher threshold value.

Moreover, this review underscores long-standing failures in the Department's internal peer review process and highlights the urgent need for stronger accountability mechanisms in its handling of data.

The remainder of my comment is organized into four parts which focus on establishing this problem through three different lines of evidence before providing recommendations that respond to this problem:

1. The Simulation Study and Its Fundamental Flaw:

I will describe the Simulation Study and its reliance on an egg deposition time series that is unsubstantiated for years prior to 1991.

2. Documenting Shifting Methodology:

I will outline the evolution of the Department's efforts to enumerate herring in Sitka Sound over the past half-century. Herring counting is effort-dependent, and the Department's increased effort over time has influenced the resulting data in ways that remain unacknowledged. This includes four distinct eras of biomass-assessment techniques and three major expansions in regulatory/survey area.

3. **Historical Characterizations of Herring Abundance By ADF&G Managers, 1979-1992**

I will share anecdotes from Department staff in the 1980s and early 1990s that suggest Sitka Sound supported far more herring during that period than is currently recognized.

4. **Recommendations for Responsive Management:**

Based on these findings, I recommend

- Adopting a higher threshold of no less than **50,000 tons**.
- Setting a hard cap of no more than **15,000 tons**.
- Lowering the harvest rate to no more than **10%**.
- Adopting a consent-based co-management framework with Tribal Governments to ensure robust peer review and accountability, among countless other benefits.

I welcome any questions or requests for further evidence to clarify these points. I have endeavored to keep these comments concise and focused, and I appreciate your attention to these critical issues.

1. The Simulation Study & Its Fundamental Flaw

1.1 About the Simulation Study

The concept of "Unfished Biomass" (B_0) represents the hypothetical size of the herring population in Sitka Sound in the absence of commercial fishing activities. This estimate is intended to serve as a baseline to assess the potential natural abundance of herring and guide management decisions.

The **Simulation Study to Estimate the Unfished Biomass of Sitka Sound Pacific Herring** (ADF&G 2024) conducted by the Alaska Department of Fish and Game (ADF&G) uses the Statistical Catch-At-Age (SCAA) model to inform the estimated B_0 . This model, however, is heavily reliant on the egg deposition time series, which forms the foundation of the SCAA model—and by extension, the Simulation Study.

The striking result of this study is that the estimated Unfished Biomass is lower than the biomass estimates for 13 of the past 20 years—a period marked by intensified commercial exploitation of herring

in Sitka Sound. This counterintuitive outcome stands in stark contrast to the persistent concerns voiced by subsistence harvesters over declining herring populations in recent decades.

ADF&G attributes this anomaly to a possible change in the ocean's carrying capacity (Simulation Study, p. 4). However, the more immediate explanation lies in deficiencies in ADF&G's understanding of the historical data underlying their models. The low Unfished Biomass estimate is a direct result of flawed methodology and the inclusion of unreliable historical data. By failing to account for these shortcomings, ADF&G has produced an estimate that is unrealistically low and unsuitable for setting management thresholds.

The Simulation Study assumes the accuracy of historical data without adequately addressing the variability, errors, and gaps in earlier data collection methods. As a result, the model cannot reliably describe the historical spawning stock biomass. Using such flawed estimates to inform current management risks overfishing at low abundance levels, with potentially severe ecological consequences. To mitigate these risks, the Board must reject ADF&G's recommended thresholds and adopt a higher, more precautionary threshold to safeguard the Sitka Sound herring population.

1.2 The Flawed Egg Deposition Time Series

To understand how ADF&G's assumptions have led to erroneous conclusions, it is essential to examine the egg deposition time series. This series is unpublished in its entirety but can be reconstructed using the documentation for the SCAA model (covering 1971–2017) and pre-season meeting materials provided by ADF&G for more recent years (2018–2023). Since egg deposition estimates are derived by multiplying dive survey transect data (density and width) by the nautical miles of spawn, it is also necessary to refer to the nautical miles of spawn time series, which can be compiled from ADF&G's website (1979–2023) and historical reporting (1971–1979). Both data sets can be found in appendix 1 of this comment.

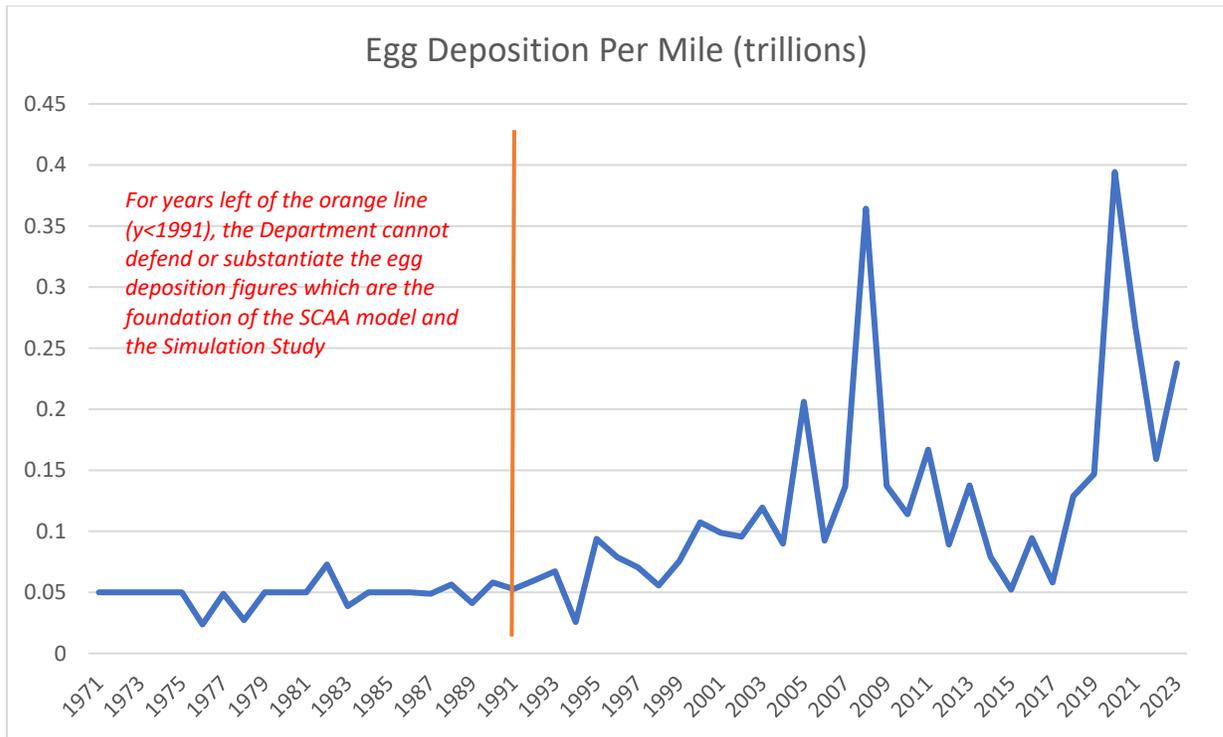
When the egg deposition time series is combined with the nautical miles of spawn time series, and the relationship between egg deposition and miles of spawn is charted, a stark contrast emerges between the two halves of the dataset:

1. The Recent Period (Post-1991/1992):

This period reflects thorough, well-documented surveys based on rigorous dive survey methodologies. The egg deposition figures vary significantly year-to-year, displaying the natural fluctuations expected in herring spawning.

2. The Early Period (Pre-1991/1992):

In contrast, the earlier data exhibit a static and linear relationship, with many years showing identical results of 0.05 trillion eggs per mile of spawn. This flatlined relationship suggests that a simple, artificially low mathematical assumption—not observational data—was used to fill gaps in the time series.



The reliance on these flawed early estimates amounts to using surrogate "junk" data that misrepresents historical herring abundance in Sitka Sound. Including this data in the Simulation Study distorts the modeled biomass time series, falsely suggesting that historical herring populations were lower than they likely were.

This distortion has two major consequences:

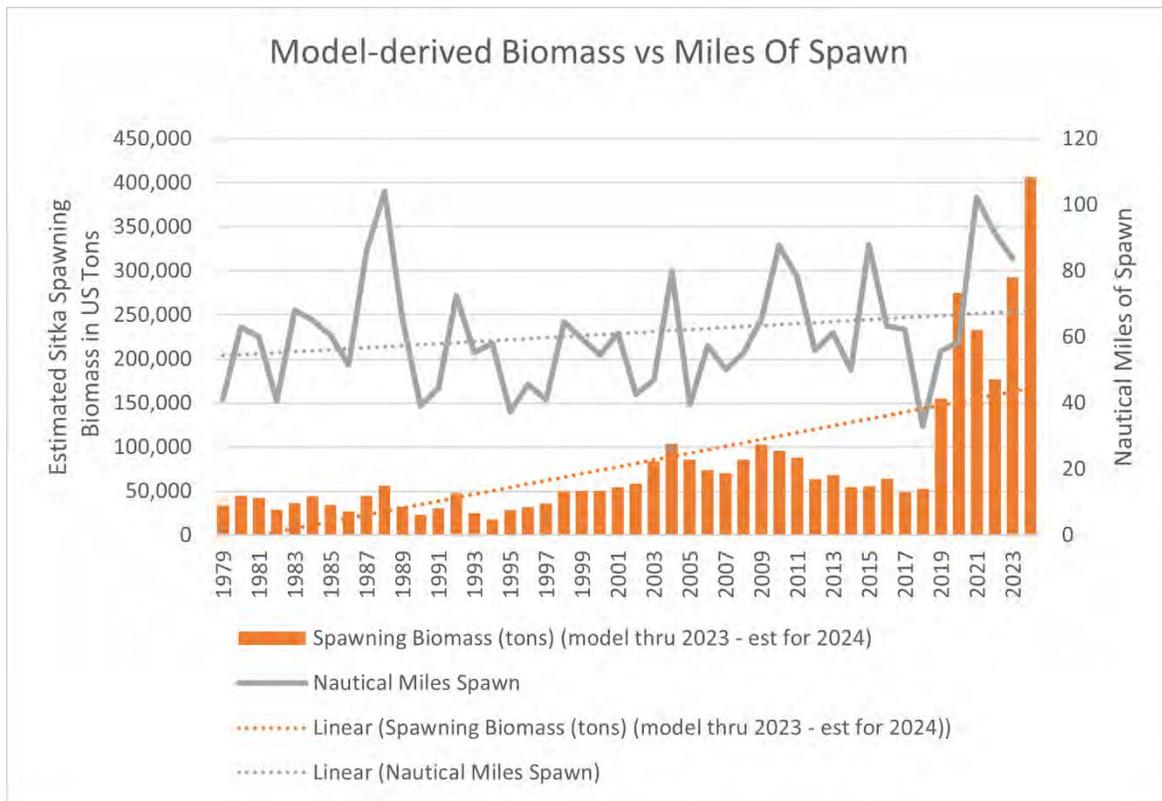
1. It diminishes the perceived harm of intensified commercial fishing in recent decades.

- 2. It supports the flawed premise that large-scale fisheries on spawning herring at biomass levels as low as 25,000–50,000 tons are sustainable.

The egg deposition time series for years prior to 1991 should not have been included in the Simulation Study. Its inclusion undermines the study's conclusions and risks promoting unsustainable management practices. ADF&G must revise its approach and exclude unreliable historical data to provide a more accurate and responsible assessment of Sitka Sound herring.

2 Documenting Shifting Methodology

In the previous section, I highlighted how egg deposition per mile of spawn remained relatively stable in the years leading up to 1991, likely due to the substitution of artificial data when observational data was either incomplete, inconclusive, or deemed unreliable or unimportant at the time. A comparison between the trend in nautical miles of spawn and model-derived biomass illustrates what happened as the egg deposition data used to inform biomass became more dimensionalized / based on thorough observational study:



To highlight the problem here, consider the difference in the values for miles of spawn and biomass for the years 1988 and 2018. Needless to say, it takes a lot of herring to produce a record mileage of spawn, as was done in 1988. It is notable, then, that the biomass for 1988 is reported as being far less than for most recent years, even though the record mileage still stands. On the flipside, note that the lowest spawn mileage on record was reported in 2018, a year that felt terrible for all observers and participants and yet where the reported biomass was *higher* than that of 1988, among other high-mileage years early in the time series.

To understand (and critique) this phenomenon, this section documents the Department's shifting methodology over time. In **2.1**, I offer a historical overview of biomass forecasting methods, highlighting their evolution and the key changes in underlying assumptions. **2.2** presents a rubric and assessment framework to evaluate survey quality and effort, illustrating how these factors have evolved over the years in ways likely to result in higher egg counts and resulting biomass assessments. Lastly, **2.3** charts the major expansions in the survey and management areas.

2.1 Overview of Biomass Forecasting Methodologies (1976–Present)

Over the decades, the Alaska Department of Fish and Game (ADF&G) has undergone several massive transformations in biomass assessment methodology. Each of these shifts has introduced new tools, assumptions, and models, often enabling higher biomass estimates independent of biological reality. Below is an overview of the major biomass forecasting modes over time:

1976–1980: Hydroacoustic (High Survey)

During these years, biomass assessments relied on primitive hydroacoustic equipment, offering resolution equivalent to that of an Etch-a-Sketch. Biomass estimates were derived from the highest single hydroacoustic survey conducted on local wintering populations, and quotas were set at 10% of this value. These high-survey results are now erroneously used to represent total biomass in Sitka Sound for this period.

Experimental spawn deposition surveys were conducted from 1976–1978 but covered a very small area. For 1979 and 1980, egg deposition figures were back-calculated from nautical miles of spawn, further limiting the reliability of data for this period.

1981–1993: Miles of Spawn with Primitive/Incomplete Spawn Deposition Surveys

During this period, biomass forecasts and quotas were primarily informed by the escapement from the previous year, which was often based on the number of nautical miles of spawn observed rather than thorough analysis of dive surveys. While spawn deposition surveys were conducted during these years, the methodology was inconsistent and under active development. As such, escapement figures were typically not grounded in detailed survey data, as discussed in Section 1.

1994–2019: Age-Structured Analysis (ASA)

The introduction of Age-Structured Analysis (ASA) marked a major transformation in ADF&G's survey priorities, placing a central emphasis on egg deposition surveys. Throughout this period, the ASA model was progressively refined:

- Initially, the model assumed very low survival rates.
- Major adjustments to survival assumptions occurred in 1998, 2004, and 2008.
- A scale mis-aging issue between 1999 and 2010 confounded the Department's understanding of population age structure, leading to inaccurate forecasts and contributing to significant uncertainty.

2020–Present: Statistical Catch-at-Age (SCAA) Model

In recent years, ADF&G has transitioned to a new Statistical Catch-at-Age (SCAA) model. While this represents a shift in methodology, ADF&G reporting for these years has not been published. As such, these years are excluded from this review except in discussions related to the Unfished Biomass study.

2.2 A Rubric and Assessment of Survey Quality & Effort Over Time

The transformations outlined above are accompanied by significant changes in survey methodologies and intensities. To systematically evaluate these changes, I developed and applied a rubric to assess the presence or absence of key survey features over time. This highlights various methodological inconsistencies and improvements, shedding light on how survey quality has evolved.

Spawn Deposition Surveys

- **Transect Map:** Checked for map inclusion in reports (1 = present / 0 = absent).
- **Transect Distribution:** Scored based on visual analysis of survey coverage (1 = well-distributed, 0.5 = moderate, 0 = uneven).
- **Summary Data:** Assessed for inclusion of average transect metrics like length and egg density (1 = present / 0 = absent).
- **Detailed Data:** Checked for raw transect data, including regular interval estimates and diver calibration (1 = present / 0 = absent).
- **Clear formula to compute total egg deposition from dive transects:** Identified if a formula links individual transect data to final estimates (1 = present / 0 = absent).
- **Dive Depth:** Scored by dive limit evolution: 0 (pre-1992), 1 (1992–2008, 15m), 2 (post-2009, 21m).

Aerial Surveys

- **Survey Log:** Checked for inclusion of survey logs (1 = present / 0 = absent).
- **Limited Study Range:** Scored maps/logs indicating restricted survey range (1 = present / 0 = absent).
- **Management Area:** Scored by regulatory area expansion evolution: 1 (1978-1980), 2 (1981-1993), 2.5 (2008-2009), 3 (2010-2024)

Sampling (Age, Sex, Weight, Length)

- **Commercial Data:** Assessed presence of biological data from seine sets (1 = present / 0 = absent).
- **Active Spawning Data:** Checked for cast-net sampling from spawning areas (1 = present / 0 = absent).
- **Precise Active Spawning Data:** Precision of active spawn data utilized by model (0 = rounded to nearest percentage point; 1 = rounded to nearest 100th of percentage point)
- **Scaling Error:** Noted long-term error confounding scale analysis results from 1999–2010 (-1 for affected years).
- **Fecundity Assumption:** Scored by fecundity assumption evolution: 0 (assumes longstanding simplified assumption of 100,000,000 eggs per ton of herring); 1 (an assumption of 102,567,376 eggs per ton based on a 1998 fecundity survey); 2 (fecundity determined by a fecundity-at-weight algorithm (fecundity = -3032.0 + 198.8*weight) derived from 2005 survey).

Model Parametrization

- **Model Parametrization evolution:** Scored by major model parametrization update: 0 (pre-ASA); 1 (1994-1997); 2 (1998-2008); 3 (2008-2020).

With that rubric in place, I analyzed all available reports. The results are summed for each year as follows, and the scorecard can be found in appendix 2 at the end of the document:

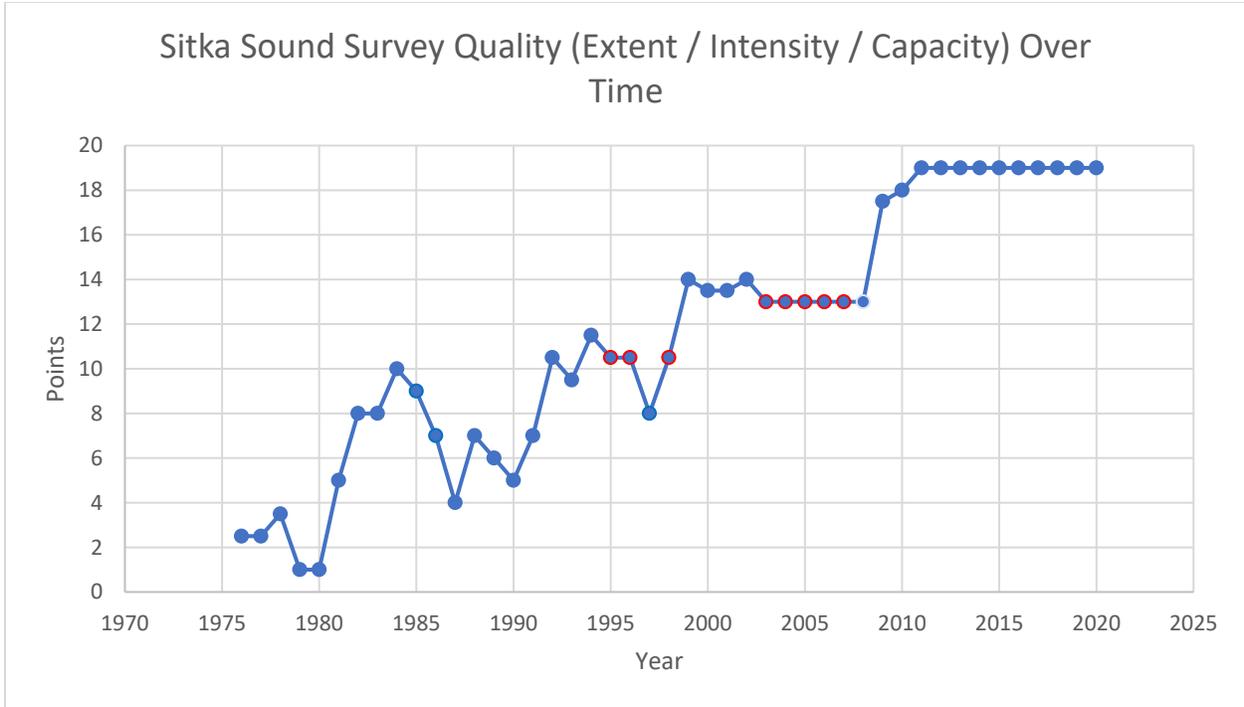


Figure 1 This chart (which is surely itself an imperfect representation) is an attempt to quantify the steady evolution in ADF&G survey quality and effort over time. Because egg deposition survey results are highly effort-dependent, this evolution should be understood as a significant artificial factor contributing to rising biomass estimates over time. Note: Years marked with red dots lack reporting. Scores for these years were calculated as the previous reported year's score, minus one.

While this chart cannot provide direct insight into the historical abundance of herring in Sitka Sound, it highlights the degree to which survey results are increasingly subject to retrospective bias the further back in time we look. This should not be a controversial viewpoint, yet the Department has repeatedly denied it. However, this pattern is an obvious outcome of the Department's gradual process of learning how to survey a vast area effectively. Each generation of ADF&G staff undoubtedly worked diligently within the constraints of their tools, mandates, assumptions, and resources, but the Department's failure to acknowledge and account for the steady development of their biomass assessment capacity remains a major problem. This oversight distorts their historical narratives and undermines the reliability of biomass assessments derived from older data.

2.3 Charting the Major Expansions in Survey/Management Area Over Time

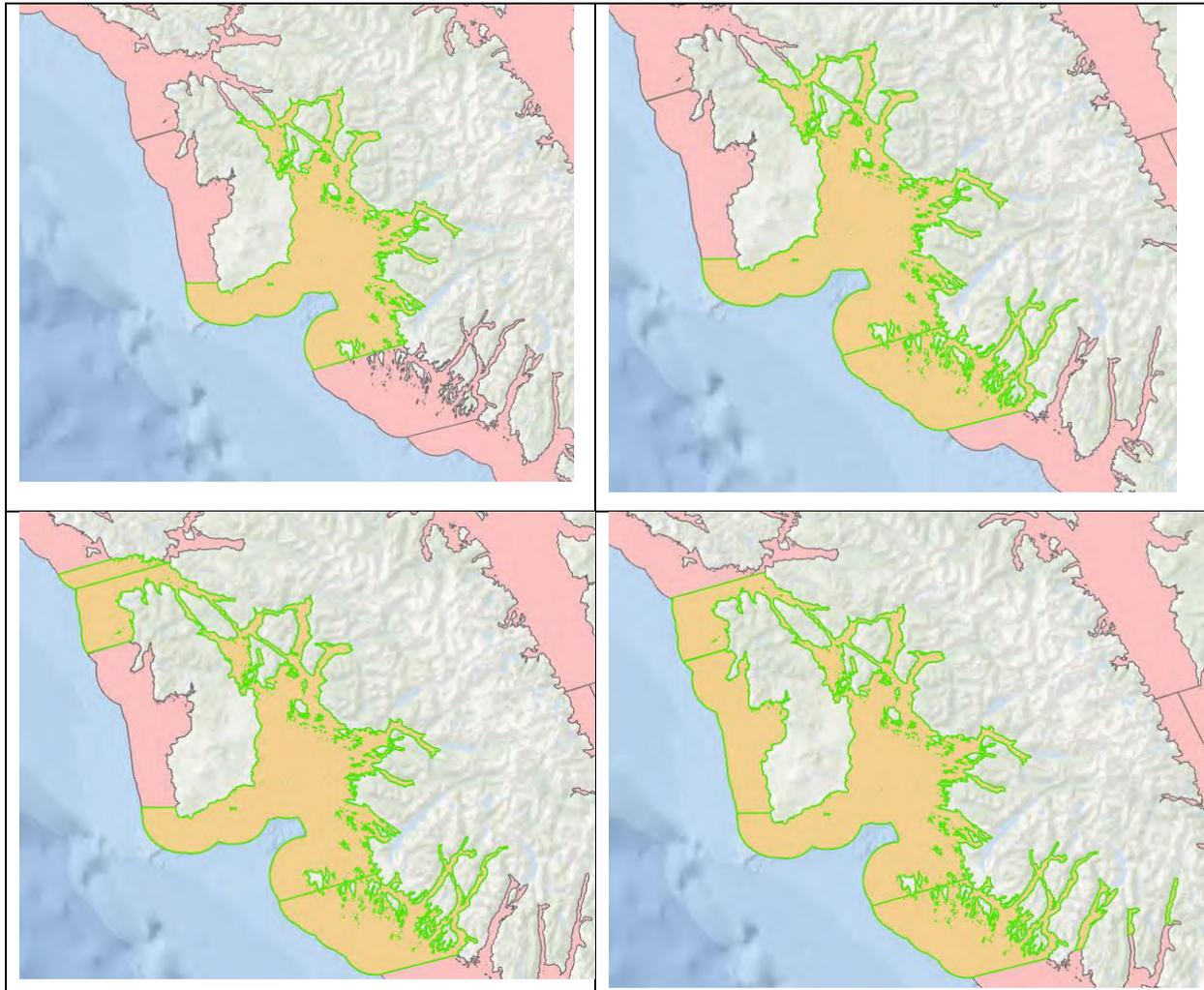


TABLE x: Evolution of the area considered to be part of the Sitka Sound herring area by regulation. Top left: 1978–1980; Top right: 1981–2007 (sporadic surveying of Salisbury Sound commenced in 1988, despite not formally being included in the management area at the time); Bottom left: 2008–2009 (extended, oddly, semi-formally by management plan edict; not by regulation); Bottom right: 2010–present.

