

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 Bud Marrese 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.

I have served on the NSRAA board in the past for 16 years during both Pete & Steve's directorship. It has been very well run and managed in line with its mission which has benefitted all user groups immensely, always with biological concerns foremost. A 25% reduction is throwing a number out there without any real proven data, especially when considered against the overwhelming benefits that have been obtained by these programs in Southeast.

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,

Bud Marrese

A solid black rectangular redaction box covering the signature area.

Submitted by: Patrick Marrs
Community of Residence: Sitka

Prop 106 amendment: prohibits non residents on charter vessel from retention in the EEZ “including state waters unless the fish is documented, landed and taxed.” In which case, a nonresident can purchase Salmon/ seafood production back from the state at Ex Vessel price.

Prop 107. amendment suggestion is to clarify nonresidents in EEZ area harvest with allowance of AK commercial permit holder that are non resident, along with AK commercial crew licensed holder that are non resident

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Submitted by: Collin Martens
Community of Residence: Petersburg Alaska

I oppose 156, fishing at southeast salmon hatcheries have been a positive source of income for my family and community.

Submitted by: Chase Martin
Community of Residence: Petersburg

My name is Chase Martin and I’m a lifelong Alaskan who grew up in the heart of the commercial fishing industry. Fishing isn’t just a job for me—it’s a way of life, a tradition I’ve been a part of since I was old enough to step foot on a boat. I’ve worked hard in this industry, especially in the Red King Crab Fishery, and I’ve seen firsthand how crucial this fishery is for families, processors, and communities like Petersburg.

Proposal #243, submitted by the Alaska Department of Fish and Game (ADFG), is about more than just crab—it’s about preserving the livelihoods of fishermen, supporting our local processors, and ensuring that our way of life continues for future generations. Every year, there’s a surplus of Red King Crab that can be responsibly harvested, and this proposal makes sure we get our fair share while staying within sustainable limits. It’s designed to protect the resource and the fishermen who depend on it.

Extending the season to three months isn’t just a nice idea—it’s what we need to make this fishery work. A longer season gives us the time to fish safely, bring in the best quality product, and support our families. It also means better opportunities for the processors who rely on a steady supply of crab to keep their operations going.

As someone who’s spent their life in this industry, I can tell you that commercial fishermen like me often feel like we’re fighting an uphill battle. Fishing is the backbone of Alaska’s economy after oil, and yet it feels like we’re overlooked time and time again. We need consistent prices, sustainable

management, and transparency in how decisions are made. Records of decision (RODs) need to reflect the realities we face out on the water and in our communities.

This proposal isn't just good—it's necessary. It's based on strategies that already work in other fisheries like sablefish, herring pound, and sea cucumber. It's time for the Board of Fisheries to stand with the hardworking men and women who make their living from the sea and approve Proposal #243.

Thank you for your time and consideration. I hope you'll support this proposal and the future of Alaska's fishing communities.

Sincerely,

Chase Martin

PC305

Submitted by: Jon Martin

Community of Residence: Sitka

I am not commenting on a specific king salmon proposal but have a suggestion that may garnish support from the troll fleet, resident anglers, and charter operators in SE AK. I suggest making king salmon harvest by charter operators a limited entry fishery with permits being allocated by the state similar to how the commercial sector went to limited entry and the federal agencies issued charter halibut permits based on previous years logbook/catch history. The intent of this suggestion to limit the number of guide boats in a quickly growing industry. In Sitka, anyone with a guide license, a relatively small boat, down riggers, and some fishing gear can take non-residents fishing every day during the summer with no additional permitting required. I know of at least 5 new charter businesses that have opened their doors in 2024. These small operators are targeting cruise ship passengers marketing a "salmon fishing trip" which means that annual king salmon limits on this demographic of anglers is moot since they are not booking multiday trips. I believe that once of the primary causes of the charter fleet going over the 2024 20% allocation of king salmon is due to the rapid expansion of an unregulated charter fleet. If the board was to consider making guided king salmon a limited entry fishery, it would effectively cap the number of operators and help to keep the sport sector within their allocation.

PC306

Submitted by: Rachel Martin

Community of Residence: Juneau AK

I recommend that the Board of Fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a strict harvest cap for the commercial sac roe herring fishery.

Such actions are necessary to prioritize subsistence harvest and to prevent the development of any high volume or non-food herring fishery in Sitka Sound.

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

PC307

Submitted by: Jake Martinson
Community of Residence: Craig

My name is Jake Martinson I'm a charter boat captain at Waterfall Resort, located near Craig, AK. I've fished and worked in the sport fishing industry all over Alaska. From remote fly out camps to beautiful all inclusive resorts. I've seen first hand how important these fisheries are to locals and non locals alike. So many families depend on robust sport fishing seasons to make it through the year. Some directly and many more indirectly. The economic boost provided to the residents of Alaska by sport fishing tourism is irreplaceable. I support science based conservation and regulations, unfortunately many of these rule proposals are not that. They are based in emotion and personal opinion, not fact. These proposals will inflict long term damage not only to the fishery and the economy as a whole but to the individuals that make up the many small rural communities of Alaska.

For these reasons I strongly urge the board to oppose proposals 114,115,116,117,119,120,140 and 141.

I fully support proposals 108 and 113, and I kindly ask the board to do the same. Not for me but for the people of Alaska

PC308

Submitted by: Alicia Maryott
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.

Charles Mason
16526 Glacier Hwy
Juneau, AK 99801

January 14, 2025

To whom it may concern,

I am in opposition to proposal 242. I am a commercial fisherman and I live in Juneau as well as my family and crew, I rely on commercial fishing to support my family. It is unjust for the Board of Fish to allocate the harvestable surplus to one user group. Red King Crab is an Alaskan fishery here in Southeast. This will harm my income and business. This proposal will also harm many other Alaskans, small communities, permit holders, and processors throughout southeast.

If you take from the commercial group to give to the sport group they will take more and more and that is not sustainable for the resource. We can only harvest 10 percent of the legal male biomass, and the Red King Crab is already allocated to its users. Sportsman have been getting their fair share every year while we wait. Another question I have is how will sport fish pay for the surveys and management for 11A once the commercial group is not doing it for them?

I am in favor of proposal 243 that was proposed by ADFG, and the Board of Fish should trust the states management recommendations. Other fisheries managed by the state in this same manner are surviving. This proposal is supported by all Stakeholders, ADFG, Fisherman, and processors. This is an Alaskan fishery. Alaskans hold 57 or 58 Red King Crab permits. This fishery will support other Alaskans and their communities across Southeast Alaska. Most of our fisheries are under attack due to the increased sport and personal use sector and we need protection from these user groups trying to take our livelihoods for their gain. This bill would support all Alaskans by allowing individual catch limits from the harvestable surplus and would allow the commercial user group to access our share of the resource. The proposal 243 will also enable other Alaskan residents whom are not sport fisherman the ability to access the resource.

Charles Mason

PC310

Submitted by: Derek Mason
Community of Residence: Juneau

I oppose prop 242.

They call it fishing not catching . If you can't catch a legal red crab in the allotted time then maybe you should just go buy one from the store . Or try the other open areas the rest of the year .

PC311

Submitted by: Deven Mason
Community of Residence: Juneau

I am opposing proposal 242 for a few reasons. One of them being Juneau locals can easily access king crab all summer long outside of 11A. I don't think taking away from the commercial fleet who sell their product to everyone including people who can't or don't want to harvest their own king crab to give to the few people who are fortunate enough to be able to harvest their own king crab is a fair thing to do. From what I understand sport and personal use king crab has been open almost every year since the last commercial opening even if commercial were to be open the sport fleet is already allowed more crab. To take away more from a fishery that hasn't seen an opening in so long seems like it would be the death of commercial king crab in Southeast Alaska. Another thing to take into consideration is that there is already personal use areas in 11A that have a large amount of red king crab.

I am in support of proposal 243. I think there's a wasted resource that would benefit everyone involved. Having a non competitive fishery would let fishermen fish and it would also provide more information on the crab stocks to biologists which would result in a better managed fishery for both commercial and personal use. It makes sense to close areas that are doing poor but allow fishermen to harvest an appropriate amount of crab in areas of abundance.

PC312

Submitted by: Brian Massey
Community of Residence: Sitka

I am writing because I am opposed to proposal 156. I believe this proposal would be harmful to not just fishermen (commercial and sport) but to the entire economies of costal communities. I am a resident sport fisherman who commercial fished when I was younger, before any kind of limited entry or IFQ's.

I see today so many young Alaskan families that support themselves through fishing. I've seen these fisheries be a crucial part of Sitka's economy. I respectfully urge you to consider the disastrous affect this proposal would have on not just Sitka but the entirety of Southeast Alaska.

Submitted by: Valerie Massie
Community of Residence: Wrangell

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 maximum for the commercial sac roe herring fishery. These 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. As a rural Alaska resident in an area where we cannot reliably harvest our own herring roe, the Sitka Sound subsistence herring egg harvest is foundational to Southeast Alaska springtime and a rich traditional food that sustains the food web that other commercial fisheries rely on.

Submitted by: Raymond May
Community of Residence: Kodiak

My name is Raymond May, and I'm an Alaska Native permit holder and catcher vessel in the Sitka Sac roe herring fishery. All three of my children and my wife have fished with me in Sitka. I'm one of the youngest permit holders and consistent participants in the fishery. Between that and my subsistence upbringing and culture, I have a unique perspective on the commercial and subsistence harvest of herring.

I have taken time away from my family and business the past couple of cycles to participate in the Southeast BOF meetings, I likely can't make it this year. Not because I don't care, but I might have a fishery overlap that I can't get out of. As a subsistence harvester myself, and an active herring fisherman in Sitka, I participate in that fishery every single year and have seen for myself the massive subsistence herring roe on branch opportunities that are available before, during, and after the commercial herring fishery opens in Sitka. I've also observed a steady decline in subsistence effort over the years. I believe this is true

I strongly urge the Board of Fish to consider the impacts of proposals on commercial herring harvesters before taking actions that would harm our ability to harvest herring. Not only is herring a sustainable fishery, there is ample harvest able surplus throughout the State. The commercial fishing industry is still trying to recover from the global seafood market collapse, now is not the time to take away opportunity because of a very vocal group of people who don't think any herring should be harvested ever.

This Board of Fish cycle will likely bring in very few comments from commercial herring dependent fishermen, processors and support services due to ongoing record high herring biomass in Sitka and the other herring regions of the state, leading most commercial herring harvest supporters to believe that no

negative actions towards the fishery could be legitimately justified. It's not because herring fishermen don't care anymore, they just don't see any biological reason to further harm the herring fishery in Sitka.

Proposal #171 - OPPOSE

The Department is going to need to fully justify modifying the spawning biomass threshold minimum and maximum harvest rates for the herring sac roe fishery in Sections 13-A & 13-B. It appears that since 2022, not enough significant data has been collected in Sitka to justify this more conservative management shift. Further, it sets a bad precedent to make management so much more conservative when herring are at record highs. It's my understanding that this shift in management strategy is based on science from Canadian herring, but Canada is the last place I would look to for herring management. They aren't very successful.

Please tell ADF&G to keep up the good work with Sitka herring management by rejecting this entire proposal. If it's not broken, we don't need to fix it.

Proposal #172 - OPPOSE

This proposal to reduce the maximum allowable commercial harvest rate for ALL herring in SE Alaska from 20% to 15% is too drastic of a change to make when all stocks in Southeast are unique. Since Sitka has been and continues to be by far the largest biomass in SE, this change to make all herring fisheries more conservative than current management is going too far.

Proposal #173 - OPPOSE

This is yet another anti herring harvest proposal to eliminate provisions to establish a guideline harvest level for the Sitka Sound Herring Sac Roe herring fishery. Not only is this proposal unnecessary, it may be trying to eliminate the commercial Sitka herring fishery by deleting the reference to the harvest rate in without understanding the default being the Southeast region wide harvest rate.

Proposal #174 - OPPOSE

There is no reason to establish a maximum guideline harvest level and minimum spawning biomass to conduct fisheries for the Sitka Sound sac roe herring fishery. This is yet another anti herring harvest proposal to cripple the Sitka herring fishery when the herring biomass is at a record high and the fishery is sustainable. The BOF needs to see through the talking points and recognize that commercial and subsistence harvest of herring can and does coexist, but not if one side is constantly trying to eliminate the other.

Proposal #175 - OPPOSE

There is no reason to establish a 15,000 ton harvest limit for the Sitka Sound herring fishery.

SEAFAs oppose proposal #175 to cap the allowable commercial harvest for the Sitka Sound Sac Roe herring fishery at 15,000 tons. These exact same proposals are submitted cycle after cycle, and yet herring biomass is at record highs in Sitka. Please don't let the Sitka herring fishery be managed by very vocal anti commercial groups looking to shut down herring harvest in Southeast.

Proposal #176 - OPPOSE

There is no justification for reducing the maximum harvest rate from 20 percent to 10 percent for the Sitka Sound herring fishery. This is yet another proposal looking to unnecessarily restrict commercial herring harvest with the eventual goal of eliminating it completely. Herring biomass is at record highs in Sitka and there is no management or conservation reason to cap the harvest.

Proposal #177 - OPPOSE

There is no biological reason to reduce the minimum harvest rate to 10 percent and increase the threshold that allows for a fishery

from 25,000 tons to 50,000 tons for the Sitka herring fishery. I participate in the Sitka herring fishery every year and can attest that there is more than enough subsistence opportunity before, during, and after the commercial fishery opens.

Proposal #178 - OPPOSE

There is no reason to expand waters closed to commercial sac roe herring fishery to include the majority of waters herring having historically spawned in and the fishery has historically occurred, essentially creating yet another herring reserve. There is already 18.5 square miles of near shore state and federal waters in Sitka Sound closed to commercial herring fishing. That's just in Sitka alone. Closing this additional massive swath of area includes waters where the commercial fishery has historically taken place. Every year, more closed waters proposals are submitted because in the past, the BOF has used them as what they think are easy proposal wins to "give" to the vocal anti herring fishing advocates. However this has resulted in significant closed area in Sitka Sound, and has also resulted in the vast majority of the rest of Southeast Alaska being closed to commercial herring fishing. The end goal of these proposals is to regulate the commercial fishery into extinction. ADF&G follows the Sitka herring management plan and ALWAYS considers and distributes the commercial harvest by time and area to provide for subsistence opportunities. These considerations are never taken lightly and are announced on the VHF as justification for both deciding to open or not open the fishery for the day in a given area.

Proposal #179 - OPPOSE

There is no reason to expand waters closed the Sitka Sound herring sac roe fishery to include Promisla Bay. See proposal 178 for more reasoning. ADF&G follows the Sitka herring management plan and ALWAYS considers and distributes the commercial harvest by time and area to provide for subsistence opportunities. These considerations are never taken lightly and are announced on the VHF as justification for both deciding to open or not open the fishery for the day in a given area.

Proposal #180 - SUPPORT

Support this housekeeping proposal to align the latitude of Aspid Cape with the actual location of Aspid Cape for the southern boundary of the Sitka Sound herring sac roe purse seine fishery.

Proposal #181 - OPPOSE

Establishing provisions for conducting test setting in the Sitka Sound herring sac roe fishery by limiting the number of test sets per day and season would severely hamstring the ability of the fleet to find marketable herring and conduct the fishery. Period. ADF&G manages the Sitka Sound sac roe purse

seine fishery conservatively and sustainably with UNPRECEDENTED coordination and cooperation from the fleet and processors to ensure that we are only harvesting what the market wants and how much. Allowing the Department to continue to have a small amount of flexibility with test sets is crucial to having a successful fishery.

Proposal #182 - OPPOSE

This proposal to establish provisions for a herring sac roe purse seine permit holder participating in the Sitka Sound sac roe herring fishery to use open pound instead of purse seine fishing gear has been introduced so many times that at this point, my opinion is that there's not enough of a market or permit holder support to spend literally any more time on this proposal. Please focus your time and energy on the proposals that are looking to eventually eliminate the commercial herring fishery period.

Proposal #188: OPPOSE

There is no justifiable reason to limit the number days and limit the number of hours in a day commercial herring activity may occur, require observers for commercial herring fishing, require reporting of bycatch in fishery announcements, and limit the overall commercial harvest of herring in Southeast Alaska to 15,000 tons. Unless the goal is to regulate all Southeast commercial herring fisheries into extinction, please reject this proposal. Really, this proposal is just mean.

Proposal #190 - OPPOSE

Providing for co-management of herring fisheries in Southeast with tribal governments is yet another proposal that ultimately seeks to eliminate commercial herring fishing altogether. This proposal repeals the basic management plan for managing commercial fisheries in Southeast Alaska and replaces it with a consent based Co-management framework with Tribal Governments. Co management would result in the use of opinions and not facts when managing Alaska's herring resource, and would undermine the public process that has refined the herring management process over decades.

PC315

Submitted by: Charles McCain
Community of Residence: Juneau

I oppose 156 because of 25% reduction of hatchery chum salmon which will eliminate sockeye, king and coho for sport fishing

Alaska Board of Fisheries

P.O. Box 115526

1255 W. 8th St

Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

I am a guide at Waterfall Resort writing in opposition to propositions 109, 110, 111, 114, 115, 116, 117, 119, 120. I support the current 3-2-1 nonresident king salmon annual limit with no in season management. It stands at the breaking point for our business. Anything less makes it extremely difficult to provide a valuable satisfying experience and is not outweighed by a comparable benefit to conservation. At the current level our business can continue to be a sustainable economic engine in SE Alaska.

I support SEAGO's position and as a guide I can add that the effect of having a less than 3 annual limit in June before coho are present pressures me into an open ended catch-and-release scenario which is neither good for client satisfaction nor king salmon, a lose-lose. A blackout day of 0 does not provide me with enough opportunity to fill a reasonable day while limits on halibut and rockfish have also been curtailed. With 3 we have an attainable daily harvest goal after which we like to move to another species and end up hooking less king salmon than when the client is led to believe that every king they catch is too small to fill their limited tag. The attainable but modest goal creates enough satisfaction for business while serving conservation goals.

Thank you for your consideration.

Colin McCrossin

PC317

Submitted by: Charles McCullough
Community of Residence: Bellingham, Wa

Oppose 134: King Salmon retention can be regulated in all number of ways and going straight to the stick for regulation places a huge stress and burden on a group of people who are struggling financially and the vast majority of people are trying hard to help this issue. There are already fines in place that hurt.

Support 157, Support 158, Oppose 167.

PC318

Submitted by: Jerry McCune
Community of Residence: Cordova Ak

156 oppose the hatcheries are huge economic driver and huge part of Alaska fishing for all users

See attached [Boards Support note: no attachment was uploaded]

My name is Chris McDowell Im a lifelong Juneau resident and regular participant in the 11A personal use red king crab fishery. I am also a commercial crabber and own permits for SE Alaska red king crab (RKC) and Tanner crab. Im writing to oppose proposal 242 and encourage the Board of Fisheries to reject it.

The proposal and its supporting rationale are flawed in several important ways.

- A) The essential argument and basis for requesting this BOF action relies on flawed correlation-is-causation logic. Namely, the assertion commercial fishing is "devastating" to the RKC stock and results in loss of fishing opportunities for all users. The proposal language consistently infers personal use opportunities are lost to the commercial fishery, and in the opening paragraph specifically directs the Board of Fisheries to find commercial fishing is the cause of RKC stock declines in the region. This ignores all other factors affecting RKC abundance in SE Alaska such as environmental conditions, recruitment and predation by finfish and marine mammals.
- B) Red king crab in 11A is currently allocated 60% to personal use and 40% to commercial. This proposal asserts that catching the 40% commercial allocation constitutes overfishing, and asks the board close 11A to commercial fishing to protect the stock from excessive harvest. However, the proposal also requests the board increase personal use harvest by the same [ostensibly problematic] amount of crab the commercial fleet is allocated. Such an increase would affect the RKC stock to precisely the same extent as the commercial harvest it displaces, raising the question of whether this proposal's conservation concerns are genuine.
- C) This proposal improperly conflates closure of the commercial fishery with closure of personal use fisheries. In fact personal use opportunities for RKC are a matter of ADFG managers' discretion, unrelated to whether a commercial fishery occurs. The RKC management plan requires the regionwide commercial Guideline Harvest Level (GHL) reach a specific, relatively high threshold to trigger a commercial opening. No such requirement exists to open personal use fishing. ADFG can (and regularly does) open RKC personal use fishing when the commercial fishery is closed.
- D) The proposal fundamentally misrepresents the current state of RKC personal use opportunities;

"... the commercial red/blue king crab fishery has not opened since the 2017/18 season and personal use red/blue king crabbing has also been closed or severely restricted in areas throughout Southeast Alaska since that season." (source: proposal text)

The commercial fishery has indeed been closed since the 2017 season. But there have been eight consecutive years of personal use openings in 11A (two each year, 16 seasons) which have produced over 16,500 RKC for Juneau area personal use fishermen. Similarly, most of the region outside 11A has been open for personal use every year since the last commercial fishery in 2017, producing 6,700 RKC for personal use fishermen since 2018. (1)

There are two major user groups of RKC in SE Alaska; personal use and commercial. Proposal 242 would produce a minor increase for Juneau area personal use (on the order of one additional crab per permit each year) while producing a major, regionwide downside for the commercial sector.