Generally, the Department’s survey efforts have been confined to areas within the regulatory management area for Sitka Sound herring. That area has grown with time. Needless to say, herring may

have spawned in areas outside these boundaries earlier in the time series, when those areas went unsurveyed by the Department. There is every reason to think this occurred. Naturally, any uncounted eggs would have contributed to underassessments of herring present in those years, leading to a skewed understanding of historical herring abundance. Despite this, the Department does not acknowledge that these boundary restrictions and their implications for survey coverage matter in their interpretation of historic survey data.

3. Historical Characterizations of Herring Abundance By ADF&G Biologists and Managers, 1979-1992

In addition to reviewing the Department’s published reports, I reviewed Department commentary available in Sitka Sentinel coverage of herring seasons from 1979–1992. Many seasons culminated in summary updates from Management Biologists representing the Alaska Department of Fish and Game (ADF&G). These updates, whether issued immediately after the season or later in the year, consistently provided ADF&G’s contemporaneous assessments of herring abundance and stock health.

In this section, post-season summaries are examined for each year, alongside context from other Sentinel articles or ADF&G reports where necessary. These statements reveal a remarkable rhetorical consistency: year after year, ADF&G managers described the herring population as healthy, abundant, and in many cases, growing.

Yet, ADF&G’s current portrayal of this era diverges starkly from those contemporaneous accounts. Today, biomass from 1979–1992 is retrospectively represented as far lower than current estimates. This discrepancy invites scrutiny of the assumptions underlying retrospective biomass assessments and raises questions about how historical management actions are understood.

Historical Narratives by Year

- **1979:**

Jim Parker, Sitka’s area management biologist, issued a detailed summary of the spawning season:

“At the time of this writing, the herring spawning is nearly over in the vicinity of Sitka Sound. I have recorded 31.25 linear miles of beach spawning in the Sitka Sound, Goddard Hot Springs, and Windy

Passage area. This is the most spawning I have recorded in this area since I began keeping these records in 1964.” (Sentinel, 1979-4-26)

Parker’s account highlights that Sitka was emerging from a period of low returns, entering a new phase of abundance.

- **1980:**

Following the strong 1979 returns, ADF&G reported a continuation of the trend:

“Winter surveys of the Sitka Sound area have found that the herring stock that winters and spawns in this area is in healthy condition. The roe herring fishery in Sitka Sound should produce a harvest somewhat larger than the harvest taken in 1979.”

(Sentinel, 1980-3-24)

After the largest harvest on record (4,445 tons), Parker remarked:

“Sitka Sound experienced one of the largest herring spawns in recent years, with 49 linear miles of beach spawning, compared to 32 miles last year. These figures show a strong and building population of herring in the Sound.” (Sentinel, 1980-6-10)

- **1981–1985:**

During this period, ADF&G consistently emphasized population health and high spawning activity:

“This spring marks the third successive year that herring have spawned over a wide area in Sitka Sound.” (Sentinel, 1981-4-14)

“This season’s fishery represented the fourth consecutive year that Sitka Sound herring stocks have been at high levels, resulting in good catches.” (Sentinel, 1982-3-31)

“Surveys indicate herring stock spawns in Sitka Sound continue to be very healthy.” (Sentinel, 1983-4-22)

By 1985, commercial harvests were regularly surpassing previous records, and ADF&G reported:

“This season’s fishery represents the seventh consecutive year that the Sitka Sound herring stocks have been at high levels and resulted in good catches.” (Sentinel, 1985-

4-8)

- **1986–1988:**

In 1986, Parker noted a new recruitment event:

“The stock continues to be healthy and includes a large proportion of young 2- and 3-year-old herring.” (Sentinel, 1986-4-9)

By 1988, Sitka Sound experienced an unprecedented 100 nautical miles of spawn, the largest recorded since statehood:

“Nearly 100 nautical miles of herring spawn has been observed along the beaches of Sitka Sound, the largest amount since record keeping began at the time of statehood, said Boo DeJong, the Alaska Department of Fish and Game biologist who manages the Sitka sac roe herring fishery.” (Sentinel, 1988-4-22)

This record remains unbroken to this day.

- **1989–1992:**

In 1989, ADF&G reported signs of high mortality, which they interpreted as a natural correction:

“The mortality could be a sign that nature is trying to restore a balance in the number of herring. If a strong class of younger fish appears, the downward trend of the biomass could be slowed or reversed.” (Sentinel, 1989-6-29)

However, by 1992, the Department expressed confidence in the population’s resilience:

“The spawning population is very, very high this year, in spite of going over the quota. There will be ‘a lot of eggs in the water.’ This is the 14th consecutive year that the Sitka Sound herring stocks have been at high levels and resulted in good catches.” (Sentinel, 1992-4-7)

1992 featured the highest mile-days of spawn ever recorded in Sitka Sound, at 180 mile-days. The modeled biomass for that year is currently reported at 50,905 tons, 1/8th the estimated biomass in 2024, when 140.3 mile-days of spawn were reported.

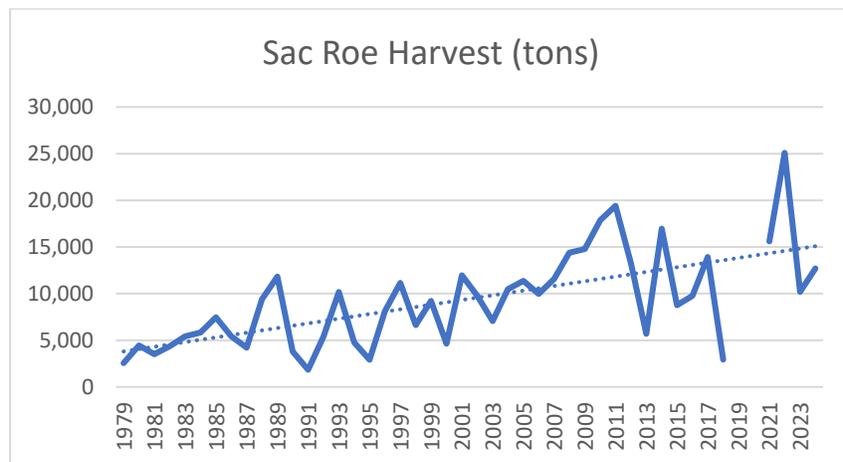
ADF&G’s contemporaneous accounts from 1979–1992 describe a period of robust stock health and growth. Yet, in hindsight, the Department now represents this same era as one of low biomass. This stark discrepancy strongly suggests that assumptions underlying retrospective biomass estimates do not adequately account for the observations and management perspectives of the time.

4. Conclusions and Recommendations for Responsive Management:

In each of the three preceding sections, I have demonstrated, through different lines of evidence, how the historical biomass estimates for Sitka Sound herring show chronic retrospective bias; the estimates have inflated over time, as might be expected given the extraordinarily challenging task of enumerating small migratory pelagic fish during their spawning season.

I have taken the time to write this comment because the implications of this reality are vast, as you consider the proposals in front of you. The rising biomass assessments throughout the time series have resulted in rising commercial pressure on spawning herring in Sitka Sound. This rising commercial pressure has been felt and noticed by subsistence users, who have noticed that herring behave more stressed and less predictable on the spawning grounds than they once did.

Please consider the following chart, and note the vast expansion in harvest pressure. Every 2,500 tons of harvest represents approximately one day of intense fishing pressure on the spawning grounds.



Considering what I have shared with you – that much of the increase in biomass is due not to an increase in actual biomass but rather to a steady increase in that proportion of the *real* biomass that is assessed by ADF&G – it is essential that you prevent further expansion of commercial herring take in Sitka Sound. Further, when considering harvest rates, it is crucial to recognize that 15% of herring estimated by today's standards is not the same thing as 15% of herring under past biomass assessments. Historically, biomass estimates *must have been* lower than the true population, meaning that harvest rates applied to these estimates were in fact more conservative than they appear today. If, for example, 100,000 tons were assessed in a past year but the true biomass was 200,000 tons, then a 15% harvest

rate applied to the lower figure would have had a much smaller effect than the same 15% applied to today's higher estimates. This example highlights the need to adjust conservation strategies to account for this historical underestimation. It must be understood that the relative proportion of herring taken by the fishery has gone up with time. Enough is enough.

Recommendations

- Please reject ADF&G's recommended threshold based on their deeply flawed *Simulation Study to Estimate the Unfished Biomass of Sitka Sound Pacific Herring*. **Instead adopt the 50,000 ton threshold recommended by Sitka Tribe of Alaska in Proposal 177.**
- Please prevent circumstances like that of 2022, where the fleet provides chronic disturbance of spawning herring for weeks on end in pursuit of unreasonably high GHs. The average harvest since 1979 is 9,241 tons. **A hard cap should be set no higher than 15,000 tons, as recommended in Proposal 175, to reduce the likelihood of catastrophe.**
- Please acknowledge the growing capacity of the department to assess herring **by lowering the maximum harvest rate to no more than 10% of assessed biomass, per STA's Proposal 176.**
- Please recognize that the mightily flawed *Simulation Study* and the falsely premised historic narrative that you and your predecessors have been presented with reveals a failure of the Department's internal peer review process and self-accountability. For that reason and countless others, which you will surely hear about at the meeting, **it is time to adopt a consent-based co-management framework with Tribal Government, as per Proposal 190.**

For many recent years, subsistence needs have not been met.
Meanwhile, the commercial harvest has gone up and up and up.

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For many recent years, subsistence needs have not been met.
Meanwhile, the commercial harvest has gone up and up and up.

It is up to you to stop this pattern.

Thank you for your consideration.

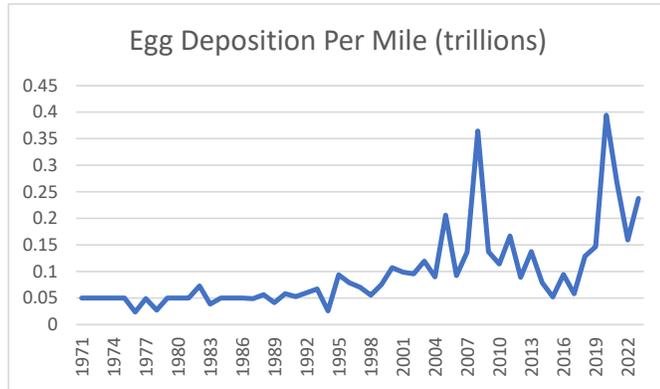
Peter Bradley

Attached:

Appendix 1: Egg deposition and nautical miles of spawn time series;

Appendix 2: Survey/Reporting Quality Assessment Scorecard

Year	Egg Dep	N_Miles_spawn	Egg dep per mile (trillions)
1971	0.425	8.5	0.05
1972	0.675	13.5	0.05
1973	0.5	10	0.05
1974	0.5	10	0.05
1975	0.4	8	0.05
1976	0.308	13	0.023692308
1977	0.523	10.7	0.048878505
1978	0.341	12.5	0.02728
1979	2.05	41	0.05
1980	3.15	63	0.05
1981	3	60	0.05
1982	2.972	40.8	0.072843137
1983	2.63	68	0.038676471
1984	3.25	65	0.05
1985	3.025	60.5	0.05
1986	2.58	51.6	0.05
1987	4.201	86	0.048848837
1988	5.871	104	0.056451923
1989	2.7	65.5	0.041221374
1990	2.273	39.1	0.058132992
1991	2.347162	44.5	0.052745213
1992	4.335124	72.5	0.059794814
1993	3.715034	55.3	0.067179638
1994	1.494131	58.1	0.02571654
1995	3.498959	37.3	0.093805871
1996	3.592768	45.6	0.078788772
1997	2.887696	41	0.07043161
1998	3.583937	64.5	0.055564915
1999	4.495727	59.5	0.075558437
2000	5.851341	54.5	0.107364055
2001	6.026426	61	0.098793869
2002	4.073178	42.6	0.095614507
2003	5.627429	47.1	0.119478323
2004	7.169008	79.8	0.089837193
2005	8.138852	39.5	0.206046886
2006	5.30074	57.4	0.092347387
2007	6.857687	50.2	0.136607311
2008	20.148381	55.3	0.364346854
2009	9.005419	65.6	0.137277729
2010	9.999569	87.7	0.114020171
2011	13.066512	78.3	0.166877548
2012	4.979795	55.9	0.089083989
2013	8.433562	61.3	0.137578499
2014	3.960458	50	0.07920916
2015	4.593762	87.9	0.052261229
2016	5.979411	63.3	0.094461469
2017	3.617525	62.3	0.058066212
2018	4.262	33.1	0.128761329
2019	8.195	55.8	0.146863799
2020	23.065	58.5	0.394273504
2021	27.302	102.3	0.26688172
2022	14.571	91.5	0.159245902
2023	19.904	83.8	0.2375179



Year	Model/Method	Management Area		Spawn Deposition Survey Section					Aerial & Skiff Surveys		Sampling - age/weight/length/sex/fecundity				Total	
		Model Parametrization Evolution	Management Area Evolution	Transect Map	Transects Well Distributed / Represent Whole Area Equally	Summary Survey Data	Detailed Transect Data	Clear Formula	Max Dive Depth	Fecundity Evolution	Survey Log	Spawn Deposition Map and/or Log Suggests Especially Limited Study Range	Commercial Sample Data	Spawning Catch Data Used By Model rounded to nearest percentage point = 0; rounded to nearest 100th of percentage point = 1		Active Spawning Cast Net Sample Data (in reports)
1976	Hydroacoustic (high survey)	0	0	1	0	1	0.5	Used to groundtruth hydroacoustic only	0	0	-1	1	0	0	0	2.5
1977		0	0	1	0	1	0.5	Used to groundtruth hydroacoustic only	0	0	-1	1	0	0	0	2.5
1978		0	1	1	0	1	0.5	Used to groundtruth hydroacoustic only	0	0	-1	1	0	0	0	3.5
1979		0	1	0	0	0	0	0	0	0	-1	1	0	0	0	1
1980		0	1	0	0	0	0	0	0	0	-1	1	0	0	0	1
1981		0	2	1	0	0	0	0	0	0	0	1	1	0	0	5
1982		0	2	1	1	1	0	1	0	0	0	1	1	0	0	8
1983		0	2	1	1	1	0	1	0	0	0	1	1	0	0	8
1984		0	2	1	1	1	1	1	0	0	0	1	1	0	1	10
1985		0	2	1	1	1	1	1	0	1	0	1	1	0	0	9
1986	0	2	1	1	1	0	0	0	1	0	1	1	0	0	7	
1987	0	2	0	0	0	0	0	0	0	0	1	0	0	0	4	
1988	0	2	0	0	0	1	1	0	1	0	1	0	0	0	7	
1989	0	2	0	0	0	1	0	0	0	1	0	1	0	0	6	
1990	0	2	0	0	0	1	0	0	0	0	1	0	0	1	5	
1991	0	2	0	0	0	1	1	1	0	0	1	0	0	1	7	
1992	0	2	1	0.5	1	1	1	1	0	1	0	1	0	1	10.5	
1993	0	2	1	0.5	1	1	1	1	0	1	-1	1	0	1	9.5	
1994	1	2	1	0.5	1	1	1	1	0	1	-1	1	1	1	11.5	
1995				NO REPORTING												10.5
1996				NO REPORTING												10.5
1997	1	2	0	0	1	0	0	1	0	0	0	1	1	1	0	8
1998				NO REPORTING												10.5
1999	2	2	1	1	1	1	1	1	1	1	0	1	1	1	-1	14
2000	2	2	1	0.5	1	1	1	1	1	1	0	1	1	1	-1	13.5
2001	2	2	1	0.5	1	1	1	1	1	1	0	1	1	1	-1	13.5
2002	2	2	1	1	1	1	1	1	1	1	0	1	1	1	-1	14
2003				NO REPORTING												13
2004				NO REPORTING												13
2005				NO REPORTING												13
2006				NO REPORTING												13
2007				NO REPORTING												13
2008				NO REPORTING												13
2009	3	2.5	1	1	1	1	1	2	2	1	0	1	1	1	-1	17.5
2010	3	3	1	1	1	1	1	2	2	1	0	1	1	1	-1	18
2011	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2012	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2013	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2014	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2015	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2016	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2017	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2018	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2019	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2020	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2021	3	3	1	1	1	1	1	2	2	1	0	1	1	1	0	19
2022				NO REPORTING												19
2023				NO REPORTING												19
2024				NO REPORTING												19

Submitted by: Zane Bradley

Community of Residence: Haines, AK

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

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

Dear Chair Carlson-Van Dort and Board Members,

My name is Joel Brady-Power. I am a second-generation commercial salmon troller. I have been trolling in Southeast Alaska every summer of my life from the time I was two weeks old, aboard my dad's boat. I bought the boat from him when I was 22 and have been running it with my wife for the past 20 years. Trolling is our sole source of income for our household and king salmon make up a large portion of that.

I support Proposals 109 and 110 with the RC amendments

I strongly oppose Proposals 108 and 113

Proposals 109 and 110 look to protect the commercial troll fishery and its allocation from an attempt by the largely non-resident sports fishery to reallocate king salmon from the troll fishery to the sports fishery to avoid in-season management. These proposals maintain the current management plan structure and offer different approaches to address the increasing effort in non-resident sport fisheries in the context of lower all-gear catch limit scenarios that we find ourselves in due to losses at the last PST.

These proposals have three primary objectives.

- Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.
- Authorize in-season management by ADFG to ensure the sport allocation is not exceeded.
- Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

On the flip side proposals 108 and 113 seek to reallocate king salmon from the largely resident troll fleet to the ever expanding non-resident sports fishery.

Proposal 108 seeks to “borrow” troll quota rather than take it, but the result is the same, since NR sport receives an allocation increase at low abundance and low abundance is the current and likely future reality.

Proposal 113 seeks a direct, uncompensated re-allocation and increase to the combined personal use resident sport fishery and guided non-resident sport fishery. Most of this re-allocation would accrue to non-resident anglers at considerable cost to Southeast Alaska's coastal and rural fishing communities.

As a result of the last Pacific Salmon Treaty all of Southeast Alaska's fisheries suffered a reduction in King Salmon quota and all sectors have felt this pain. One sector should not be allowed to benefit at the detriment of another. Trollers are limited in number under limited entry and in line with Alaska's constitution on conservation and sustainability of resources. The non-resident sports sector on the other hand has been allowed to grow exponentially with limited regulation and no caps or limits on the number of boats or permits. We are all struggling with lower quotas and for the non-resident sports sector to seek to mitigate their losses by taking fish from the troll fleet ignores the impact on the livelihoods of trollers and resident sports fishermen. The fact of the matter is we are going to be in low abundance tiers likely for the foreseeable future under the current PST and have already seen that under the current king salmon management plan this has resulted in the non-resident sports sector going over their allocation in 2 of the last three years resulting in the troll fishery losing their August king opener twice. This had a considerable financial impact on the troll fleet.

Had in season management been in place I have no doubt that even with restrictions in place to limit the number of king salmon harvested by the non-resident sports sector they still would have filled their boats with customers. A direct example of this is the Juneau charter vessels that are successfully operating on just 6-7 kings annually because of restrictions on harvest due to stocks of concern. The idea that the non-resident sport fishery NEEDS more king salmon in order to be viable is simply false. One could also look at the boom in whale watching operations in Southeast Alaska. People want to come to Alaska for the experience. They are not going to stop coming just because they can't catch a king salmon or catch one less king salmon. However this loss of king salmon has massive financial impacts to the troll fleet which then ripples down throughout the communities of southeast Alaska and the businesses and infrastructure supported by trollers.

Southeast Alaska's troll fishery provides more resident jobs than any other fishery, with 85% of troll permits held by residents and representing all 35 Southeast Communities. I have been salmon trolling in Alaska for my entire life and so has my wife. We are deeply invested in Sitka, our homeport, for years we have donated salmon to Sitka's Fish to Schools program and shared our catch with locals who lack the means or ability to access this resource themselves. We self market our catch throughout the PNW and as such are ambassadors for Alaskan troll caught salmon. We are proud to promote the quality and sustainability of Alaskan salmon to all of our customers. With recent attacks on Alaska's fisheries, such as the Washington Wild Fish Conservancy

lawsuits and British Columbia's bid to revoke Alaska's Marine Stewardship Council (MSC) certification, these efforts have become increasingly urgent and important.

However, it is difficult to praise Alaska's sustainable fisheries when it is clear that we are not all playing by the same rules. All commercial fisheries are managed under some kind of limited entry. It is my belief that the non-resident sport fishery should be managed as a commercial fishery and as such should also be subject to a cap on boats and permits. Of course we know that this is not the case and allowing the non-resident sport fishery to grow exponentially and unchecked makes any words about sustainability ring increasingly hollow. Now, instead of properly managing their fishery, like every commercial fishery has done for years, they instead want to take fish from the 85% resident troll fleet to accommodate and ultimately facilitate this exponential growth. This reallocation would take money straight from the hands of local small businesses who by a vast majority are residents of southeast Alaska communities and hand it over to an ever expanding sports fishery who caters almost exclusively to non-resident anglers. This is wrong. It is bad for trollers and it is bad for Alaska.

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

Dear Members of the Board of Fisheries:

My name is Jaso Brandenburg of Sitka, Alaska. I am a commercial and personal use fisherman.

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

A decrease of 25 percent in Hatchery production would possibly have devastating effects on my family business and a ripple effect for southeast Alaska communities. I heavily rely on hatchery fish and have built my fishing business around the Hatchery fisheries. My two children and wife and nephew all work for our family commercial fishing business, and I'm afraid that a 25 percent reduction of hatchery fisheries could put me out of business.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm

to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Joshua Brandenburg

[REDACTED]

Sitka, Alaska

Submitted by: Elizabeth Brandon
Community of Residence: Anchorage, Alaska

Hello,

As Alaskan permanent resident and a full-time employee of Salmon Falls Fishing Resort in Ketchikan, Alaska, I am writing to urge the Board of Fisheries to carefully consider the far-reaching impacts of the line items in the 2025 proposal. The long term success of our business is dependent upon fair science-based regulations to maintain healthy & stable fisheries for years to come. With the same passion and respect that we have for the many others that depend on this sensitive ecosystem to support their own livelihoods, families and communities, I voice my support in the following items:

- 108, supporting the Proposal submitted by the South East Alaska Guides Organization (SEAGO)
- 113, the 75%/25% proposal by Jeff Wedekind

These items provide the best balance for maintaining healthy fisheries and the vibrant tourism business we depend on.

Conversely, proposals 116,117,119,120 would negatively impact our ability to operate the guided fishing portion of our resort's programming which is the foundation of our business model.

Thank you for your consideration.

-Beth Brandon

Submitted by: John Branrtuas
Community of Residence: Petersburg, Alaska

I oppose Prop 156. The hatchery fish are not affecting the runs in SE.

Submitted by: Dominic Branson
Community of Residence: Juneau

As a life-long Juneau resident I've seen the king crab resource dwindle to a point where a any fishery is unsustainable causing closures for all users. Bag limits of multiple crab per person per day used to be the norm. Now we consider it a luxury when personal use fishers are given a 48 hour window to catch one crab per household. I support closing area 11A to commercial operations to support catch rates for households, as well as the safety of personal use permit holders who often don't have vessels that safely operate in any weather or over long distances to get to areas where they can produce a successful harvest.

Submitted by: Lukas Brickweg
Community of Residence: Ketchikan

Oppose proposal 156 seeking to reduce hatchery stocks of pink and chum salmon. These stocks and increased stocks are vital for commercial, recreational and charter fishing activities.

Submitted by: Jared Bright
Community of Residence: Petersburg

134-I oppose this proposal. The East PoW AC sights only 3rd hand rumors and makes unsupported speculations in calling for this regulation change.

135-I would support this proposal if Seine fisherman were allowed a bi-weekly rotation in the same area as the subsistence fishery.

156-I oppose this proposal. I understand that we are having statewide King salmon problems. Mr. Umphenhour seems willing to cut Southeast hatchery production by 25% with absolutely zero evidence it will help the Yukon.

Russia has been ramping up its pink and Cham production for over a decade now. Any reduction in SE will lead to market shortages that will result in further Russian ramp up of production. Russia is much closer to the Yukon river than SE.

157-I support this proposal.

163-I support this proposal.

167-I would support this proposal if a second permit was required to have 50 more fathoms of net.

168-I oppose this proposal. There are very few fish spotting pilots left in SE.

The he issue brought up in this proposal will not be changed by its passing. Flying during the opening is not illegal nor will it be if this passes.

194-I support this proposal.

195-I support an earlier and later closure date to give permit holders more opportunity to catch their fish. I also understand the departments need to complete their survey. Perhaps a compromise can be found.

233-I support this proposal.

234-I support this proposal.

235-I support this proposal.

236-The rest of the state has a 20fa storage requirement. Enforcement has some concerns with this for SE. Hopefully there is a compromise to be had.

237-I support this proposal.

238-I support this proposal.

239-I support this proposal.

242-I oppose this proposal. The Red King Crab fleet is almost entirely a resident fishery. I I I have a significant investment in my Red King Crab permit and gear and do not appreciate this allocation grab by The Territorial Sportsmen. They make a lot of contradictory statements in this proposal. They seek to take the commercial allocation away because of stock health concerns, but reallocate 100% of the commercial allocation to personal use. Doesn't seem they are really concerned about conservation. Later in their proposal they also talk about how healthy the stocks in 11-A are and the fact that there are already commercial closures around Juneau to preserve personal use opportunity for locals.

243-I support this proposal. The Department and industry have worked together to come up with a biological based harvest strategy for Red King Crab.

244-I support this proposal.

245-I support this proposal.

246-I support this proposal.

249-I support this proposal.

250-I support this proposal. It seems to have worked well in Washington.

251-I oppose this proposal.

258-I support this proposal in conjunction with proposal 250.

259-I support this proposal.

260-I oppose this proposal.

261-I oppose this proposal.

Submitted by: Thatcher Brouwer
Community of Residence: Juneau

January 14, 2025

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

I respectfully submit comments for consideration at the Southeast Board of Fisheries meeting this year as someone who earns most of my income as a commercial salmon troller, who has owned and operated my own vessel since 2006. I started with a hand troll permit and a small double end troller that was built in 1928 and I now run a freezer troller. I live year-round in Southeast Alaska and it is an honor to be a participant in a fishery with an estimated 85% of the permits held by residents. I would like to see the 80/20 allocation between the troll and sport fishery maintained so that this storied fishery can continue to support the communities and residents of Southeast Alaska for another 100 plus years.

I am proud to catch, process and market some of the highest quality king and coho salmon in the world. While I have participated in some other fisheries both as crew and permit holder, the vast majority of my income has always come from the salmon troll fishery and a large portion of that income is from catching and selling king salmon. I am usually paid about \$100 a fish when I deliver these beautiful, delicious, frozen at sea king salmon. Trolling is relatively accessible for fishermen to get a start in the industry, with lower value permits and vessels, but it is still consistently one of the top three most valuable fisheries in Southeast Alaska, with an average annual economic impact of about \$85 million.

I spend my winters in Juneau, however I rarely return to Juneau in the summer and instead I spend my time fishing the outside coast and delivering most of my catch in the smaller coastal communities of Pelican, Hoonah, and Sitka. From my time fishing out of these communities, I have learned how much these and many other Southeast communities, include the smallest towns, depend on the troll permit holders who live in town and the trollers who deliver to the local processors, and purchase fuel, food and gear. Furthermore, most of the maintenance and repairs for the troll fleet is done in

Southeast communities. It was amazing to witness the outpouring of support from Southeast communities when the troll fleet was faced with the Wild Fish Conservancy lawsuit and this support was only there because these communities understand the value of the fleet.

Unfortunately, it is becoming increasingly difficult for trollers to make ends meet, with the recent shift away from the historic allocation of 80 % of the chinook quota to the commercial troll sector and 20% of the chinook quota to the sport fishery. Driven by non-resident harvest supported by the sport fishing service sector, the sport fishery took about 29% of the chinook quota in 2023 and nearly 27% of the chinook quota in 2024. It is a serious concern that currently there is nothing stopping the sport fishing service sector from expanding every year and harvesting even more of the quota. Not only does this increase in the non-resident sport fishing catch of king salmon impact the troll fleet, it also impacts the resident sport fishermen, as we witnessed this year with the resident closure. This overage by the sport sector is compounded by an unfavorable treaty regime we are stuck in until 2029, and other economic factors that are negatively impacting the fleet. The troll fleet and the communities that depend on the

fleet need these king salmon now more than ever, and I urge you to take measures to ensure the historic 80/20 split remains that status quo.

As a commercial fishing representative on the Juneau AC, I am proud of the collaborative work we did to Territorial Sportsmen and the Alaska Trollers Association to develop a number of proposals to address the problem with allocating a larger percentage of the quota to the non-resident sport fishery and I support the Juneau AC proposals. In addition, it was an honor to work with a diverse group of AC members to consider the proposals, and while I did not always agree with the majority, I support the process and appreciate the opportunity to participate.

For the reasons outlined above, and the experience I gained serving on the Juneau AC, a gear group and hatchery board, I support proposals 109, 110 and 115, 116, and 117, and the RCs that will be submitted to make these proposals better and ensure the historic 80/20 split remains between the troll and sport fishery and that resident sport fishermen do not risk losing opportunity like they did this year. For the same reasons, I oppose proposals 108, 113, and 121. I also support proposals 122, 125, 129, 131 and 132. I believe these proposals will both protect stocks of concern and update some regulations that will make the troll fishery more economical for the participants. Finally, as a commercial fisherman who has witnessed the economic benefit hatcheries provide to the region and not seen and substantive science showing negative impacts, I oppose proposal 156.

Thank you for considering my comments and taking the time to deliberate on all the important proposals before you during the upcoming Southeast Board of Fisheries Cycle. Your service on the Board of Fisheries is greatly appreciated.

Sincerely,

Thatcher Brouwer

F/V Deep Sea

PO Box 22927

Juneau, AK 99802

PC62

Submitted by: Dave Brown

Community of Residence: Wrangell

I oppose proposal 156. I believe the decrease of hatchery fish will hurt all of Alaska and will in no way benefit Alaskans.

Submitted by: Jacob Buck
Community of Residence: Juneau

PROPOSAL 105 5 AAC 47.020

Oppose

Residents should have preference via sport regs or that of personal use.

PROPOSAL 106 5 AAC 47.020.

Support

PROPOSAL 107 5 AAC 47.020.

Support

PROPOSAL 132 5 AAC 29.140

Oppose

This is a circular argument. Fisherman will continue to have a hard time estimating length and if the legal length is reduced by 1.5", it is only likely that fish 25" will be incidentally retained. Why are they wanting to retain immature kings?

PROPOSAL 133 5 AAC 29.140.

Oppose

This is a circular argument. Fisherman will continue to have a hard time estimating length and if the legal length is reduced by 1.5", it is only likely that fish 25" will be incidentally retained. Why are they wanting to retain immature kings?

PROPOSAL 134 5 AAC 33.392.

Support

Commercial bycatch is killing our resources in the state and we need to get our act together in preventing it.

PROPOSAL 169 5 AAC 29.120.

Support

PROPOSAL 172 5 AAC 27.190.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 173 5 AAC 27.160.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 174 5 AAC 27.160.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 175 5 AAC 27.195.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 176 5 AAC 27.160.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 177 5 AAC 27.160.

Support

The herring roe harvest needs to be reduced to bring balance back to the food chain.

PROPOSAL 178 5 AAC 27.150.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 179 5 AAC 27.150.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 183 5 AAC 27.185.

Oppose

The herring roe fishery needs to be reduced not expanded to bring balance back to the food chain.

PROPOSAL 184 5 AAC 27.185.

Oppose

The herring roe fishery needs to be reduced not expanded to bring balance back to the food chain.

PROPOSAL 188 5 AAC 27.190.

Support

The herring roe fishery needs to be reduced to bring balance back to the food chain.

PROPOSAL 192 5 AAC 77.674

Support

This just makes sense and better aligns with subsistence regulations.

PROPOSAL 224 5 AAC 31.110.

Support (This refers to the commercial fishery.)

PROPOSAL 225 5 AAC 31.110.

Support (This refers to the commercial fishery.)

PROPOSAL 230 5 AAC 38.XX

Support

PROPOSAL 231 5 AAC 38.XXX.

Support

PROPOSAL 242 5 AAC 34.111

Strongly support

This fishery has gone on the way side since the commercial fishery started in 2005 and neither commercial or personal use has been able to have consistent and regular seasons since. This needs to return to a personal use only area for the good of the resource.

PROPOSAL 250 5 AAC 02.115.

Oppose

If the minimum size is reduced, only smaller crab across the board will be the result.

PROPOSAL 251 5 AAC 32.110.

Support

This allows for personal use and sport to have more access before the commercial gear is utilizing the resource.

PROPOSAL 258 5 AAC 32.150.

Oppose

The areas near Juneau in 11A has a lot of local pressure on its resources. The areas of 11A should remain for sport and personal use. If the minimum size is reduced, only smaller crab across the board will be the result. The amount of harvestable meat drastically changes as the crab increases in size. Hypothetically, a crab that is ¼” smaller would yield a disproportionally amount less meat than that of a 6 ½” crab as is currently overly obvious when processing 6 ½” vs 7” crab.

PROPOSAL 259 5 AAC 32.150.

Oppose

This would only strain some of these areas that have limited legal biomass as it is. Letting the resource have some reprieve should help the resource for personal use and sport. This could also limit personal use/sport from venturing out and fishing where the commercial gear is. This may pay initially for the commercial fisherman but, would be short lived in its benefit.

PC64

Submitted by: Meg Buck

Community of Residence: Juneau

I strongly support the proposal #242 to remove the commercial harvest of red and blue king crab from the 11A area and allocate 100% of the red and blue king crab to personal use. I won't re-cite the data points in the proposal but it's clear that following the commercial openers for king crab in this area, there has been a significant reduction in biomass which caused the closure or significantly reduced seasons for both the commercial and personal use fisheries in the years following. For area residents with skiffs or smaller watercraft, the inconsistent and/or closed king crab fishery is a lost opportunity to harvest crab close to town in the more protected water of 11A. As an area resident, I encourage you to consider proposal #242 to ensure residents have the continued opportunity to harvest red and blue king crab now and into the future.

PC65

Submitted by: James Burton

Community of Residence: Cordova / Anchorage

Dear Madam Chair and members of the Board of Fish, I urge you to take no action on proposal 156. A similar version of this proposal (78) failed at the PWS meeting 1-5. Since then, the board voted 4-2 to only accept these type of proposals at the Statewide fin fish meeting. These "shotgun" type approaches to proposals in every region throughout the year are a financial strain on the entire industry to attend and defend. I applaud the board in moving these to essentially 1 time per cycle event, rather than multiple times per year. Taking no action on 156 will likely save an entire day of public testimony and committee of the whole testimony regurgitating hours and hours of the same exact information you just heard in defense of Proposal 78, by the same exact proposer, last week. It will also save opponents of 156 thousands of dollars in travel fees to defend Southeast pink and chum hatchery production like we already (and just) did at a time when finances are tight. Thank you.

January 14th, 2024

Marit Carlson-Van Dort
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Public Comments for Prince William Sound / Copper River Proposals

Dear Madam Chair and Board of Fisheries Members:

I urge you to take no action on Proposal 156. In the last BOF regular meetings in Cordova, the board opted to only hear hatchery production level proposals at the Statewide finfish meeting. This proposal was submitted prior to the Board's action but nonetheless, it would be appropriate to simply take no action. In reality, I believe that any other action of the Board on this proposal would be grounds for a lawsuit from any member of the public based upon reasonable reliance of the Board's most recent action in Cordova. Essentially the public believes the Board will not hear this proposal so anything other than rejection would put stakeholders in a defenseless position.

With regard to the herring proposals before the board, I would urge you to reject proposals 171 and 172 submitted by the Alaska Department of Fish and Game. Ordinarily, you would see and hear me advocating for following *most* Department initiated proposals. However, in this instance - and I think this is a critical factor - both of these proposals are unnecessary due to the current market conditions of the herring industry. Changing the spawning level threshold biomass by 1000 tons is an impossible feat to measure when surveying the waters of the Sitka Sound and adjacent areas. Even the best sonar operators in the State of Alaska would find that level of discrimination impossible over the expanse of the district. If we're ever back in the position of measuring biomass in the thousands of tons vs the hundreds of thousands of tons currently present, I could see this proposal coming before the board again. At this time however, no.

With regard to proposal 172, we (the industry) took zero tons in 2019 and 2020. In 2021, 22, 23 and 24, the available quota was as much as double what the industry could take, market and sell. In essence, the harvest amount is self-regulating while we're in a period of the present enormous biomass. A reduction in the maximum harvest level could be necessary when ADF&G completes their data acquisition and studies. However, when we are looking at potentially no harvest in 2025, or at the very least, a harvest that represents a fraction of the available quota - I would argue that making a change in regulation, based on the unknown, to potentially come back in the future and request to change it again is an unnecessary step. In other words, if the maximum exploitation rate (harvest rate) is 20% under current regulations, yet the industry is only taking 30-50% of the available quota then what we're really discussing is a change on paper

with no effect on the fishery for no reason **at this time**. To put it even more simply, we (the industry) are currently taking a percentage of the allowable 20% - if any at all. As these studies materialize, the Department has the ability to submit an ACR based upon new information and make a request to change the regulation based upon new science. Between now and then, and the next regular cycle meeting, the Department has the goodwill and cooperation of the industry to self-regulate; this is exceedingly obvious to ADF&G.

On proposals:

173 - Oppose

174 - Oppose

175 - Oppose

176 - Oppose

177 - Oppose

178 - Oppose - there's no reason to expand the closure area further. In fact, previously closed area should be rescinded.

179 - Oppose

180 - Support ADFG correction to GPS boundary

181 - Oppose limiting test sets.

182 - Support alternate herring use for an open pound fishery. If G01A permit holders want to participate in open pounding in lieu of sac roe fishing, let them. It's a non-lethal alternative to utilizing some of the resource and should garner some support from those who oppose the sac roe fishery. I don't plan to participate in pounding but I support those who want to create another market for these fish resources. The obvious caveat is if you participate in open pounding, you're precluded from sac roe seining for that regulatory year. And vice versa if you choose to sac roe fish, you cannot participate in open pounding.

183 - Expand L21A permit into Sitka Sound - oppose. The Sitka Sound area is fully allocated and bringing additional permit holders in circumvents the CFEC limited entry process. If anything we should be looking at fishery consolidation / reduction based on market conditions. Not expansion of the number of permits.

188-190 Oppose

Thank you for your consideration and dedication to this process.

Submitted by: Chris Buschmann
Community of Residence: petersburg

support 236

support 247

Finding areas to store gear in less than 10 fathoms is an unnecessary challenge for fishermen. It results in coves and small bays being full of gear, buoys, floating line and it is a mess. Storing gear in less than 10 fathoms becomes a safety issue not only for fisherman in the area but anyone using the waterways that is looking for a safe, protected anchorage during a storm.

Submitted by: Chris Buschmann
Community of Residence: petersburg

oppose 242

support 243

Allocating 100 percent of anything to a specific user group is theft. Personal use users in 11-a already enjoy the majority of access to this resource and this proposal is just plain greed. This is an attack on the limited entry system and a punch to the gut of the department's ability to manage. Invested commercial fishermen deserve better than this proposal even being printed, it is disgusting.

With the passing of prop 243 the department will have better tools to manage Red King Crab for everyone.

Submitted by: Chris Buschmann
Community of Residence: petersburg

support 239

The fact that Lyne Canal and Chatham Straights are currently managed as the same Golden King Crab shows exactly the level of management disfunction we are dealing with in this fishery. These are two very different bodies of water with a 150 mile spread with most of the quota being taken in a fraction of the area. Splitting them could allow for better management decisions, but I would not commit to dividing the quota up.

Submitted by: Chris Buschmann
Community of Residence: petersburg

oppose 156

To reduce hatchery production is a shot in the foot at this point. We are at war with Russia and our little baby hatchery fry are our ammo, problem is Russia been increasing production faster than us. We know that Russian hatchery chum and pink feed, grow, and mature in the Gulf of Alaska and the Bering Sea, competing with all of our wild fish. I want our wild salmon strong, we all do and there are things we could be doing to strengthen them that we are not doing, but lowering our hatchery output and making more room for Russian fish is not the answer.

It would be nice if there was something we could do about Russian hatcheries, maybe sanctions and war will bankrupt them. We could be figuring out ways to catch Russian chum as they leave Alaska but fishermen are not allowed to touch them because of these in state blame game shit shows.

PC67

Submitted by: Chris Buschmann
Community of Residence: Petersburg

oppose 168

Planes do not benefit the fleet

PC67

Submitted by: Chris Buschmann
Community of Residence: Petersburg

support 167

Post-buyback, Southeast has so few boats fishing that it would be nice to improve efficiency. A longer net would allow us to tow longer per set without losing fish, which would reduce the number of sets we need to make each day. We could catch the same amount of fish with fewer sets, improving efficiency. Currently, we have fewer nets in the water, but the same management structure in place. In times of high abundance, some areas go unfished, and at times, too many fish slip by. We can afford to be more efficient.

The regulatory constraints we've been given have led boat owners to invest in more powerful hydraulics and stronger, lighter nets, allowing for faster hauling and quicker redeployment. As a result, we've become more efficient within the current constraints and have been able to catch more fish without any regulatory changes. A longer net would further reduce the number of sets needed per day, leading to less wear and tear on both the gear and the crew.

Submitted by: Chris Buschmann
Community of Residence: Petersburg

Support 144.

Cutthroat trout are abundant and rampant in most creeks and estuaries I visit with a fly rod. They're not only delicious but also fun to catch. Many of these areas see little to no fishing pressure ever and my 2 fish bag limit is a joke. Cutthroat trout are natural predators of salmon, consuming salmon eggs from the time the first steelhead spawns to the last coho. Given this, there really shouldn't be a Cutthroat or Dolly Varden limit for residents. I do have concerns about rainbow trout, as they can be mistaken for juvenile steelhead.

I only support raising limits for residents, not for non-residents.

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

Dear Members of the Board of Fisheries:

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

I'm a fisherman in PWS and I strongly oppose proposal 156. The idea that our hatchery fish are the cause of the extinction of the king and chum runs in the Yukon River is ludicrous. There is no evidence of this happening or any evidence of any kind. It is vital for the board of fish to vote no on this proposal as it has no evidence behind it.

These attacks on hard-working Americans is a sham and a shame. These attacks come from sad miserable people who have nothing to offer the world, they just want to destroy the lives of hardworking Alaskans. I'm sorry that the fish in the Yukon River have not been returning to their previous numbers but to try to destroy the lives of other salmon fishermen is not the answer. We instead need to look at the massive problem that is the dragging fleet and the destruction that they have caused to the king salmon numbers. The hatchery programs are not the problem, the massive dragging fleet and their destructive nature are the problem. Let's unite to deal with the real problem instead of blaming the main driving economic force in our state.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish,

are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Jeremy Cabana
Homer, Alaska



Submitted by: Devon Calvin
Community of Residence: Sitka

My name is Devon Calvin. I am 29 years old, and have lived in Sitka for 7 years.

I support proposals 173, 174, 175, 176, 177, 178, 179, 181, 188, 189, and 190. I oppose proposals 182 and 183. I believe that current ADF&G management could and should do more to protect the herring, in order to fulfill the meaning of the subsistence priority, and in recognition that the amount (of herring eggs) necessary for subsistence has continued to decline despite a recent increase in the number of subsistence harvesters.

I support proposal 179 to add Promisla Bay to the area closed to commercial fishing. I first began to learn how to harvest herring eggs in this bay three years ago. In recent years, the harvests from this area have been consistently productive. During 2017, 2018 and 2019 there was almost no spawn or harvests from the current closed area, causing harvesters to move further north, and putting them in greater conflict with the commercial herring fleet. For example, in one of these years, the fishery was conducted in shallow waters almost on top of subsistence harvesters. Later, the herring fishery manager developed a policy to distribute the commercial fishery 200 yards away from active herring egg sets in spawn. However, unless Promisla can be protected, the possibility still exists for a commercial fishery to be held in Promisla Bay. A fishery within the Bay would severely impact the subsistence harvest for that year as well as wipe out the few older aged fish that lead the younger fish into the spawning grounds for the years to come.

I support proposal 190 to require ADF&G to co-manage the Sitka Sound herring fishery with the Sitka Tribe of Alaska (STA). An amended version of proposal 190 received overwhelming support from the Sitka Advisory Committee. While the Sitka AC elected to amend the proposal to remove the provision allowing the tribe to call for an emergency closure of the fishery, AC members felt "the tribe should definitely have some input on the fishery, and it needs to increase" and that "this is long overdue". It was also emphasized at the AC meeting that co-management would need to build off of the MOU that was previously established. Given the STA's expertise in managing subsistence resources, and conducting research, such as baseline studies to determine appropriate minimum spawning biomass thresholds, I believe STA has much to contribute towards ecosystem based management of herring in Sitka Sound. I also support proposal 181, as test sets, being an area of concern for STA due to unaccounted mortality of herring, could be an opportunity for co-management.

I would like to end my comment by offering the words of one Kiksadi leader, who says that herring eggs are "the last traditional food that can be gathered in abundance, without a permit."

Hello Board of Fish members,

My name is Ben Campen and I have been a resident of Sitka since I was born here in 1989. I began commercial fishing while in high school, working as a deckhand during summer breaks and continued to fish my way through undergraduate school where I studied marine ecology at WWU. Thirteen years ago I bought my first CFEC permit via a loan from the State of Alaska - a hand-troll permit. With this permit I fished for king salmon from a 18' skiff when I had days off from my other deckhand duties working on salmon seiners and longliners.

After a handful of years deckhanding in various fisheries and hand-trolling my own skiff in the off time, I decided to upgrade and in 2018 I bought a 40' wooden troller and power troll permit, again with loans from the State of Alaska. I have had good years and bad years in the time since, but that's to be expected in a volatile industry like fishing. In the past year, I once again made a significant investment in this fishery and industry by selling my wooden troller and upgrading to a fiberglass troller with equipment for freezing salmon at sea - again taking on loans from the State of Alaska.

I'm writing today in regards to the several King Salmon Management Plan proposals on the agenda. Since several of the proposals are similar in details, rather than single out a specific proposal I'm in support of, I thought it better to detail how the various options would impact my family's business and other commercial trollers.

King salmon are a vital piece of my business's health (in some years king salmon have accounted for more than half of my summer salmon income). Commercial trollers losing access to a second king salmon opening because of guided charter overfishing is inexcusable. ADFG staff are more than capable of using in-season management with the charter fleet to keep them within their allocation.

By letting the charter fleet overfish, the economic value of the king salmon taken from the commercial troll fleet simply vanished. The charter fleet already had their clients booked and trips sold. Because of this, the charter fleet didn't see an economic increase as a direct result of this mismanagement. Instead, the value of these fish was lost forever.

A glaring issue I see with the charter sector is that with the exception of halibut, there is no limit to the number of operators and they have experienced massive growth over the last several years. Expansive growth, combined with no in-season management is not a sustainable fishery. In-season management is vital for the sustainability of all fishery stocks and it is absurd that an industry that is commercial in all but name and has ever increasing harvest power, isn't held to the same standards as all other fisheries in the State of Alaska.

The payback provision of the Pacific Salmon Treaty further reinforces the unsustainable future of an unbridled, unaccountable and unmanaged charter industry who has been allowed to use the commercial fishing sector as a cushion for their overfishing. In the scenario where there is an over-harvest of the Southeast Alaska TAC of king salmon, the over-harvest numbers are subtracted from the following years TAC. Due to the way the fish are divvied up: net fisheries

off the top, then 80/20 split with commercial/sport, the charter sector will never feel the effects of over-harvest as they currently aren't accountable to the 80/20 split without active in-season management. Instead, the commercial harvesters will feel the negative impacts and continue to get a smaller slice of the pie year after year, making the 80/20 split meaningless unless there is in-season management of the charter sector.