- Per the 2024 ADFG survey, the legal RKC biomass in 11A is 447,849 lbs (1)
- Harvest rate in 11A is set by ADFG at 8%, yielding a total harvestable poundage of 35,828 (1)
- Commercial allocation in 11A is 40%, equal to 14,331 lbs (1)
- Assuming average size of 8 lbs, the commercial allocation in 11A is equal to 1,791 crab
- Assuming 1,500 personal use permits in 11A (consistent with the 5-year average) (2) the increase from absorbing the 2024 commercial allocation would be 1.19 crab per permit

There is a significant likelihood this proposal will result in continued closure of the regional commercial RKC fishery for the foreseeable future, as the reallocation would eliminate the 11A stock from calculation of commercial fishery threshold. ADFG staff comments regarding effects of this proposal (3) indicate this would have occurred multiple times in the last 20 years.

- ADFG conducts annual stock surveys and estimates area-specific and regionwide legal biomass of RKC. That is, male crab exceeding 7" carapace width. The 2024 survey estimates legal biomass of RKC in SE Alaska at 1.63 million lbs of which 447,000 lbs (27% of region total) is in 11A. (1)
- Opening the commercial fishery requires reaching a regionwide threshold of 200,000 lbs commercial GHL. Managers consider the stock assessment in each of eight areas and determine appropriate harvest rate in each area based on stock status. For instance, Pybus Bay and Excursion Inlet (stock status poor due to sea otter predation) are currently set at zero, Gambier Bay (stock below average) is set at 4% and 11A (stock status above average) is set at 8%. (1)
- The commercial GHL calculation for 2024 was 117,000 lbs, well below the 200,000 lb threshold for a commercial fishery. (1) By allocating all RKC to personal use in 11A, the legal biomass in the Juneau area (27% of region total) drops out of future seasons' commercial GHL calculation, substantially widening the gap between calculated commercial GHL and the threshold level for a commercial RKC fishery anywhere in SE Alaska.

I urge the Board of Fisheries to reject this proposal. It will produce major, regionwide detrimental effects for the commercial user group, in exchange for a minor benefit to a user group that already enjoys good, consistent access to the best red king crab fishing in Southeast Alaska.

Sources

(1) ADFG staff presentation of RKC stock assessment Dec 9, 2024

(2) RC 2 staff comments table 242-3 pg. 26

(3) RC 2 staff comments pg. 22

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Chris McDowell, Juneau AK

Submitted by: Chris McDowell
Community of Residence: Juneau, AK

156, oppose

242, oppose see attached

243, support

Submitted by: Chris McDowell
Community of Residence: Juneau, AK

proposal 109, support

proposal 110, support

Submitted by: Christopher McFadyen

Community of Residence: Petersburg

Proposal 242: I strongly Oppose this proposal. The Majority of Red king crab permits are in rural communities which rely heavily on that income. The territorial sportsman's club out of Juneau is not rural and is only looking to increase sport instead of supporting families and livelihoods.

Dear Alaska Board of Fisheries Representatives,

I am writing this email to voice my concerns and opinions with upcoming regulation proposals for the following 2025 fishing season in Alaska.

There are several proposals being presented to you, the board of fisheries, which will have great implications on my job as a charter fishing captain in Southeast Alaska. I strongly oppose proposals 119 & 120 , closing down two-days of the week to non-resident king salmon harvest could affect my work and turn possible customers away for those days of the week causing me to be out of work, I could go target other species. I have several clients that travel to specifically fish for king salmon. These two-days a week closure could have a heavy impact on my livelihood as a charter captain.

I strongly oppose proposal 140 for sport fishing to use single barbless hook. What are commercial fisherman to do after king salmon troll season is closed for commercial harvest and silver salmon is open? Commercial practices of line troll caught silver salmon still use barbed hooks and they have to release incidentally caught kings. If they don't have to use barbless hooks, I feel it is unfair that we must use them. Proposal 141 of sport fishing with no bait is not fair to sport fishing and I OPPOSE this regulation proposal, if the commercial fisherman are fishing for silver salmon and incidentally catching king salmon while using bait and barbed hooks, why can't we use bait?

I am in STRONG SUPPORT of proposal 108 with having the 3-2-1 regulation for king salmon. This works best for us sportfisherman and goes along with helping commercial fishing too, as the season goes on, silver salmon becomes the main focus for us and the commercial fisherman are left to fish for far less pressured king salmon. I support proposal 113.

Thank you for reading,

Sam McGree

PC322

Submitted by: Madalena McNeil
Community of Residence: 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.

PC323

Submitted by: Dennis Meier
Tanaku Lodge

Community of Residence: Elfin Cove

see attached [Boards Support note: no attachement was uploaded]

PC324

Submitted by: Abigail Meiners
Community of Residence: Juneau

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

My name is Abby Meiners and I have grown up sport fishing in Juneau Alaska.

I OPPOSE proposal 156.

DIPACs tourism and education program has been hugely valuable in my life as it has both provided summer tourism jobs and aided in my passion for science. Community days and field trips to DIPAC are incredibly valuable in increasing the knowledge about salmon in our community which relies so heavily on the resource.

Proposal 156 would potentially eliminate the tourism and education programs with no clear benefit to wild stocks.

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

Sincerely,

Abby Meiners

Submitted by: Amy Jo Macaulay Meiners

Community of Residence: Post Falls, Idaho; Juneau, Alaska 1966-2023

January 3, 2025

Amy Jo Macaulay Meiners



Post Falls, ID 83854

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

My name is Amy Jo Macaulay Meiners and I was born and raised in Juneau, only moving to Idaho last year. I am currently DIPAC Board of Directors President, and have served on the board since inception in 1976. As the daughter of the late Ladd Macaulay, I have a lifetime investment in salmon enhancement in Southeast Alaska. My comments here represent my personal views.

I vehemently OPPOSE Proposal 156.

When Dad and Armin Koernig were designing what is now the Macaulay Hatchery on Gastineau Channel, they put much thought into having the greatest impact on the salmon industry. They included areas designated for University research, space for students of all ages to come learn about salmon, and a global outreach to educate visitors on the importance of salmon. The DIPAC mission to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism is now almost 50 years in its efforts. I'm confident both Dad and Armin are smiling as they see their work come to fruition with the many benefits of enhanced commercial, sport, personal-use, and subsistence harvests.

If DIPAC cuts 25% of our chum production, there is much that will be lost. Our income is based on our chum cost recovery. Therefore, all our budget expenditures are built around our chum program. Our Chinook and coho efforts are supported by chum production. Our joint projects with Fish and Game will take a hit with less funding. Sport and shoreside fisheries will feel this impact. Likewise, our sockeye project at Snettisham will be negatively impacted, in turn negatively impacting the State of Alaska's Treaty obligations. Jobs will need to be cut from the budget, impacting our education and tourism work. A 25% cut to chum production means we will need to take on more cost recovery harvests and thus the commercial fishermen will be hit with even more of a loss. Consider, too, the impact a 25% chum reduction in all of Southeast would have on the State of Alaska's Department of Commerce and Economic Development Loan Fund. How many loans would be impacted by such a drastic cut?

I know you understand the thorough public review process for Alaska Salmon Hatcheries and Enhancement Regulations as noted in the 34-page document from ADF&G. It begins, “Salmon enhancement and hatchery activities in Alaska are governed by statutes, regulations, and policies designed to protect wild salmon stocks.” Further reading notes, “PNP Hatchery permits require an extensive application process and considerable documentation and planning.” I thank the Department for a job well-done.

I’ll leave it to the ADF&G scientists to share the data relevant to Southeast. However, I would like to take a highlight from High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate, (Wertheimer, Heard; 2018), including their 97 references. “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 than at any time in the 90-year time series.” (p. 1) The research concludes, in part, that “hatchery fish provide a buffer to sustain fisheries, with empirical evidence that large releases and returns ... did not limit the production potential of the wild stocks.” (p. 3).

DIPAC’s chum production has been consistent for 30 years. I have yet to see any science on the possible negative impact of this enhancement. Talk to the fishermen. Talk to the elders who share this watershed. Talk to our community. You will hear of the positive impact DIPAC has in our area, economically, socially, and culturally. A 25% cut to our chum program would be devastating to the point of potential collapse.

Please vote no on Proposal #156.

Sincerely,

Amy Jo Macaulay Meiners

PC326

Submitted by: Mac Meiners

Community of Residence: Juneau

January 13, 2025

Dear Members of the Alaska Board of Fisheries,

I am a lifelong resident of Alaska and current resident of Juneau, an avid sportsman and retired commercial fisherman.

PROPOSAL #242: OPPOSE

I am writing to express my strong opposition to Proposal #242, which seeks to reallocate red king crab in 11 A to personal use. As a sportsman and avid angler and reliance on personal use fishing since retiring, I believe this proposal would be detrimental to the long-term health of the fishery and undermine the principles of sustainable management.

Red king crab are a vital component of Alaska's marine ecosystem, and their populations are already under pressure from various factors, including climate change and bycatch. Reallocating a portion of the fishery to personal use would not only increase the risk of overfishing but also create new challenges for enforcement and management.

Furthermore, I am concerned that this proposal would disproportionately benefit a select few at the expense of the broader public interest. Personal use fisheries often lack the same level of oversight and accountability as commercial and sport fisheries, which could result in wastage and abuse of the resource.

As a sportsman, I believe it is essential to prioritize the long-term sustainability of Alaska's fisheries over short-term gains. I urge you to reject Proposal #242 and maintain the current allocation of red king crab in 11 A. This decision would ensure that this valuable resource remains healthy and productive for future generations of Alaskans and visitors alike.

PROPOSAL #156: OPPOSE

I am writing to express my strong opposition to Proposal #156, which seeks to reduce hatchery production of pink and chum salmon by 25%. I believe this proposal would have significant and far-reaching consequences for Alaska's fisheries and the communities that depend on them.

Reducing hatchery production would likely lead to decreased abundance of pink and chum salmon, which could have cascading effects on the entire ecosystem. This reduction would also impact commercial and recreational fisheries, potentially leading to reduced fishing opportunities and economic losses for coastal communities.

Furthermore, Alaska's hatchery program has been instrumental in supplementing wild salmon stocks and providing a sustainable source of salmon for commercial and recreational fisheries. Reducing hatchery production would undermine the progress made in managing Alaska's fisheries sustainably.

I urge you to reject Proposal #156 and maintain current hatchery production levels. Instead, I recommend exploring alternative management strategies that prioritize the long-term sustainability of Alaska's fisheries.

Thank you for considering my comments,

Mac Meiners

Submitted by: Tom Meiners

Community of Residence: Burien, WA

Hello, my name is Tom Meiners. I'm a purse seiner, I was born and raised in Juneau, and I currently sit on the board of directors for DIPAC (a private non-profit hatchery based in Juneau) and am the president of the Southeast Alaska Seiners Association (SEAS). I have sat on the board of directors of both regional aquaculture associations (SSRAA and NSRAA) in the past. I'm commenting today as a member of the public, albeit one fairly well versed in hatchery goings on.

I'm here to voice strong opposition to proposal 156, which seeks to decrease hatchery production by 25%.

Over the last fifty years, the collaborative efforts between hatchery operators, fishermen, ADF&G, federal folks, and SE community members have built a robust aquaculture program, with scattered release sites around the region. These programs focus mainly on chum salmon, but also produce king and coho. Very few pink salmon in SE are hatchery produced, with nearly the entirety of southeast pink salmon coming from wild stocks in southeast's 2,500+ pink salmon streams.

This collaborative effort has slowly built a successful program that is ecologically safe, environmentally sustainable and defensible, and has been of huge value to the region.

Hatchery fish smooth out and pad the economic roller coaster that is the commercial fishing business, creating something closer to a sure bet for fishermen and processors. As time has gone on, fishermen have come to rely on these programs for their business models.

Hatcheries in southeast are about so much more than just putting money in fishermen's pockets. They create hands, outdoor, science based jobs. They provide educational benefits and scholarships. They provide fish to communities. Stability to local processors. Raw fish tax directly into communities. Fishermen in SE spend their (sometimes hatchery produced) dollars locally, from fuel at Petro (everywhere in southeast), groceries at Hammer and Wikan (Petersburg), parts at Pacific Pride (Ketchikan).

Because chum salmon are economic to produce and have a strong return on investment, hatcheries are able to produce coho and king salmon, which on their own would never pencil out financially. Almost every community in southeast has a hatchery king salmon program on its road system. Programs that locals can fish on and feed their families, often even from shore. In addition, most charter operators fish on hatchery kings and cohos in SE. A reduction in chum salmon production would harm, if not end, many of these programs, because without the chums, these programs are too expensive.

In summary, I oppose 156

I also

Oppose 134

Support 157

Support 158

Oppose 167 - We don't need longer nets, they work fine.

Support 168 - At this point there are not very many folks with spotter airplanes. Having them illegal during the fishing day has made fishing much more pleasant and equitable. Having them buzzing around during hatchery openings is annoying.

PC328

Submitted by: Nickolas Mendoza
Community of Residence: Craig

Dear board of fish my name is Nick Mendoza and I am a guide at waterfall resort out of Craig, Alaska. I highly support the SEAGO proposal for 2025. In regardless to proposals 119 and 120 I highly oppose closing any form of retention for non residents and residents alike as the local economic value of the King Salmon being caught in SE highly supersedes the market value of king salmon in any marketplace worldwide not to mention the jobs created by the Sportfishing industry that trickle all the way down to gas pumps and tackle and licensing sales, which fund our hatcheries. I highly support proposition 131 allowing more than one limited harvest commercial fishery for troll caught fish as the west coast hook and line fisheries have historically pioneered the way for sustainable fisheries. The importance and support of Proposition 134 which imposes fines for seine caught kings outside of an opener can not be pushed enough. I heavily oppose Propositions 140 and 141 suggesting barbless circle hooks and limiting the use of bait as it s not conducive to efficiently catching our customers fish as we are often able to target multiple species at the same time for a much more enjoyable experience for our guests with limited bycatch. Lingcod retention for non guided anglers as proposed in 203 should be opposed as the already minimal slot length of 30-35” has not yet been proven to help the biomass. Proposition 206 which reopens retention of yellow eye for non residents should not only be supported but amended to include non residents as well as even though our efforts to stay away from areas in which they are known to be prevalent the incidental catch no matter what techniques and gear used still happens and no matter how they are defended their is an undeniable mortality rate that just results in a wasted resource. Reducing pelagic rockfish retention as proposed in 210 is highly opposed as there is a very healthy biomass of not just black rockfish which are often targeted for their size and table fair, but an even healthier biomass of widow rockfish that guests are enjoying taking home and feeding their families with not to mention the time spent enjoying their trip to Alaska and taking in all she has to offer. There are far more propositions and problems to be addressed in the future at the state and federal level but we all have to band together and start somewhere. If I can add anything that I have seen throughout my career that contains a VERY HEAVY background in commercial fisheries it is that until our sport fleet and troll fleet come together and propose more sustainable measures as west coast hook and line fisheries have been very well known to due we are going to continue to see mismanagement and an entire fishery/natural resource get exploited and go to waste. Thank you very much for your time to read over all of our letters of support opposition and concern for the future of such a beautiful fishery that we look forward to stewarding for generations to come.

Submitted by: Kathleen Menke
Community of Residence: Haines

Thank you for this opportunity to comment.

Herring are a keystone species, supporting tribal food traditions as well as salmon, migratory birds, and marine mammals among others.

I appreciate the effort Herring Protectors group has put into these proposals, as well as the Sitka Tribe.

The proposals I support are in the interest of preserving the herring. The proposals I oppose would increase the harvest to the detriment of the herring population.

Proposal Recommendations:

173: Support

174: Support

175: Support

176: Support

177: Support

178: Support

179: Support – Protects an important subsistence harvest area.

181: Support – Minimizes herring mortality from test sets.

182: Oppose

183: Oppose

188: Support

189: Support

190: Support – Recognizes Tribal sovereignty and establishes a co-management framework for subsistence resources.

Submitted by: Sam Mennitt
Community of Residence: Ketchikan

I would like for all regulations to follow science based evidencing and not attack a specific facet of the industry (charter fishing).

PC331

Submitted by: Brian Merritt
Community of Residence: Wrangell

I oppose 108 and 113 because the commercial guys have already lost enough king salmon. If other entities want to fish king salmon, find a way to do it other than stealing from the historical user group.

I support 111 because it makes sense and is a fair way to deal with the ongoing problem that the board continues to deal with!

PC332

Submitted by: Ron Merritt
Community of Residence: Wrangell

I strongly support proposal 111.

PC332

Submitted by: Ron Merritt
Community of Residence: Wrangell

proposal 108 and 113 I oppose 108 because it allows the sport/charter industry far more king salmon than has been historically allowed. Last season the troll fishery lost thousands of king salmon that were given to the sport/charter fishery. This will continue in the future.

Comments by Steve Merritt

Proposal 104,

To create a salt water subsistence fishery by taking 5,000 kings from the other user groups.

I **OPPOSE** proposal 104

1. I would point out that Southeast Alaska has a subsistence fishery on king salmon already, and its accounted for in the Pacific Salmon Treaty. Those fish are added to Alaska's allocation of kings via the transboundary river agreement. See the Pacific Salmon Treaty, Page 21, paragraph D.

(D) Harvest of Chinook salmon in the Stikine River U.S. subsistence fishery shall be managed as a component of the U.S. directed fishery for Stikine River Chinook salmon. All Chinook salmon harvested in the U.S. Stikine River subsistence fishery shall count towards the U.S. AC.

There may also treaty issues with creating a marine subsistence king fishery. Consulting the department on the issue would be prudent.

2. The proposers rational is flawed and out of context. They state that:

In the 2021-22 cycle, the Board approved a proposal (Proposal 125) to modify 5 AAC 01.730 to allow ADF&G to issue subsistence permits for king salmon.

Passing proposal 125 did not call for the department to allow for the creation of a new direct king salmon substance permit. It clarified that when using the known subsistence permits available for other species, if you catch any other salmon during that endeavor, king salmon included, they were considered legally caught. And if king salmon were caught incidentally, you could only keep two.

So, the proposer's wish for you to take the next step and create a Chinook subsistence allocation, really doesn't exist, since there never was a first step requiring the department to create a permit for marine subsistence king salmon. Board members should be careful here not to feel that this board passed something in the past, that obligates them to do something on this issue now.

5 AAC 01.730 States **(b)** Subsistence Permits will not be issued for the taking of Coho salmon from the Taku River and Stikine River drainages.

However, Coho salmon taken **incidentally** by gear operated under terms of a subsistence permit **for other salmon** are legally taken and possessed for subsistence purposes as described in (j) of this section.

(j) Salmon, trout, or char taken **incidentally** by gear operated under the terms of a subsistence permit for salmon are legally taken and possessed for subsistence purposes, **except that the possession limit for king salmon is two fish.**

The statement in (j) above, the **terms of a subsistence permit for salmon**, implies that there are subsistence permits for all salmon, but that is not the case. There are only subsistence permits for certain species of salmon for specific areas in Southeast. A marine direct king salmon permit is not one of them.

Now we all know that people have and continue to subsist on Chinook salmon they catch in southeast Alaska. We have a resident sport fishery that we all use as a basic subsistence fishery. In the current king salmon management plan, there are clauses added, to protect the resident users from shut down to the best of the department's ability.

The proposer's fear of the resident sport fishery being closed down is not totally unfounded. However, it is highly unlikely that the residents would be closed down early during the season due to protection clauses in the sport plan. In 2024 the resident sport fishery closed August 22, and that may have been avoidable had the department not made an error in estimating the nonresident catch.

Even so, the subsistence users had opportunity to fill their freezers with kings, from April- through most of August using the sport fishery in 2024. By August, coho and other species are readily available in southeast and as far as true subsistence is concerned, those opportunities could fill their food needs if they had not done so earlier on king salmon.

However, if you do decide that there is need for a marine subsistence king fishery, the allocation should **not** be created out of Alaska's total allocation. Since the allocation of treaty Chinook was developed in the State law, subsistence users have been using the sport fishery to get their fish.

Proposal 104 is written in such a way that it creates a new user group and involves a reallocation of the treaty resource from the past. But in reality, the user group is not new and its harvest has always been within the current system. The fish that proposal 104 wants for a subsistence fishery, is and always has been, located within the sport fishery's allocation.

If you reallocate treaty fish for a subsistence allocation outside the sport fishery's current allocation, subsistence users will stop using the sport fishery for their needs and switch to the subsistence fishery. This will result in removing historic participation from the sport fishery, which in turn, will lower the annual sport fishery harvest percentages, affecting the long term 20% average you have set as a goal for the sport fish allocation. So, if you decide to do this, it is important to keep the source of treaty Chinook used for a subsistence allocation, within the same user group it has always been located.

The issue that is really driving the bus here is the residents and subsistence users (one in the same really), don't want to suffer shut down when the sport quota is over run by nonresidents.

I believe there is a way to use the sport fish plan to accommodate 104, while not affecting the sport allocation goal of 20% over time. Simply amend whatever sport plan you chose, where it says to minimize impacts on resident sport fishermen, to include subsistence users in that sentence.