I am in strong support of active in-season management for the charter industry/sport sector and for the 80/20 split to be maintained. I also believe there needs to be a distinction made between the charter client catches vs. the resident sports fisherman within the sport allocation, otherwise the growing charter sector will gobble up all the sport catch before locals get a fair opportunity.

My path as a independent business owner and employer was built on access to king salmon when I began harvesting them with my hand troll permit in an 18' skiff and since then has allowed me to upgrade vessels/permits and hire deckhands in the process. Losing access to king salmon for the second summer in a row due to charter over-harvest was a massive gut punch and financial hit. Commercial salmon trollers have one of, if not the highest, percentage of permit holders who are residents of Alaska. Power troll permits are one of the few affordable limited-entry permits for new entrants into commercial fishing. If we continue to lose access to the fish, folks won't be able to stay in business and new entrants will be deterred. Loss of jobs and income potential will be especially detrimental to rural communities where other job opportunities are extremely limited and switching purpose-built salmon trollers to other fisheries can be too cost prohibitive for many fishermen.

Thank you for the opportunity to comment and for considering my position.

Sincerely,
Ben Campen
Sitka

CANFISCO GROUP USA

A Division of the Jim Pattison Group

January 14, 2024

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

RE: Canfisco Group Comments on Proposal 156

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

The Canfisco Group comprises several seafood processing companies united by common ownership and purpose. Our group operates 11 seafood processing plants from Bristol Bay to Southeast Alaska employing over 3,500 workers each year. Canfisco's operations, fishermen, and community partners depend on fishery enhancement programs. **We oppose proposal 156 seeking to reduce permitted pink and chum salmon egg take by 25%.**

Canfisco Group supports the Regional Planning Team (RPT) process, led by ADF&G and open to the public, to manage hatchery production. In Southeast, the RPT meets biannually to facilitate this rigorous permitting process for hatchery production levels and release sites. These meetings include representatives from regional aquaculture associations, ADF&G staff, and industry groups. Additionally, there is rearing site permitting oversight by the Department of Natural Resources and the Department of Environmental Conservation. If a permit is deemed worthy after this extensive review process, it becomes subject to the ADF&G commissioner's approval, amendment, or disapproval.

In their comments, ADF&G finds changes to Alaska's hatchery salmon production under this proposal are not likely to have an appreciable effect on marine competition among salmon species. They also find no evidence current permitted pink and chum salmon egg-take levels are adversely affecting wild stocks in or outside southeast enhancement areas and therefore oppose proposal 156.

NOAA's Alaska Seafood Snapshot published in August of 2024 outlines the impacts of our industry's current crisis driven by lower seafood prices caused by exchange rates and tariffs, high Alaskan inventories combined with high global supply, lower global consumer demand due to inflation, and rising labor costs. The report shows *'revenue losses between 2022 and 2023 are estimated to be a \$1.8 billion shock to the Alaska economy, resulting in a loss of more than 38,000 fishing and non-fishing jobs in the United States and a loss of \$4.3 billion in total U.S. output and a total decrease of \$269 million in state and local tax revenues.'*¹

ADF&G comments highlight the potential cost of this proposal on our struggling industry, *'capping egg*

¹ NOAA Fisheries. 2024. Alaska Seafood Snapshot. <https://www.fisheries.noaa.gov/resource/outreach-materials/alaska-seafood-snapshot>.



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*takes at 25% current capacity results in capacities of 96 million pink salmon eggs and 553.35 million chum salmon eggs. It is reasonable to assume the production cut would have a similar percentage cut on the annual average exvessel value, that equates to \$290 thousand less revenue for pink salmon and \$13 million for chum salmon.'*²

In addition to the annual loss to the commercial fleet estimated by ADF&G above, proposal 156 would decrease cost recovery revenues by \$1.36 million at DIPAC, \$1.77 million at NSRAA, and \$1.62 million at SSRAA.

Chum production sustains revenue for additional hatchery programs. At DIPAC, NSRAA, and SSRAA this is the only species that generates a profit. Sockeye, coho, chinook, and educational programs all operate on a deficit covered by the income from their chum rearing programs. These additional programs benefit all user groups including personal use and subsistence fishermen.

In closing, we ask you prioritize stability for our fishermen, processing operations, and community partners by rejecting proposal 156 and continuing to support the existing RPT process for management of hatchery operations and releases.

Respectfully,



Megan O'Neil
Director of Government Affairs

² ADF&G (Alaska Department of Fish and Game). 2024. Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals, Committee of the Whole—Groups 1–6 for Southeast Alaska king salmon, groundfish and shellfish Alaska Board of Fisheries meeting, Ketchikan, Alaska, January 27–February 9, 2025. Alaska Department of Fish and Game, Regional Information Report No. 5J24-10, Anchorage



Submitted by: Marc Carrel
Community of Residence: Cordova

See proposal decision summary

Submitted by: Larry Carson
Community of Residence: Pelican

108 Opposed Re-allocates KS from the commercial troll to the sport fishery without recognizing the impact of the non-resident catch, the majority within the charter fleet.

113 Opposed Same as 108, Takes fish from the commercial fishery and allocates it to the sport fishery, dominated by the guided charter fleet.

156 Opposed Hatchery produced salmon are important to resident Alaska communities.

110 Support; keeps the historic allocation.

111 Support; seems fair.

116 Support; recognizes the significant impact in the non-resident catch in the guided charter industry.

117 Support; the non-resident sport fish catch in the guided charter fleet dominates the sport catch negatively affecting resident fishermen.

January 7th Joint Statement on King Salmon Management in SEA presented by the Alaska Trollers Association and The Territorial Sportsmen, Inc.

Submitted by: Richard Catrett
Community of Residence: Juneau

Hello I oppose the reallocation of King Salmon to the sport fishery. Things are hard enough for the power troll group. Please don't make it harder.

Submitted by: Ed Cavagnaro
Community of Residence: Juneau

Please approve Proposal 242 making 11A OFF limits to commercial king crab fishing.

Overfishing of 11A's king crabs biomass occurs every time 11A is opened to commercial king crab harvest. This occurs mainly because of the relative shallow depth in some areas of this fishery, a lot of commercial king crab boats fishing's 11A use it as a way to right off their deer hunting trips to the area, and it's close to their home ports of Juneau and Petersburg.

Submitted by: Chloey Cavanaugh
Community of Residence: Juneau

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

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



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1/14/2025

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

Sent via electronic submission at www.boardofgame.adfg.alaska.gov

Re: Tlingit & Haida's 2025 Alaska Board of Fisheries, Southeast & Yakutat Finfish Comments

Dear Alaska Board of Fisheries members,

I submit the following comments on behalf of the Central Council of Tlingit and Haida Indian Tribes of Alaska (Tlingit & Haida).

I. Overview

Tlingit & Haida is the largest federally and state recognized tribe in Alaska, serving 19 villages and representing 38,000 Tribal Citizens who reside in communities that stretch over 43,000 square miles across what is now referred to as Southeast Alaska - and beyond. Our region encompasses over a 500-mile strip of coastline and interior waterways, bordered by Canada on the north, south, and east, with the Gulf of Alaska on the west. Tlingit and Haida peoples have stewarded our traditional lands and waters from Southeast Alaska into what is now called the Yukon and British Columbia, Canada since time immemorial and continue doing so as a sovereign nation; Tlingit & Haida maintains a government-to-government relationship with the United States and State of Alaska; and is a regional coordinator for collaborative stewardship projects with tribes, government entities, non-profits, and other groups.

While I write to express **support for proposals 104 (with amendment), 109 (with amendments), 110, 118-120, 135, 137, 173-179, 181, 188-190, and opposition to proposals 108, 113, 156, 182-183**, I direct your attention to the Traditional and Ecological Knowledge (TEK) that Tlingit & Haida has worked diligently to obtain and utilize for the purposes of informing and improving the management of Southeast Alaska's fisheries (see section below and enclosures). Furthermore, Tlingit & Haida applauds the Alaska Board of Fisheries in its efforts to dedicate space in the upcoming meeting agenda for the inclusion of Traditional Knowledge reports. We look forward to seeing refined progress or processes in how the TEK, as provided during these reports, is meaningfully considered and weighted in regulatory frameworks, board actions, fisheries management, and decision-making.

In the same regard, Tlingit & Haida expresses deep concern over the overlapping scheduling for the Alaska Board of Fisheries meeting for Southeast and Yakutat Finfish and Shellfish, the North Pacific Fishery Management Council meeting, and the Federal Subsistence Board Fisheries Regulatory meeting. The dual fisheries management system in the state of Alaska already presents challenges and barriers for effective tribal engagement and participation, and these overlapping meetings highlight that reality. Many tribes have limited capacity to access meeting information in a timely



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matter, read over 156 proposals or digest hundreds of pages of technical reports to be informed of certain regulatory changes and important issues that have direct impacts to our way of life. In addition, it is not feasible to travel and be present at each meeting and the state and federal management bodies have now created an unfortunate situation where tribal staff and leaders will have to choose where (and if it's possible) to allocate their resources, travel funding and expertise to provide written or in-person testimony.

II. **Background**, prepared by Tlingit & Haida for Section 6.2 *Tribal Importance of the SEAK Salmon Fisheries*, [SEAK Salmon ITS EIS \(NOAA / NMFS 2024\)](#)

For thousands of years, the Lingít (Tlingit) and Xaadas (Haida) peoples have been stewards of wild salmon populations that span 43,000 square miles across what is commonly known as Southeast Alaska (SEAK). Today, there are nineteen federally and state recognized SEAK tribes for whom salmon is the foundation of their cultural existence and economic well-being.

The Lingít and the Xaadas peoples have occupied this region since time immemorial, with their history in the region dating back over 10,000 years. The traditional Lingít Aaní (Lingít homelands) stretches from beyond Yakutat in the north, to Prince of Wales Island in the south of SEAK. The Xaadas have occupied Haida Gwai'i (Xaadas homelands), including the southern reaches of SEAK, since time immemorial and their history is documented to extend back at least 12,500 years. Metlakatla was settled by Ts'msyen people who migrated to Annette Island in the 1800s and was established as a reservation by the United States Congress in 1891.

The tribal communities in SEAK include Angoon, Douglas, Craig, Haines, Hoonah, Hydaburg, Juneau, Kake, Kasaan, Ketchikan, Klawock, Klukwan, Metlakatla, Pelican, Petersburg, Saxman, Sitka, Wrangell, and Yakutat. Many tribal citizens who reside in each of these communities participate in SEAK salmon fisheries, especially in the smaller communities, contributing to the region's annual multi-million-dollar salmon industry.

Salmon are also harvested by Indigenous peoples in both personal use and subsistence fisheries that provide food security for families and are highly valued in traditional and customary activities for communities throughout SEAK, British Columbia, and the Pacific Northwest as a whole.

The participation of tribal citizens throughout commercial, sport, personal use, and subsistence salmon fisheries are vitally important for the social, cultural, and economic resiliency of SEAK coastal communities.

Salmon fisheries are of critical importance to the Indigenous people throughout all coastal Alaska, which is shown through the diet, artwork, dances, and other expressions of culture throughout coastal tribes in Alaska. Wild salmon are the lifeblood of Alaska and are an irreplaceable resource for the



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world. Salmon have sustained Indigenous families in SEAK for over 10,000 years and serve as the foundation of Alaska Native culture, commerce, and biodiversity. In comparison, many researchers suggest that Euroamerican colonization occurred only in the last 2% of the time period that Indigenous people and salmon have been forming close relationships in the SEAK lands and waters (Carothers et al. 2021). Salmon are and have been the most important resource for Lingít peoples. Lingít relations with salmon combine spiritual understandings with “pragmatic empirical engagement, knowledge acquisition, and practical intervention” (Langdon 2006).

The management of salmon fisheries has developed throughout the course of human history due to social, ecological, and political changes. Traditional knowledge and spiritual belief led to practices that sustained salmon runs, informing systems that included allocation and use for clan groups. The governance system of salmon engagement developed by the Lingít was successful in sustaining the highly productive systems for thousands of years. As Dr. Steve Langdon writes, the Lingít system can be characterized by the term ‘relational sustainability’ – through spiritually inspired prescriptions and actions, Lingít maintained existence, as they know it” (Langdon 2006).

Langdon writes that special relations with places are memorialized by the Lingít in at.oow— objects, stories, dances, crests—that represent the clan history and claims to the location, territory, or resource. Salmon stream ownership was one of the most important forms of property held by clans. Salmon streams were under the control of stream chiefs (*heen saati*) who exercised governance by determining who had access, harvest timing, technology, and location of harvests. In general, other Lingít respected clan claims to streams, but if they were violated, Lingít would use violence to protect their claims¹. While SEAK salmon fisheries have changed over the course of time, access to these very important fisheries remains of utmost importance to Alaska Native peoples and their families.

Since colonization, Alaska Native peoples have seen reduced access to and decision-making power over the management of fisheries and the privatization of the salmon industry. Moreover, clearcut logging has damaged salmon streams, commercial fisheries can compete for traditional and customary uses, and global hatchery production has created conflict between communities because culturally important species could face resource competition from fish hatcheries (Ohlberger et al. 2021). Exacerbated by anthropogenic causes, climate change factors are adding additional stressors on natural systems, and these changes in ocean conditions are reducing salmon size and availability, resulting in the relational changes between Alaska Native peoples and salmon fishing practices.

Salmon are a culturally important food source and economically critical for tribal citizens; each community in SEAK is supported by salmon fisheries (Hosmer 2004; Sisk 2007; Walch et al. 2018; Carothers et al. 2021) where the five species of Pacific salmon accounted for 70% of SEAK seafood

¹ “History of salmon governance, State of Alaska’s salmon and people” (Accessed Nov 30, 2023).



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production value in 2019². Maintaining continuity, access to salmon and subsistence fishing provides food security and supports food sovereignty in SEAK communities. Protein sourced from salmon fisheries is culturally and nutritionally significant to many tribal citizens and can be a lower cost alternative compared to other sources of protein in small rural communities in SEAK, where grocery prices are often inflated due to shipping expenses. The seafood industry provides economies of scale and economic activity that lowers the cost of utilities, shipping, fuel, and local taxes for residents in many Alaska communities. Fishing communities also benefit from marine infrastructure and support services, which are more developed due to the presence of the commercial seafood industry (McKinley Group 2022).

In addition, it is often difficult to quantify the economic importance of subsistence activities across cost benefit or economic analyses. For instance, the sharing and providing of salmon is not only a social practice but has economic value as well. Many families in SEAK communities are interconnected and rely on the subsistence economy; however, commodification and marketization of salmon fisheries have disposed tribal communities from sustaining or gaining access to fishing and place-based livelihoods. Inequities are deeply embedded among the legal and economic institutions of salmon science and the management of personal, sport, and commercial fisheries. Cumulative impacts and limited access obstruct a healthy succession of fishing as an economic and cultural mainstay in SEAK for Alaska Natives (Carothers et al. 2021). Consequently, changes in the management of salmon fisheries that would result in further limiting access for Alaska Natives to harvest all species of salmon would have devastating consequences for SEAK - and those consequences would reverberate markets throughout the Pacific Northwest and beyond.

While all SEAK salmon fisheries are important to Alaska Native communities, the commercial troll fishery has an outsized impact on SEAK tribal participants and their families, and their communities. The commercial troll fishery is important for Alaska Native communities in several key ways. Lingít and Xaadas peoples have called SEAK home since time immemorial, and salmon has been the foundation of culture the entirety of that time. Tribal citizens of the Central Council of Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) have fished the waters of SEAK for more than 10,000 years, and continue to do so, including as commercial troll fisherman. The tradition of “trolling” pre-dates western contact: Lingít, Xaadas, and Ts’msyen people used a hook-and-line (bone hooks) from their canoes when fishing for Chinook (king) salmon. In some cases, four generations of one family have supported their household and the Southeast economy through a hook-and-line fishery³. Now, many citizens of the tribe depend on the commercial troll fishery for their livelihood⁴, with some Alaska

² ASMI: The Economic Value of Alaska’s Seafood Economy, (Accessed December 11, 2023).

³ Brief for the Alaska Congressional Delegation as Amicus Curiae Supporting Defendants and Intervenor-Defendants, Peterson Decl. ¶13, DktEntry 22-3, page 103, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 2, 2023).

⁴ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Peterson Decl. ¶16, DktEntry 42-3, page 33, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023).



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Natives earning 60% to 70% of their income from the commercial troll fishery⁵. Additionally, nine troll permits are held by residents of the Metlakatla Indian Community of Annette Islands Reserve. Of the 1,820-hand troll and power troll permits issued in Alaska, 85% are held by SEAK residents, 14% of which are held in the most rural communities with the highest percentages of Alaska Natives. Access to other livelihoods, and even different gear types for fishing, is cost prohibitive, requires years of specialized training or is simply unavailable for Alaska Native peoples who reside in SEAK's small and remote communities.

Fishing remains deeply tied to a traditional way of life for Alaska Natives in SEAK, and fishermen largely rely on the commercial and sport fishery to secure salmon for personal use to feed their families. In addition, fishing has other impacts across communities, for example, revenues from fishery taxes help to keep schools operating and basic infrastructure up to date. Every fisherman matters in a small community. Moreover, the stewardship of traditional lands and waters is crucial to maintaining Alaska Native ways of life and is an expression of their sovereignty.

In the First half of the 20th century, SEAK salmon fisheries' cannery-owned fish traps were used to harvest salmon. The pursuit of Alaska statehood was driven by the territorial citizens' desires to control and benefit from their resources. Following statehood in 1959, fish traps were banned. Ensuing struggles over access to salmon continued with the introduction of limited entry permits in the 1970s⁶.

When 2022 permit data from the Alaska Commercial Fisheries Entry Commission (CFEC) is analyzed with Tlingit & Haida's tribal enrollment database, the prominence of Tlingit and Haida families who depend upon SEAK salmon fisheries is very clear. 2022 CFEC data with current (2023) T&H data indicates that nearly 20% of the SEAK permits for both the purse seine and drift gillnet salmon fisheries are registered to tribal citizens of Tlingit & Haida.

This is even more evident in the SEAK salmon commercial troll fishery. As an example, approximately 61% of the communities directly supported by the SEAK salmon troll fishery are recognized communities of Tlingit & Haida, and approximately 31% of SEAK trollers are Tlingit & Haida tribal citizens⁷.

Currently, SEAK's troll fishery has the highest level of local ownership of any major Alaska fishery, making its survival critical to nearly all SEAK's communities. The economic and community impacts of the SEAK troll fishery, for example, are far reaching to the region, where nearly every community is home to trollers. Trollers comprise the region's largest fishing fleet, and 85% of the SEAK troll fleet is

⁵ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Dybdahl Decl. ¶6, DktEntry 42-3, page 18, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023).

⁶ State of Alaska's Salmon People, (Accessed December 11, 2023)

⁷ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Peterson Decl. ¶8, Dkt Entry 42-3, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023).



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local to SEAK (Stern et al. 2022). From 2011-2020, an average of 971 and 961 hand and power troll permits were issued, with an average of 295 and 715 permits actively fished, respectively (Conrad and Thynes 2022).

Nearly 120 permit holders are Tlingit & Haida tribal citizens, and nine holders are Alaska Native tribal citizens of the Metlakatla Indian Community Annette Islands Reserve. Alaska residents generally earn 55-86% of the fleet's annual ex-vessel value, which from 2011-2020 ranged from \$22 million to \$52 million⁸.

Tlingit & Haida's tribal citizens who are "permit holders provide food, employment, and income for many people beyond themselves in [tribal] communities."⁹ Trolling is one of the few industries that offers well-paying jobs in remote SEAK, jobs which enable tribal citizens "to continue to live on [their] traditional homelands . . . and to practice [their] traditional way[s] of life"¹⁰.

Alaska Native villages are in isolated locations on the coast of the Pacific and the shores of the SEAK archipelago. Few villages have road access; fishing and harvesting from the ocean and beaches is a major food source. "[Troll] fishing keeps our culture and traditions alive and gives young people an opportunity to make a living and support their families..."¹¹

Fishing, as it is practiced by Alaska Native people, comprises three major interrelated components: economic, social, and cultural. It operates as a cohesive, adaptive and functioning system. As an example, closing of salmon fisheries for even one season can cause irreparable breaks in this intergenerational knowledge. "Our young people will lose out on critical learning opportunities or may move out of the region entirely if the troll fishery is no longer a viable source of income to support their Families"¹².

Furthermore, connection to culture through salmon is an integral component in youth suicide prevention efforts. For Alaska Natives, "Indigenous suicide is associated with cultural and community disruptions, namely, social disorganization, culture loss, and a collective suffering" (Wexler and Gone 2012). For Alaska Native youth, "resilience" refers to a set of qualities that help to ensure that, despite

⁸ SeaBank 2022, (Accessed November 13, 2023)

⁹ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Peterson Decl. ¶18, Dkt Entry 42-3, page 34, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023).

¹⁰ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Ware Decl. ¶13, Dkt Entry 42-3, page 41, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023). ; see generally 16 U.S.C. § 3111(1) ("the continuation of the opportunity for subsistence uses . . . is essential to Native physical, economic, traditional, and cultural existence").

¹¹ Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Peterson Decl. ¶¶ 4-7, Dkt Entry 42-3, page 32-33, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023).

¹² Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, Peterson Decl. ¶7, Dkt Entry 42-3, page 33, Wild Fish Conservancy v. Quan, Nos. 23-35322, 23-35323, 23-35324, 23-35354 (June 16, 2023)..



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generational traumas, stress, and other challenges, youth can succeed in school, avoid substance misuse, manage mental health, and remain connected to culture and family, etc.¹³

As a result of the plethora of challenges that have been put upon Alaska Native peoples because of colonization (past and present), many communities have begun cultural revitalization, decolonization, and healing efforts to prevent suicide. Many of these efforts incorporate the harvest of wild salmon to strengthen connection to land and water, and thus, traditional and customary culture.

Tribal stewardship and management systems are deeply rooted in principles of respect, balance, and reciprocity. These values ensure the protection and equitable distribution of resources, not only for immediate use but for future generations. Tlingit & Haida looks to examples like the *Boldt Decision*, which affirmed the rights of tribes in Washington state to fish in their traditional waters, granting them the right to harvest up to half of the harvestable salmon and steelhead catch, giving them equal access and establishing a system of co-management between tribes and Washington state. This landmark decision demonstrates how tribal stewardship, based on thousands of years of traditional science and best practices, can contribute to robust and balanced fisheries management.

We urge the Alaska Board of Fisheries to incorporate co-management strategies that provide Tribes a formal (voting) seat at the table, like systems in other states where tribal expertise is integrated into management regimes and decision-making.

III. KING SALMON MANAGEMENT PLAN AND ALLOCATION

The King Salmon Management Plan, as interpreted by the Alaska Department of Fish & Game (ADF&G), allows nonresident anglers to catch king salmon in excess of what is allocated for sport fishing, negatively impacting and destabilizing subsistence and personal use harvesters and local commercial fishermen. In a time where many salmon populations are at a tipping point, subsistence access is not prioritized or protected, the Pacific Salmon Treaty lacks equity for Alaska's fisheries, and Alaska Native peoples are excluded from voting seats on boards and commissions, **the allocated excess for nonresident anglers in 2023 and 2024 was more than 30,000 fish.** Modifications to the King Salmon Management Plan must prioritize subsistence users, and both provide ADF&G with the authority to manage nonresident harvest in-season and the direction to do so when excessive harvest by nonresidents threatens to impact subsistence, personal use, our local commercial fishermen, and the communities dependent upon them. Tlingit & Haida fully supports the restriction of access to nonresident sport harvesters to meet the needs of local Alaskan people, consistent with the Alaska Constitution (Article 8, Section 2).

The allocation of king salmon is a deeply important issue for our traditional ways of life, it directly impacts food security, cultural practices, and passing on traditional knowledge from generation to

¹³ Suicide Prevention in Alaska: SAMHSA



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generation. The Katie John litigation highlighted the critical need to prioritize subsistence fisheries, affirming the role these fisheries play in supporting the health and cultural continuity of Indigenous and rural communities. We acknowledge the Alaska Board of Fisheries efforts to manage fisheries equitably and encourage continued work by prioritizing subsistence users in any reallocation of king salmon. To that end, below is our position on several proposals:

a. Support – with amendment - for Proposal 104

Tlingit & Haida supports this proposal - *with the amendment that reallocation would come from the nonresident sport fishery* - to allocate 5,000 king salmon for Alaska's all gear quota to a king salmon subsistence fishery and establish provisions for king salmon subsistence fishery. This proposal includes inseason management to ensure guided sportfish remains within their allocation and highlights the need for the prioritization of subsistence fisheries amidst a fully allocated resource.

b. Opposition to Proposal 108

Tlingit & Haida Tribal Citizens and Southeast Alaska communities depend upon the Southeast Alaska king salmon troll fishery. Tlingit & Haida opposes this proposal as it seeks reallocation from our Alaska Native fishermen and our primarily resident troll fishery ("borrowing quota") to expand Southeast Alaska's nonresident sport fishery.

c. Support – with amendments - for Proposal 109

Tlingit & Haida supports the intentions of this proposal for ADF&G to meet the Alaska Board of Fisheries' management objectives – *but with amendments* – to prioritize resident bag limits (sport / subsistence), to maintain the 80/20 allocation split between the troll fishery and the sport fishery with each sector managed to stay within its allocation, and for the authorization of inseason management by ADF&G to ensure the sport fishery allocation is not exceeded.

d. Support for Proposal 110

Tlingit & Haida supports this proposal as it addresses the current ability for nonresident king salmon sport fishing to occur, with no annual limit, and no inseason management. This proposal also realigns the King Salmon Management Plan with the Pacific Salmon Treaty and addresses the need to reallocate king salmon from the nonresident sport fishery to the local Southeast Alaska troll fishery.

e. Opposition to Proposal 113

Tlingit & Haida opposes this proposal as it seeks to establish an inequitable reallocation to personal use resident sport fishery and guided nonresident sport fishery, without consideration for tribal requests for the prioritization of subsistence fisheries.



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f. Support for Proposal 118

Tlingit & Haida supports this proposal to set the nonresident annual limit for king salmon to not exceed three and nonresident annual limits will not apply in terminal harvest areas. It is widely supported that this proposal would encourage charter operations to target king salmon in terminal areas, shifting away from fisheries that count toward allocated king salmon fisheries.

g. Support for Proposal 119

Tlingit & Haida supports this proposal to close the nonresident sport fishery for king salmon for two days per week to reduce stressors on king salmon runs, especially during times of reduced abundance.

h. Support for Proposal 120

Tlingit & Haida supports this proposal to close the nonresident sport fishery for king salmon on weekends to reduce the competition with resident sport fishers, and to lessen the potential impact on troll quota due to the lack of inseason management.

IV. SOUTHEAST AREA AND YAKUTAT AREA SUBSISTENCE, PERSONAL USE, AND SPORT SALMON

a. Support for Proposal 135

Tlingit & Haida supports this proposal that would only allow for the use of seine gear in the Redoubt Bay subsistence fishery when the escapement is projected to be greater than 40,000 sockeye salmon.

b. Support for Proposal 137

Tlingit & Haida supports this proposal that would increase sockeye salmon possession limits from 15 to 30 at Basket Bay to allow subsistence users of the Hoonah, Tenakee, and Angoon communities the opportunity to harvest their limit in fewer trips, without increasing overall harvest of the Basket Bay stock.

V. ENHANCEMENT AND TERMINAL HARVEST AREAS

a. Opposition to Proposal 156

Tlingit & Haida opposes this proposal* to reduce hatchery production of pink and chum salmon by 25%, as it poses unnecessary risks to salmon availability for food security and Indigenous ways of life.

**Please refer to Tlingit & Haida Resolution 25-05, to be considered by Tlingit & Haida's Executive Council on January 17, 2025.*

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VI. HERRING**a. Support for Proposals 173-177**

Tlingit & Haida supports these proposals to ensure adequate protections for pre-spawn and spawning herring, and the subsistence harvest of this culturally significant resource.

b. Support for Proposal 178

Tlingit & Haida supports this proposal that would expand areas closed to commercial sac roe herring fishery, specifically within the Sitka Sound during the months of February, March, and April, North of the latitude of Goddard Hot Springs, to ensure successful herring spawns and subsistence harvest.

c. Support for Proposal 179

Tlingit & Haida supports this proposal to expand waters closed to the Sitka Sound herring sac roe fishery to include Promisla Bay to ensure adequate protections for spawning, conservation, and subsistence harvest of herring.

d. Support for Proposal 181

Tlingit & Haida supports this proposal to improve data collection and data utilization necessary for herring.

e. Opposition to Proposals 182 and 183

Tlingit & Haida opposes these proposals as it would place additional pressures on pre-spawn and spawning herring populations, impacting subsistence users.

f. Support for Proposal 188

Tlingit & Haida supports this proposal to prioritize proper management and subsistence access to the traditional harvest of herring by limiting the number of days and hours in a day where commercial harvest of herring may occur and to require observers for commercial herring fishing, require reporting of bycatch in fishery announcements, and limit of the overall commercial harvest of herring in Southeast Alaska to 15,000 tons.

g. Support for Proposal 189

Tlingit & Haida supports this proposal to reduce the allowable size of purse seine nets for commercial herring harvest by requiring that a herring purse sein may not be more than 100 fathoms in length. A smaller net might allow for more precise fishing, less catch and release and / or bycatch, and thus less impact to species.

h. Support for Proposal 190

Tlingit & Haida supports this proposal to provide for co-management of herring fisheries with tribal governments.



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Tlingit & Haida appreciates the opportunity to convey our comments for the purposes of contributing to robust and balanced fisheries management. If you require further information or have any questions a regarding our comments, please contact the Office of the President at otp@tingitandhaida.gov.

Sincerely,

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

Richard J. Peterson

President

Enclosure: Brief for the Southeast Alaska Tribal Coalition as Amicus Curiae Supporting Defendants, *Wild Fish Conservancy v. Quan*, including Exhibit I, Declarations

Nos. 23-35322, 23-35323, 23-35324, 23-35354

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,
Plaintiff-Appellee/Cross-Appellant,

v.

JENNIFER QUAN, in her official capacity as the Regional Administrator for the
National Marine Fisheries Service, et al.,
Defendants-Appellants/Cross-Appellees,

and

STATE OF ALASKA and ALASKA TROLLERS ASSOCIATION,
Intervenor-Defendants-Appellants/Cross-Appellees.

On Appeal from the United States District Court for the
Western District of Washington,
Case No. 2:20-cv-00417-RAJ-MLP

**SOUTHEAST ALASKA TRIBAL COALITION
AMICI CURIAE BRIEF IN SUPPORT OF STATE OF ALASKA'S
MOTION FOR STAY PENDING APPEAL**

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1(a), Sealaska Corporation is an Alaska Native Claims Settlement Act (ANCSA) Regional Corporation. Sealaska has no parent corporation and there is no publicly held corporation that owns 10% or more of its stock. Huna Totem Corporation, Kake Tribal Corporation, Klawock Heenya Corporation, Kootznoowoo, Incorporated, and Shaan-Seet, Incorporated are each ANCSA Village Corporations. These Village Corporations do not have parent corporations and there is no publicly held corporation that owns 10% or more of the stock of any of the Village Corporations.

INTEREST OF AMICI CURIAE

The Amici Curiae are the Central Council of Tlingit & Haida Indian Tribes of Alaska (“Tlingit & Haida”), fifteen other federally recognized Tribes located in Southeast Alaska,¹ the Sealaska Corporation, the regional Alaska Native Corporation for Southeast Alaska, and five Alaska Native village corporations² (together, “Tribal Amici”).³ The tribal citizens and shareholders of the Tribal Amici are dramatically and disproportionately impacted by the closure of the Southeast Alaska salmon troll fishery and share an interest in ensuring continued access to this culturally important food source and economically critical fishery.

INTRODUCTION

Southeast Alaska is home to the Lingít (Tlingit), Haida, and Tsimshian peoples, who have been stewards of the wild salmon populations of this region since time immemorial. Today, there are nineteen federally and state recognized Southeast Alaska tribes for whom salmon is the foundation of their cultural existence

¹ Angoon Community Association, Chilkat Indian Village, Chilkoot Indian Association, Craig Tribal Association, Hoonah Indian Association, Hydaburg Cooperative Association, Ketchikan Indian Community, Metlakatla Indian Community, Organized Village of Kake, Organized Village of Kasaan, Organized Village of Saxman, Petersburg Indian Association, Skagway Village, Wrangell Cooperative Association, and Yakutat Tlingit Tribe.

² Huna Totem Corporation, Kake Tribal Corporation, Klawock Heenya Corporation, Kootznoowoo, Incorporated, Shaan-Seet, Incorporated.

³ No party’s counsel authored this brief in whole or in part; no party, party’s counsel, or other person contributed money to the brief’s preparation or submission.

and economic welfare.⁴ Approximately 61% of the communities directly supported by the Southeast Alaska salmon troll fishery are recognized communities of the Tlingit & Haida,⁵ and approximately 31% of Southeast Alaska trollers are tribal citizens.⁶ Yet the District Court’s decision shuttering the Southeast Alaska troll fishery *does not once* mention tribes or tribal citizens, let alone the devastating and disproportionate impact the court’s decision will have on indigenous communities.

Instead, the District Court cursorily states that “[s]everal Southeast Alaska communities would also be impacted given their economic reliance on the commercial troll fishery seasons for income, the loss of tax revenue to these communities, and because of existing cost barriers to entry into other salmon fisheries.”⁷ That single sentence is the entire extent of the District Court’s

⁴ See Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs, 88 Fed. Reg. 2112, 2115-16 (Jan. 12, 2023); *List of Federally Recognized Tribes in the Sealaska Region*, ANCSA Reg’l Ass’n., <https://ancsaregional.com/wp-content/uploads/2020/01/The-Sealaska-Region-Tribe-List.pdf>.

⁵ Compare Dkt. No. 21, Ex. 4 ¶ 41, FE-58 (“Harrington Decl.”) (“fisheries support over 23 communities around Southeast Alaska”), and Second Decl. of Douglas Vincent-Lang ¶ 7, Case No. 2:20-cv-00417-RAJ (Oct. 3, 2022), ECF No. 136 (listing troll permits in 23 communities), with Ex. 1, Decl. of Richard *Chalyee Éesh* Peterson ¶ 2 & Ex. A (June 14, 2023) (“Peterson Decl.”) (listing communities of Tlingit & Haida, which include 14 of the troll permit communities).

⁶ Compare Peterson Decl. ¶ 8 (nearly 600 troll permits held by tribal citizens), with Harrington Decl. ¶ 32, FE-54 (annual average of 1,932 permits issued 2011-2020).

⁷ R. & R. at 30, Case No. 2:20-cv-00417-RAJ-MLP (Dec. 13, 2022), ECF No. 144.

consideration of the far-reaching and disastrous consequences its decision will have on these small, remote communities. Critically, the court failed to consider the drastic and unparalleled cultural, subsistence, community health, and economic harms its decision would have on the tribes and indigenous communities of the region, whose livelihoods, cultures, and ways of life depend on this fishery.⁸

The Tribal Amici support meaningful conservation efforts that will generate real benefits for the Southern Resident killer whales. But shuttering the Southeast Alaska salmon troll fishery is simply the wrong solution to a complex problem. Vacatur of the Incidental Take Statement (“ITS”) contained in the 2019 Biological Opinion—which effectively shuts down the *entire* fishery—will irreparably harm the Lingít, Haida, and Tsimshian indigenous communities of Southeast Alaska.

ABOUT TLINGIT & HAIDA

Tlingit & Haida is a federally recognized Indian tribe comprised of the indigenous peoples of Southeast Alaska: the Lingít and the Haida. The Lingít history in the region dates back to time immemorial and is documented to extend back over 11,000 years. The traditional Lingít Aaní (Tlingit homelands) stretches from beyond Yakutat in the north to Prince of Wales Island in the south.⁹ The Haida have

⁸ See, e.g., Peterson Decl. ¶¶ 5-9.

⁹ *Id.* ¶ 3; see also *Indigenous Peoples and Languages of Alaska*, Univ. of Alaska Fairbanks, Alaska Native Language Archive, <https://www.uaf.edu/anla/collections/map/> (last visited June 15, 2023) (map

occupied Haida Gwai'i (Haida homelands), including the southern reaches of Southeast Alaska, since time immemorial and their history is documented to extend back at least 12,500 years.¹⁰ Metlakatla was settled by Tsimshian people who migrated to Annette Island in the 1800s and was established as a reservation by Congress in 1891.¹¹ The lands and waters of Southeast Alaska are of historic and cultural importance to these indigenous peoples:

The Haida people and Tlingit people have always lived on these sacred and wondrous lands and waters of Southeast Alaska as the original occupants and guardians. . . .

Our people take great pride in our ability to both cultivate and harvest the resources of the land and sea in a responsible manner. We recognize the value of and retain reverence and respect for all life of the land and sea that we harvest to give us strength and sustenance. . . .

Our history shows that prior to contact this land that is occupied by Tlingit and Haida people remained in balance, maintained that way by our active stewardship, hard work, wise laws, and respect.¹²

Today, the tribal communities in Southeast Alaska include Angoon, Craig, Haines, Hoonah, Hydaburg, Juneau, Kake, Kasaan, Ketchikan, Klawock, Klukwan,

showing traditional territory of Tlingit & Haida).

¹⁰ Peterson Decl. ¶ 3.

¹¹ See Act of March 3, 1891, 26 Stat. 1095, 1101. Metlakatla tribal citizens participate in the Southeast Alaska troll fishery.

¹² *Our History*, Cent. Council of Tlingit & Haida Indian Tribes of Alaska, <http://www.ccthita.org/about/history/index.html> (last visited June 15, 2023).

Metlakatla, Pelican, Petersburg, Saxman, Sitka, Wrangell, and Yakutat.¹³ The smaller communities are predominantly comprised of tribal citizens, many of whom participate in the Southeast Alaska salmon troll fishery deploying traditional practices; the larger communities have significant numbers of tribal citizens who do the same.¹⁴ Troll-caught salmon is a culturally important food source and an economically critical fishery for tribal citizens.¹⁵

ARGUMENT

The Court should grant the State of Alaska’s Motion for Stay Pending Appeal, because the State has “made a strong showing that [it] is likely to succeed on the

¹³ Peterson Decl. ¶ 2 & Ex. A; *see also Chapters*, Cent. Council of Tlingit & Haida Indian Tribes of Alaska, <https://www.ccthita.org/government/delegates/chapters/index.html> (last visited June 15, 2023).

¹⁴ *See* Peterson Decl. Ex. B.

¹⁵ *Id.* ¶ 5; *see also* Courtney Carothers et al., *Indigenous Peoples and Salmon Stewardship: A Critical Relationship*, 26 *Ecology & Soc’y* 1, 5 (2021), <https://repository.library.noaa.gov/view/noaa/31612> (“Salmon were/are the most important resource for the Tlingit.”); David Arnold, *Work and Culture in Southeastern Alaska: Tlingits and the Salmon Fisheries*, in *Native Pathways: American Indian Culture and Economic Development in the Twentieth Century* 158-59, 164, 177 (Brian Hosmer & Colleen O’Neill eds., 2004) (“Tlingits continue to participate in the commercial fisheries Tlingit identity is still inextricably linked to salmon fishing.”); Amanda Walch et al., *A Scoping Review of Traditional Food Security in Alaska*, 77 *Int’l J. Circumpolar Health* 1, 1 (2018), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5757232/#CIT0011> (discussing role that “traditional, culturally appropriate foods play in the health and well-being of Indigenous peoples”).

merits,” the State and third parties “will be irreparably injured absent a stay,” “issuance of the stay will [not] substantially injure the other parties interested in the proceeding,” and “the public interest lies” in granting a stay.¹⁶

The District Court’s decision to vacate the ITS will shut down the Southeast Alaska salmon troll fishery for the summer and winter seasons. The District Court greatly discounted the severe economic impacts of its decision and failed to consider the devastating cultural and economic impact this closure will have on indigenous communities. In fact, the District Court *did not once* mention tribes or Southeast Alaska’s indigenous peoples at all.

Whether agency action should be vacated on remand “depends on how serious the agency’s errors are and the disruptive consequences of an interim change that may itself be changed.”¹⁷ Thus, “when equity demands,” the agency action “can be left in place while the agency follows the necessary procedures to correct its action.”¹⁸ The Court should balance the agency’s “errors against the consequences of [vacatur as] a remedy.”¹⁹ Here, equity demands the ITS be left in place.

The harm from vacatur of the ITS is not speculative or abstract. It is concrete,

¹⁶ *Lair v. Bullock*, 697 F.3d 1200, 1203 (9th Cir. 2012) (quotations omitted).

¹⁷ *Cal. Cmty. Against Toxics v. U.S. E.P.A.*, 688 F.3d 989, 992 (9th Cir. 2012) (quotation omitted).

¹⁸ *Id.* (quotation omitted).

¹⁹ *Id.* at 993.

imminent, and dire. Southeast Alaska’s indigenous communities face irreparable injury if the stay is not granted. An entire industry—one that the residents of the region’s small, remote, and largely indigenous communities critically depend on—faces extinction.²⁰ As described by Tlingit & Haida President Richard *Chalyee Éesh* Peterson:

Our villages are in isolated locations on the coast of the Pacific and the shores of the Southeast Alaska archipelago. Few villages have road access; fishing and harvesting from the ocean and beaches is a major food source.

Troll-caught salmon is a culturally important food source and an economically critical fishery for our tribal citizens. For untold numbers of generations, our people have ventured out to troll for salmon, including Chinook salmon (king salmon). . . . Historically this was done by hook-and-line in cedar canoes. Today we use small fishing boats, but the techniques and knowledge used are based on our traditional practices. . . .

Troll fishing keeps our culture and traditions alive and gives young people an opportunity to make a living and support their families. . . . Closing of the troll fishery for even one season can cause irreparable breaks in this intergenerational knowledge. Our young people will lose out on critical learning opportunities or may move out of region entirely if the troll fishery is no longer a viable source of income to support their families.²¹

Tribal fishermen “play a crucial economic role in their communities.”²²

²⁰ See *Am. Passage Media Corp. v. Cass Commc’ns, Inc.*, 750 F.2d 1470, 1474 (9th Cir. 1985) (“The threat of being driven out of business is sufficient to establish irreparable harm.”).

²¹ Peterson Decl. ¶¶ 4-7.

²² *Id.* ¶ 8.

Nearly 600 trolling permits are held by tribal citizens, and these “permit holders provide food, employment, and income for many people beyond themselves in [tribal] communities.”²³ Trolling is one of the few industries that offers well-paying jobs in remote Southeast Alaska, jobs which enable tribal citizens “to continue to live on [their] traditional homelands . . . and to practice [their] traditional way[s] of life.”²⁴ The stories of tribal citizens who are impacted by this closure are countless. Tribal Amici urge the Court to consider the personal statements from tribal leaders and tribal citizens regarding the catastrophic impact this closure will have, not only on their livelihoods but on their cultural heritage and their entire way of life.²⁵

²³ *Id.*

²⁴ Ex. 1, Decl. of William Ware ¶ 3; *see generally* 16 U.S.C. § 3111(1) (“the continuation of the opportunity for subsistence uses . . . is essential to Native physical, economic, traditional, and cultural existence”).

²⁵ *See* Decl. of Clinton Cook Sr. ¶ 13 (“The District Court’s order has frightened our Tribe and our people. We are frustrated and angry that this decision was made without considering the impact on our Tribal communities and without consulting us.”); Decl. of Michael Douville ¶ 3 (“[T]he sustainable harvest of these salmon is in line with our traditional and customary practices and is an expression of our sovereignty. Telling us we cannot fish is another attack on our Indigenous rights and way of life.”); Decl. of Raymond Douville ¶ 4 (“Trolling allows younger tribal fishermen who are just entering the industry, like I did at 21, to support their families and remain in their Southeast Alaska communities.”); Decl. of James Dybdahl ¶ 6 (“Not being able to fish for Chinook will be devastating to my business. About 60-70% of my income comes from the Chinook troll fishery. The July 1 season opener alone accounts for tens of thousands of dollars in gross sales.”); Decl. of James Erickson ¶ 3 (“We are fundamentally connected to a way of life on the water, and we have been since before western contact and the monetary system we have today. The food of the ocean, such as Chinook, nourishes us both physically and

In addition to failing to consider cultural harms to the indigenous peoples of Southeast Alaska,²⁶ the District Court greatly underweighted the economic impact of its decision. This Court has found vacatur of an agency decision to be an inappropriate remedy when it would cause severe economic consequences, which will irrefutably happen here.²⁷

culturally.”); Decl. of Paul Marks II ¶ 7 (“Fishing is not only my livelihood but my connection to my family and my culture. I’m happiest when I’m on the water, and I handle each individual fish with care and respect.”); Peterson Decl.; Decl. of Frederick Phillips ¶ 5 (“Tribal elders especially depend on the trollers to have access to healthy, traditional foods, like Chinook, year-round.”); Decl. of William Ware; Decl. of Julie Yates ¶ 7 (“If the closure is allowed to happen, we will not only lose a large portion of our income, but we will also be deprived of an important part of our Haida culture as well.”). These declarations are included as Ex. 1 to this brief.

²⁶ Cf. *United States v. Washington*, 20 F. Supp. 3d 986, 1021 (W.D. Wash. 2013) (“The depletion of salmon stocks and the resulting diminished harvests have harmed the Tribes and the individual members economically, culturally, and personally.”), *aff’d*, 853 F.3d 946, 966 (9th Cir. 2017) (“consequent reduction in tribal harvests has damaged tribal economies, has left individual tribal members unable to earn a living by fishing, and has caused cultural and social harm to the Tribes in addition to the economic harm” (quotation omitted)).

²⁷ See, e.g., *Cal. Cmty. Against Toxics*, 688 F.3d at 993-94 (concluding vacatur would be “severe” where it would delay construction of “a much needed power plant” and affect the employment of 350 workers); *Ctr. for Food Safety v. Regan*, 56 F.4th 648, 652, 668 (9th Cir. 2022) (declining to vacate pesticide registration—even where EPA admitted it did not comply with ESA—where vacatur would cause “a disruption to the agricultural industry”); *City of Los Angeles v. Dickson*, No. 19-71581, 2021 WL 2850586, at *3 (9th Cir. July 8, 2021) (concluding FAA violated NEPA, NHPA, and section 4(f) by failing to complete proper environmental review, but remanding without vacatur because vacating agency action “would be severely disruptive in terms of cost, safety, and potential environmental consequences”); *Nat’l Fam. Farm Coal. v. U.S. E.P.A.*, 966 F.3d 893, 929-30 (9th Cir. 2020) (noting “evidence of potentially serious disruption if a pesticide that has been registered for

The Southeast Alaska salmon troll fishery “is a resilient, responsible, and sustainable fishery” that not only supports tribal citizens economically but keeps the cultures and traditions of the indigenous peoples of Southeast Alaska alive. Closing the fishery will inflict irreversible harm on tribal citizens who “rely on this fishery for [their] livelihoods and [their] cultural wellbeing.”²⁸

CONCLUSION

The Tribal Amici respectfully request that the Court grant the State of Alaska’s Motion for Stay Pending Appeal.

over five years can no longer be used”); *Cook Inletkeeper v. U.S. E.P.A.*, 400 F. App’x 239, 240-41 (9th Cir. 2010) (declining to vacate permit that authorized water pollution by natural gas and oil extraction facilities in Cook Inlet, even where EPA conceded the “antidegradation finding was flawed,” “to avoid the disruptive consequences that would flow from vacating the permit”). This approach is consistent with other Circuits. *See, e.g., Gulf Restoration Network v. Haaland*, 47 F.4th 795, 805 (D.C. Cir. 2022) (declining to vacate offshore oil and gas leases where doing so “would be highly disruptive for the lessees”); *Shafer & Freeman Lakes Env’t Conservation Corp. v. FERC*, 992 F.3d 1071, 1096 (D.C. Cir. 2021) (remanding without vacating ITS because utility operating dam would lose legal protection from ESA liability); *Vecinos para el Bienestar de la Comunidad Costera v. FERC*, 6 F.4th 1321, 1325, 1331-32 (D.C. Cir. 2021) (declining to vacate orders authorizing natural gas export terminals and pipelines); *W. Watersheds Project v. Haaland*, Nos. 22-8031 & 22-8043, 2023 WL 3637804, at *21-22 (10th Cir. May 25, 2023) (declining to vacate decision authorizing livestock grazing in violation of National Forest Management Act because it would disrupt seasonal patterns of grazing and adversely impact ranchers and local communities).

²⁸ Peterson Decl. ¶¶ 6, 9.

Respectfully submitted this 16th day of June 2023 at Anchorage, Alaska.