Section (b) 4

This will facilitate the need for a direct marine king salmon subsistence permit and they can use it within the sport fishery, and not change the participation aspect of the sport fishery. The only thing that would be different, would be the subsistence bag limits. Instead of going out 10 times sport fishing to get their fish, substance users would only go out once or twice to get those same fish.

Proposal 108

I **OPPOSE** proposal 108 as written

There are several reasons why you should not adopt SEAGO's proposal 108 as is written now.

1. Proposal 108's nine-year rolling average incorporates Covid year 2020's sport harvest into the math. That year was affected by external impacts that had nothing to do with the abundance of Chinook salmon and everything to do with low participation. In 2020 there were only 59,911 salt water anglers in Southeast Alaska. Omitting 2020, the 2015 to 2023 average of anglers fishing the marine waters of Southeast Alaska is 131,010.

<https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=region.results>

If you leave proposal 108 as is, the 2020's sport harvest will be figured in the nine-year rolling average, and that average will be unauthentically skewed downward until 2029.

2. Proposal 108 is likely to provide a sport allocation that is substantially beyond the current plan's main objective of a 20% average over time. The proposed cap is set at 25% and the trigger for stopping the sport harvest reduction measures is at 20%. With this scenario, it is likely you will end up with a long-term average somewhere in the middle around 22 and 23 percent. With a cap at 25% ,the trigger point for removing the restrictive annual limits, needs to be around 15%, if the nine-year rolling average is to end up near 20%.

Another way to get closer to the main objective of a 20% average using 108, would be by lowering the 25% cap to 23% and lower the trigger point for removing the management measures to 18%. You can keep the upper trigger of a 22% two-year consecutive rolling average the same. This will give you a long-term rolling average around the midpoint between 23% and 18%. Not only will this shorten the cycle of over/under 20% to around 6 years, it would help with troller acceptability.

3. There are hazards to allowing the sport fishery to reach 25% under the current treaty agreement between the US and Canada. In a year when the seine fleet does not have multiple openings for kings, a change in the troll fisheries fishing regime, even to the extent of 5%, could result in Alaska exceeding the 2019 treaty agreement incidental mortality cap. When that happens Alaska will be summoned to a meeting with the Pacific Salmon commission to discuss the issue. There may be cookies and tea at that meeting but I can guarantee that will be the **ONLY** thing at that meeting that will be pleasant for Alaska. They will be discussing what Alaska **WILL** do to its fisheries, to lower the Chinook incidental mortality of **ALL** its salmon fisheries and abide by the cap Alaska signed onto.

4. Proposal 108 only addresses the amount of troll allocation the sport fishery can take in the current plan. It does not address the plan's problem of the sport fishery taking fish from the net groups allocation. Section (b) states:

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

Proposal 108 does address limiting the amount of the troll allocation the sport fishery can take. However, with (b) 2 above still in place, any seine

or gillnet fish remaining on their allocations is up for grabs. And it does not matter whether or not the nets intend to harvest it before the end of the year, (b)2 allows the sport fishery to just take it.

5. Seago’s suggested reduction annual limits are not insulated from the increasing number of nonresident anglers. This fact can render those ineffective at curbing the long-term sport harvest percentage below 22%. Any and all suggested annual limits for reducing sport harvest are only dependable if participation in the fishery were to remain equal or lower to the past. All indicators say opposite. The average number of active salt water king salmon guides has increased 14% from the 2012-2018 average. The number of charter business targeting kings has increased 10 % from the 2012-2018 average. So not only is Alaska getting less fish to administer to its fisheries since 2019, there is one user group expanding without bound, and invading the other limited user group’s allocations.

See table provided by the department below.

Table 2.-Number of licensed businesses and guides by region 2012 - 2023.												
Note : Data are current as of 8/7/2024												
^a Business only licenses do not include the owner as a guide.												
^b Region assigned based on permanent mailing address indicated at time of licensing												
^c Combination licenses that include the business and the business owner as the guide.												
^d Guide license only , no business license.												
Licensed Businesses ^a												
Region ^b	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Southeast	36	31	36	37	32	39	44	39	35	42	45	41
Southcentral	64	58	63	52	53	55	76	64	51	81	87	80
Other Alaska	4	3	6	4	4	5	10	5	4	10	10	6
Resident Total	104	92	105	93	89	99	130	108	90	133	142	127
Other U.S.	27	30	27	28	33	31	37	35	29	29	36	25
Foreign	0	0	0	0	0	0	0	0	0	0	0	0
Nonresident Total	27	30	27	28	33	31	37	35	29	29	36	25
Total	131	122	132	121	122	130	167	143	119	162	178	152
Combination Licenses ^c												
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Southeast	288	277	268	276	298	275	274	283	257	278	271	284
Southcentral	656	608	560	604	639	605	615	610	591	652	661	674
Other Alaska	50	53	40	57	70	72	72	63	56	67	75	68
Resident Total	994	938	868	937	1,007	952	961	956	904	997	1,007	1,026
Other U.S.	138	118	115	142	155	150	158	156	133	174	165	174
Foreign	0	0	0	0	0	0	0	0	0	0	0	0
Nonresident Total	138	118	115	142	155	150	158	156	133	174	165	174
Total	1,132	1,056	983	1,079	1,162	1,102	1,119	1,112	1,037	1,171	1,172	1,200
Licensed Guides ^d												
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Southeast	228	207	222	264	272	339	348	353	229	300	341	377
Southcentral	614	585	598	723	741	791	766	727	617	830	881	875
Other Alaska	72	68	72	100	116	127	151	124	76	105	107	92
Resident Total	914	860	892	1,087	1,129	1,257	1,265	1,204	922	1,235	1,329	1,344
Other U.S.	798	850	911	908	973	954	1,071	1,163	726	1,164	1,313	1,342
Foreign	0	1	2	3	2	0	0	0	1	1	0	0
Nonresident Total	798	851	913	911	975	954	1,071	1,163	727	1,165	1,313	1,342
Total	1,712	1,711	1,805	1,998	2,104	2,211	2,336	2,367	1,649	2,400	2,642	2,686

Proposal 111

Creating solid management targets from 19-22 percent for sport fishery management.

I **SUPPORT** proposal 111 and will speak to it in committee. Below are 3 amendments I will suggest during committee of the whole.

Amendment 1. Change section (b), (5) to :

(5) Allow for the transfer of any projected unused balance of treaty Chinook, first, to the sport fishery, to be used to reach the season's management target, and any unused balance after that, be transferred to the troll fishery, for harvest at a date, determined by the department.

Possible amendment 2

Allow the department at their discretion to create any dated brackets within all tiers for varying nonresident annual limits.

Possible amendment 3

Change Section (b), (4) to:

(4) minimize regulatory restrictions on resident anglers and subsistence users; and

Proposal 113 To change the troll/sport allocation to 75/25 percent

I **OPPOSE** this proposal

*The Proposer states : **Adjusting sport to 25% of the troll/sport allocation while using the bag and annual limits from the 2022 king management plan that target an average 20% harvest will give the sport fleet similar flexibility to harvest above its historic 20% in low abundance for sufficient opportunity while redirecting sport and net underage's to the troll fishery (under statute 5 AAC 29.060), allowing troll to meet or exceed its historical allocation of 80% over the time.***

The 2022 plan has a 20% average over long term as its goal. The proposer's concept that increasing the allocation to 25% will somehow aide the sport harvest averaging 20%, is illogical and mathematically incorrect. Once you change the allocation in 5 AAC 29.060 that becomes the target, because that is the new allocation.

The 2022 plan has no restrictions on exceeding the sport allocation of 20% right now, and that is the problem with it. The plan has basically unlimited flexibility as far as taking from other user groups. Limited only when it endangers the State of exceeding its entire quota. So, increasing the allocation to 25% will do nothing to the 2022 plan concerning flexibility.

The proposer claims that without fresh approaches within the Southeast all-gear catch limit and between gear groups, instability of in-season management and inadequate sport fishing opportunity will occur.

Yet, this idea of increasing the sport allocation is not a fresh idea at all. In the early nineties this board gave the sport fishery an allocation of 17% based on their historic highest harvest. Years later the board was persuaded there was a need for a generous allocation of 20% for potential charter expansion. In following board meetings there were other charter proposals for increasing the sport allocation, but those boards held them to 20%. Having seen enough expansion and forcing them to live within their means just as the other user groups were doing.

Quite frankly, the only true fresh approach, is to hold the nonresident sport fishery to stay within the fisheries 20% allocation, and that will take creative annual limits and as a last resort, in-season management.

The instability of in season management can be avoided if the nonresident annual limits are set correctly for each tier of abundance. They can be set up where there would be no need for in- season changes, and still stay within the 20% allocation. There would be times when those limits differ from the current 3 kings before June 30th, 2 kings up to July 15, and one king after that.

Adequate fishing opportunity is a matter of individual opinion. If a client is not allowed to keep a king salmon, while catching their limits of Coho, halibut, lingcod and other species, is that inadequate fishing opportunity? Is harvesting one or two kings compared to 3, inadequate?

There are solutions that don't involve taking historic allocations from other user groups. Solutions like setting nonresident annual Chinook limits lower early in the season, or taking some closure measures like the guides suggest in proposal 108, to stay within the sport allocation.

The fact is, with the current treaty agreement, the only way we can expect a long-term average of 20% in the sport fishery, is to force it to it. Unlike the past, where the state could go over its total treaty allocation without penalty, this agreement won't allow that. That is gone and the sport fishery

managers had relied on it heavily, because it kept the sport fishery from consuming other users' allocations. With that flexibility gone, stricter management must be undertaken for the sport fishery.

We just can't rely on it to average out to 20% over time with the 2019 treaty agreement. There is not the same amount of fish available to Alaska to distribute to its Chinook fisheries as in the past. All the other user groups of the treaty king salmon are being held to the use of less fish than the past, why should the nonresident sport fishery be any different?? Proposal 113 is basically an irrational attempt to spare the nonresident sport fishery from having to tighten its belt, like the rest of the user groups have had to.

Since 2019, the typical nonresident catch of the sport treaty fish is about 72%. Increasing the allocation will allow a far greater growth of the nonresident fishery compared to the resident. The resident fishery is somewhat protected by special clauses in the 2022 plan. Despite that, the resident fishermen still worry about the nonresidents catching all the sport quota, as happened in 2024, and they are becoming frustrated with the increased competition in their favorite fishing spots. They are reaching their tolerance for the number of nonresidents affecting their way of life. It has gotten to the point in Craig, Alaska that a charter AC member suggested there be a summit between the local residents and the charter sector, to facilitate better relations. Increasing the allocation will only aggravate that situation.

Proposal 113 will not affect the 2022 plan in any way the proposer believes. If this board votes to adopt it, then this trend of growth in the nonresident fishery will continue; as well as add to the rising nonresident animosity and lead to the destruction of the commercial fisheries depending on Alaska's treaty king salmon.

Proposal 114

I am withdrawing my support for my Proposal number 114.

Proposal 114 addresses the conservation issue of nonresidents at lower abundances, but not the charter fishery taking allocation from trollers at medium and higher abundances. My Proposal 111 is a better proposal and will solve both of those issues. So, I do not want to waste the Board's and Public's time debating proposal 114.

Steve Merritt, Craig, Alaska.

Proposal 131 Create a limited troll fishery in August.

I OPPOSE proposal 131

Even though the proposer made it optional for the commissioner to summon this new fishery if conditions warranted, it's a regulation that I would prefer not be on the books at all.

I helped design and convince the BOF to adopt the September trip limit regulation for the troll fleet.

This regulation's purpose was to harvest small amounts of troll Chinook allocation that would **not** support an unlimited opening.

There are a couple of benefits to that regulation.

1. It would allow for the State to not forfeit the Chinook it had spent large sums of money and effort on acquiring, during the treaty negotiation process.
2. The confidence in the fleet to actually catch small quotas of remaining Chinook, using a small trip fishery, in September was high.
3. Because we were talking a relatively small amount of fish to be divided up amongst the fleet, no fair start closure was needed. The logic being, that should some individuals contemplate jumping the gun on the starting date of the fishery, the total fish value possible, compared to the fine if caught, differed adversely. The fine for such a violation is up to \$3,000 first offense and the value of 10 summer king salmon is such, serious foolish thought would have to be given to starting early.
4. Having a small trip limit on kings not only would save coho time and money because of no closure, it would also allow the fleet to continue its efforts on coho and catch the kings incidental to coho fishing.
5. Catching small amounts of kings incidentally while coho fishing also results in less incidental mortality on kings than not being able to retain them at all.

If you adopt proposal 131, it would negate three of the five benefits stated above.

The amount of Chinook that could support a three day or less unlimited fishery is somewhere in the neighborhood of 10,000 to 25,000 kings.

So, the first thing that would go by the way side is no need for a fair start closure. The value of 30- 80 kings is too close to the standard fine for

getting caught fishing early. There is also a August troll coho closure in regulation that may occur regardless of the troll king salmon situation. So, the very thing the proposer was trying to avoid, would probably happen anyway.

Second for 30-80 kings, many, if not all fisherman would have to reduce their coho effort and concentrate on kings to get them all. So coho income and whatever incidental mortality gains of harvesting kings incidental to the coho fishery, would be lost.

The chances of the fleet not catching 10,000 to 25,000 kings by the end of August is relatively slim, but there have been years second king openings lasted for 28 days. It just depends on how fast the lower 48 fish are slipping through our waters, and their abundance as a whole.

You have to remember the Chinook are traversing to the Southern rivers and may not be long for the Southeast water world. Many northern areas by mid-August are void of kings, yet this proposal depends on fisherman who fish those areas to catch their allotted share even though not possible. The unlimited opening, no matter how short is the surer thing for getting those fish off the treaty table. I'll admit the short August 1-2 day openings are a pain, but we'll just have to deal with it.

Max E. Mertz, CPA
3140 Nowell Avenue
Juneau, Alaska 99801
max@mertzcpa.com
907.957.7131

January 13, 2025

Chair Carlson-Van Dort,
Members
Alaska Board of Fisheries

RE: Oppose Proposal 156

I am a CPA and business owner in Juneau, Alaska. My wife and I have been residents of Juneau since 1992. In my professional capacity over the last thirty-two years and through today, I serve clients throughout the State of Alaska, including NSRAA, SSRAA and DIPAC, along with other entities involved in the fisheries industry throughout SE Alaska.

SSRAA, NSRAA and DIPAC are important businesses to Alaska's economic and fisheries well-being. In total, these entities have over 250 full-time and part-time employees who are paid in excess of \$8 million in annual wages, and their impact to the educational and community health of Southeast Alaska is greater still.

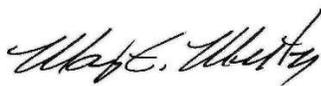
The entities operate chum salmon programs that collectively are a very important economic engine for the Southeast Alaska economy. The chum salmon harvested in southeast Alaska create jobs and income for fishing families, revenues for-profit fishing and fish guiding concerns that provide additional jobs in Southeast Alaska, and important tax revenue for our communities.

The chum salmon programs are also the financial cornerstone for NSRAA, SSRAA and DIPAC. A significant reduction in the chum salmon programs will likely cause them to eliminate programs that are subsidized through chum salmon. These programs include sockeye, chinook, and coho production that lose money and need specific subsidies to continue. Sockeye, chinook and coho programs are produced to support subsistence and sport fishing activities in Southeast Alaska, and their loss will have a significant impact to already fragile economies in SE Alaska and to the important sport fishing industry.

Southeast Alaska is facing significant economic and demographic hurdles. Declining populations and industries, threaten our future. Proposal 156 appears to lack any sound scientific basis, yet would have significant negative impacts to our communities and our fisheries. The chum salmon programs need to continue in order to have the important salmon we need to harvest. The proposer states there is no avenue to address biological concerns surrounding hatchery production, but that is untrue, as the Regional Planning Team review process does just that. These meetings are open to the public, and public comments are welcome.

For these reasons, I strongly oppose proposal 156.

Sincerely,



Max E Mertz, CPA

Submitted by: Mark Mesdag
Community of Residence: Juneau

Thank you for your consideration of the outlined proposals. I am writing to voice my support for Proposal 242 5 AAC 34.111 regarding Section 11-A Red and Blue King Crab management. I strongly support this proposal to better manage the resource by limiting this area to personal use only. Since the commercial fishery started in 2005 both commercial and personal use have been unable to have consistent and regular seasons. Limiting this could stabilize this resource in this region and make it better available to residence in the area. Currently, this fishery is not readily available to the community who lives in this area.

Submitted by: William Metivier
Community of Residence: Craig, AK

Hello, my name is William, I am a 7 year fishing guide out of prince of whales Alaska. I highly support the seago proposal for 2025. I oppose proposals 119, 120, 140, 141, 203 and 210 for these will hurt all charter captains and employees! I believe our economic impact on the state of Alaska is crucial for the state, bringing a sea of tourists to southeast AK. Proposition 206 I very much support and non residents should also be included. We are constantly trying to avoid yellow eye and non pelagic rockfish but they are caught and sunk everyday. Thank you very much for taking the time to hear our voice and we all value and appreciate this organization!

COUNCIL ANNETTE ISLANDS RESERVE^{PC337}

METLAKATLA INDIAN COMMUNITY

ALBERT G. SMITH, MAYOR
JUDITH A. EATON, EXECUTIVE TRIBAL SECRETARY
DARCY BOOTH, TREASURER

ESTABLISHED 1887

POST OFFICE BOX 8
METLAKATLA, ALASKA 99926
PHONE (907) 886-4441
FAX (907) 886-7997

RESOLUTION #25-09

BY THE COUNCIL/EXECUTIVES, ANNETTE ISLANDS RESERVE

METLAKATLA INDIAN COMMUNITY

OPPOSITION TO PROPOSAL #156 BEFORE THE ALASKA BOARD OF FISHERIES

WHEREAS salmon are a vital component of the economy, culture, wellbeing, and survival of Southeast Alaska communities, including the Metlakatla Indian Community, with healthy salmon stocks having served as the lifeblood of the Alaska Native communities of Southeast Alaska, including the Tsimpsian people, for millennia; and

WHEREAS Proposal 156 seeks to reduce hatchery production of pink and chum salmon in southeast Alaska by 25%; **WHEREAS** salmon are not the primary consumer of forage fish in the Gulf of Alaska, with many other species of mid-trophic level piscivorous fish consuming much more feed than do pink and chum; and **WHEREAS** the combined biomass of only seven common species (not an exhaustive list) of groundfish and pelagic fish common in the Gulf of Alaska is estimated at over four times that of the combined pink and chum biomass, and very likely consume over four times as much feed as do the pink and chum salmon; and

WHEREAS if feeding pressure from hatchery-produced pink and chum salmon were depleting the Gulf of Alaska's forage fish, we would not see the spectacular abundance of herring spawning in Sitka Sound, where, over the last decade, the herring biomass has grown to more than six times their abundance in the 1990s; and

WHEREAS Proposal 156 focuses on hatcheries in Southeast Alaska, where wild pink salmon returns comprise more than 97% of the annual returns, which suggests that if pinks are really a problem, Proposal 156 would do little to change it; and

WHEREAS Southeast Alaska hatcheries' pink and chum production facilitate terminal area fisheries, enabling fishery managers to divert fishing pressure from wild, mixed-stock fisheries; and

WHEREAS Southeast Alaska's salmon hatchery programs have successfully operated for almost 50 years, supplementing wild salmon harvests across the State and supporting approximately 4,200 jobs, \$219 million in labor income, and \$576 million in economic output annually, benefiting over 14,000 Alaskans; and

WHEREAS Proposal 156 would pose a substantial risk to the hatchery-supported ecosystem in Southeast Alaska, introducing an additional oversight mechanism that would conflict with the established regulatory framework, threatening the stability of salmon resources, and risking disruption of the balance between hatchery and wild stocks that has been achieved under existing management.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL, ANNETTE ISLANDS RESERVE, ALASKA, THAT:

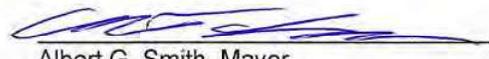
The Metlakatla Indian Community strongly opposes Proposal 156 and urges the Board to reject the unfounded assertions and conjecture it is based on. Furthermore, the Metlakatla Indian Community has great respect for the science-based approach that SSRAA, DIPAC, and NSRAA take to fulfilling their mission, particularly their efforts to promote sustainable fishery management practices. The contribution they make to the economies and well-being of Southeast Alaska communities, including the Metlakatla Indian Community, is vital.

DATED: The 14th day of January 2025, at Metlakatla, Alaska 99926

ATTEST:

Signed:
METLAKATLA INDIAN COMMUNITY


Judith Eaton, Executive Secretary


Albert G. Smith, Mayor

CERTIFICATION

I hereby certify that the foregoing resolution was duly passed at a meeting of Executives and available Council, held on January 14, 2025, at which a quorum was present, by a vote of 7 FOR and 0 AGAINST, the Mayor being authorized to sign the resolution.