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CERTIFICATE OF COMPLIANCE

In accordance with Fed. R. App. P. 29(a)(4), this brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionately spaced typeface using Microsoft Word for Office 365 Times New Roman 14-point font.

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

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**IN THE UNITED STATES COURT OF APPEALS
 FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,)	
)	
Plaintiff-Appellee/Cross-Appellant,)	
)	
v.)	Appeal Nos. 23-35322, 23-
)	35323, 23-35324, 23-35354
JENNIFER QUAN, in her official capacity)	
as the Regional Administrator for the)	D.C. No. 2:20-cv-00417-RAJ-
National Marine Fisheries Service, et al.,)	MLP
)	
Defendants-Appellants/Cross-)	
Appellees,)	
)	
and)	
)	
STATE OF ALASKA and ALASKA)	
TROLLERS ASSOCIATION,)	
)	
Intervenor-Defendants-)	
Appellants/Cross-Appellees.)	
)	

Declaration of Clinton Cook Sr.

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DECLARATION OF CLINTON COOK SR.

Clinton Cook Sr., acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Clinton Cook Sr. I am the elected President of the Craig Tribal Association (“the Tribe”), and I also serve as the Fifth Vice President of the Central Council of Tlingit & Haida Indian Tribes of Alaska (“Tlingit & Haida”).

2. I make this declaration based on my personal knowledge, including information known to me in my role as President of the Tribe.

3. Craig Tribal Association is a federally and state recognized tribe with about five hundred tribal citizens. Of those five hundred, approximately twenty people directly participate in the salmon troll fishery. And many more people live in a household that has a permit and therefore depend on the permit for their economic stability as well.

4. Our Tribe has a six-member Tribal Council that is our governing body. Three of those six Tribal Council members will be directly impacted by the closure of the troll fishery, either because they themselves hold a permit or because their spouse does.

5. Since the District Court issued its order closing the troll fishery, Tribal citizens and other members of our community have come to talk with me about their

Declaration of Clinton Cook Sr.

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fears about how this will harm them and their families. For many fishermen, up to seventy percent of their annual income comes from troll fishing. People here are scared of what this order will do to their ability to support their families.

6. Some individuals have told me that based on the closure this summer alone, they fear they may need to move away in order to earn enough income. I fear that if the closure lasts longer, many more might have to leave. Our community is small and even a few families leaving would harm us. As people leave the community, I expect that our Tribal citizenship would also decrease.

7. The impacts of the fishery closure will be felt far beyond those individuals who actually hold the permits and their immediate families and households. When the fishermen leave town to go out troll fishing on their boats, they stop to buy ice for their coolers, they stock up on groceries for while they are gone, they go to the fuel dock to purchase fuel, and they buy licenses and fishing gear from the local sporting goods store. When the fishermen return to the community, they sell some of their fish to local small businesses, who then smoke the fish and sell it. The loss of the troll fishery will also mean the loss of these many exchanges that help drive our local economy and support local businesses.

Declaration of Clinton Cook Sr.

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8. The troll fishery also supports other industries that our Tribal citizens work in, like the shipping industry. If the fishery closure goes into effect, then some of these Tribal citizens may lose their jobs.

9. The City of Craig taxes many of these purchases. The decrease in taxable spending will lower the taxes the City takes in, and I worry that will in turn reduce the services that the City provides. The City provides crucial services to our Tribal citizens who live in Craig, including police and fire service.

10. Troll fishing is also an important subsistence activity for our people. Even those of us who do not have commercial permits engage in troll fishing if we can, to help feed our families. For many of our people, troll fishing is knowledge that they learned from their grandparents and parents and now seek to pass down to their children and grandchildren.

11. Our ancestors have been the stewards of our lands and waters for generations. We have cared for the ocean and the animals that live in it. We respect the killer whale; in fact, one of our clans has the killer whale as its crest. For the many generations that our ancestors used our traditional troll fishing methods, the killer whales were not harmed by this activity. Shutting the fishery down now does not address the actual problems facing the killer whales. It only harms our Tribe and many other similar small communities.

Declaration of Clinton Cook Sr.

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12. Salmon is central to our Tribe's culture. In mid-June, our Tribe held a high-school graduation ceremony to celebrate our Tribal graduates and we served fresh king salmon to the graduates and their families. Similarly, our Tribal Council is currently establishing a food sovereignty program that will purchase commercial fish, including salmon, and provide it to Tribal citizens for traditional uses such as smoking and canning. No matter what the future brings, salmon and trolling have always been a part of our culture and I know that will never change.

13. The District Court's order has frightened our Tribe and our people. We are frustrated and angry that this decision was made without considering the impact on our Tribal communities and without consulting us.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.



Clinton Cook Sr.

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Declaration of Michael Douville

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DECLARATION OF MICHAEL DOUVILLE

Michael Douville, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Michael Douville. I was born in Ketchikan, Alaska, and grew up in Craig, Alaska. I am Tlingit, a tribal citizen, and an elected tribal council member of the Craig Tribal Association, a federally and state recognized tribe. For the past 25 years, I have served as a member of the Federal Regional Advisory Council, which advises the Federal Subsistence Board. I also sit on the Craig Advisory Committee, which advises the Alaska Department of Fish and Game on their regulations and policies. I make this declaration based on my personal knowledge from my experience as troll fisherman.

2. I started troll fishing with my stepfather when I was eleven years old. I purchased my first power troller boat in 1970, and I am still a troller today. Trolling has enabled me to provide for my family for decades. I taught my son, Raymond Douville, how to troll, and he now owns and operates his own boat. It has been one of the biggest joys of my life to troll for Chinook salmon, and I am happy to share this sustainable food with my family and community.

3. Many young people in our community learn vital life skills on troll boats. Trolling requires a strong work ethic and discipline to be successful. A closure

Declaration of Michael Douville

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of the Chinook fishery would directly impact Alaska Natives; if you have been a fisherman your entire life, you are not qualified for other jobs, and you do not have access to other jobs. The economies of our communities depend entirely on these fisheries. This is all we have ever done—building fish traps and trolling with bone hooks from canoes, and harvesting the salmon when they return each year. Most Native people have been fishermen from before anyone can remember. The traditions go back to before commercialization, before state management, and before the federal government even existed. You did not fish where you did not have permission—families and clans had their own salmon streams. All the salmon streams and all the outside islands had fish traps that were owned by families, and those rock formations are still here to this day. They are a constant reminder that the sustainable harvest of these salmon is in line with our traditional and customary practices and is an expression of our sovereignty. Telling us we cannot fish is another attack on our Indigenous rights and way of life.

4. It is unfair that our people are going to lose substantial income as a result of this lawsuit. Scientifically sound evidence supports that there are many factors that are impacting the decline of the Southern Resident killer whales, like pollution, boat traffic, and a decline in salmon in Puget Sound, just to name a few.

Declaration of Michael Douville

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.



Michael Douville

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Declaration of Raymond Douville

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DECLARATION OF RAYMOND DOUVILLE

Raymond Douville, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Raymond Douville. I grew up in Craig, Alaska, and I am a tribal citizen of the Craig Tribal Association. I make this declaration based on my personal knowledge from my experience as a troll fisherman.

2. I grew up troll fishing with my dad, Michael Douville, on his boat. It was on my dad's boat that I learned the necessary skills to be a troll fisherman. We fished for a few species of salmon, but it was fishing for Chinook salmon that made our fishing seasons worth the time and effort. The Chinook openers were short, but the money we made during the Chinook openers was a large portion of our annual income.

3. When I turned twenty-one, I used all the money I had made fishing with my dad, plus a loan from the State of Alaska, and I bought my own troll boat. That was seventeen years ago. Since then, with a lot of hard work and time on the water, I have been able to expand into other fisheries. However, my career as a fisherman started with the Chinook troll fishery, and my fishing operation today is still heavily dependent on the short Chinook openers.

Declaration of Raymond Douville

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4. Trolling is one of the best industries for our young people to get involved with because it has relatively low costs to enter and you do not need a large operation to be successful. In addition to needing a boat, before the threatened closure of the Chinook troll fishery by this lawsuit, a power troller permit was worth about \$40,000 on the open market and a hand troller permit was between \$20,000 and \$30,000. Compared to a purse seine permit, worth approximately \$200,000 to \$255,000, or a gillnet permit, worth about \$65,000 to \$90,000, a trolling permit is a lower buy-in cost for a new fisherman. Trolling allows younger tribal fishermen who are just entering the industry, like I did at 21, to support their families and remain in their Southeast Alaska communities.

5. When I was younger, many Native people in Southeast Alaska were fishermen, and in the smaller villages, fishing was the main occupation. Today, outside economic pressures have forced many people to leave their communities to seek work, and there are fewer native people participating in the troll fishery than when I was a kid. I have been successful as a fisherman because of what I learned from my dad on his troll boat. If the court allows the Chinook fishery closure to proceed, I fear that young Tlingit & Haida people today will not have the same opportunities that I had to learn about fishing. Without the Chinook fishery, we lose

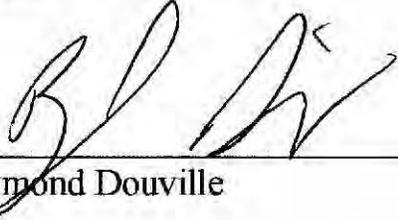
Declaration of Raymond Douville

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the opportunity to bring new tribal citizens into the troll fishery and to pass on the skills they will need to be successful.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.



Raymond Douville

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Declaration of James Dybdahl

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DECLARATION OF JAMES DYBDAHL

James Dybdahl, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is James Dybdahl. I am Tlingit and a tribal citizen of Central Council Tlingit & Haida Indian Tribes of Alaska. I was born and raised in Hoonah, Alaska, and my clan is Taakw.aaneidí. I have personal knowledge of the matters discussed herein.

2. I started fishing at the age of ten with my mom, who is also Tlingit and grew up in Klawock. My mom loved to be on the water—whether picking seaweed, collecting gumboots, or fishing for salmon. My mom and I fished together for almost five years on our family’s fourteen-foot skiff. When I was fifteen, my mom and dad sat me down and let me know that I was ready to fish by myself. That’s how I became a troller. From then on, I spent my summers fishing for Chinook and used my income to pay for school-related expenses. This was our way of life, and I never thought about it being any other way.

3. I was eventually able to purchase a bigger boat and got a power troll permit. I’ve now spent fifty-eight years of my life fishing for Chinook and have been a commercial troller for thirty-five years. In that time, I’ve fished from the Canadian border in the south to up past Yakutat in the north, and all four of my

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children have fished with me at one point or another during their lives. Being a troller is who I am.

4. About twenty-three years ago, I cultivated a special market in the Juneau area where I sell my Chinook directly to individuals in the community with a Catcher-Seller Permit, rather than selling my catch to processors. I now have a base of about 400 customers who rely on me for their salmon. Many of my customers have been Native elders who are no longer able to fish for themselves. These community members appreciate that I take care of and respect the salmon I catch. They also love my stories that come with every fish and knowing the place names of where their salmon was caught.

5. My customer base has supported me through thick and thin. During the pandemic, in particular, the Juneau community really showed up to help small businesses like mine survive. We came up with creative schemes, such as curbside delivery of salmon, to make sure the community was safe and continued to be nourished both physically and emotionally. Chinook is so sacred to everyone.

6. Not being able to fish for Chinook will be devastating to my business. About 60-70% of my income comes from the Chinook troll fishery. The July 1 season opener alone accounts for tens of thousands of dollars in gross sales.

Declaration of James Dybdahl

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7. There is no way I can target any other species of fish and make up that loss of income. I can try to catch coho salmon, but they are smaller, not as plentiful early in the fishing season, and have a lower value. With rising costs for both fuel and bait, and an anticipated increase in competition from other former Chinook trollers, it may not be worthwhile at all. I could also lease a halibut quota, but that requires changing my boat over to target halibut, and the owner of that quota will get an automatic 40% of whatever revenue I make. That in turn reduces the wages I'm able to pay my crew, and I may ultimately end up making less than my crew in order to keep them employed. I don't see enough revenue coming back to commit to an entirely new fishery. I may not be able to troll at all.

8. The likelihood of the fishery closing also affects my long-term financial prospects. I had hoped to retire in 5-10 years and planned to sell my boat and my permit in order to fund my retirement. But without Chinook, my boat and permit are basically worthless. For example, I recently tried to sell my old boat, which was surveyed last year as having a value of \$250,000 to \$260,000 (although, realistically, it could probably only be sold for about \$140,000). I had two potential buyers interested, but when news broke about the closure of the fishery they backed out. Right now, I don't think I could find any buyer willing to pay more than \$70,000 for the boat. I am now stuck with two boats and the moorage and upkeep costs for both

Declaration of James Dybdahl

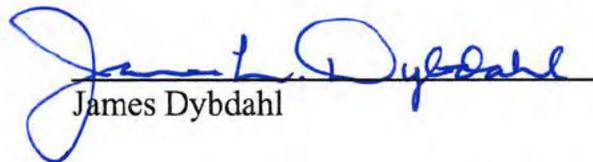
Nos. 23-35322, 23-352323
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(almost \$10,000 per boat per year), which is a constant drain on my bank account. Similarly, my permit was valued at close to \$40,000, but currently Chinook permits are sitting on the market at less than \$25,000 with no takers. The value of both hand and power trolling permits has fallen significantly because of this litigation and the threatened fishery closure.

9. The closure of the fishery will not only affect fishermen like me. I generally employ four to five people—two crew members, a bookkeeper, and on-the-ground support in Juneau to help with sales. Each of these people will also lose income if the Chinook troll fishery is closed. Fuel companies, grocery stores, cold storage companies, processors, and tender crews will all lose income. The closure of the fishery might be the death knell of traditional small fishing boats like mine in Hoonah.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.


James Dybdahl

Declaration of James Dybdahl

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Declaration of James Erickson

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DECLARATION OF JAMES ERICKSON

James Erickson, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is James Erickson. I am Tlingit and a tribal citizen of the Hoonah Indian Association. I am Teikweidee, of the Eagle moiety and Brown Bear clan. I grew up and continue to live in Hoonah, Alaska. I hold a power troller fishing permit. I submit this declaration based on my experience as a troll fisherman.

2. I first started fishing as a child with a rod-and-reel. I fell in love with fishing for Chinook in the waters around Hoonah. I loved the thrill of catching a big Chinook in places special to us, such as Icy Straits, Idaho Inlet, and Glacier Bay. In 1973, I bought my first power troller, a thirty-four-foot double ender wood boat named the Delores. I learned how to troll from some of Hoonah's master fishermen, Kenny Schoonover, Howard Gray, Gerald "Jerry" Gray Sr., Adam Greenwald, Bill Metz, and Floyd Peterson, all of them Alaska Native fishermen. They passed their knowledge and expertise down to me, which I have in turn taught to my son, Jay Erickson, and to others who were interested.

3. Hoonah is proud of its fishing heritage. It is one of the largest native villages in Southeast Alaska. We are fundamentally connected to a way of life on the water, and we have been since before western contact and the monetary system

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we have today. The food of the ocean, such as Chinook, nourishes us both physically and culturally. Since time immemorial, Tlingits have been tied to the salt water and the coastal areas for our food, clothing, and trade goods. Tlingit people today continue to make their living from the sea because it is how our elders taught us. Our waters and their bounty are the reason for our existence.

4. The troll fishery is a limited entry fishery, meaning that there are only a set number of trolling permits available. If a fisherman wanted to become a troller today, they must buy an existing permit, the State of Alaska does not issue new ones. This management approach has worked. Limited entry ensures there is never a huge fishery fleet depleting the fishing stock. Additionally, troll fishermen must pay a three percent salmon enhancement tax when they sell their fish. The tax revenue is put towards salmon enhancement projects, such as hatcheries, to ensure there is enough salmon for everyone, not just trollers, but subsistence, sport, and commercial fishermen alike. Troll fishermen are invested in the sustainability of the Chinook population.

5. During my fifty plus years as a fisherman, I have observed killer whales many times. I have fished with killer whale pods in the same area. The decline of the Southern Resident killer whales is a complex problem. Scientific studies have shown there could be many causes, such as pollution, inbreeding, boat traffic, dams

Declaration of James Erickson

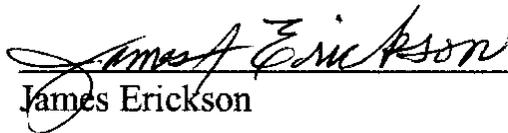
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dams blocking salmon spawning rivers, and an overpopulation of sea lions, just to name a few.

When local friends, family, or fellow fishermen get together, everyone always has a good story about catching their first Chinook. We all have memories of the times we spent fishing in and around Hoonah. It hurts to think that a court almost two thousand miles away could take away our ability to fish for Chinook. It is life changing really. It will put my livelihood in jeopardy, and it will stop my family and my community from partaking in an important part of our culture.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.


James Erickson

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Declaration of Paul Marks II

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DECLARATION OF PAUL MARKS II

Paul Marks II, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Paul Marks II. I am Tlingit and a tribal citizen of Central Council Tlingit & Haida Indian Tribes of Alaska. I was born in Anchorage, Alaska, and raised in Anchorage, Juneau, and Kake, Alaska. I now live in Juneau. I make this declaration based on my personal knowledge.

2. I started fishing when I was three or four years old at Chilkoot Lake, near Haines, Alaska, and have loved fishing ever since. I trolled for the first time when I was eight and grew up subsistence hand trolling with my family. It's my life.

3. I've been a commercial troll fisherman for seven or eight years now. I started off as a hand troller on an eighteen-foot skiff, and I now own a forty-two-foot double-ender and power troll with my dad and my brother.

4. My grandfather was also a power troller, and I was named after him and carry his Tlingit name—Keet Yaanayi. Fishing is my connection to him. I never got to meet my grandfather, as he passed away before I was born. But his clan crest is the porpoise, and whenever I go fishing, a pod of porpoises always follows. I feel like that's my grandfather checking in on me and guiding me as I fish.

Declaration of Paul Marks II

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5. The July 1 opener is by far the most important part of the king salmon troll fishery season—that’s what every troller looks forward to and what we rely on for the bulk of our income. Right now, I would normally be getting my boat ready for the season and would then head to Sitka next week to plan out where to fish. But if the king salmon fishery doesn’t open, it won’t be commercially viable for me to fish this year. I’ll be forced to try to find other, less lucrative work, which will dramatically affect my ability to support my family.

6. I know that closure of the troll fishery will affect all of Southeast Alaska, as well. All of the small, remote communities that fishermen visit have specialized businesses that cater to trollers—if we’re not visiting those communities and spending money on groceries, boat maintenance, fuel, and other expenses, what are those businesses going to do?

7. Fishing is not only my livelihood but my connection to my family and my culture. I’m happiest when I’m on the water, and I handle each individual fish with care and respect. The Tlingit are fishing people. Our ancestors fished on oceangoing boats up to seventy feet in length. They were fearless. They knew fish were out there and they discovered the Fairweather Grounds and the best places to fish. Salmon has always been our lifeline, the resource we are most dependent on. It’s in our blood.

Declaration of Paul Marks II

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Page 3 of 5

8. Closure of the troll fishery is so detrimental to our people, as it also affects our subsistence rights and our ability to harvest food for winter. When I fish, it's not just to make money, but a way for me to provide salmon to feed my family. I also harvest fish that I bring to our potlatches.

9. I listened to an interview by a representative of the Wild Fish Conservancy who claimed to represent Indigenous interests. The Wild Fish Conservancy does not represent me or my community. They do not speak for me or my people. They do not know my people's land and territory; they do not know how we have interacted with and actively stewarded our lands and seas for thousands of years. We do, and we have done it well.

10. There are so many factors affecting the Southern Resident killer whale population—inbreeding, damming of rivers, high toxicity levels, traffic, noise pollution—it's not fair that traditional fishers in Southeast Alaska are paying the price.

11. As a fisherman, I'm a conservationist. Fishermen know what we need to survive, and we want to leave something for the future. I want to leave a sustainable, healthy fishery for my four-year-old daughter. She loves fishing and has been on a boat since she was a baby. This year, she told me, "I can't to catch a king salmon, daddy, it's my dream." I hope that dream can remain a reality.

Declaration of Paul Marks II

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Page 4 of 5

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 15 day of June, 2023.



Paul Marks II

Richard D. Monkman
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 K. Amanda Saunders
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**IN THE UNITED STATES COURT OF APPEALS
 FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,)	
)	
Plaintiff-Appellee/Cross-Appellant,)	
)	
v.)	Appeal Nos. 23-35322, 23-
)	35323, 23-35324, 23-35354
JENNIFER QUAN, in her official capacity)	
as the Regional Administrator for the)	D.C. No. 2:20-cv-00417-RAJ-
National Marine Fisheries Service, et al.,)	MLP
)	
Defendants-Appellants/Cross-)	
Appellees,)	
)	
and)	
)	
STATE OF ALASKA and ALASKA)	
TROLLERS ASSOCIATION,)	
)	
Intervenor-Defendants-)	
Appellants/Cross-Appellees.)	
)	

Declaration of Richard *Chalyee Éesh* Peterson

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 Page 1 of 6

DECLARATION OF RICHARD *CHALYEE ÉESH* PETERSON

Richard *Chalyee Éesh* Peterson, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is *Chalyee Éesh*, or Richard Peterson. I am the elected President of the Central Council of the Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida). I am Lingít of the Kaagwaantaan, Eagle's Nest House. My clan lineage is from Sitka, and I grew up in Kasaan, Alaska.

2. I make this declaration based on my personal knowledge, including information known to me in my role as President of Tlingit & Haida, a federally and state recognized tribe representing over 35,000 tribal citizens. Tlingit & Haida's ancestral lands and waters encompass Southeast Alaska and extend into the Yukon and British Columbia in Canada. Tlingit & Haida recognized communities in Southeast Alaska include Angoon, Craig, Haines, Hoonah, Hydaburg, Juneau, Kake, Kasaan, Ketchikan, Klawock, Klukwan, Metlakatla, Pelican, Petersburg, Saxman, Sitka, Wrangell, and Yakutat.¹

3. Our tribal citizens have lived in Southeast Alaska since time immemorial and continue to live here today. We arrived as the glaciers retreated,

¹ Exhibit A attached to this declaration is a map showing Tlingit & Haida's recognized communities.

and we never left. The historic tribal area for the Lingít (Tlingit) is the Lingít Aaní, which stretches nearly 500 miles along the Pacific coast from north of Yakutat to south of Saxman and Prince of Wales Island, and inland to Atlin, Tagish, and Carcross in the Yukon and British Columbia. The historic tribal area for the Haida is Haida Gwai'i, also known in English as the Queen Charlotte Islands, and includes the southern portion of Prince of Wales Island in Alaska.

4. Our people are people of the ocean. We have depended on the waters of the Lingít Aaní and Haida Gwai'i to provide us with food for thousands and thousands of years and continue to do so today. Our villages are in isolated locations on the coast of the Pacific and the shores of the Southeast Alaska archipelago. Few villages have road access; fishing and harvesting from the ocean and beaches is a major food source.

5. Troll-caught salmon is a culturally important food source and an economically critical fishery for our tribal citizens. For untold numbers of generations, our people have ventured out to troll for salmon, including Chinook salmon (king salmon). There are salmon present in our waters all year long, not just during the summer salmon runs. Each generation has taught the next generations how, where, and when to troll for salmon. Historically this was done by hook-and-

line in cedar canoes. Today we use small fishing boats, but the techniques and knowledge used are based on our traditional practices.

6. Troll fishing is a resilient, responsible, and sustainable fishery that supports our Tribal citizens not only economically, but in their health and spirit. When troll fisherman have a permit to sell from the docks, they provide both affordable access to the foods that continue our traditions and a healthy food source for our communities. The trollers can be one of the only means for families who cannot afford a boat to access the foods that nourish our spirit. While salmon are a well-documented source of healthy food, much healthier than the red meat available for purchase in a grocery store, it's as important that they help maintain our connections with our lands and waters.

7. Troll fishing keeps our culture and traditions alive and gives young people an opportunity to make a living and support their families. In some cases, four generations of one family have supported their household and their communities through a hook-and-line fishery, as did their ancestors before them. Closing of the troll fishery for even one season can cause irreparable breaks in this intergenerational knowledge. Our young people will lose out on critical learning opportunities or may move out of region entirely if the troll fishery is no longer a viable source of income to support their families.