Judith Eaton, Executive Secretary

Submitted by: Parker Midthun
Community of Residence: Stanwood

251

I oppose a shortened July opened summer season for dungies. We don't need any shortened season because sometimes there is some softies we need all the opportunity we can get with the industry in a glut. The handling study referred is wrong because the department and industry have a differing soft shell scale department calls a soft shell crab soft when the actual shell is soft industry calls it soft when the meat content is low

Submitted by: Heather Mieth
Community of Residence: Wrangell

All proposals should be in favor of fisherman being allowed to fish all their available permits within a season for maximum income. When fishermen are paying on permits that they are unable to utilize or have to choose not to use. Like proposals to change start dates of fisheries to coincide with others. We are making our industry more and more unviable. We need to support our commercial fishermen to the best of our abilities their success is integral to our rural communities.

Submitted by: Caleb Mieth
Community of Residence: Gustavus

I do not support proposal 156 I'm a commercial fisherman and it would be very detrimental to me and my family who depend of these fish for are income and it would hurt all of southeast Alaska where fishing is a huge industry the effect of it will be felt through the entire state

Hello, my name is Garrett Miller and I am writing this short letter to show my opposition to proposal 156. I oppose this proposal simply because I believe that our salmon hatcheries do nothing but good for our fisheries. I believe that if this proposal goes through and we lose 25% of our egg take that it would be devastating to the fishermen. The hatcheries are vital to fishermen year after year, especially years when common property are more slim. I am a fourth generation southeast alaska fishermen and SE Salmon permit holder. The future hatchery success plays a key role in my future and many other young fishermen like me. This is why I oppose proposal 156.

Submitted by: Garrett Miller

Community of Residence: Wrangell, Alaska

Good day board members. My name is Garrett Miller. I am 26 years old. I am a second-generation commercial fisherman born and raised here in Wrangell, Alaska. I have done all the right things that I am supposed to do in the commercial fishing industry. I have financed a boat, a 225 southeast dungeness crab permit, a southeast salmon gillnet permit, a southeast pot shrimp permit, halibut ifq, and most recently almost a year ago today a K19 red crab permit. That is why I am writing you today to strongly oppose proposal #242 and fully support proposal #243.

First of all, I would like to comment on proposal #243. I am in full support of proposal #243. The Alaska Department of Fish and Game has worked countless hours with fisherman and processors, along with organizations as SEAFSA and PVOA and have come up with an individual catch limit plan that all parties support in years there is a surplus of legal male red king crab. The ADF&G has done a great job doing yearly surveys and keeping concrete records of biomass and legal male red crabs. What an opportunity we have now in front of us to allow a small yet completely no risk harvest of red king crab to the commercial entity. I financed \$51,000 to buy my K19 red king crab license. I/we just want opportunity. That's all we were simply asking. Proposal #243 ensures much welcomed income in a time where we all know our fisheries are not stellar anyway with shorter seasons, less than desirable prices, increasing operating costs, and so on. Please trust the Alaska Department of Fish and Game science and their backing of this proposal.

I strongly oppose proposal #242. First off if proposal #242 gets adopted proposal #243 goes away period. None of southeast will ever be open commercially to red king crab because the 11-A (Juneau Area) compromises a large portion of the red king crab biomass. I will be making payments on a \$51,000 permit that will never ever get used. Juneau sports fisherman already get a yearly season to harvest red king crab. Why do they deserve more? We all need to share and have access to the resource. So many people other than myself will be affected by this potential, unjust allocative move. Permit holders, their families, cannery workers, processors, and fish tax to the State of Alaska, so much potential lost income for so many in all our neighboring towns of Ketchikan, my home town of Wrangell, Petersburg, Kake, Sitka, Hoonah, Haines, and even Juneau. Again, the commercial fleet is simply asking for opportunity to harvest our share of the red king crab biomass based on Alaska Department of Fish and Game science, nothing more. Proposal #242 does nothing for the red king crab resource. The Juneau sport fishers just want their share and ours which is unfortunately complete greediness.

Please consider all the people affected in the commercial fishing industry when deliberating and voting on proposal #242 and #243. It is a very pivotal time in the red king crab fishery. Please back and support the hard work of the Alaska Department of Fish and Game. Again myself, the ADF&G, fellow fisherman, processors, and organizations all approve and fully support proposal #243. And again, I am strongly opposed to proposal #242. As a young, in debt to my gills, commercial fisherman I still have high hopes our fisheries can be stabilized and turned around. With your help they can be. Thank you for your time and sensitivity towards proposal #242 and #243. For me it could be life changing.

Regards,

Garrett Miller

F/V Jessie Girl

Wrangell, Alaska

Submitted by: Trevor Miller
Community of Residence: Wrangell

Trevor Miller

I am commenting on proposal 156 in opposition of reducing the egg take level in southeast hatchery's by 25%. I am 23 years old and I have been basing my decisions for my future based on the salmon returns especially the chum return. I have bought a SE salmon gillnet permit, and bought nets while I wait for the right opportunity to buy a boat. The chum salmon return has heavily influenced my decisions about my future and it would be devastating to see a large decrease in the chum salmon return this would create.

Submitted by: Trevor Miller
Community of Residence: Wrangell, Alaska

I am a crewmember and proposal #242 and #243 affect my overall income. I am strongly against proposal #242 please vote no. I very much support proposal #243. Please vote yes and adopt. Thank you.

Trevor Miller

Crewmember

Wrangell, Alaska

Submitted by: Grey Mitchell
Community of Residence: Juneau

Proposal 242 - Support.

This proposal is aimed at protecting the red and blue king crab (RKC) in unit 11A for personal use by Alaska residents. This area is immediately adjacent to the community of Juneau and is intensely managed by the Alaska Department of Fish and Game (ADF

&G). Unit 11A is within about a 10-mile range from Juneau, so it provides a special opportunity for access by small skiff and scuba diving. Immediately following commercial RKC openings in 2007/08 and 2011/12, ADF&G had to close both commercial and personal use seasons for a number of years. Thankfully, there has not been a commercial RKC opening since 2017/18 and stocks have finally rebounded, but now there are rumblings of having another commercial RKC opening soon. This area should not be subject to RKC commercial harvest by a handful of permit holders, as it is already used by a relatively large number of Alaskan households and history demonstrates that commercial openings have led to closures and limit reductions. Simply put, there are not enough RKC in unit 11A to sustainably support a personal use fishery along with a commercial fishery. Commercial permit holders

have large vessels and are able to access areas further away that are not accessible to most personal users, so this proposal is not going to affect the commercial fleet's ability to access RKC, provided ADF&G adopts a sustainable RKC management plan with a RKC minimum harvestable legal crab threshold that only includes RKC biomass estimates in areas that are going to be open to commercial harvest.

Proposal 116 and 117 - Support

This proposal is aimed at managing the sport king salmon fishery to help ensure that the 20% sport allocation does not get exceeded due to non-resident overharvest.

Proposal 122 and 123 - Support

This proposal aims to protect king salmon from unnecessary handling during harvest closures. While it may be very difficult to enforce, this provision would at least cut down on blatant acts where people haul in a king salmon caught under a catch and release effort for photo opportunities.

Proposal 164 - Support

This proposal would help Alaska residents a harvest priority in the Juneau Terminal Harvest Areas (JTHA) for king salmon. Currently, non-residents have the same harvest limits as residents in the JTHA, and residents have to struggle to catch a king salmon in times of weak returns. Charter boats filled with out-of-state tourists fish the JTHA daily, while Alaska residents have to go to work. This will only get worse as visitor numbers continue to increase if returns do not improve. As an alternative to Proposal 164, if the Board of Fish approves proposal 163, which establishes a simplified approach for prioritizing Alaska resident access to king salmon harvest in the Blind Slough terminal harvest area, it may want to establish a similar requirement for all terminal harvest areas throughout the Southeast Alaska region. This would provide more consistency for region-wide enforcement and management.

Proposal 222 - Oppose

This proposal would change the year-round shrimp personal use and subsistence seasons by closing the seasons from 2/28 to 5/1 each year. The commercial shrimp season opens 5/15, so this adjustment would limit personal and subsistence users to a two-week window of opportunity from 5/1 to 5/15. This would severely curtail opportunity, as once the commercial season starts, shrimp stocks are quickly reduced to the point where it is not economically feasible to personal or subsistence users to engage in the fishery. This season closure period would be more acceptable if Proposal 224 and 225 were approved by the Board of Fish.

Proposal 224 and 225 - Support

This proposal would shift the commercial shrimp season back to a start date of 10/1 instead of 5/15. This would help avoid conflicts with the personal and subsistence fisheries. As reported by ADF&G in Proposal 222, these fisheries only take 19%-26% of the spot prawn harvestable biomass, so the commercial fishery would still have plenty of shrimp to harvest.

Alaska Board of Fisheries
Southeast Alaska January 2025 meeting

January 8, 2025

Opposition to Proposal 156
Submitted by **Ian Bering Moller**

I am a 19 year old commercial and subsistence fisherman born in Juneau, Alaska and raised on the F/V Mikiah Bay and I oppose Proposal 156. I have commercial fished aboard the F/V Mikiah Bay every season since I was 3 years old. At 16, I bought a Dungeness crab permit with a loan through the State of Alaska commercial fishing loan program. At 18, I bought John Moller's (my dad) SE gillnet permit and 50% of the F/V Mikiah Bay (a commercial fish company owned by my dad), including crab pots, nets, gear trailers and trucks. Thankfully my dad was able to finance me for this portion and help me get started with my commercial fishing career.

I still owe the state of Alaska, Division of Investments \$30,000 for my Dungeness crab permit and another \$275,000 to my dad for 50% of the Mikiah Bay commercial fishing operation. This is a lot of debt load for a 19 year old trying to make it as a commercial fisherman.

I listen to many "old timers" talk about the aging of the fleet or the 'greying of the fleet." I even hear politician's concerns about the lack of the "next generation" entry into Alaska's commercial fishing industry. Well, I am that next generation Alaskan fisherman that all the "old timers" are talking about. All I ask, is you give me a chance to survive as a commercial fisherman.

My future as a commercial fisherman depends on the Alaska Board of Fisheries making sound, science-based decisions. Proposal 156 falls short of sound science and is speculation at best. I hope my future as a commercial fisherman doesn't teeter on someone's feelings and speculation. Please make the right scienced based decision and vote down Proposal 156.

Sincerely,

Ian Bering Moller
Capitan/Owner, F/V Mikiah Bay
Juneau, Alaska
[REDACTED]

PC344

Submitted by: Ian Moller
Community of Residence: Juneau, Alaska

see attached

Opposition to Proposal 156

PC344

Submitted by: Ian Moller
Community of Residence: Juneau

Support 254, 255, 256 &257

Oppose 251

Alaska Board of Fisheries
January 2025 Ketchikan meeting

January 9, 2025

Support for Proposal 224
Submitted by **John Moller**

I am a life-long commercial and subsistence fisherman born in Unalaska, Alaska and currently live in Juneau, Alaska. I have commercial pot shrimp fished in SE Alaska since 2013 and I support Proposal 224.

My experience fishing in May is extremely spotty fishing and inferior product, primarily soft-shell shrimp. Productivity is down substantially in May verses October creating increased costs to prosecute this fishery. With fuel and bait cost continually creeping up this fishery has become less viable. I urge the Board to support moving the Pot Shrimp fishery back to October 1.

John Moller

Juneau, Alaska



PC345

Submitted by: John Moller
Community of Residence: Juneau, Alaska

See Attachment

PC345

Submitted by: John Moller
Community of Residence: Juneau

Support 254, 255,256 & 257

Oppose 251

Dear Chairman and Board of Fisheries,

I am James Moore, a long time Alaskan Salmon Troller and Longliner (54 years) . I'm writing to defend the fishery that has sustained my family for all these years and which I hope will sustain the families of my two sons (also trollers) for many more!

I request that the Board act to achieve these three management objectives

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

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.

OPPOSE Proposals 108 and 113-- which seek reallocation from our historic and primarily resident troll fishery to an 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 reality.

OPPOSE Proposal 156—this proposal would set a precedent for Board of Fisheries, a politically appointed body, to make decisions about matters of a scientific nature. Leave these decisions in the hands of the biologists and fisheries specialists whose job it is to protect and manage Alaska's resources.

This proposal (156) seems to be agenda driven, thus based on selective research. If implemented it would cause certain economic harm to Southeast fishermen like myself, our families, our communities. There is no certainty of any positive outcome.

Joshua Moore, Owner, FV Castaway
[REDACTED]

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

Subject: Opposition to Proposed Reversion to October 1 Shrimp Season
(Proposal 224 & 225)

Dear Board Members,

My name is Joshua Moore, and I am a commercial fisherman and owner of the F/V *Castaway*. I am expressing my strong opposition to the proposal to revert to an October shrimp season.

I participated in the shrimp fishery during the mid-1990s and have observed firsthand the decline in quotas during the winter fishery. In contrast, other regions with summer fisheries have experienced relatively stable quotas over time.

I spend my summers traveling the coast and witnessing the fisheries in Washington State and Canada. These areas demonstrate that summer fisheries maintain more consistent resource levels and yield a higher market value, with a greater price per pound than what we typically see here in Alaska.

When Alaska shifted back to a summer shrimp season, I reinvested in the fishery and developed markets that are inaccessible during a fall season. My buyers have consistently expressed that they are not interested in shrimp carrying eggs, as these are harder to market at premium prices.

Reverting to an October season would undermine the investments that I and many others have made and limit our access to valuable market opportunities. I strongly urge the board to prioritize the long-term sustainability of the resource and the economic viability of those who depend on it by maintaining the summer season.

Thank you for your time and consideration of my perspective. I look forward to the opportunity to work together to ensure the health of Alaska's fisheries.

Sincerely,
Joshua Moore
Owner, F/V *Castaway*

PC348

Submitted by: Joseph Moran
Community of Residence: Bellingham

187 I support

marine mammals getting into the pen poses a danger to themselves and ruins product .hanging large web would solve this problem while letting herring free

PC349

Submitted by: Paulette Moreno
Community of Residence: Sitka

I support proposals 173,174, 175, 176, 177, 178, 179, 181, 188, 189, and 190. I oppose 182 and 183.

I am a traditional and customary harvester for over 15 years on the traditional homeland of the Sheet'ka Kwaan (Sitka). Your vote will affect our way of life.

PC350

Submitted by: Rose Morgan
Community of Residence: Ketchikan

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.

Submitted by: Robert Morgenthaler
Community of Residence: Juneau

I strongly support Proposal 242 and 258!

As a long time resident of Juneau I have experienced the long term closure of the 11a king crab fishery due to overharvest by commercial crabbers.

Allowing only personal use harvest of king crab in 11a provides a unique local opportunity that helps build community spirit and helps offset the frustration of other dwindling harvest opportunities.

My support for proposal 258 stems from the increased pressure by commercial Dungeness crabbers that have moved into area 11a as opportunity for harvest has decreased.

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 Mosher of Juneau, Alaska. I participate in Alaska's salmon fisheries as a commercial, personal use, and sports fisherman.

Proposal 156 would negatively impact the commercial salmon drift net portion of my commercial fishing operation. I live & fish in SE Alaska. Raised my kids here. Salmon dollars put them through college. I have grandkids now, living here who are starting to gillnet with me. Hatchery salmon are the lion's share of the salmon I gillnet. The wild stocks couldn't support the commercial fisheries, sport & personal use on their own. Too many people want salmon. The hatcheries take pressure off our wild stocks, & provide productive fisheries that provide employment, dollars & taxes to flow through our communities. I have 2 full-time crewmen in gillnet season, along with myself. This proposal would cause me to drop at least one. The dollars we spread through the community with the various multipliers are significant. It saddens me to have to defend a program this good.

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

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound

scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 156: Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure. For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Robert Mosher

[REDACTED]

Juneau, Alaska

Submitted by: Robert Mosher
Community of Residence: Juneau, Alaska

Opposition to Proposal 156

Submitted by: Robert Mosher
Community of Residence: Juneau, Alaska

I oppose proposal 242

I'm in favor of proposal 243

Submitted by: Robert Mosher
Community of Residence: Juneau, Alaska

I'm writing in support of my proposal 224. Returning the spot prawn pot fishery to its traditional October 1 opening date. The surprise & ensuing chaos tossed into the laps of permit holders in this fishery by the Covid BOF decision is intolerable. There was zero outreach by F&G to permit holders that they were supporting this change. They're science then...as now, is very sketchy at best. There is no clear plan. There is no clear goals. Any change this big should have a clear reason. And clear goal. Not some fuzzy kinda, maybe, sorta.

I feel with all my heart we are hurting the stock fishing in spring. Something isn't right. The catch rate is about half, of the fall catch rates for myself & the guys I fish around & talk to.

And here lies the problem. I'm paid to understand what I'm catching. Guessing/hunches/observations on where things are & what they're doing. But feel I'm given zero credibility as an expert. Whereas any F&G employee with a four year degree is automatically considered an expert! But they have no skin in the game. If a weakly thought out theory they espouse fails miserably...they still get a check & retirement. I've got permit, gear, boat & 30 years of spot prawn college in the game. I can't afford to be wrong. For the sake of my livelihood, for sure. But also for the resale value of my boat, permit & gear. I vehemently want the fishery to prosper into perpetuity.

It seems we're taking native folks historical knowledge into account anymore. Why is it so hard to get my historical knowledge, or better yet...the commercial spot shrimp pot fleets knowledge listened to?

I & every pot shrimp permit holder I know, want our October start date back! Along with all the historical data to go along with it.

It's intolerable to risk this spot shrimp resource by continuing this ill conceived May experiment.

Thank you,

Alaska Board of Fisheries
PO box 1155626 Juneau Ak.

Members of the Board of Fisheries
SE and Yakutat Finfish and Shellfish meeting

Greetings John Murray F/V Sea Bear 224 Observatory st. Sitka AK. 99835
I wish to offer a introduction, a preface and parameters before going into comments

I live and fish out of Sitka ,I'm a longtime member of the Sitka AC (power troll rep) and have commercial fished since 1978. I am an advocate for trolling and resident anglers harvest . All the while recognizing the importance of the guided charter industry.

I know some of the Board members are familiar with Southeast fisheries from previous meetings. For the other members I wish to point out there are major differences between our fisheries and other regions. Also want I want to offer context and parameters to my comments on the KSMP by the following.

1. Commercial trolling is the only hook and line fishery in Alaska for salmon. Trolling mostly deals in less quantity but higher quality therefore usually higher ex-vessel prices. With the exception of chum salmon.Trolling started in 1905. The fishery has plugged along through ups and downs till this day. We catch salmon one by one . So we are paid by producing, by the pound, FISH BY BLOODY FISH. I know it seems a bit archaic but we are still around .It is still a viable fishery.
2. We are bound by actions taken by the Pacific Salmon Commission . There is no wiggle room when the All-gear king salmon allocation is announced. There has been in the past some **flexibility** between the sport allocation and the troll allocation within the language of the KSMP. I see those days being over ,because every Pacific Salmon Treaty (10 year) cycles Alaska loses king salmon, 2019 to 2028 is no exception to that rule. The king salmon pie has always gotten smaller for Alaska. The big variable is abundance. Which the all -gear quota is based on. Even when there seems to be good overall abundance 2023 / 2024. Alaska is stuck with a low to mid range abundance or quota number. I firmly believe we are in a new **paradigm** since the latest Treaty annex in 2019.
3. The last two years have been hard for most of the salmon fisheries Statewide. Add in the lawsuits against trollers (orca) and the suit dealing with the ESA and king salmon in SE and South Central river systems. It is what I'd describe as very unsettled. Add to that the troll fleet losing our second king opening in August 2023 and 2024 An estimated 2 million dollar loss, loss market opportunities.
4. The troll fishery has some of the highest resident participation in the State, around 85%. Per : McDowell Group economic impact report Dec. 5 2019. Trolling is an entry level fishery for many. The cost of entering into the fishery for residents makes it doable for villagers as well people from larger towns.I can personally attest to that. We need fisheries like these to help counter the out migration of Alaska's population. I also want to bring home the point of trollers being vested in their fishery by the following example. 1) loans for boats and permits with banks, CFAB and the State (revolving loan fund) 2) a 3% aquaculture assessment tax is paid off top of our fish tickets 3) trolling is an apprentice program for youth and others 4) money circulates in local economies and our Ports and Harbor systems.Trolling is one of the economic drivers in SE.
5. Stocks of Concern Management . Board actions taken in 2018 and 2022, while **necessary** these Action Plans have disrupted all users to some extent.The curtailment in harvest seems to be helping rebuild some Stocks of Concern stocks ,with exception of some systems (Stikine river). Trollers lost most of our areas of opportunity in the Spring Hatchery access fisheries. We currently have 3 areas , Sitka , Craig and Ketchikan in the Spring now.
6. My main two goals dealing with KSMP proposals are 1) protect resident angler access and filling our household needs.2) separating the sport allocation from the troll allocation.As you will notice proposals dealing with the KSMP are numerous and mostly FOCUSED on Non-Resident harvest.

I hope this has added to the understanding of our salmon fishery.

Comments on proposals: King Salmon KSMP (most of my comments relate to the years 2019 to 2024) per Pacific Salmon Treaty 10 years cycle 2019 to 2028.

Proposal 104 OPPOSED. King salmon are taken by resident sport anglers and are MUCH THE SAME as a subsistence fishery. Overall this seems to have worked out over time. You go out to harvest and basically do the same exact things one would do in a subsistence fishery. Process, fill your household needs and share. I am a Sitka resident so I'm more familiar with our current subsistence harvest of herring on kelp and branches and Redoubt bay sockeye. Both of which are long time traditional usage.

- This proposal could reallocate 5% or a 11,000 king salmon (long term average) into an already fully allocated fishery or fully subscribed fishery.
- Per : 5 AAC 99.010 Boards of fisheries and game subsistence procedures. (b) " following criteria" .I have a hard time bridging a subsistence fishery with sport rod and reel fishery and moving part of king salmon harvest into a full fledged subsistence fishery.
- For the most part I believe resident sport fishing for king salmon is meeting the household needs. The middle range 2 or 3 resident bag limit of king salmon is more the norm. Do the math if you were to go out with 2 family members at 2 fish bag limit family members you could conceivably harvest 6 kings a day.
- I would support using any other salmon species because none of those are already fully allocated in an ocean subsistence fishery.
- As written the allocation to an ocean king subsistence fishery would come out of the current KSMP and predominantly affect the troll allocation.
- I believe some of the impetus of this proposal comes from SOC management .Some other method (KSMP) could perhaps be used to address this .

Proposal 105 neutral but generally in support.

- The State needs to take the lead to align State management with MSA (Federal)
- Since this is uncharted waters I'm concerned about unintended consequences occurring or unforeseen loop-holes. Please be aware if they come up during the meeting.

King Salmon Management Plan-KSMP I've noted related information of importance and ADFG's Overview and the document #93-04-FB

{Finding of the Alaska Board of Fisheries .SE Alaska Chinook salmon allocations . Finding # 93-04-FB (page two)"}
In support of the allocation the Board found the following.(2) Commercial fisheries participation is subject to limited entry. Recreational fisheries participation is increasing. In 1985 ,16,664 chinook were harvested by Alaska residents, or 67% of the total sport harvest. In 1990 28,297 chinook were harvested by Alaska residents, or 55% of the total harvest."

PER: (Overview of the sport fisheries for king salmon SE AK. through 2024 : a report to the Alaska Board of Fisheries) page 34 . " The percentage of nonresident harvest in the most recent 5 years (2019 -1023) has averaged 67% of the total harvest." As you can see this is a total flip in who catches king salmon.

Proposal 108 OPPOSE This proposal is confounding in the way it is written. I oppose in season reallocation of king salmon from the troll fishery to the sport fishery. I feel it is basically a 5% reallocation with a bunch of bells and whistles attached. Good luck getting your head wrapped around this proposal.

- (OVERVIEW) page 27 { EFFORT) total numbers of anglers }. This is worth noting the NR effort ,compared to Resident effort.
- (OVERVIEW) page 31 { Active saltwater charter vessels and trips.} Both vessels and trips are rising. My personal observations also show a very high degree of efficiency in the charter fishery. They are very successful and the fleet has top notch vessels and operators. What I'm trying to convey is the charter

industry is overall doing very well. Is there a real need for more kings to sustain their industry? No. Not to reward the NR / guided sector increase allocation.

- (OVERVIEW) page 34 { Harvest by Resident and Nonresident anglers}. What this shows to me in black and white is. The Non Resident harvest of king salmon is 67% ,leaving resident anglers 33 %. The King salmon harvest by sport type from the Statewide Harvest Survey 2013 - 2022. Show the Guided NR harvest percentage of 50% of the 67% total . When is enough, enough? Or to put it another way. When will the charter operator and lodges live WITHIN THEIR MEANS ?That really is the million dollar question. A 5% reallocation with squashy language is a big hit to the troll fleet . In the range of 9k to 12k kings a year. Or around a million dollars a season. Mostly those would be taken from the troll fleet.

Proposal 113 OPPOSE . I will use my comments on proposal 108 as a basis for opposition with the following comments. It is an open ended reallocation.

- This proposal is a total rehash of the current and past KSMP. It doesn't work anymore, it's broken. It will only work for guide vessels who take out mostly NR clients . At the expense of the troll fleet that is mostly resident.
- We are in a new paradigm folks for a number of reasons. The charter industry cannot rely on the same old things without harvesting king salmon relied upon by trollers (and resident anglers). This relates back to my 5 points at the beginning of this written testimony see 2 and 5 please.
- The question really comes down to whether the charter industry needs this allocation to proceed with their business plan. NR already harvest 67% of the total sport kings.With 50% of that harvest coming from the guided sector. Now they want more .

KSMP proposals 109,110,111 along with the RC by ATA/ TSI and the RC by a Ketchikan AC are all what I call similar in overall goals but with differing means to an end. If the Board chooses to make one of those a WORKING VEHICLE at the meeting .Things could be moved toward compromise language by the parties at the meeting.I will offer some comments below.

Enclosed are some ADFG graphs and such I'll use as supporting papers.

- 1) King Salmon Harvest Timing in SEAK 2017 -2024
- 2) King Salmon Harvest by Sport Angler Type -Statewide Harvest Survey
- 3) Timing of Marine Harvest Overview page 40 RC3 TAB 1
- 4) average timing of king salmon treaty harvest.Figure 9 Overview page 41 RC3 TAB1
- 5) Harvest by resident and nonresident anglers Overview page 34 RC3 TAB1

Proposal 109 SUPPORT in general as amended by Sitka AC and the proposer via an RC that will be presented at the meeting.The Sitka AC used 109 as their working vehicle. It was amended and finally passed at the last AC meeting January 8th. The proposer of 109 has refined her proposal and will put in a RC at the meeting. 109 is considerably less prescriptive than the two RC's when dealing with the sport king allocation. It still needs some language changes to protect / buffer resident anglers I believe. I would like to see some buffers put into 109 that would allow the resident anglers bag limit for king salmon to start at a number and stay that way throughout the season.This would go toward filling the household needs of BOTH inside and outside resident anglers.109 also gives the Department flexibility to manage the sport fishery. Which I think is a good thing.It also allows the charter industry to exercise its need to support their business plans.

- **Keys: to 109 is in season management.Section (c) PER: (Sitka AC as amended)**
- **Using a percentage of the catch in season to reduce harvest by NR to protect resident anglers.Section (c) (2) and (3)PER: (Sitka AC as amended) Whatever percentage or range needs to recognize ALL resident anglers both inside and outside areas.**
- **Please note (b) The objectives (2) adding sport fishing to read (2). Allow sport fishing in salt water for king salmon, while not exceeding the sport fishing harvest ceiling.PER: Sitka AC as amended)**
- **Worth noting under (b) The objectives (3) minimize regulatory restrictions on resident anglers . Also PER Sitka AC as amended (g) 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 resident bag limits is necessary to comply with the Pacific Salmon Treaty.**

Proposal 110 SUPPORT in concept. There is some solid language in this proposal. It should be further refined to protect resident anglers.

Proposal 111 SUPPORT in concept. The language in this proposal would support the troll allocation more so than the resident anglers. Could use some language to support residents.

The two RC's ATA / TSI and the Ketchikan AC SUPPORT in concept. Both of these RC's seek to add needed language to the KSMP that protects the troll allocation and supports resident anglers' household needs for king salmon. They are rather prescriptive and would need amending to offer the charter industry support for their business plans. Either RC would be a good starter for a working vehicle I believe. General support.

Proposal 123 SUPPORT. With Sitka AC's amended language. While in ADF&G staff comments they oppose this proposal. I will offer another POV.

- **Not netting a fish you wish to release is a positive change. I'll offer two examples: 1) catch and release is a common practice, if you are going to C&R king salmon you should minimize harm to the fish. 2) there is currently no prohibition to C&R of SOC fish. We are all striving to reduce the overall mortality. Netting fish is contrary to conservation of king salmon. It increases overall mortality.**
- **I'd suggest looking at the Sitka AC's comments and amended language for ways to reduce handling.**
- **To be perfectly honest the practice of catch- net- PHOTO-OP and release is a bad practice. It should be discouraged in any practical way possible.**

Proposal 125/ 126 SUPPORT This area was left out of the SOC Action plan even though it is on a major migration corridor for SOC salmon..I will say my rationale for support is anecdotal. I would characterize keeping 14A open is INCONSISTENT with management restrictions to the trollers in the same area.

- **See map page 156 staff comments. This 20 mile area 14-A is a part of an important corridor for SOC fish.**
- **There are other options for anglers, one just has to use fuel and pick the weather to access these areas. Which I believe most anglers do, they move to the more productive outside waters already. As stated in staff comments "strike a balance between the priority to minimize harvest of SEAK wild-stock origin fish and providing opportunity". I question if it strikes a balance when anglers from the Juneau area are closed till June 15th or longer. We need to rebuild the Taku to provide access for our Juneau neighbors.**
- **As a troller who used to fish some of the areas in 14 A during the Spring Troll Hatchery access fishery Trollers lost (for good reasons) access to the same areas, sport anglers were allowed to continue fishing for kings.**
- **Perhaps there is some tradeoff to balance the need to minimize the harvest of SOC kings. I'd suggest the areas west of Soapstone Pt be pulled from the proposal. Taku kings start running in late March and run through the Icy Straits corridor till mid-June it appears.**

Proposal 131 SUPPORT. This is what I call a good proposal for all of the troll fleet, it is also supported by ADFG staff

- **Tad offers good rationale for this proposal. It is a short one and deserves the Board's support. Widely support within the troll fleet.**

Proposal 132 SUPPORT I'd suggest to the Board to support this proposal. The proposal is well written please read the " What is the issue" part of 132 .It explains it all very well.

- Currently there are only three spring hatchery access fisheries open in SEAK for king salmon. Therefore it will have little impact overall.
- The kings in question here are not the "feeder kings" . These kings are hatchery produced fish that metamorphose late in their life. The tail squares off instead of the feeder v-fork.
- Currently trollers cannot keep these kings but when they move into the terminal harvest areas seine and gillnet can keep them. Double standard? You decide.
- I can speak from experience from spring trolling around Sitka. You might catch 1 to 6 a day, most of the time zero. Because the spring king price 5 a day at \$ 8.00 per pound adds close to \$400.00 to your fish check. It is meaningful to our bottom line.

Thank you for serving Alaska and coastal communities in this go around.

Appreciate your time and diligence.

Sincerely John Murray 224 Observatory st. Sitka Ak.

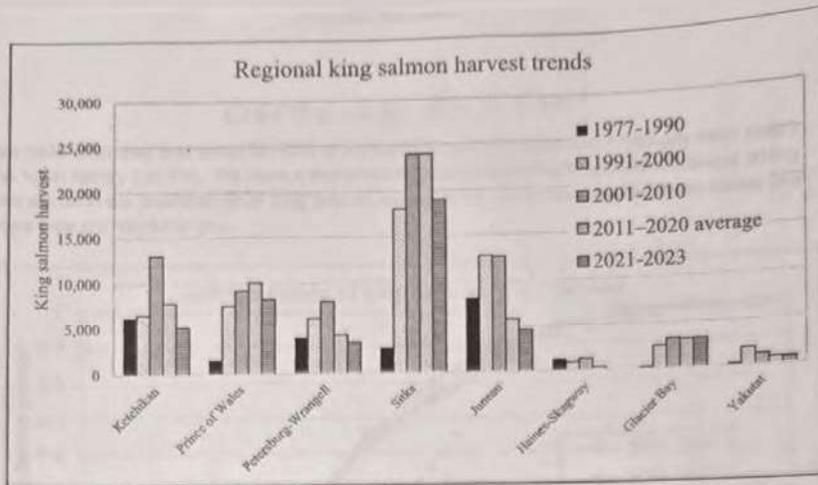


Figure 6.—Average estimated harvest of king salmon in Southeast Alaska for 1977–1990, 1991–2000, 2001–2010, 2011–2020, and 2021–2023 as determined by the Statewide Harvest Survey (SWHS).

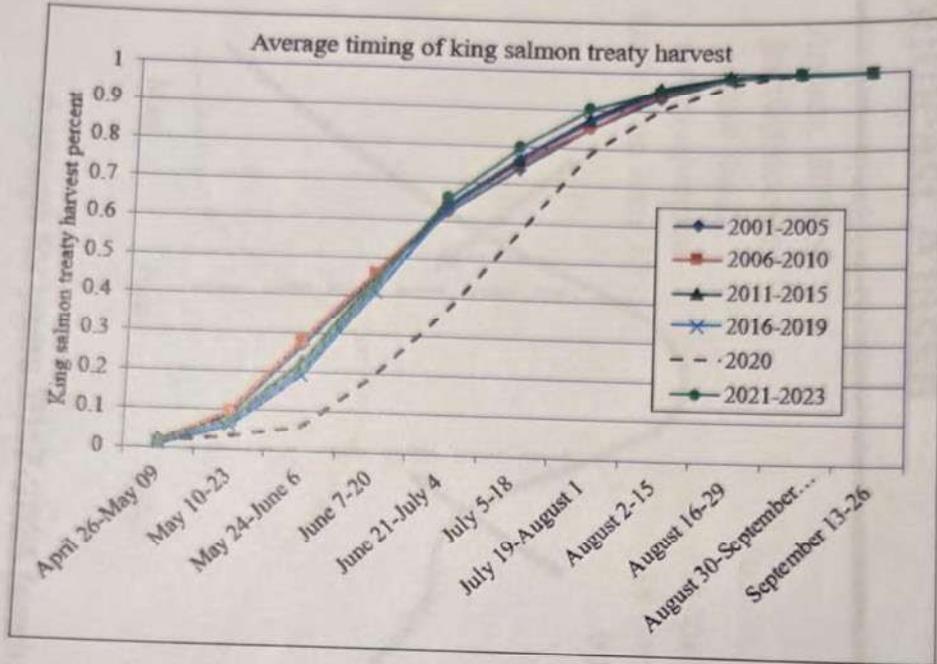
HARVEST BY RESIDENT AND NONRESIDENT ANGLERS

Marine and freshwater harvests of king salmon by both Alaska resident and nonresident anglers have been estimated since 1987 (Figure 7, Tables 11 and 12). In the late 1980s through mid-1990s, the proportion of fish taken by nonresident anglers increased from 28% in 1987 to a peak of 68% in 1994. In response to increasing harvest in the sport fishery, the board implemented annual limits for nonresidents in 1997. Annual limits, as well as lower bag and possession limits for nonresidents, reduced the proportion of the total harvest taken by nonresidents up through 2010, averaging 55% between 1997 and 2010. Growth in the nonresident fishery occurring after 2010 is reflected in the increase in nonresident harvest. The proportion of nonresident harvest in the most recent 5 years (2019–2023) has averaged 67% of total harvest.

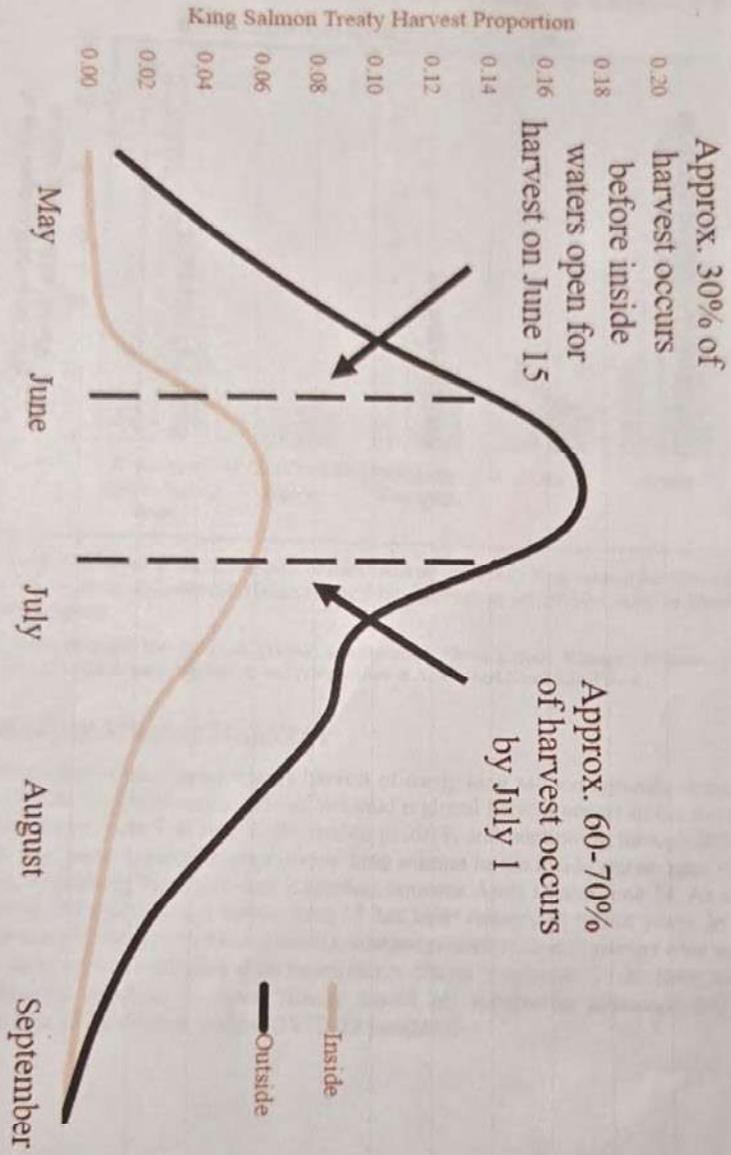
OVERVIEW RC3 Tab 1

Overview RC3 Tab 1

We have estimated that about 60-70% of the harvest occurs before July 1 typically each year in the sport fishery just FYI. We have a few general graphs regarding king salmon harvest timing that will be in our published BOF king salmon written report and I have copied these below and hope they are helpful to you.



King Salmon Harvest Timing in Southeast Alaska



Average for years 2017-2024 (excluding 2020)

OVERVIEW RC3 Tab 1

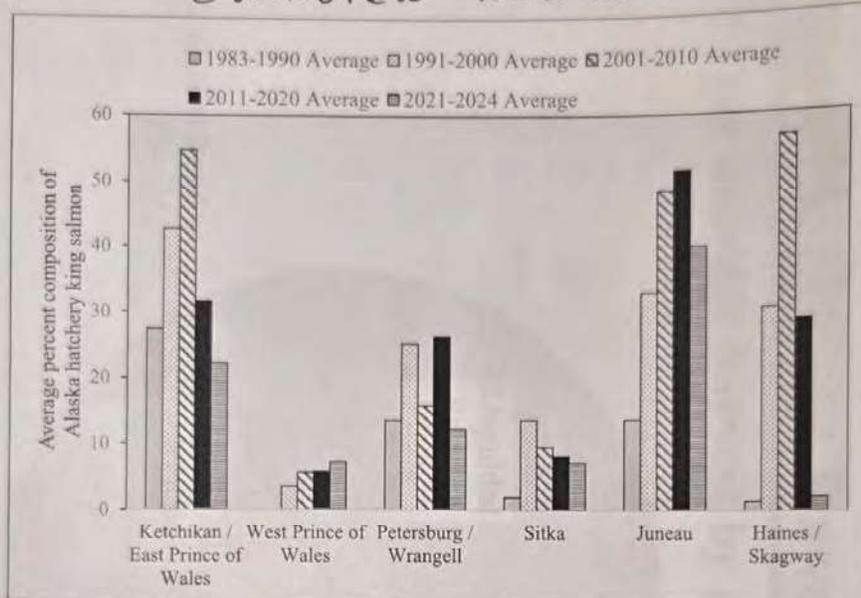


Figure 8.—Estimated percentages of Alaska hatchery-produced king salmon harvested in selected marine sport fishery areas in Southeast Alaska during 4 time periods as determined from the SEAK Marine Harvest Studies program.

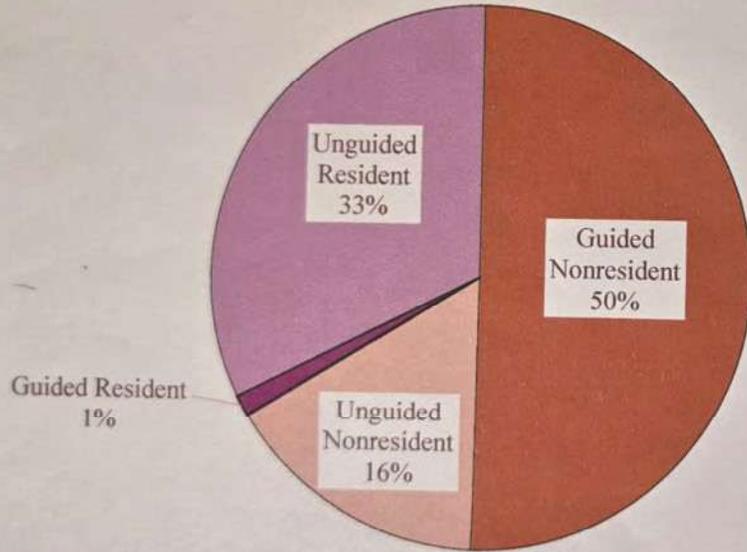
Note: Some terminal harvest areas (THAs) are excluded. These include Wrangell Narrows THA in Petersburg, shoreline fisheries near hatcheries, and release sites in Juneau and Ketchikan THAs.