Declaration of Richard *Chalyee Éesh* Peterson

Nos. 23-35322, 23-352323
23-35324, 23-35354
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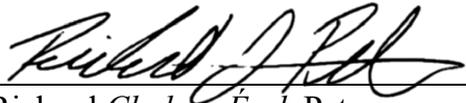
8. Responsible stewardship of our waters is vital to the Tlingit & Haida way of life. Our troll fishers continue our traditional practices by harvesting Chinook salmon sustainably and responsibly. In addition to their cultural role, these fishermen play a crucial economic role in their communities. There are nearly 600 commercial power and hand troll permits held by tribal citizens. They live and work throughout the Lingít Aaní and Haida Gwai'i.² These permit holders provide food, employment, and income for many people beyond themselves in our communities. They employ deckhands. The fish go to processors who benefit economically from their share of the work. Families pay individuals to clean and sometimes to smoke their fish. The negative economic impacts are far reaching.

9. If a stay is not granted, the closure of the summer and winter Chinook salmon troll fishery will have a devastating cultural and economic impact and inflict irreversible harm on our Tlingit & Haida tribal citizens and our communities. We rely on this fishery for our livelihoods and our cultural wellbeing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

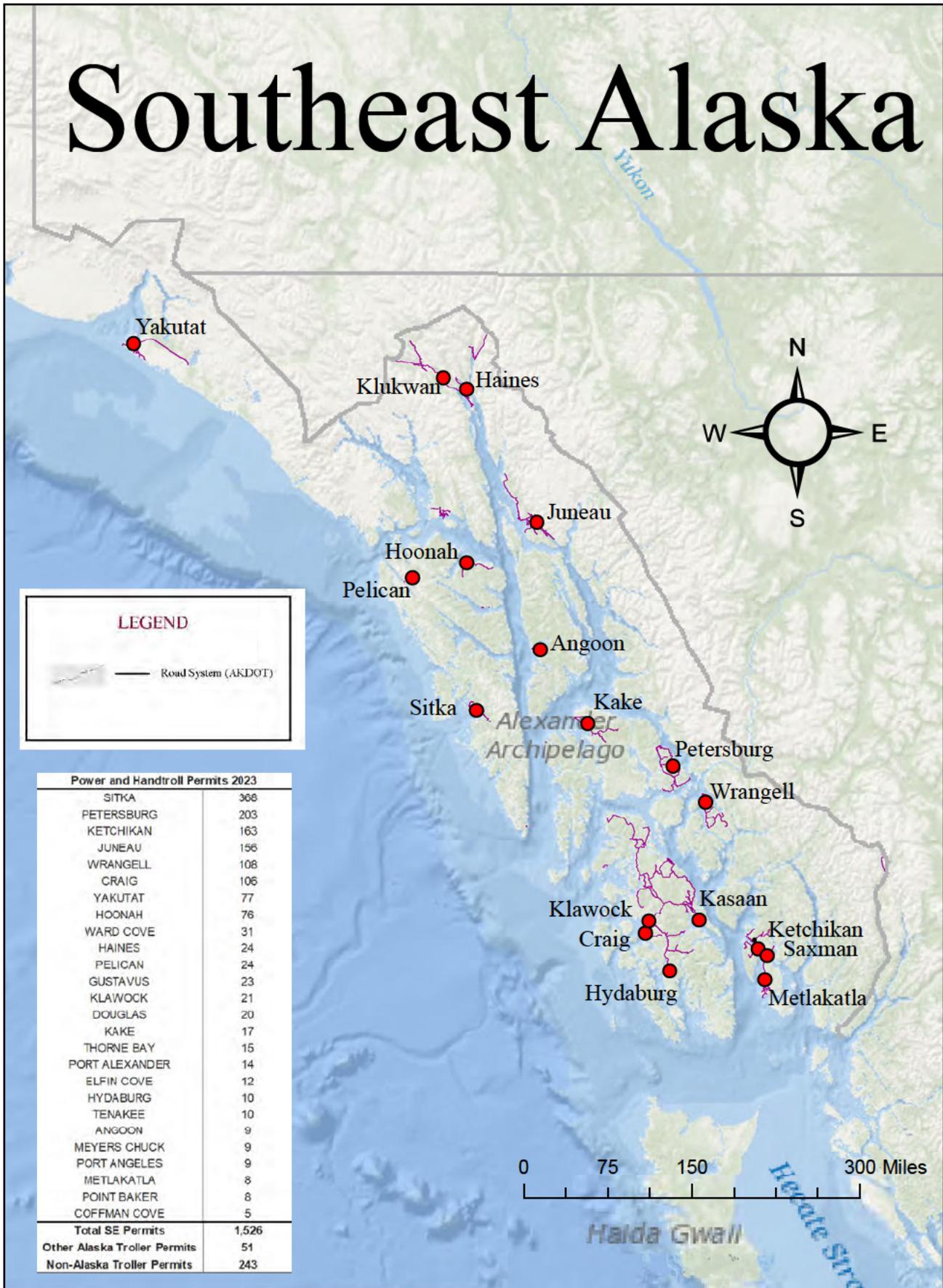
² Exhibit B attached to this declaration is a chart of the number of troll permits held in each community throughout Southeast Alaska.

DATED this 14 day of June, 2023.


Richard *Chalyee Eesh* Peterson

Declaration of Richard *Chalyee Eesh* Peterson

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Southeast Alaska Community	Hand Troll Permits 2023¹	Power Troll Permits 2023²	Population 2022³	Percent Alaska Native⁴	Median household income in the past 12 months⁵ (in 2021 inflation-adjusted dollars)
Angoon	6	3	340	89%	\$ 44,167
Craig	36	70	992	35%	\$ 61,875
Coffman Cove	2	3	201	10%	NA
Edna Bay	3	1	42	0%	\$ 38,500
Elfin Cove CDP	2	9	38	4%	\$ 194,063
Gustavus	12	11	657	11%	\$ 76,500
Haines CDP	5	19	2,575	19%	\$ 64,430
Hollis CDP			139	11%	\$ 52,450
Hoonah	51	25	917	62%	\$ 64,432
Hydaburg	6	4	347	88%	\$ 45,938
Hyder CDP	1		46	2%	NA
Juneau	105	70	32,202	21%	\$ 90,126
Kake	10	7	530	86%	\$ 64,000
Kasaan	1	1	49	30%	\$ 75,417
Ketchikan	111	86	7,998	28%	\$ 68,125
Klawock	14	7	694	63%	\$ 53,750
Metlakatla CDP	6	2	1,444	88%	\$ 58,229
Pelican	8	16	83	31%	NA
Petersburg CDP	139	64	3,001	15%	\$ 73,289
Point Baker CDP	5	3	10	17%	NA
Port Alexander	7	7	57	5%	\$ 45,625
Saxman			356	82%	\$ 46,250
Sitka	102	269	8,350	24%	\$ 82,083
Skagway CDP	1		1,146	6%	\$ 83,125
Tenakee Springs	2	8	126	5%	\$ 45,865
Thorne Bay	8	7	449	11%	\$ 49,583
Whale Pass			84	8%	\$ 46,500
Wrangell	68	50	2,084	31%	\$ 54,891
Yakutat CDP	49	28	673	53%	\$ 72,083

¹ Data from the State of Alaska Commercial Fisheries Entry Commission, <https://www.cfec.state.ak.us/plook/#downloads> (Accessed June 14, 2023)

² Data from the State of Alaska Commercial Fisheries Entry Commission, <https://www.cfec.state.ak.us/plook/#downloads> (Accessed June 14, 2023)

³ Data from the Alaska Department of Labor and Workforce Development, Alaska Population Projections, <https://live.laborstats.alaska.gov/pop/projections.html> (Accessed June 14, 2023)

⁴ Data from the U.S. Census Bureau, <https://www.census.gov/programs-surveys/decennial-census/decade/2020/2020-census-results.html> (Accessed June 14, 2023)

⁵ Data from the U.S. Census Bureau American Community Survey data, <https://www.census.gov/programs-surveys/acs/data.html> (Accessed June 14, 2023)

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**IN THE UNITED STATES COURT OF APPEALS
 FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,)

Plaintiff-Appellee/Cross-Appellant,)

v.)

JENNIFER QUAN, in her official capacity)
 as the Regional Administrator for the)
 National Marine Fisheries Service, et al.,)

Defendants-Appellants/Cross-)
 Appellees,)

and)

STATE OF ALASKA and ALASKA)
 TROLLERS ASSOCIATION,)

Intervenor-Defendants-)
 Appellants/Cross-Appellees.)

) Appeal Nos. 23-35322, 23-
) 35323, 23-35324, 23-35354

) D.C. No. 2:20-cv-00417-RAJ-
) MLP

Declaration of Frederick Phillips

Nos. 23-35322, 23-352323
 23-35324, 23-35354

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DECLARATION OF FREDERICK PHILLIPS

Frederick Phillips, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Fredrick Phillips. I am Aleut, Inupiat, and Haida, a citizen of the Sitka Tribe of Alaska, and I am a third-generation troll fisherman. I have participated in the Chinook troll fishery in some capacity for all my life. I make this declaration based on my personal knowledge from my experience as both a troll fisherman and now as the captain of a fish tender boat.
2. My family recently sold our troll boat to fully dedicate our time to our fish-tender business based out of Sitka, Alaska. We own and operate a fish tender boat named the F/V Shari Ann. We employ five employees year-round and a few seasonal employees during the fishing season.
3. Tender boats buy fresh caught fish from trollers during openers, immediately put them on ice, and then sell those fish to local fish processing plants in Southeast Alaska. Troll caught Chinooks are high quality fish. This is because trollers catch Chinook salmon on a line, not in a net, so the meat of a troll caught fish is pristine. Buyers are willing to pay top-dollar for this amazing fish. Pound for pound, Chinook salmon are the most valuable fish caught in Alaska.

Declaration of Frederick Phillips

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4. Fish buyers, such as our family business, rely on the money generated from Chinook salmon to stay in business. While we do buy other types of fish, Chinook salmon make up half of our annual revenue. We are not unique; many fish buyers rely on Chinook salmon to keep their operations afloat. If the Chinook fishery is closed, we will likely have to shut down our business due to the lost revenue. A closure will have a devastating impact on my family and our employees.

5. In addition to its economic importance, the commercial trolling fishery plays an important part in tribal member access to Chinook salmon. For those tribal members who cannot fish, trollers provide this important food to our people. Tribal elders especially depend on the trollers to have access to healthy, traditional foods, like Chinook, year-round. I grew up eating troll-caught Chinook, my three children grew up eating troll-caught Chinook, and now with this threatened closure, I fear that my grandchildren will not be able to eat this important cultural food. A closure would mean that my family would lose access to one of our main food sources. We supplement our diet with Chinook we catch while we are out fishing. If we cannot troll, we would have to depend on other fishing methods to get fish for ourselves, which often mean higher costs. Our people have responsibly managed and sustained ourselves off Chinook salmon for thousands of years. A closure of the Chinook troll

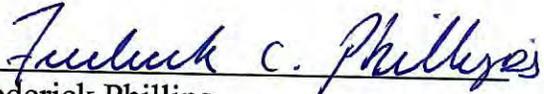
Declaration of Frederick Phillips

Nos. 23-35322, 23-352323
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fishery would be a loss of an important part of our identity and purpose as indigenous fishermen.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.


Frederick Phillips

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**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,)
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JENNIFER QUAN, in her official capacity)
as the Regional Administrator for the)
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Defendants-Appellants/Cross-)
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STATE OF ALASKA and ALASKA)
TROLLERS ASSOCIATION,)
)
Intervenor-Defendants-)
Appellants/Cross-Appellees.)
)

Appeal Nos. 23-35322, 23-
35323, 23-35324, 23-35354

D.C. No. 2:20-cv-00417-RAJ-
MLP

Declaration of William Ware

Nos. 23-35322, 23-352323
23-35324, 23-35354

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DECLARATION OF WILLIAM WARE

William Ware, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is William Ware. I am Tlingit and a tribal citizen of Central Council Tlingit & Haida Indian Tribes of Alaska. I live in Petersburg, Alaska. I have personal knowledge of the matters discussed herein.

2. I hold a hand troller permit for the Chinook salmon troll fishery in Alaska. I grew up in Southeast Alaska and spent my childhood summers trolling with my grandparents, who are also Tlingit. This early introduction gave me a lifelong passion for fishing for Chinook. I raised my four sons on the water in Southeast Alaska and taught them how to fish according to our Tlingit way of life. Two of my sons now make their living on the water, continuing our Tlingit way of life.

3. Life in rural Alaska is not luxurious, but it is beautiful. The cost of living is high (for example, a gallon of milk in Petersburg costs more than \$8), and trolling is one of the few jobs available that pays well. Trolling has allowed my family and I to continue to live in our traditional homelands, rather than move to a larger, more urban community, and to practice our traditional way of life. Tlingit

Declaration of William Ware

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people have harvested Chinook salmon for thousands of years. Prior to contact with westerners, Tlingit people fished and traded up and down the coast and the troll fishery is an evolution of that practice today.

4. The seasonal nature of the troll fishery means that even missing one season opener can result in the loss of a substantial portion of our income for the year. If the Chinook troll fishery is closed for the summer and winter seasons, I estimate that I will lose approximately 50-75% of my annual fishing income. The closure of the Chinook troll fishery could end the fishing careers of tribal citizens like myself. Without the Chinook troll fishery, I fear that our already small community will decline as people are forced to move away to find work. In small communities such as Petersburg, off the road system, there are not other industries to pivot to that can support a family.

5. There is no guarantee that closing the Chinook troll fishery will help the Southern Resident killer whales, but it is certain to cause irreparable harm to our tribal troll fishermen, their families, and our tribal communities.

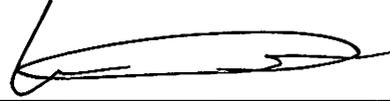
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.

Declaration of William Ware

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William Ware

Declaration of William Ware

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**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

WILD FISH CONSERVANCY,)
)
Plaintiff-Appellee/Cross-Appellant,)

v.)

Appeal Nos. 23-35322,
23-35323, 23-35324, 23-35354

JENNIFER QUAN, in her official capacity)
as the Regional Administrator for the)
National Marine Fisheries Service, et al.,)

D.C. No.
2:20-cv-00417-RAJ-MLP2:20-c
v-00417-RAJ-MLP

Defendants-Appellants/Cross-App)
ellees,)

and)

STATE OF ALASKA and ALASKA)
TROLLERS ASSOCIATION,)

Intervenor-Defendants-Appellants/)
Cross-Appellees.)

Declaration of Julie Yates

Nos. 23-35322, 23-352323
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DECLARATION OF JULIE YATES

Julie Yates, acting in accordance with 28 U.S.C. § 1746, does hereby declare as follows:

1. My name is Julie Yates. I am a tribal citizen of the Craig Tribal Association, from Craig, Alaska, where I still live and raise my own family. My family is Haida and from the Yahkw'Laanaas (Double Fin Killer Whale) Clan. I have personal knowledge of the matters discussed herein.

2. The Troll fishery is a way of life for our family. I am a second-generation commercial troller fisherman and I have been fishing in Southeast Alaska with my family for over forty years. I come from a large Alaska Native family. My father, George Yates, is one of the oldest of his seventeen siblings. He learned to fish at an early age to help support his family. He would give most of his earnings at the end of fishing season to his mother, my grandmother, to supplement the family income. My aunts and uncles have told me that they would have gone hungry as kids if my dad hadn't fished to support them.

3. I spent my childhood on the back deck of my father's power troller. During those years, I learned a deep respect for the ocean, the value of hard work, the traditional indigenous knowledge about our local waters, and how to properly

Declaration of Julie Yates

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care for each fish we caught. I learned that each fish must be treated with great care and respect. This is the ethos of troll fishermen. I am who I am today because of my childhood fishing on our family boat. I have continued to troll fish throughout my adult life and now fish with my husband Chad Fulton, and my thirty-year-old son, Bear Yates. Bear started fishing with his grandpa when he was nine years old, and it has been his dream to follow his grandpa's legacy. For the past five years, he has lived out that dream fishing on his grandpa's boat with my husband and I.

4. Trolling is the backbone of small Southeast Alaska communities. The closure of the Chinook troll fishery will deprive our family of an important part of our traditions and cultural practices. I am now passing down the skills and knowledge of troll fishing to the next generation. My two sons have grown up fishing as I did. A break in the fishery means we cannot pass down these important cultural practices to the next generation. Many of our younger tribal citizens learn not only the technical skills of troll fishing, but also the cultural importance Chinook salmon play in our culture when working on a troll boat. I am blessed that I was able to learn our ways and pass these skills and values onto my children and I hope the closure of the Chinook troll fishery will not deprive the next generation of these important lessons.

Declaration of Julie Yates

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23-35324, 23-35354
Page 3 of 5

5. The closure of the troll fishery will also result in my family losing approximately half of its annual income. Many of us are already stretched thin with the high cost of fuel and grocery prices in rural Alaska (for example, milk is almost \$6 a gallon here). This lawsuit and the threatened closure of the king fishery is causing insurmountable stress and taking a mental toll on trollers and their families. Many trollers incur debt during this time of year to prepare for the fishing season. Fishermen have expenses like boat repair and maintenance, vessel insurance, purchase equipment, and hire deckhands. We count on the Chinook salmon summer opener to recoup those expenses before we can even start to make a profit. If we are not able to do these pre-season preparations, that could affect the safety and well-being of our crew and our fishing boats. Tribal fishermen who cannot afford to incur these debts without a Chinook season opener may have to sell out or move away to support themselves and their families.

6. Native people have faced so many challenges during our lifetime. We continue to have to fight for our way of life. This lawsuit is based on an Endangered Species Act technicality, and it is causing harm to one of the most well managed sustainable fisheries, a fishery that promotes the conservation of Chinook salmon. Haida trollers are passionate fishermen who care about our way of life. We care about the Chinook we catch, and we care about our relatives the killer whales.

Declaration of Julie Yates

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Page 4 of 5

The Southern Resident killer whales are a product of their immediate environment, which is inundated with pollution, dams, boat traffic, marine sonar traffic, inbreeding in their population, and more.

7. I fear the far-reaching effects a Chinook fishery closure will have—it will affect not only me and my sons but our entire community. If the closure is allowed to happen, we will not only lose a large portion of our income, but we will also be deprived of an important part of our Haida culture as well. I implore the court to consider this lawsuit's impact on small boat trollers, such as me and my family.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 14th day of June, 2023.



Julie Yates

Declaration of Julie Yates

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23-35324, 23-35354
Page 5 of 5

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

Dear Members of the Board of Fisheries:

My name is Brian Chace and I am a commercial and personal use fisherman.

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

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Brian Chace

A solid black rectangular redaction box covering the signature area.

Submitted by: Marcus Chernecke
Community of Residence: Juneau

I support Proposal 242. The citizens of Juneau should have priority to obtain King Crab over Commercial Crabbing in 11A. Allowing Commercial Crabbing in 11A is profit-driven and is not in the people's best interest. A citizen of Juneau should be able to get King Crab from the very ocean the community is adjacent to without having to worry about decimation of the crab population by Commercial Fisherman. By allowing the Commercial crabbers to fish for crab you are increasing the cost to its community members for the same crab in which would be nearly free otherwise. The right to King Crab should first lie with the people, not the Commercial industry.

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

Dear Members of the Board of Fisheries:

My name is Robert Chichester of Juneau, Alaska. I am a commercial and sports fisherman. As a gillnet fisherman out of SE Alaska, Proposal 156 will have a huge impact on my family's livelihood in multiple ways. I captain the boat while my family of four work on the boat. As my main source of income, this proposal will put me in financial hardship. As a result, I may not be able to fish and that will have a ripple effect on me in that I am forced to find other work that may not provide enough to help my family through the year. The impact on the cost recovery can be detrimental to multiple programs which impacts the hatchery, fisherman, and the community at minimum. Please vote no on Proposal 156.

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

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

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

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Robert Chichester
Juneau, Alaska



Submitted by: Sandra Coats
Chickcharters sportfishing

Community of Residence: Ketchikan

105 and 106 proposals. I think. I am a my life and business by myself as one person one boat person that has built sole proprietor. As an Alaskan I do follow the rules for longevity of our kings. I do think some larger operations do not but they are not resident here so they don't care. I have seen behind the scenes a bit. If they do it in their own state, why not ours. Maybe more looked after the larger charter operations that do their own packing and shipping Also an observer on commercial boats might solve some of the king problems as well as bottom fish. I started this dream when I was a so young and love my family and what it stands for. I am truly Alaskan and want to keep the dreams alive. I like sharing a bit of it to people and giving them a taste of our world it's not always about catching fish. Some people that come to work here take take take. They don't care about the adventure so they are not thinking about sustainability. Thank you



Chilkoot Indian Association

Federally Recognized Tribe

P.O. Box 490 Haines, Alaska 99827 907.766.2323



James Hart
Tribal Council President
Chilkoot Indian Association
PO Box 490
Haines, AK 99827
907-766-2323

To: Alaska Board of Fisheries

Re: CIA Tribal Council Letter of Opposition to Proposal 156 being considered at the January 28th-February 9th, 2025, Alaska Board of Fisheries Meeting

To Whom it May Concern,

This is a letter of opposition from the CIA Tribal Council against Proposal 156 being considered at the January 28th-February 9th, 2025, Alaska Board of Fisheries Meeting.

According to the Haines Economic Development Corporation, approximately 100 Haines residents hold 160 limited entry fishing permits and own 86 commercial fishing vessels; an additional 96 residents participate in the fishing industry as crew. Haines commercial fishermen together earned an average of \$7.24 million in gross annual income over the period 2007-2016, with salmon accounting for nearly 70% of this income. The Haines gillnet fleet is predominately local residents, and includes many Tribal Members whose families have fished commercially for generations.

Proposal 156 proposes a reduction in pink and chum salmon egg take of 25% across Southeast Alaska Hatcheries. This proposal would result in direct financial losses to the Hatcheries of Northern Southeast (DIPAC and NSRAA), leading to reductions in hatchery programming to balance the budgets. These reductions in programming would then directly reduce the harvest opportunity and income to the local salmon fishermen, businesses they support, and fish tax revenues for the Haines Borough.

The CIA Tribal Council opposes Proposal 156, scheduled for consideration at the January 28th- February 9th, 2025, Alaska Board of Fisheries meeting, and urges the Board to reject this proposal to prevent detrimental economic impacts on Southeast Alaska hatchery programs, fishermen, and their communities.

Sincerely,

James Hart

CIA Tribal Council President

Date 1.13.25

Chinook Shores, Inc.

PO Box 6555 - Ketchikan, AK 99901

info@chinookshores.com

January 14, 2025

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

Dear board members,

Chinook Shores fishing lodge has been in business for 20 years and is owned and operated by a local Ketchikan family. We provide lodging for 40 guests and operate 2 charter vessels and 8 self-guided fishing boats.

In 2024 we employed 15 individuals, 14 of them were Ketchikan residents.

In 2024 we spent over \$1 million locally on payroll, business expenses, supplies, maintenance and assets. We also paid over \$60,000 in local sales taxes and property taxes to the Ketchikan Gateway Borough.

In 2024 we had 740 paying customers stay at our lodge and fish. Many of them spent additional nights in Ketchikan at other hotels and vacation rentals. They also rented cars, dined at restaurants and purchased groceries, supplies and gifts.

In 2024 our lodge guests harvested less than 200 king salmon, but they had the opportunity to harvest 3 in June, 2 in July and 1 in August. The opportunity to catch king salmon is what makes their trip and keeps them coming back – especially in June when there are no other salmon species available. Recent restrictions on halibut, lingcod and rockfish have made the opportunity to harvest king salmon even more important to our business.

The difference between commercial fishing and charter fishing is commercial harvest is sold by the pound and shipped out of Alaska to consumers. Charter boats bring the consumers to Alaska and sell opportunity, and these anglers will pay a premium to catch the fish themselves. The magnitude of added value to our local communities in the sport fishing industry is unparalleled in the commercial fisheries and should be taken into consideration when determining allocation among sectors - especially when considering sport fish closures and low bag limits that could jeopardize our businesses.

We Support KSMP Proposals 108 and 113, which allow the sport sector to fish at a higher allocation above 20% during times of low king salmon abundance to preserve a 3-king annual limit in June with continued opportunity in July and August.

This is the only way to have a prioritized and uninterrupted resident sport fishery and also offer ample opportunity for a viable nonresident king fishery. Both proposals ask for additional allocation but only at times of low abundance. During years of high abundance sport fishing businesses do not need the additional quota and those additional fish have more value as troll harvest. We have harvested high allocations in the recent past with increased bag limits of 2-kings/day and increased annual limits of 6/season, but that does not increase our revenue. We just need stability.