TIMING OF MARINE HARVEST

The midpoint of the marine waters harvest of treaty king salmon typically occurs in mid to late June (Figure 9). On average, 45% of the total regional harvest occurs in the 4-week period from approximately June 7 to July 4. Beginning in 2018, and continuing through 2024, management action was taken to prohibit retention of king salmon in the inside waters near Haines/Skagway, Juneau, Petersburg/Wrangell, and Ketchikan between April 15 and June 14. As a result, regional harvest in the early season before June 15 has been reduced in recent years. In 2020, observed harvest was shifted later in the season due to management actions to protect wild stock king salmon in the early season combined with increasingly liberal regulations in the latter half of the season as it became apparent the sport fishery would not achieve its allocation due to the reduced nonresident effort related to the COVID-19 pandemic.

King Salmon Harvest by Sport Angler Type – Statewide Harvest Survey

10 year average harvest by angler type (2013-2022)



Submitted by: Mageda Nader
Community of Residence: Sitka

I recommend that the board of fish select the elements of proposals 173 through 177 which may provide the greatest protection to spawning herring by increasing the minimum threshold, reducing the harvest rate, and establishing a maximum cap on 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 179 to protect an important subsistence harvest area as well as proposal 181 to minimize herring mortality from test sets.

I oppose proposals 182 and 183 to expand access of commercial permit holders to hearing in Sitka sound. Listen to the traditional owners of the land when they are pleading for us to make changes based on their generational knowledge. If we want herring to be around for the next generation, please listen to these suggestions and move forward with co-management and indigenous knowledge. Thank you.

Submitted by: Melyssa Nagamine
Community of Residence: Craig, Prince of Wales

I strongly oppose proposal 156. Hatchery chum is essential to the economic health of our Southeast Alaska fishers. The hatcheries are already struggling economically (as are the processors and fishermen) and limiting production would put them at further risk to no longer be able to operate.

I strongly oppose proposal 165. I see no benefit to delaying the opener to Monday morning. If a fisherman has concerns about conflict with sport fishermen, then the solution is to be proactive about communicating and watching your net. Giving fish and game the chance to hear reported catch on Monday morning can only benefit the fleet - as the other option is to have them manage excessively conservatively from lack of information.

Submitted by: Chris Nagy
Community of Residence: haines

I oppose proposals 242,156,108,113

I support proposals 110,111,116,117

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

Dear Members of the Alaska Board of Fisheries,

My name is Riley Naylor, I am a charter captain working out of Craig, Alaska area on Prince of Wales Island. I appreciate your attention to public comments and your interest in understanding how the proposals you will deliberate will affect me as well as the different user groups in our region.

In my area, around Craig AK. The past king salmon regulations have worked well. Anglers get more opportunities at King Salmon in the first half of the season (June through mid-July) when there are fewer opportunities at other species, specifically other salmon species. After mid-July, opportunities for King Salmon decrease but that is offset by the arrival of Coho salmon and plentiful opportunities for them.

I fear decreases in king salmon opportunities will most certainly hurt business and will be impactful to many local economies that rely on non-resident angling participation especially during the short summer months.

Below are a few of the proposals that I **SUPPORT**:

SUPPORT Proposal 108- SEAGO's proposal which helps maintain a 3-2-1 type platform like we have had, but adds an additional ceiling cap of 5% of the troll fishery to help protect comm. fish from having sport/charter going too far over their allocation and into their quota, and also runs on a 9 year average since returns have a history of being cyclical over time for possible payback provisions if needed. This will also help provide a little stability within the industry.

SUPPORT Proposal 113- shifts to an allocation of 75/25 which would help give enough King Salmon to the sport and charter industry through most allocation levels (not all in cases of very low return years).

Below are some proposals that I **OPPOSE**:

OPPOSE Proposal 104- Subsistence allocation of 5,000 King Salmon. Don't support as Federal Fisheries handles subsistence allocations.

OPPOSE Proposal 116- Science does not support this type of regulation in years of high abundance.

OPPOSE Proposal 117- Science does not support this type of regulation in years of high abundance.

OPPOSE Proposal 119- Closing two days a week to Non Resident King Fishing - Science does not support this type of regulation. This would be detrimental to charter operations serving non-resident anglers and the local economies that support them.

OPPOSE Proposal 120- Closing weekend to Non Resident King Fishing - Science does not support this type of regulation. This would be detrimental to charter operations serving non-resident anglers and the local economies that support them.

OPPOSE Proposal 140- Only allow Barbless Circle Hooks outside Terminal Hatchery Areas (THA's). Unnecessary and not supported by Science

OPPOSE Proposal 141- No baited hooks outside THA's. Unnecessary and not supported by Science

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,
 Riley Naylor

Submitted by: Nik Nebl
Community of Residence: se alaska

proposal 156, I oppose prop 156

30 years seine boat owner.

Submitted by: Darby Neil
Community of Residence: craig

The sportfishing industry does not only provide food, Alaskan sportfishing provides an experience found nowhere else in America. The amount of cash flow generated per pound of fish is worth so many times more than simply catching fish to sell. Entire communities of people who work in the various support industries are dependent on it to survive. We need to protect our sport fishing industry as much as the fish.

Submitted by: Nicholas Nekeferoff
Community of Residence: Sitka

Proposal 105 - Support Contingent on Conditions

This proposal supports the King Salmon Management Plan with the following critical conditions:

EEZ Waters:

State Waters Definition: Explicitly acknowledge that "inside waters," including areas within the 3-mile limit (commonly referred to as "donut holes"), are considered state waters for the purposes of this action.

EEZ Regulations: Ensure that regulations in the Exclusive Economic Zone (EEZ) mirror the more restrictive bag and possession limits currently in place for non-residents in state waters.

King Salmon Management Plan Amendments:

Prioritize Sport Fishery Management: Emphasize the importance of managing the sport fishery in-season to harvest 20% of the remaining annual king salmon allocation after deducting the net allocation.

Resident Priority: Move the resident priority language higher in the plan to underscore its significance.

"Sport Fishery" Terminology: Reinstate the term "sport fishery" throughout the plan where it was previously removed.

Allocation Averaging: Eliminate the provision that averaged the sport fish allocation over time, recognizing the significant growth of the fishery and the ambiguity surrounding this provision.

Two Rods in Winter: Include the provision for two rods in the winter as a baseline management measure.

Sunset Language Repeal: Repeal the sunset language as the plan is already subject to review and potential adjustments during each Board of Fish cycle.

EEZ Management: Incorporate a provision explicitly stating that non-resident management measures (bag limits, possession limits, etc.) will apply to all users within the EEZ.

Allocation Split: This proposal supports an allocation split of 80% troll and 20% sport, with management authority granted to the Department to ensure that the sport fish allocation is not exceeded through the use of in-season management measures and to prioritize resident sport fishing within the state waters portion of the sport allocation.

Other Proposals:

Proposal 108 & 113: Oppose the reallocation of king salmon to the sport sector.

Proposal 129: Support Proposal 129 to add a second day to the Yakutat Bay spring troll fishery, providing additional opportunity to reach the seasonal harvest limit without increasing the king salmon allocation.

Proposal 130: Oppose Proposal 130. Any significant changes to chinook salmon management require review and approval by the Pacific Salmon Treaty.

Proposal 131: Support Proposal 131 to allow for limited harvest fisheries to occur in place of the second summer retention period, providing the Department with flexibility when smaller allocations for treaty chinook salmon make a competitive fishery difficult to manage.

Proposal 169: Support Proposal 169 to allow the use of fishing rods in conjunction with downriggers by hand troll permit holders during the spring and summer commercial troll seasons.

Submitted by: Norval Nelson
Community of Residence: Juneau, Alaska

Opposition to Territorial Sportsmen, Inc. Proposal 242

Norval E. Nelson, Jr.

[Redacted]

Juneau, Alaska. 99801

[Redacted]

[Redacted]

January 9, 2025

Board of Fish

January 28, 2025 BOF Mtg, Ketchikan

ADF&G Electronic Submission on 1/14/25

Dear Members of the Board,

My name is Norval E. Nelson, Jr. At 72 years of age, I continue to fish the waters of Southeast Alaska and possess a K69A non-severable Tanner/Red/Blue/Brown King Crab limited entry permit. I am writing to strongly oppose the Territorial Sportsmen’s Proposal 242 intended to close the entirety of Section 11-A to commercial red crab fishing and to “allocate at 100% to personal use”. Proposal 242 is written to impose the Territorial Sportsmen’s reasoning and interpretations of management’s reports on the board when in fact, the “findings” in Proposal 242 are flawed and biased, nor in keeping with the board and management’s duty of care to “conserve and develop the fishery resources of the state”.

As background history, my father Norval H. Nelson, Sr., (Ole), grew up on his family’s homestead at the mouth of Fish Creek, North Douglas, and attended school at Fish Creek and Tenakee. Ole and his father Arnt Nilsen were boat builders, longliners and trollers. After an honorable discharge from the army, Ole returned to his family’s homestead and back to his life as a commercial fisher and carpenter. In the late 50’s and early 60’s, Ole and a few other fishermen pioneered the first commercial red crab fishery in the waters surrounding Juneau, Taku, Douglas Island, Auke Bay and eventually ventured out to Lynn Canal, Chatham Straits, Peril Straits, Icy Straits, Glacier Bay, Stephens Passage, Frederick Sound (inclusive of Taku Inlet, Snettisham, Gambier, Pybus, Seymour Canal, Widman Bay, Holkham Bay, Tracy Arm). Ole fished the F/V Curlew, F/V Aleut Princess and lastly the F/V Christian up until he was 93 years old with the help of his grandson Norval E. Nelson III.

I was born at St. Ann’s hospital. I lived in North Douglas, Auke Bay, Fritz Cove, and Juneau my entire life. At the age of 15, I began to fish crab, halibut, cod and rockfish with my father (some 57 years ago). Fishing is not only what I do, but also who I am. As a descendant of Unangax from St. Paul Island and those unjustly interred/imprisoned at Funter Bay during WW II, I represent the unbroken line of indigenous fishers of this state since time immemorial. I have been a longliner, a gillnetter, a crabber, a

seiner, a troller and a tenderer. Just as many of you who earned your credentials in business, law, science, and the like, I have earned my credentials of learning and knowing the land and waters and its bounty from a life on the waters of Southeast Alaska to Yakutat Bay, to Icy Bay, through the Gulf of Alaska, to the Aleutian Chain and to Bristol Bay.

My wife Barbara and I reared four children in Juneau “in the house that crab built”. We fed, sheltered, clothed, and educated our children from commercial fishing income. Our children are now adults and have families of their own.

Our family business is the F/V Star of the Sea, Inc. My wife, son and I each possess SE Commercial Red Crab permits, and other various permits. Our vessels, F/V Star of the Sea and the F/V Trinity, are rigged for crabbing, herring seining, salmon seining, and tendering.

In 1972, my father sold his 55’ crabber/longliner – the F/V Curlew--and we became partners in the purchase of the 78-footer F/V Aleut Princess from Kodiak where she fished in the glory days of king crab fishing in the Bering Sea and Kodiak. The Aleut Princess was the first commercial fishing vessel in Juneau larger than the standard 58 footers. I mention this because in the early 80’s, there was a local campaign to bar vessels over 58 feet from Section 111-A red crab commercial fishery –with the argument that smaller vessels could not safely fish outside the waters of Auke Bay nor compete with the Aleut Princess.

Territorial Sportsmen’s Proposal 242 is not a new agenda. There were many other campaigns to restrict and/or eliminate my father and me from participating in the red crab fishery, one most notable affront was led by [REDACTED] who both represented by office and deed the Territorial Sportsmen in their effort to create an exclusive red king crab fishery for personal users only (which includes sports charter). This effort came on the heels of the start-up of the limited entry program– another vicious campaign which negatively impacted my family and many others. While my father pioneered the first commercial fishery in Juneau waters and Glacier Bay, and while I fished in the majority of these years as well, it took close to 20 years for CFEC to finally grant each of us our earned K69 crab permits and our Glacier Bay lifetime access tanner crab permits. The red crab fishery was closed in Glacier Bay. CFEC eventually eliminated over 30 red king crab fishers regionwide from the SE fishery; 58 remain, all but two are Alaska residents, of which 13 fished the last commercial opener in Section 11-A during a 24-hour opener with 20 pots per boat.

As an outcome of many campaigns throughout the past 50 years to tie the hands of commercial red crab fishers, the commercial king crab fishers lost critical fishing grounds – Gastineau Channel, Auke Bay waters, Outer Point across to Horse and Colt Island, Barlow Cove, Portland Island Trench, Lena Point, North to Eagle River, up to Amalga Harbor—and also lost fishing time (from weeks to days to now hours in 11-A), loss of annual fishing seasons (15 seasons since 1998) and the loss of the number of pots (from 100 to 20).

Proposal 242 asserts at least fourteen (14) findings through the lens of the Territorial Sportsmen’s biased and self-serving reasoning but most egregious and ignorant is the assertion that “the red king crab fishery in Section 11-A is not economically significant”. If their argument is that the absence of a commercial fishery is not impactful, think again.

If passed, this change to 5 AAC 34.111 Section 11-A red and blue King Crab Management and Allocation Plan would have significant negative impacts on the local economy and the livelihoods of commercial fishers who depend on this fishery. Mind you that each CFEC Red King Crab Limited Entry Permitholder (59 in total) represents a business as much as the other businesses they rely on – ship stores, grocery stores, fuel companies, fish companies, etc. The economic contributions to local economies from the red crab fishery matters. The red crab fishery revenue contributes significantly to related businesses such as processing plants, transportation services, and local markets. The closure of this fishery would have a ripple effect, leading to job losses and economic strain across multiple sectors.

Many fishers participate in other fisheries and each fishery counts toward the stability and growth of their fishing business. The commercial red crab fishers have individually and collectively born the sole weight of loss and sacrifice due to the numerous commercial red king crab closures since the 1998/99 season (approximately 15 closures years to date) including the loss of traditional fishing grounds closed to them in favor of personal use fishers. The loss of this income impacts a commercial permit holder's ability to meet their business overhead expenses, to maintain their vessel, to insure their vessel, to fulfill their financial obligations for themselves and for their families (including medical, dental, vision insurance), and to invest in their retirement accounts, etc.

The closure of Section 11-A to commercial fishing would have a double-jeopardy effect as declared by ADF&G Fishery managers in response to Proposal 242, "Removing the 11-A area from this estimate [the sum of biomass estimates across the region], will make reaching the 200,000 lb. threshold more difficult." Management response to P- 242 states that if not for the 11-A survey counts of legal red king crab males, there would have been four additional closures (in the years 1997/98, 2001/2002, 2003/2004, and 2005/2006).

As noted in Proposal 242, the Territorial Sportsmen did not work in coordination with others, or with ADF&G Advisory Committee in its development. With such a drastic act to "repeal 5 AAC 34.111 and readopt 8 AAC 34.111," a public process should be required before moving such a proposal to the BOF for action. In addition, for this proposal in particular, ADF&G should collaborate with other experts such as CFEC Fishery Economist to assess the risks.

Not working collaboratively and transparently undermines, disregards and destroys decades of time and effort and trust building among the Board of Fish, former ADF&G fishery managers (Tim Koeneman, Don Ingledue, Paul Larson, Ken Imamura, Gretchen Bishop, and Chuck McCloud (Kittiwake and Stellar) to name a few), RKC permit holders, industry (buyers, businesses including RKC permit holders/vessel owners), and other stakeholders invested in the effort to fulfill the Board of Fish's dictate to "conserve and to develop the fisheries resources of the state." In many of the years of management closures of the commercial red crab fishery, I have personally advocated among commercial fishers to stand down when my own findings corroborated ADF&G stock assessment findings.

The commercial fishers in section 11-A have consistently demonstrated their commitment to responsible and sustainable fishing practices. Commercial fishers adhere to strict regulations that ensure the long-term health and viability of the red crab population. Compare this to the personal use fishery's honor system to report their catches. Without adequate monitoring by law enforcement, the personal use harvest data is far from accurate.

Without a strict monitoring system of the personal use fishery, the delicate balance that has been achieved through years of careful management and collaboration between the fishing community and regulatory bodies is at risk.

It is also important to consider the broader economic implications of this proposal. The commercial fishers serve the public at large (the other 31,000 Juneau residents) who do not have the wherewithal to engage in the RKC personal use fishery. Many commercial fishers sell their catch at dockside. Other than this access, residents only have access to Russian caught red king crab at local food markets and restaurant who in turn sell RKC for \$38 per pound or a full crab for \$275 at a restaurant. Equity is access and access to the RKC for those who do not fish is through the commercial fishers.

Considering these concerns, I urge the Board to VOTE NO on Proposal 242. I believe that a more balanced and collaborative approach is needed to address any issues within the red crab fishery. Instead of an outright closure, I recommend exploring alternative measures such as enhanced monitoring, increased research, and the implementation of adaptive management strategies that can ensure the sustainability of the fishery while protecting the interests of all stakeholders.

My recommendation is to protect the RKC habitats during the months following their reproductive cycle (February through April) by closing the fishery to all user groups regionwide (including Port Frederick) and then reopen to all user groups at the same time no earlier than October if stock assessments support a harvest. As it is, personal use fishing during the summer months disturb the KRC fragile habitats and put at risk the female crab carrying 50,000 to 500,000 eggs. As a side note, the RKC shells are soft during the months of June, July, and August. The meat in the crab legs is at optimum in late October and November.

To have a credible and reliable RKC stock assessment survey, I recommend that ADF&G use commercial industry square pots (7 x 7, 500 to 800 pounds). ADF&G cone pots are subject to landing top down and/or “bouncing” “walking” on the bottom due to heavy currents --both of which make it impossible to catch king crab. Also, change the survey schedule from the months of June, July and August to late September. And to achieve consistent and comprehensive stock assessment data, include Port Frederick and all other assessment grounds in each annual survey.

I sincerely hope that the Board will take into account the voices of the commercial fishing community and the broader economic impact and vote “No” on Proposal 242.

Norval E. Nelson, Jr.

F/V Star of the Sea, Inc.

[REDACTED]

[REDACTED]

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

Dear Members of the Board of Fisheries:

My name is John Nettleton of Haines, Alaska. I am a subsistence, commercial, personal use, and sports fisherman.

We rely on our local fishing fleet to provide product for our family-run business and as a source for a large portion of our own personal food supplies at home. Our kids also rely on commercial salmon fishing as summer employment while school is out of session. It's one of the few meaningful employment opportunities here for our kids.

The local fishing fleet is a huge economic driver here in Haines. They support local vendors for nearly every aspect of their lives and businesses. Aside from the commercial side of this, you have so many families that rely on these salmon stocks for food. Wildlife that are able to maintain in this ecosystem also rely on the salmon, it is paramount that we retain these aspects.

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 believe it would do more far reaching harm than can be immediately understood, and would not be a positively beneficial measure.

Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish,

are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

John Nettleton
Haines, Alaska



Submitted by: Todd Nevers
Community of Residence: Sitka

156, if passed would have significant impact on many communities and fishing fleet of these in s.e Alaska, 167 would allow bigger seiner an unfair advantage over smaller ones that can't pack any larger net than they have pre-existing, 168 has been happening with this loophole and something needs to be done about it

Submitted by: Jamie Newland
Community of Residence: Juneau

Personally I'm all for more red crab but if you're gonna hurt the commercial fisherman maybe you should do a state buy back for the 58 king crab permits . \$800,000 - 1.2 million is fair per permit . Unfortunately it's gonna not only hurt the permit holders but their family's too and their future generations. So unless 242 is going to pay out those commercial guys then I'm opposing it .

Submitted by: Willem Neyhart
Community of Residence: Juneau

Dear Alaska Board of Fisheries,

My name is Willem Neyhart and I am a young commercial fisherman from Southeast Alaska. I've been fishing for five years but haven't had the opportunity to participate in the Red King Crab Fishery because it has been closed during my career. Meanwhile, sport fishermen in our area have continued to target Red King Crab and have taken more than their fair share. This imbalance is frustrating, especially for those of us who depend on the commercial fishing industry to make a living.

Proposal #243, put forward by the Alaska Department of Fish and Game (ADFG), is a step toward fairness and sustainability. The proposal ensures that the harvestable surplus of Red King Crab is responsibly accessed by commercial fishermen while protecting the resource for future generations. It's a balanced and necessary approach that benefits all stakeholders—fishermen, processors, and ADFG.

A three-month season extension is critical. It allows commercial fishermen the time needed to fish safely and efficiently while maximizing the value of the crab. This also provides processors with the steady supply they need to operate successfully, which supports our local economies and communities.

As someone building a career in this industry, I rely on decisions that ensure sustainable fishing opportunities and fair access to resources. Commercial fishing is a cornerstone of Alaska's economy, and the Board of Fisheries must make decisions that reflect its importance. Proposal #243 is a fair and practical solution that will help keep this vital industry strong.

Thank you for considering my comment. I urge you to approve Proposal #243 so that young fishermen like me can have a future in this industry and a chance to participate in a fishery that has been closed to us for too long.