Nonresident king salmon limits have systematically been reduced from 3-kings/day with no annual limits in the 1980’s to 2/day in the 1990’s to 1/day through 2005. Since 2006 nonresident bag limits have been reduced to 1/day, 3 annually in June with further reductions in July and closures in August. Sport fishing businesses have proven they can survive on these bare minimum bag limits, but any further reduction basically equates to untenable annual limits and closures.

We Oppose KSMP Proposals that do not offer nonresidents 3-kings in June; 2 or 1-king in July; and 1-king in August depending on allocation and harvest level. Recent reductions in halibut, ling cod and rockfish limits have increased the importance of king salmon as one of the few fish we can harvest in the first half of the season. A one or two king annual limit in June would absolutely jeopardize our businesses – especially since we’ve been experiencing stock of concern closures through June 15.

We oppose Proposals 122-123 – These proposals prohibit netting or removing king salmon from the water when fishing in areas closed to king salmon. In many SEAK waters throughout the summer, king salmon is closed due to stocks of concern or for allocative purposes while silver, pink and chum salmon may be retained. Not all anglers can identify salmon in the water and Kings may be unintentionally netted if the anglers mistake them for other salmon. These proposals would be difficult to enforce and would criminalize anglers accidentally netting King salmon. Education and best practices would be a better approach.

**Summary of positions on proposals for SEAK salmon, groundfish and shellfish.
Alaska Board of Fisheries Meeting – Ketchikan, AK January 27 – February 9, 2025.**

Proposal No.	Position	Issue
108	Support	KSMP – Modify management and allocation provisions.
109	Oppose	KSMP – Modify structure of the plan by removing management tiers.

110	Oppose	KSMP – Manage sport fishery in-season to achieve the annual king salmon alloc.
111	Oppose	KSMP – Modify management provisions and target allocations for sport fishery.
112	Oppose	KSMP – Modify sport allocation and provisions for management.
113	Support	KSMP – Modify provisions and increase king salmon sport allocation to 25%
114	Oppose	KSMP – Reduce nonresident annual limit in low allocation management tiers.
115	Oppose	KSMP – Reduce nonresident annual limit to one fish in all tiers.
116-117	Oppose	KSMP – Reduce nonresident annual limit to 2 fish < July 1 and 1 fish > July 1.
118	Oppose	KSMP – Nonresident annual limit never to exceed 3 kings.
119	Oppose	KSMP – Close nonresident sport king fishery 2 days per week.
120	Oppose	KSMP – Close nonresident sport king fishery on weekends.
121	Neutral	KSMP – Extend sunset provisions in KSMP.
104	Oppose	Allocate 5,000 king salmon to subsistence fishery and establish provisions.
105	Support	Modify sport fishing regulations in EEZ per MSA.
106-107	Oppose	Prohibit nonresidents possessing fish caught in EEZ from possessing or off-loading those fish in state waters.
122	Oppose	Prohibit removal of king salmon from the water when retention is not allowed.
123	Oppose	Prohibit netting or handling king salmon when catch-and-release fishing.
124	Neutral	Prioritize resident sport fishing opportunity in SEAK king salmon action plan.
125-126	Neutral	Close sportfishing for king salmon in District 14A when stock of concern exists.
130	Oppose	Allow for remaining troll king allocation after winter and spring troll fisheries to be harvested during a single summer troll opening beginning July 1.
131	Support	Establish criteria for multiple limited harvest troll fishery in August to occur.
132-133	Oppose	Establish a minimum size limit for king salmon of 26.5” in spring troll fisheries.
140	Oppose	Sport fishing may only use single barbless circle hooks from April 1 – June 14.
141	Oppose	Prohibit use of bait in sport fisheries from April 1 – June 14.
159	Support	Establish resident priority king salmon bag limits in sport hatchery harvest areas in Wrangell Narrows-Blind Slough THA.
164	Support	Establish resident priority king salmon bag limits in sport hatchery harvest areas near Juneau.
169	Oppose	Allow use of two rods in conjunction with two downriggers or hand troll gurdies during king salmon troll openings.
198	Support	Increase resident Sablefish bag limit from 4/day to 6/day in sport fishery.
203	Oppose	Establish unguided nonresident lingcod limits with priority over guided nonresident limits.

206	Support	Reopen yelloweye sport fishery for residents.
207-208	Support	Allow retention of DSR by nonresidents with annual limit.
209	Support	Establish provisions for resident priority within EO authority for pelagic rockfish.
210	Support	Reduce bag limits for pelagic rockfish in SEAK.

Thank you for this opportunity to comment.

Sincerely,

Jeff Wedekind
President - Chinook Shores, Inc.

Submitted by: Tim Chittenden
Community of Residence: Petersburg Alaska

I support proposal 159. It will help ensure collection of brood stock for the hatchery while giving harvest opportunities to multiple user groups.

I support proposal 163. It will help ensure collection of brood stock for the hatchery.

As a resident I have fished Blind River for more than 40 years and think both these proposals are needed now to keep it possible for all the user groups to fish for hatchery produced fish going forward. Thank You

Submitted by: Oliver Christensen
Community of Residence: Petersburg

225

Closing of 11-A to personal use only, would be a grave mistake. Southeast fisherman have already been battling a small Red King Crab stock for 20 years now on top of all the other current conditions that are putting a lot of the commercial fishing fleet in jeopardy of even being able to make a living. Many of us have fished 11-A for generations and our family's have been dependent upon fishing that location for years. Some boats are not equipped to travel further distances from Juneau with a load of pots to take part in the fisheries elsewhere. On top of all that you will be consolidating the fleet to Fredrick sound, icy straights, and Chatham, and putting more pressure on those stocks in those particular areas making it even harder for the stocks to rebound fully. subsistence and personal use fisherman of Juneau can still go catch a crab if stocks warrant enough for a season. But to put one section of the population and one industry above the other is unfair and a bad president to start. I implore you to use common sense and fairness before you put yet another dagger in the heart of the commercial fishing fleet that brings revenue into Juneau and has been a long standing industry in the state and has bent over backwards to work with fish and game to protect and help Red Crab stocks rebound.

Submitted by: Spencer Chute
Community of Residence: Sitka

Hello to members of the board and public,

My Name is Spencer Chute, I am a resident of Sitka where I am an owner/operator of a saltwater guiding business. I served on the Sitka Advisory Committee for a number of years also. In the winter I commercial troll for King Salmon to supplement my income. I would like to speak in regards to proposal 108 by SEAGO

During the last 3 years, the King Salmon management plan was supposed to provide a fair deal to all user groups. With sport harvest priority for residents. Pre season forecasts compared to what actual abundance was out there made it very challenging for the sport sector to not go over allocation and dip into commercial allocation. With two small children running around I don't have much time to take notice of every nuance happening in our region but I did take note of a couple things:

*talking with trollers it was evident how many kings were swimming around our state waters. During the July commercial opener there was a bite down south of baranof where I heard scores of 200-400 kings per day! During commercial coho fishing, a number of my troller friends commented on how they were doing everything possible to avoid kings on the drag but they were "everywhere" (sport also was either very limited or closed for king salmon retention during this time).

*One of the other things I also noticed was how many year-round Sitka locals were getting guides licenses and taking cruise ship clients out on their boats for king salmon. They were able to do 1-2 trips per day for strictly King Salmon. I have not seen this amount of cruise ship oriented guides since i started charter fishing here in 2007.

I do not blame those guys one bit for trying to support their families while living here year round. Many of those guys came from construction, police department, commercial fisheries like trolling, gillnetting, long lining. They have found stability and decent income to support their families by taking eager non residents out to catch our beautiful king salmon. In a perfect world I would suggest limited entry for King Salmon guiding. This would self cap our industry much more effectively than our current federal halibut permit limited entry that has been bypassed essentially by allowing anyone with a boat to guide for king salmon. Thus eating our allocation too quickly.

In summary,

I support proposal 108 and would like to see three more years of the current management plan with the slight included changes to see if a more accurate preseason forecast will benefit all gear groups.

PC87

Submitted by: Jennifer Cisney
Community of Residence: Petersburg

I oppose 156 as it would negatively affect my community, my fleet and lastly my business. We need all the production that currently exists.

I oppose changing the current management of Sitka sac roe herring fishery. The current management plan has worked for decades. Don't fix what's not broken.

PC88

Submitted by: Joe Cisney
Community of Residence: Petersburg

I am writing in opposition of proposal 156.

The hatchery component of our salmon run is vital to our salmon fleet and community. Reducing it would have serious impacts on the Southeast Alaska salmon fishing fleet.

I oppose any changes to the management of the Sitka sacroe herring fishery.

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Presented by: The Mayor
Presented: 01/06/2025
Drafted by: Law Department

RESOLUTION OF THE CITY AND BOROUGH OF JUNEAU, ALASKA

Serial No. 3088(am)

A Resolution Opposing Proposal 156, Alaska Board of Fisheries.

WHEREAS, salmon hatchery programs in Juneau, Alaska, have successfully operated since 1976, supplementing wild salmon harvests and supporting commercial, sport, subsistence, and personal use fisheries across the state; and

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

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

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

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

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

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

WHEREAS, the passage of Proposal 156 would potentially force DIPAC to close its doors within the next 10-15 years, which would devastate Juneau seafood processors that rely on DIPAC for the viability of their programs and would also result in a significant loss

44 in fishing opportunities and income to commercial fisheries users, sport charter programs,
45 marine and shoreside sport users, and personal use fisherman, thereby impacting the tax
46 revenue Juneau gains from local fishery-related businesses; and
47

48 WHEREAS, Alaska’s hatchery system operates as a nonprofit model funded through
49 cost recovery and enhancement taxes, following stringent public permitting and scientific
50 standards to ensure that wild salmon populations are protected while benefiting all user
51 groups; and
52

53 WHEREAS, Proposal 156 introduces an additional oversight mechanism that would
54 conflict with the established regulatory framework, risking the proven balance between
55 hatchery and wild stocks that has been achieved under existing management.
56

57 BE IT RESOLVED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF JUNEAU, ALASKA:
58

59 **Section 1.** The City and Borough of Juneau strongly opposes Proposal 156,
60 scheduled for consideration at the January 28 to February 9, 2025, Alaska Board of
61 Fisheries meetings, and urges the Board to reject this proposal to prevent detrimental
62 economic and social impacts on Alaska’s hatchery programs and the communities they
63 support.
64

65 **Section 2.** The City and Borough of Juneau reaffirms its support for DIPAC and
66 other southeastern Alaska fisheries including SSRAA and NSRAA, acknowledging their
67 essential contributions to Juneau’s economy, community well-being, and sustainable fishery
68 practices.
69

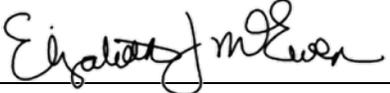
70 **Section 3.** The City and Borough of Juneau calls upon the Alaska Board of
71 Fisheries to commit to science-based, objective assessments for hatchery management,
72 working in collaboration with the Alaska Department of Fish and Game, industry leaders,
73 and the hatchery community to ensure that management decisions reflect the value and
74 benefits Alaska’s hatchery programs bring to all residents.
75

76 **Section 4. Effective Date.** This resolution shall be effective immediately after
77 its adoption.
78

79 Adopted this 6th day of January 2025.
80



Beth A. Weldon, Mayor

81
82
83 Attest: 
84 _____
85 Elizabeth J. McEwen, Municipal Clerk

CITY AND BOROUGH OF SITKA

RESOLUTION NO. 2024-17

**A RESOLUTION OF THE CITY AND BOROUGH OF SITKA OPPOSING PROPOSAL 156 TO
BE CONSIDERED AT THE JANUARY 28 - FEBRUARY 9, 2025,
ALASKA BOARD OF FISHERIES MEETING**

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

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

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

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

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

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

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

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

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

Resolution No. 2024-17
Page 2

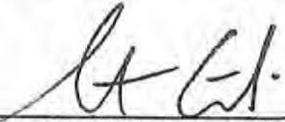
NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF SITKA, ALASKA:

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

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

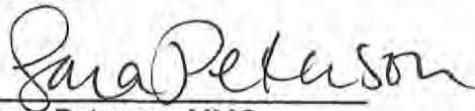
Section 3. The City and Borough of Sitka calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions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

PASSED, APPROVED, AND ADOPTED by the Assembly of the City and Borough of Sitka, Alaska on this 17th day of December, 2024.



Steven Eisenbeisz, Mayor

ATTEST:



Sara Peterson, MMC
Municipal Clerk

1st and final reading: 12/17/2024

Sponsors: Mosher/Christianson

CITY OF WRANGELL, ALASKA

RESOLUTION NO. 11-24-1893

A RESOLUTION OF THE ASSEMBLY OF THE CITY AND BOROUGH OF WRANGELL, ALASKA, SUPPORTING SOUTHEAST SALMON HATCHERY PROGRAMS AND OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE JANUARY 28 - FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES MEETING

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

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

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

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

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

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

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

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

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

NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF WRANGELL, ALASKA, THAT:

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

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

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

PASSED AND APPROVED BY THE ASSEMBLY OF THE CITY & BOROUGH OF WRANGELL, ALASKA THIS 18th DAY OF NOVEMBER, 2024.

CITY & BOROUGH OF WRANGELL

Patricia Gilbert, Borough Mayor

ATTEST:
Kim Lane, MMC, Borough Clerk



**CITY OF CRAIG
RESOLUTION 24-19**

**A RESOLUTION OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE
JANUARY 28 - FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES
MEETING**

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

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

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

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

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

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

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

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

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

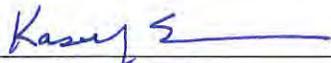
NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF CRAIG, ALASKA, THAT:

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

Section 2. The City of Craig reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Craig’s economy, community well-being, and sustainable fishery practices.

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

APPROVED THIS 17th day of December, 2024.



Mayor Kasey Smith



ATTEST: Mary Salazar, City Clerk



P.O. BOX 500
KAKE, AK 99830
PHONE: (907) 785-3804
FAX: (907) 785-4815

City of Kake

"HOME OF THE WORLD'S LARGEST TOTEM POLE"

RESOLUTION NO. 2024-15: A RESOLUTION OF THE CITY OF KAKE FOR OPPOSITION TO PROPOSAL 156 TO BE CONSIDERED AT THE ALASKA BOARD OF FISHERIES MEETING JANUARY 28-FEBRUARY 9, 2025

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

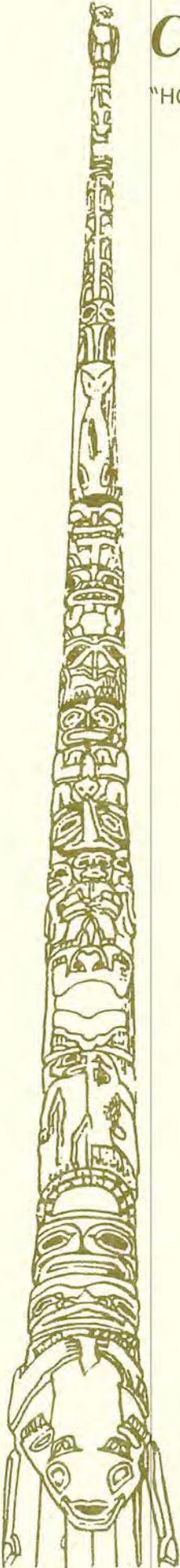
WHEREAS, Proposal 156 seeks to reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery-supported ecosystem in Southeast Alaska and threatening the stability of salmon resources on which coastal communities like Kake depend; and

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

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

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

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments



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

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

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

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

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF KAKE, ALASKA, THAT:

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

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

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

Passed and approved by a duly constituted quorum vote of 6, with
6 yea's, 0 nays, and 0 abstaining this 7th day of January 2025

Tessa Cavanaugh
Mayor of Kake

ATTEST:

Georgina Davis-Gastelum
Georgina Davis-Gastelum, Acting City Clerk



Voting:

Monica Ashenfelter	Yea X	Nay <u> </u>
Hank Copsey	Yea X	Nay <u> </u>
Kelli R. Jackson	Yea X	Nay <u> </u>
Jordana Grant	Yea X	Nay <u> </u>
Ashley Padgett	Yea X	Nay <u> </u>
Tessa Cavanaugh.	Yea X	Nay <u> </u>

CITY OF KETCHIKAN, ALASKA**RESOLUTION NO. 24-2948****A RESOLUTION OF THE COUNCIL OF THE CITY OF KETCHIKAN, ALASKA OPPOSING PROPOSAL 156 TO BE CONSIDERED AT THE JANUARY 28 – FEBRUARY 9, 2025 ALASKA BOARD OF FISHERIES MEETING; AND ESTABLISHING AN EFFECTIVE DATE**

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

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

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

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

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

WHEREAS, Proposal 156 would create uncertainty for hatchery production, complicating long-term planning and financial commitments for these organizations, and potentially jeopardizing the sustainability of Alaska's hatchery program, which has historically been a successful partnership between private nonprofits and the state; and

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

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

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

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska as follows:

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

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

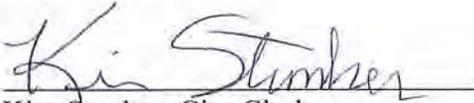
Section 3. The City of Ketchikan calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect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

Section 4: This resolution shall become effective immediately upon adoption.

PASSED AND APPROVED by a duly constituted quorum of the City Council for the City of Ketchikan on this 21st day of November 2024.


Bob Sivertsen, Mayor

ATTEST:


Kim Stanker, City Clerk

My name is Cheston Clark, I've lived and fished out of Sitka, Alaska for most of my life. I've participated in many fisheries but currently halibut and sablefish longline and commercial salmon power trolling are my only source of income. Since the declines and closures of the Bering Sea crab fisheries, I no longer have the opportunity to fish in those fisheries. Crab fishing was my primary income for almost 35 years. To have lost that opportunity has increased my dependence on salmon, sablefish and halibut.

My fishing season starts in the Spring with longline where I fish from my own vessel and I crew on other vessels. Then as soon as the Spring troll opens up, I switch to trolling on my vessels. Summer is spent salmon fishing and then again I crew in the Fall for longline. My vessel, the F/V Lorna D is not stout enough to participate in the winter troll fishing season. It is something I would like to do, but the winter weather is rarely safe for me to leave the dock. I've been hoping to be able to get into a larger vessel, specifically a freezer vessel, which would allow me to winter troll and have more flexibility in markets for my catch, but with the uncertainty in the king salmon fishery as well as high interest rates and increased cost of operation, it's really hard to see a way forward. Before 2023, king salmon fishing made up almost half of my income. With the loss of the August king salmon opening, it has significantly decreased my income and caused a lot of uncertainty year over year. It takes some stability to operate a business and right now in commercial fishing we are facing unprecedented instability.

As an Alaska resident, I live a largely subsistence lifestyle. My family and I put up a lot of fish each year and we eat fish at least 3 times a week. I share a lot of fish with members of my community as well. The threats to the king salmon resource for all stakeholders are immense. Back in the days when I was out West fishing, I saw a lot of wasteful bycatch of king salmon from trawl vessels. These practices are still happening today. The other major threat I see right now is a large increase of charter fishing vessels as well as bare boat charter fishing vessels. I was a charter fisherman for 19 yrs. I would fish the Spring commercial king salmon openings, then charter in the summer but also participate in the commercial king salmon openings. I stopped charter fishing in 2016 to focus on commercial fishing. The growth in that industry, especially in Sitka, is huge. I see it every year out on the water and at the docks. The last two fishing seasons, the charter industry has gone over their allocation and we have not had an August opening. I strongly encourage the Board to make the changes necessary to the regulations so the charter industry is subject to the boundaries of the current allocation scheme of 80/20. Without in season management, ADFG has not had the authority to properly manage the fishery. There are arguments being made that the troll participation has declined year over year, but in 2020, when there was no charter fishing, the commercial troll fishermen were able to catch all of the allocation.

Specific to proposals. I am strongly opposed to Proposal 108 and 113. These proposals reallocate king salmon to the charter sector. This has already occurred the last two seasons and it has hurt my business, as well as those of my friends and community members who depend on the king salmon openings each summer.

I also strongly oppose Proposal 156. As the king salmon season has been decreased, I have begun to fish for hatchery chum salmon. This proposal threatens to decrease hatchery production. Chum salmon has become more important for me each year and the both chum and king salmon to be under threat really adds to the uncertainty.

I am in support of proposals 109, 110 and 11 which seek to protect the commercial troll fishery. The most important points of these proposals are:

- Maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation.
- Authorize in-season management by ADFG to ensure the sport allocation is not exceeded.
- Prioritize resident sport harvest within the sport allocation by controlling non-resident harvest.

The salmon troll fishery is one of the oldest in the state. Roughly one of every 50 people in Southeast Alaska works on a trolling boat and each troller is a small business. We are family businesses, we take our kids as deckhands. We feed our families and community members from our catch. Our revenue and taxes keep Southeast communities going year round. We are the backbone of Southeast Alaska, most of us are here year round. Many of us, myself included, don't have other job opportunities. Fishing is what we know and it is what we do. I urge you to consider the importance of the 80% king salmon allocation to Southeast Alaska communities and Alaska residents.

Thank you for considering my comments.

Submitted by: Brian Cloose

Community of Residence: Wrangell, AK. Carlton, MN

Fully support this proposal. The 11 hour limit is an arbitrary number that seriously degrades the level of safety. Much more traveling, much deeper diving is now required. The dive fishery is nothing like it was 5 years ago (at least in the center section of the fishing grounds). Why would the regulations make the fishery more dangerous? Opening Sunday would be a step in the right direction.

Many permit holders I have spoken to have voiced strong support. I have heard, 2nd hand, of opposition from participants of other dive fisheries. The sea cucumber fishery should not be restricted due to the wants of other dive fisheries.

Opening Sundays will help consolidate the season. The tenders usually are on the grounds by Sunday night or Monday morning so they should not be affected.

Of course, no one is required to work on Sunday. Those that choose can still start on Monday but for those that wish adding Sunday would go a long way to lower the risks. We would have more time to avoid weather events, transition to other locations, reduce the risks of having to dive deeper by having more surface time between dives, etc.

Please support proposal 217.

Submitted by: Gabirel Cohen

Community of Residence: Juneau

105 - OPPOSE: The board of fish should oppose this measure as it would limit opportunities for Alaska residents. Non-resident angling accounts for a huge percentage of the sport catch of king salmon. All of that fish flows out of state. Non-resident fishermen already take too much of Alaska's king salmon, they should not be allowed the same rights as resident fishermen.

106 and 107- SUPPORT: The board should support these proposals to close a loophole that allows nonresident anglers to catch more than their fair share of king salmon under Alaska Regulations

114-115-116-117- SUPPORT: Non-resident fishermen fishing with the charter fleet caught too many fish this past year resulting in a closure that reduced opportunities for resident sport and commercial fishermen. Reducing the retention limits for non-resident fishermen could avoid this problem occurring again.

120 - SUPPORT: This provision would reduce non-resident fishing pressure for chinook salmon, which would allow greater opportunity for residents and commercial fishermen.

Submitted by: Stuart Cohen
Invisible World

Community of Residence: Juneau

In my various comments, I have advocated for preserving king salmon stocks and limiting charter fishing in accordance with the scarcity of the resource. I have advocated for prohibiting commercial fishermen from some sportfish-only areas like Gastineau Channel for crab etc. I've advocated for reduction of the artificially -inflated pink and chum salmon due to hatchery production, as they are outcompeting wild stocks.

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

Dear Members of the Board of Fisheries:

My name is Lynda Cole and I am a commercial fisherman. We employ 4-6 crew men and women. We have put many through college. And 2-3 have gone on to captain huge ships. The loss of income for all involved would be devastating. Chums and pink salmon are our mainstay. Doesn't the taxes, boat licensing fees, permit fees, and crewmember licensing account for anything? With heightened management/production you'd potentially "give the world" the finest nutrition. Please change your focus and fight garbage like Atlantic salmon from its threat to your pristine salmon.

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

We are a second-generation fishing family. We have fished Alaska since 1960, and our children and grandchildren have made it 3rd and 4th generation. Please don't take our livelihood from us. Commercial fishing teaches the newer generations how to work and become productive people. I have for many years advocated for the intelligence of the Alaskan system of fish propagation. I wish Washington, Oregon, and Canada would follow Alaska's example.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

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

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish,

are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Lynda Cole

A solid black rectangular redaction box covering the signature area.

Submitted by: Matt Cole
Community of Residence: Juneau

No comment at this time