Sincerely,

Willem Neyhart

My name is Ryan Nichols, I am 37 years old, I was raised on a family operated troller that I now Captain, and I am a lifelong resident of Sitka, Alaska. I've never missed a fishing season and the summer Chinook troll fishery is a substantial portion of my annual income. The troll fishery is unique and has been around for decades. It used to operate statewide, has now been restricted to operate only in Southeast Alaska, and the fishery is made up largely of local southeast Alaska residents (over 80%). There is a large number of younger, entry level fishermen and young families that have bought into the troll fishery, as the ability to fish multiple seasons of the year, and low permit prices around \$17-18k have made this fishery accessible. Without continued, stable access to chinook, this fishery won't pencil out for many of the local participants who are trying to make a go of it.

King Salmon Management Plan:

The current plan, which has been allowing charter anglers to harvest Chinook beyond their allocation and re-allocating fish from trollers mid-season has had substantial negative impacts on my livelihood in many different ways. I direct market my salmon and nearly all of my fish are spoken for at the beginning of the season – losing access to chinook salmon, which are the most valuable fish I catch, has been destabilizing and problematic for the markets I fill, **how can I maintain a market if entire openers are being taken away and I can't even count on the opportunity to go fishing? It is no different for me getting shut down then it is for a Charter operator – its disruptive and bad for business.** It is ADFG's interpretation of the King Salmon Management Plan in 2022 that has allowed an open-ended amount of fish to be given to the charter sector from other fully utilized fisheries – this has had substantial negative impacts on trollers and also on local sport fishermen access. I think it is important to note that these fish would have been fully utilized if we had been allowed to harvest them, there was no pandemic or other issue that would have prevented this.

The charter sport fishery, made up primarily of nonresident angler harvest, is a commercial, for-hire industry, and should be effectively managed along with the rest of us. Allowing unrestrained growth while other sectors are carefully managed down the last fish goes against conservation and undermines many of the goals ADFG seeks to achieve. This is not sustainable – why would you allocate more fish to a sector that you don't have tools in place to manage, that doesn't have good catch accounting, and that sees harvest going to nonresidents and away from Alaskans?

It is not reasonable to expect the troll fleet to be the bank to fund the for-hire charter sector's unrestrained growth. Its simple math, the ADFG Sport Fishery Report (Special Publication No. 24-19) states that the sport fishery is growing at a rate of about 4% per year. "In 2023, 155,584 anglers fished in SEAK, of which 82% (127,152) were nonresident anglers. This report also states that there were **617 saltwater charter vessels operating in 2023.** Most vessels are able to carry 6 clients per day, and a bag limit of one king salmon per day was implemented in 2023, along with a total harvest limit of 3 fish Jan 1-June 30, 2 fish July 1-July 15, and 1 fish July 16-Dec 31. Charter operators tend to begin operating in May, and are typically booked until sometime in early September. I think it's a fair estimate to say charter operators often operate their vessel

about 100 days of the year. That means, based on current trends, the BoF authorized the potential harvest of:

617 vessels x 6 clients per vessel x 1 king salmon per day x 100 days = 370,200 fish.

2023 king salmon sport fishery allocation: 39,036 fish.

I realize that these numbers are simply an estimate – not all registered vessels are operating every day, nor are they operating at full capacity every day. Regardless, there is no other fishery being afforded this level of growth and this minimal level of management where the potential for this level of impact is even considered. By not managing the charter sector's expectations, the BoF and ADFG are feeding into the years of strife and allocative battles between the charter sector and other sectors. This isn't good for anybody.

Suggested Modifications to the King Salmon Management Plan:

There are several proposals directed at reducing the charter sector's impact on the troll sector's chinook allocation. I am in strong support of the BoF taking action on this, but neutral for exactly how it is achieved:

- Provide ADFG with the authority to manage for-hire harvest in-season (not post season for the next year), and direct ADFG to do so when excessive harvest by this sector is expected to impact local sport fishermen or the commercial troll allocation. "Borrowing" chinook from the troll allocation undermines the entire point of having an allocation, destabilizes a primarily local fishery with participants in every community across southeast Alaska, and goes against ADFG's conservation and management efforts. The 80/20 split should be maintained and management should be directed to enforce this. There are a number of proposals aimed at achieving this, the BOF should take action to do so.
- Set season dates for the for-hire charter sector. I would suggest May 15th to July 15th. Right now, charter operators can take clients out fishing year round. This is outdated policy and should be remedied – there is no other fishery that exchanges money for the harvesting of chinook that doesn't have season dates. Another option would be to not allowing for king salmon retention on certain days of the week to reduce overall harvest. Efforts to reduce the nonresident annual bag limit without violating the MSA to keep the sector within their allocation should also be considered.

An agreement is an agreement and it should be managed that way. Why is it that the troll fishery is managed down to the last fish throughout the season, and shutdown on sometimes less than 24 hour notice, yet the charter industry cannot be managed in-season whatsoever? This is confounding to any kind of logic – regardless of who harvests the fish, we have a responsibility to understand what we are harvesting and where it is going. We have every ability to account for every fish caught in a timely manner (in-season, not post-season), its just a matter of if the BoF wants to direct ADFG to do so.

Specific Proposals:

Proposal 108: I do not support this proposal. It is unlikely we will be operating at levels of high abundance any time soon, and the “give and take” nature of this is likely to be one sided (note the 4% charter growth mentioned previously) and provide more benefits to the charter sector than the troll sector. We have the management tools to manage the sport fishery to a 20% allocation, the BoF should authorize this and direct ADFG to do so. If the sport fishery feels that these management measures are not palatable, I would suggest they consider capping vessel participation and sector growth, and/or that they take a hard look at the Pacific Salmon Treaty allocations and outcomes. The trollers are pitted against the charters in this case, but when you look at the chinook management and harvest occurring in the lower 48, Alaska should all be standing together to increase our collective access to these fish.

Proposal 113: This is a direct reallocation of chinook from trollers to the sport fishery, most of which would go to nonresident anglers. I am strongly opposed to this. I am a resident of southeast Alaska, I live here and I fish here, along with the majority of other trollers. The BoF may want to consider what proportion of charter guides, lodge owners, and anglers themselves live and work in the region as it weighs this proposal. The troll fishery provides a multi-season economy for residents all over southeast Alaska who have limited access to other opportunities. This proposal doesn't make sense for Alaskans.

Proposal 196 and 194: sablefish pot escape rings I support changing the size of the escape rings to 3.5” I personally do not see the need for a larger escape ring especially with the Gulf of Alaska sablefish fishery having no escape ring requirements. The state water sablefish fisheries are not closed systems and sablefish swim back and forth in the state and federal fisheries. Having a 3.5” escape rings makes it easier to use one set of pots in both fisheries without impacting the harvest of immature sablefish.

Proposal 198: Sablefish bag limit increase: I oppose this proposal as written. I do not think the sablefish bag limit should increase (as written) due to the fact that if the bag limit was increased as worded both residents and non-residents would be able to catch more sablefish. This proposal should be written to increase the resident bag limit and to leave the non-resident bag limit as it stands. This is in my opinion due to the fact that the majority of the non-resident harvest is through the charter/for hire fishing sector and will greatly increase the catch of sablefish and long-term would not particularly help the resident fisherman.

Proposal 199: Lingcod weather delay – strongly support, this just makes sense, especially for the Yakutat fishery. Having fished this fishery, good weather is VERY important to the safety of all involved. It can be up to a 9 hour run into the only bay that is accessible for this area. The East Yakutat area is an offshore fishery and weather should definitely be a factor in the starting date of this fishery.

Proposal 203: Lingcod General Provisions: I oppose this proposal due to the fact that the unguided non-resident fishing sector is seeing steady growth and many of these boats operate closer to the towns and areas that local, resident sport fishermen also frequent. Lingcod see

enough pressure as it is and I feel that by loosening the regulations on size etc. for unguided non-residents only sets the stage to allowing guided non-resident anglers have the same regulations. Lingcod are easily overfished in a localized area and should have restrictive protections in place to not allow overfishing. I also believe that resident anglers should have access to these fish, especially near town, and not have them be fished to localized depletion by non-resident anglers.

Submitted by: Kraig Norheim
Petersburg

Community of Residence: Petersburg

Proposal 222

Oppose- Subsistence and personal use shrimp fisheries have been traditionally open year round with no bag or possession limits. Managed by 10 pots per person or 20 pots per boat. A three (3) pound limit is unexceptionable due to the expense.

Proposal 223

Oppose

Proposal 224

Oppose- To many shrimp barred shrimp this time of year. Traditionally before 1995 opened in May. Only after limited entry did it change.

Proposal 225

Oppose- Let the fisheries prove that opening in May will help the resource rebound from catching all the barred shrimp from twenty years of an October opening.

Proposal 226

Oppose- The Department adjusts according to previous landings and surveys.

The larger fleet was done by CFEC in 1995 by moving the cut-off date forward to Dec 31, 1995 instead of back to Jan 1, 1995 which would have followed the state statute.

It was a 2 to 1 vote to move the date forward.

Proposal 227

Oppose

Proposal 228

Oppose

December 30, 2024

Feedback to Proposal #242

When I was a member of the King and Tanner Task Force, 15 – 20 years ago. 11-A struggled to recover after a commercial fishery and to the best of my knowledge never over harvested the poundage set by ADF&G. We could not figure it out, until I was approached by a biologist. I can't remember his name. He managed the sport or personal use Red King crab fishery in 11-A at the time.

He told me that personal use fishers have a 9-month season, with a 4-pot limit. OK. The kicker is there were 8K permits issued. I did the math, if every permit user used 4 little, I call them "Fred Meyer" pots. That's 32K pots for 9 months, I narrowed that down to 8K permits, 1 pot x 1 crab per pot over a 9-month period at a 7lb average came out to be 56,000 lbs. Which was the entire harvestable quota set forth by the ADF&G for 11-A at the time. The commercial fishery was not to blame for the over harvesting, just a scape goat. It was the personal use fishery which caused the decline as you can see.

This brings me to proposal #242.

Proposed by Territorial Sportsman Inc. sounds like a money-making entity.

If our 40% of 11-A is harvested by the personal use fishers it will be just rosy, there will be super bowl crab forever.

On the other hand, if commercial fishers catch the 40% to bring much needed fish tax and income to a small fishing community like Petersburg, with schools, and small businesses to support. It is automatically presumed by the Territorial Sportsman Inc. that the crab fishery will be decimated by the commercial user group. If the commercial user group catches the 40% allocated.

There are not a lot of government guarantees in Petersburg.

I know a few people like this" ALL FOR ME". I sure wouldn't want Territorial Sportsman Inc. running our fisheries we would all be out of business long ago.

As far as #243 goes it's not perfect but as I see it a start for something good.

I have held a red crab permit for 35 years and fished 10 or less seasons. Fortunately, for me my permit is now paid for. While my son who bought his permit 5 years ago, paying for the right to fish red crab. Yet, ADF&G has not opened a season to date for him to participate in the fishery he is paying for.

Personally, I have always had an issue with ADF&G on how they conduct the red crab survey.

#243 will allow us to incorporate our catch data with the Departments to get a better picture of the Red Crab abundance and health. Believe it or not commercial fishers love healthy fish stocks. It is our livelihood for the skippers, deckhands, processors, their crew and in Petersburg the whole community.

Sorry about being vague on the names and dates, but at 65 years old the years just seem to be rolling along too fast. I consider myself a short timer, I almost did not write this response, but the fire isn't out completely. For all the young folks trying to make in the commercial fishing industry, you must respond to threats like #242 from Territorial Sportsman Inc.

Sincerely,

Ladd Norheim

Submitted by: Taylor Norheim
Community of Residence: Petersburg

Proposal #242

Opposition

Reason for Opposition would be the \$50,000 i spent for the "privilege" of being allowed to partake in this fishery. This is one part of the business I chose to invest in for my livelihood. I have yet to be given the opportunity to fish this permit I am required to own to take part in this fishery. Removing 11a the way the current regulations are written would essentially make this permit worthless as we will never reach the required poundage to open the fishery. I propose the sport fishermen buy their own red crab permits and just "sell" their catch to themselves instead of preventing me from making a living by using government to get more for themselves instead of what I do, selling to the world. They already get 60% of the allotment, how is taking the 40% i have never been allowed to sell going to manage the stock better? Basic math tells you it won't and the selfishness of what they are trying to accomplish is visible in the flyers being passed around by the territorial sportsmen. I cannot add attachments so I will just type the flyer out.

WANT MORE KING CRAB FOR PERSONAL USE?

Proposal 242 will be before the 1/28/2025 board of fish meeting. This proposal aims to make unit 11a off limits to commercial fishing for red king crab this will help protect stocks from an impending commercial harvest and cause a reallocation of king crab from commercial crab to personal use in unit 11a!

The well financed, politically powerful commercial king crab fleet is fighting this, so every personal user needs to make their voice heard. Past commercial openings have to all out closures and severe reductions in personal use crab in 11a and adfg has signaled improving biomass will justify another commercial openings in 11a soon.

Google: "ADF&G board of fish" and look for the heading "Submit public comments" and press the Southeast and Yakutat finfish tab.

Support for proposal 242 would limit 11a king crab for sport fishermen only and stop commercial harvest of king crab in 11a.

ACT NOW TO PROTECT AND PRIORITIZE PERSONAL USE OF RED KING CRAB IN UNIT 11A!

Deadline for comments January 14th midnight

This flyer shows two things, they do not know the history and factors affecting the red crab stocks **ESPECIALLY THEIR OWN EFFECTS**. Also that they are willing to lie to get what they want. The effects on the stock over all range from unlimited predation by marine mammals, heavy cruise ship traffic through mixing zones where larval crab live until they are old enough to hit bottom, Maximum

usage by lodges and sport fishermen some subsistence and almost no commercial use. Now nothing has been nor likely to be done about all the cruise ships, nor the marine mammals, lodges and sport users take far more than they are reporting I've seen the fines incurred by the ones that get caught and the pictures from the Juneau guys this summer of their "legal" catches. If commercial was having the impact this proposal claims then stocks would not stay low for so long the ADF&G own information on Red Crab confirms this with their life cycle analysis. Now the lie I do not know who or what this "Well financed, politically powerful" crab lobby is based off the amount of red crabbing I've done these last 5 years I'd say they are more likely to be homeless and irrelevant. I am writing this after putting out a house fire at one of my fellow crabbers, unfortunately he is out of town and the call didn't go out until his home was very much unsalvageable everything he owns besides his boat is now ashes save for a 8 foot ladder, an old kayak and a 4 wheeler. I volunteer as a firefighter to help people when they need it most sometimes its just not enough but it's still the right thing to do. Now what do you think is the right thing to do? Permanently end mine and many others \$50,000 job investment and in my case without ever seeing a dime for it? Or voting this down so people like me can continue to work WITH ADF&G to try and figure out how we can have both an active fishery AND sport and substance stocks. This leads to my support of #243

Proposal #243

Support

Reason for Support would be with this proposal not only would a fishery be allowed. We could also begin implementing many other measures that would allow for Commercial crabbers to start self regulating to do our responsible part in managing ourselves to keep stocks up and profitable. I won't go into the multitude of ideas we go into but this proposal has long term aims to promote good Red crab stock health far into the future for the betterment of the entire region as opposed to #242 which aims to accomplish the continued degradation of over 50 small businesses.

PC370

Submitted by: John Norris

Community of Residence: Homer Alaska

Why do we always choose user groups to penalize? The problem is not nonresidents. The problem is residents that take more than they need! Conservation is needed and needs to be equal for all sport users.



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

January 14, 2024

Alaska Board of Fisheries
 PO Box 115526
 Juneau, AK 99811

Re: Proposal 156; Proposal 158.

Dear Members of the Alaska Board of Fisheries,

Proposal 156

We respectfully request that the BOF oppose Proposal 156 due to the lack of scientific evidence to support the desired outcome of improving wild salmon stocks, and consequential economic burden to all fishery user groups and Southeast Alaskan communities that a 25% reduction in enhancement fish releases would impose.

The Alaska State Legislature had tremendous forethought in 1974 whilst drafting the Private Nonprofit Hatchery statutes to remediate local depressed salmon stocks. By establishing an array of legislative guardrails to ensure that Alaska did not make the same historic salmon mismanagement mistakes that Washington and Oregon have, salmon enhancement programs in Alaska can and do operate in alignment with principles that prioritize conservation and protection of wild fish ahead of commercial fisheries supplementation and economic anthropological benefit.

The *Comprehensive Salmon Enhancement Plan for Southeast Alaska* continues to reinforce those safeguards today. Statutes such as a Genetics Policy, Fish Health and Disease Policy, avoidance of mixed-stock fisheries, and identification of enhanced fish through marking all ensure hatchery fish are produced in a responsible, ethical fashion that will not impose trophic competition or genetic harm upon wild stocks. Change requests to hatchery permits and Annual Management Plans are rightfully heavily scrutinized by ADFG Divisions of Commercial and Sport Fisheries and the Joint Northern/Southern Regional Planning Teams to ensure wild fish stocks remain protected, and the public maintains the right to participate in the process.

The economic effect of a cut to enhanced salmon production and resultant loss of common property harvest opportunity will unquestionably be felt statewide at every level of the seafood producing sector. Furthermore, this loss will come to commercial salmon permit holders during a period of record low fish prices and uncertain global markets. Since 1980, the commercial ex-vessel value contributed to the SEAK economy from NSRAA alone exceeds \$372,000,000 and has alleviated


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harvest pressure off local wild salmon stocks by providing new common property harvest opportunities that otherwise did not exist. This proposal will undoubtedly result in an increase in harvest pressure on wild fish, thereby undermining the objectives of the State of Alaska to protect wild fish populations.

It should be noted that the theory of SEAK hatchery fish imposing harm to wild-born Interior Alaska salmon runs by way of density-dependent, trophic competition is arguable, as these two cohorts inhabit different regions of the Bering Sea (BS), western Gulf of Alaska (GOA), and eastern GOA (Larson, et al. 2013). Genetic analysis in Chinook has shown that seasonal migration patterns of SEAK Chinook and chum stocks are distributed across the GOA year-round, while Yukon and western Alaskan Chinook and chum reside in the middle and western (BS). The North Pacific Fishery Management Council (NPFMC) reports that bycatch of SEAK origin Chinook and Pacific Northwest origin chum in the BS pollock fishery of eastern GOA origin chum comprise only 1.4% of Chinook and 18.7% of total chum. (Ianelli and Stram, 2015), indicating a spatial distribution between the two regional aggregates. The blanket argument behind Proposal 156 that SEAK hatchery fish are compromising wild western Alaskan salmon stocks does not consider the trophic competition imposed by Russian and Japanese origin, wild and hatchery pink and chum which do spatially overlap in the western GOA and BS. The bycatch data does not support concurrent trophic overlap with SEAK origin enhanced production.

As one example of NSRAA's dedication to responsible fisheries management, beginning in 2023, NSRAA's research department has undertaken a multifaceted scientific appraisal of our fall-stock hatchery production of chum in Crawfish Inlet to understand the biological and ecological drivers behind their homing behavior patterns. The Northern Southeast Outside (NEO) summer-chum index stock aggregate is comprised of nine streams across western Chichagof, northern Kruzof and western Baranof Islands, one of which includes the West Crawfish Inlet index summer chum run. Adjacent to this index stream in the neighboring watershed is NSRAA's fall-stock chum stock enhancement program for supplementation of the troll fisheries and as a dedicated cost recovery site. The troll gear group has been below their allocation range since 2006, and the development of the Crawfish Inlet enhancement site has been an opportunity to increase value for this under-performing gear group.

*Larson, Wesley A., et al. 2013. Single-nucleotide polymorphisms reveal distribution and migration of Chinook salmon (*Oncorhynchus tshawytscha*) in the Bering Sea and North Pacific Ocean. Canadian Journal of Fisheries and Aquatic Sciences, vol. 70(1), p. 128–41, <https://doi.org/10.1139/cjfas-2012-0233>.*

Ianelli, James N. and Stram, D. L. 2015. Estimating impacts of the pollock fishery bycatch on western Alaska Chinook salmon. ICES Journal of Marine Science, vol. 72(4), p. 1159-1172, <https://doi.org/10.1093/icesjms/fsu173>.

**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

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Per ADFG escapement data to the NSEO region, the West Crawfish Inlet index has followed the same trend as the other eight NSEO indicator stocks, suggesting impacts to the West Crawfish Inlet index-stock are not derived from hatchery-wild fish interactions. Nonetheless, NSRAA is undergoing a thorough analysis into the homing behavior of our fall chum with regard to stray rates into the above-mentioned index stream. We believe that by extensively evaluating the movement of enhancement chum fry post-release as they exit the migration corridor, we are gaining a better understanding of concurrent influences on imprinting and outmigration patterns. To determine if there could be environmental factors affecting the homing accuracy of this program of fish, numerous freshwater sites within the migration corridor have been sampled for chemical and dissolved free amino acid analysis, both of which are known to influence salmon imprinting and homing behavior.

Spawner surveys on the West Crawfish Inlet index stream have also been performed to evaluate the temporal overlap in spawning seasons between summer chum index stock and fall enhanced chum stock, in order to quantify the proportion of hatchery origin spawners (pHOS) through confirmation of otolith mark presence. Our results to date indicate that the pHOS in the West Crawfish Inlet index stream diminishes rapidly as a function of distance from the tide line. Since the inception of the fall-stock chum release enhancement program in 2015, the relative stray rate of donor hatchery fish to the West Crawfish Inlet index stream has averaged $0.31\% (\pm 0.26\%)$.

NSRAA plans to continue this significant allocation of staff time and fiscal resources to comprehensively evaluate the Crawfish Inlet chum enhancement program to inform fish culture and management decision making. We are committed to working with ADFG in managing this fish production program to ensure that it aligns with the state's resource management responsibilities while still providing common property harvest opportunity to all user groups. We will continue to manage our salmon enhancement programs with the utmost level of scientific integrity and ecological stewardship while serving as salmon management and fish husbandry experts within the broader scientific community.

Salmon hatcheries are often portrayed as willfully ignorant toward wild fish welfare and to have a perceived disregard for responsible salmon conservation biology, which is demonstrably untrue. As hatchery operators, we want healthy wild salmon runs and find collateral damage to wild stocks ethically unacceptable, thereby reinforcing our adherence to the best possible science when it comes to broodstock genetics, and disease management. NSRAA is committed to working with ADFG staff to cooperatively manage enhanced fish production that is in alignment with ADFG statutes, regulations and policies while providing economic opportunities to our SEAK fishing communities.



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Proposal 158

We respectfully request that the BOF support modification of the boundary lines for Hidden Falls Hatchery Terminal Harvest Area (THA) and Special Harvest Area as outlined in 5 AAC 33.374(a) and 5 AAC 40.042(a)(5)(A).

Boundary lines as currently written in 5 AAC 33.374(a) and 5 AAC 40.042(a)(5)(A) are insufficiently clear and therefore annually amended by Emergency Order. As presently written, boundary lines for the Hidden Falls Hatchery THA and SHA are delineated by distance from shore (2 nautical miles) rather than specific GPS coordinates. Because of this ambiguity, since 2011 boundary lines are amended annually by Emergency Order to reflect coordinates outlined in Proposal 158. Changing the language from distance from shore to GPS coordinates provides a much greater degree of clarity to users, and reduces administrative burdens on local biological management staff.

Based on the aforementioned information, we respectfully request that the BOF, oppose Proposal 156, and support Proposal 158. We invite the BOF members to visit our facilities to see firsthand our dedication to upholding a high degree of scientific rigor, stewardship of natural resources, and the added economic value that supports our local fishing communities.

Sincerely,

General Manager



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

January 14, 2025

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

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

OBI Seafoods operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in Alaska seafood processing. Sustainable salmon stocks are the single most important issue to the long-term viability of our company and the ability to maintain our industry's contribution to the state economy.

Following our review of the proposals for the Southeast meeting, we would like to share our comments and positions on the key items outlined.

Proposal 108– Oppose

Proposal 108 raises significant concerns for the processors who serve as a vital link between Southeast Alaska's fishermen and the broader market. The proposed transfer prioritizes non-resident and charter anglers' harvest during periods of low Chinook abundance, under the rationale that they would "pay back" this allocation in higher-abundance years. This proposal is deeply flawed and could have devastating consequences for the regional economy, the fishing industry, and the communities that rely on these fisheries.

The troll fishery is a cornerstone of Southeast Alaska's seafood industry, and Chinook salmon are its lifeblood. Roughly 44% of the troll fleet's total economic impact comes from King salmon, making these fish critical for processors' operations. Many small and mid-size processors in Southeast Alaska are already operating on narrow margins, and the loss of even a small percentage of the troll fleet's allocation would ripple through the entire supply chain. Without a stable and sufficient supply of Chinook, processors would struggle to maintain profitability, forcing cutbacks in staffing, operations, and the ability to buy and process other salmon species. This proposal jeopardizes not only the troll fleet but also the processing infrastructure that sustains entire communities with few economic alternatives.

Processors are acutely aware of the delicate balance required to manage fisheries in times of low abundance, and Proposal 108 disrupts that balance by prioritizing non-resident sport anglers over resident fishermen. The



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troll fleet is the largest fleet in Southeast Alaska, supporting over 1,400 fishermen directly and landing fish in more communities than any other salmon fishery. Without consistent access to Chinook salmon, many trollers simply cannot afford to fish for other species, further reducing the volume of fish available to processors. Moreover, the 2022 changes to the King Salmon Management Plan have already caused instability by allowing the sport fishery to exceed its allocation in recent years, leading to significant disruptions in the troll fleet's operations. This proposal would exacerbate those challenges and put additional strain on processors.

Each King salmon contributes to an economic chain that includes fishermen, processing workers, transportation jobs, and even restaurant and retail industries across the West Coast and beyond. Proposal 108 would undermine this chain by diverting resources from a fleet that sustains local economies and processors to support a non-resident fishery that contributes far less to the region's economic stability. For these reasons, OBI Seafoods cannot support Proposal 108 and urge its rejection to protect the long-term sustainability of Southeast Alaska's fishing industry and the communities it serves.

Proposal 156 – Oppose

Proposal 156 is an unnecessary attack on Southeast hatcheries with no evidence provided to demonstrate that hatchery-produced pink and chum salmon harm Bering Sea stocks, including those of the Yukon and Kuskokwim rivers.

The proposers claim that there are no alternative venues for discussing hatchery concerns is misleading, as multiple forums, including Regional Planning Team meetings and the Alaska Hatchery-Wild Interaction research initiative, offer ample opportunities for dialogue. The proposer's lack of engagement in these platforms highlights the availability of other avenues to address these issues.

Hatchery programs are vital to Southeast Alaska's economy, contributing \$576 million annually and supporting 4,200 jobs statewide. A reduction of this magnitude would threaten the livelihoods of commercial fishermen, processors, and local businesses while destabilizing communities such as Juneau, Sitka, and Ketchikan that rely heavily on hatchery-produced salmon.

Hatcheries are also essential for maintaining the sustainability of Alaska's fisheries by alleviating pressure on wild salmon stocks, particularly in years of low abundance. By undermining this crucial role, Proposal 156 risks destabilizing wild stocks and making fisheries less sustainable. This is not just a commercial fishing issue. These programs provide access to salmon for all user groups, including sport, personal use, and subsistence



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harvesters. Cutting production would disproportionately harm subsistence and personal-use harvesters who rely heavily on hatchery supplementation to meet their needs.

Alaska's hatchery programs are scientifically managed, rigorously overseen, and certified as sustainable by the Marine Stewardship Council and Responsible Fisheries Management. Proposal 156 introduces unnecessary uncertainty and risks disrupting this proven framework without any sound scientific justification. There is no documented evidence that the proposed reduction would benefit wild stocks. The harm to communities, economies, and the broader ecosystem, however, is well-documented.

Proposals 173, 174, 176, 177, 178, 188, 189 – OPPOSE

OBI opposes all proposals that aim to amend quotas, lower guideline harvest levels (GHL), expand closed waters, impose time restrictions, or introduce gear modifications in the Sitka Herring Fishery.

Pacific herring populations in Sitka Sound are thriving, with biomass surveys showing historically high levels far exceeding sustainable harvest thresholds. Recent assessments by the Alaska Department of Fish and Game (ADF&G) confirm that commercial harvests remain well below the GHL, ensuring ample herring stocks for ecological and subsistence needs. Current management practices, including ADF&G's adaptive strategies, successfully maintain healthy herring populations while supporting ecological and cultural priorities.

Claims that commercial activities disrupt spawning patterns lack evidence. The sac roe fishery operates under strict guidelines, with harvests rarely reaching the upper GHL limits. Average harvest levels remain far below allowable limits, minimizing pressure on herring stocks. Adopting overly restrictive measures would jeopardize the economic stability of the fishery without offering additional benefits to the ecosystem or subsistence users.

The commercial sac roe fishery does not hinder subsistence opportunities, as evidenced by consistent availability for traditional harvests. Maintaining the GHL framework ensures a balanced approach that considers both cultural and economic needs.

Proposal 251 – Oppose

Proposal 251 suggests delaying the start of the Dungeness crab commercial fishery's summer season in Registration Area A from June 15 to July 1, aiming to reduce handling mortality of soft-shell crabs and improve product quality. However, scientific evidence indicates that such a delay may not yield the intended benefits and could introduce new challenges.



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Dungeness crabs in Southeast Alaska exhibit variability in molting timing due to environmental factors like water temperature. Research by the Alaska Department of Fish and Game (ADF&G) has shown that the annual molt probability of male Dungeness crabs declines from 100% at 149 mm carapace width to near 0% by 182 mm, indicating that larger crabs are less likely to molt annually.¹ This variability means that a fixed season start date may not consistently align with post-molt periods, potentially failing to reduce the capture of soft-shell crabs.

The current management strategy, which includes a size limit of 6.5 inches (165 mm) and seasonal closures during peak molting and mating periods, has been effective in maintaining sustainable crab populations. The fishery is closed during the female molt and mating period from mid-August to the end of September, and during most of the male molt period.² Altering the season's timing without comprehensive data on molting cycles could disrupt this balance, potentially leading to unintended ecological consequences.

Additionally, the most productive period of the summer crab fishery typically occurs within the first 2–3 weeks of the season. Shifting this peak to overlap with the ramp-up of the chum salmon fishery could lead to significant production bottlenecks for processors involved in both fisheries. Additionally, this overlap may compel harvesters who traditionally participate in both fisheries to choose between them, limiting their earnings potential.

Proposal 242 - Oppose

Proposal 242 aims to enhance red king crab stocks and prioritize local personal use, several scientific, management, and economic considerations suggest that such a reallocation may not yield the intended benefits and could introduce significant challenges.

The Alaska Department of Fish and Game (ADF&G) employs rigorous stock assessment surveys, pot limits, and minimum size requirements to ensure the sustainability of red king crab populations across Southeast Alaska. These management strategies are designed to balance commercial and personal use fisheries while maintaining healthy crab populations for future generations.

Excluding commercial harvests in Section 11-A would disrupt the current balance and have severe economic repercussions. Processors depend on consistent and predictable supply chains, which the commercial fishery provides. A blanket reallocation would reduce the availability of high-value red king crab and jeopardize the



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livelihoods of fishermen, processors, and other industry stakeholders. It could also displace fishing efforts to adjacent areas, increasing pressure on other crab stocks and undermining broader sustainability goals.

Rather than implementing a blanket reallocation, it would be more effective to continue monitoring red king crab populations and adjusting harvest levels and allocations based on real-time data. Adaptive management allows for flexibility in decision-making, ensuring both conservation and equitable resource use. Maintaining the commercial harvest in Section 11-A is essential not only for the sustainability of red king crab populations but also for the viability of businesses and the broader seafood economy. By prioritizing adaptive management strategies, stakeholders can achieve a balanced approach that benefits both personal and commercial interests.

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

Sincerely,

John Hanrahan, CEO

¹ Alaska Department of Fish and Game. (n.d.). *Southeast Alaska commercial fisheries*. Retrieved January 9, 2025, from <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareasoutheast.main>

² Alaska Department of Fish and Game. (n.d.). *Dungeness crab management*. Retrieved January 9, 2025, from <https://www.adfg.alaska.gov/index.cfm?adfg=dungenesscrab.management>.

Submitted by: Chandler O'Connell
Community of Residence: Sitka

My name is Chandler O'Connell. I am a born and raised Sitkan and I am now raising my own children in this community as part of a commercial fishing household. My family depends on the local ecosystem for subsistence (salmon, black cod, halibut, rockfish, shrimp, herring eggs, and more), recreation, and our livelihood (king salmon, coho salmon, halibut, black cod). My partner is a troller and longliner, a small independent business owner, who is entirely dependent on healthy fish stocks to support our family. We also appreciate the intrinsic importance of traditional and customary foods to the Tlingít culture and respect Tribal sovereignty on Lingít Aaní.

Given multiple crises in fish and shellfish populations throughout state waters and the accelerating impacts of climate change, I urge the Board of Fisheries to be extremely conservative in your management decisions, to insure the long-term viability of, firstly, the ecosystem, secondly, traditional and customary uses of local foods, and thirdly, commercial uses. In cases where species are at risk or there is a lack of abundance, I urge the Board of Fisheries to stop the growth and restrict extraction by the nonresident sport fishery and charter fishermen. Nonresidents, who do not depend on Alaska's fish for their culture, food or income, can still come and appreciate the beauty and adventure of Alaska without exporting massive quantities of fish and undermining the health and vitality of Alaska's fisheries and communities. It is critical that we protect the environment and the fish populations of Alaska for future generations.

I support proposals 109-112, 114, 173-177, 179, 181, 190.

I oppose proposals 108, 113, 182, 183.

SALMON

Please maintain the 80/20 allocation split between the troll fleet and the sport sector, with each sector managed to stay within its allocation, including authorizing in-season management by ADFG to ensure that the sport allocation is not exceeded. Please also prioritize resident sport harvest within the sport allocation by controlling non-resident harvest. The troll fishery is a major economic driver (one of the top three most valuable fisheries in Southeast) and a lifeline for *all* of Southeast's coastal communities and it should be prioritized. The fisheries' resident trollers (85% of permit holders) also consistently help to feed local households even in tough seasons by sharing with friends, families, Fish to Schools, and via other programs, and by contributing to community economies and local businesses year-round.

Please support proposals 109 and 110 with RC amendments.

I *strongly* oppose proposals 108 and 113. The non-resident and charter sectors demand for more king salmon during a time of low abundance is disrespectful to the resource and, if given in to, will hurt coastal communities, resident trollers and resident sport fishermen. It is a painful to see Alaska Airlines flights stuffed to the brim with fish boxes going to private households down south all summer long when abundance is low, families in Southeast are going hungry, and local trollers are making sacrifices for the wellbeing of the species. The responsibility of the Board of Fisheries is to conservation; please fulfill this duty by stopping the expansion of non-resident king salmon harvest.

HERRING

It is a joyful sign of spring when my small children get to eat their first fresh herring eggs, pulling eggs off the branches, dipping them in soy sauce, and feeling that pop and tasting the ocean. I love the chance to participate in herring ceremonies that bring community members out from the winter hibernation to celebrate the vibrance and abundance of spring and express gratitude to the herring. I love seeing dozens of people working together to do the hard labor of love to harvest and feed not just Sitka, but to share eggs with people all over the state and nation.

Sitka's herring spawn is of global significance. Herring eggs, which used to be abundant up and down the coasts from Japan to California and were a staple food for Indigenous people since time immemorial, have now become practically a rare delicacy, with Sitka's spawn being one of the last dependable traditional and customary harvest areas in Alaska. The Lingít culture is living and vibrant and it is intrinsically connected to the herring; it is my belief that this cultural and spiritual relationship and access to this traditional food should be absolutely prioritized over any commercial uses. And given the rarity and preciousness of this spawning population and the complicated and growing impacts of climate change, pollution, and development, (plus the history of sudden herring crashes around Southeast) there is no room for error. A management mistake (regardless of good intentions) could result in a population crash that would be devastating and irreparable for this generation.

Additionally, I believe that herring are worth more and positively benefit many more people when left in the water, than when they are taken out by the sac-roe industry. Herring feed all the other commercial and subsistence species that keep our economy and communities going. They feed the birds and sea creatures that attract tourists, especially in the spring shoulder season. An ecosystem-based management approach would not allow for a new sac-roe herring fishery to be added; we should pay attention to this change in best practice and act accordingly.

I was happy to see that ADFG has submitted proposals to reduce the maximum harvest cap for the Sitka Sac-Roe fishery. For many years I have listened to testimony to the Board of Fisheries urging action to align harvest caps with the 10% often utilized in other herring fisheries (California's Pacific Herring Fisheries Management Plan, Canada's Pacific Herring Integrated Fisheries Management Plan). I urge the Board of Fisheries to select the most conservative elements (or go beyond those) of proposals 173 through 177 to 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 also 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. This is a beautiful and accessible spot where the traditional and customary practice of herring egg harvesting could be continued and passed on to new generations, with minimal disruption from the commercial industry. I also support proposal 181 to minimize herring mortality from test sets.

Thank you for your service and for thoughtfully considering public comments. It is my hope that at the end of this Board meeting, the fisheries of Alaska will be in a better position for long term abundance and viability than they were at the start of the meeting.



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM.B24068

JANUARY 13 2025

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

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the proposals being considered at the 2025 Alaska Board of Fisheries (BOF) Southeast and Yakutat Finfish and Shellfish Meeting. OSM will not be providing specific written comments as most of the proposals involve fisheries that are outside of Federal jurisdiction. However, OSM encourages the BOF to carefully consider proposals 104 and 136, which were submitted by the Southeast Alaska Subsistence Regional Advisory Council.

Although we are not providing specific written comments on proposals prior to the meeting, OSM may wish to comment during the meeting on items that impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@ios.doi.gov, with any questions you may have concerning these materials.

Sincerely,

Crystal (Ciisquq) Leonetti
Director,
Office of Subsistence Management

cc: Federal Subsistence Board
Interagency Staff Committee

Chair Carlson-Van Dort

2

Office of Subsistence Management

Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and
Game

Administrative Record

Submitted by: Chris Olsen

Community of Residence: Haines

My name is Chris Olsen, I run the F/V Ambition out of Haines, AK. Proposal 156 to reduce pink and chum salmon production by 25% would be a devastating blow to the fishing communities of Alaska. From the canneries to the fishermen themselves, over 4,700 jobs could be jeopardized. Less hatchery opportunities will force the fisherman to target wild salmon runs, posing an even greater threat on wild stocks. There is no direct evidence that the number of hatchery chum and pink salmon being released is the actual cause of declining king salmon numbers across the state. What we do have the exact numbers for is the amount of king salmon that are killed by commercial trawlers fishing in Alaskan waters. 38,803 king salmon were caught as bycatch in 2024. I'm not a scientist but I don't see how a yearly amount of anything near that could be sustainable. Perhaps instead of reducing a fishery that has no direct proof of harming the wild king salmon in this state, we reduce a fishery that does have proof of a direct impact on the king salmon in this state. The Cons will outweigh the Pros not only for the fisherman and their communities, but for the wild salmon as well. It is for these reasons that I strongly oppose proposal 156

I support changing the start of the 2025 SE Dungeness season to July 1, 8:00 AM. A two week delay supports harvest of higher quality crab and a lower mortality rate associated with sorting soft crab. I have been a Southeast Alaska commercial Dungeness crab fisherman for 35 years, fishing both summer and fall seasons and seen first-hand the toll exacted by harvest of soft crab.

Proposal # 251 submitted by Tom Traibush presents a clear and accurate accounting of the fleet harvest and the current practice of processors purchasing “lite”, or soft crab which results in lower quality product in the overall market. Neither the bulk of the fleet nor the processors can self-impose a delay in season start up to ensure higher quality crab.

Knowing that the Dungeness grounds in SE are declining, maximizing crab quality benefits the fishermen, processors and consumers.

Peter Ord

Submitted by: Peter Ord

Community of Residence: Juneau

I oppose proposal 242. Accepting this proposal would decrease the access of King Crab to local people who do not have sport boats. When a "Crabber" ties up at the dock to sale King Crab there is an eager response by local people to buy live KIng Crab.

As a Commercial Dungeness fisherman for 35 years, I know how important it is to the fishermen to increase the value of their catch. Also the appreciation of local people that want live crab.

Submitted by: James Orr
Community of Residence: Juneau

Proposal 225, 225 and 226

Changing commercial opening dates for shrimp back

I have recreationally shrimped in south east alaska for the last ten years. When the commercial opening fir shrimp was moved from October to may three years ago, the results for me were catastrophic. I saw my shrimp harvest go down. What used to be 100-200 shrimp with 8 pots was now 20-30. This has been a constant since the opening was changed

I respectfully request the commercial opening for shrimp go back to its former opening. The current opening penalizes the recreational shrimper. Most of us don't have a boat out on the water in October, nor the skill to operate in winter seas.

Thank you for your consideration

James Orr

Submitted by: Nicholas Orr
Community of Residence: Juneau

I support proposals 230 and 231 with the amendment that the fishery be limited to boats under 28ft. The idea would be to use the small boat fishery as a source of data to assist ADFG in creating a stock assessment program. If the resource proved of sufficient size and a market existed, then the BOF could explore creating a fishery with larger boats as well, similar to the current hand troll / power troll structure in the salmon fishery.

Submitted by: Nicholas Orr
Community of Residence: Juneau

I support proposals 224 and 225 to move the commercial spot prawn opener back to October or an alternative date because doing so makes scientific sense and it doesn't disadvantage the personal use shrimpers.

ADFG supports the May 15 opener because most spot prawns will have released their eggs by that point. The problem with this logic is that a percentage of the spot prawns have not released their eggs by May 15. I know that last year on May 18 I observed about 10% of my catch was females with eggs. ADFG is aware that the spawn, similar to a deer rut, is a flexible range. By prosecuting this fishery in May we are harvesting shrimp that are actively releasing their eggs. I realize that most of the shrimp have released their eggs, but if my experience is representative, we may be targeting up to 10% of shrimp that

are actively releasing their eggs. I can't think of another fishery where we target the species during any portion of their active spawning period.

I should note that I DO strongly support Proposal 222, closing the shrimp fisheries during the months of March and April to protect shrimp from harvest while they are actively spawning. It is because of that spawning period, and the fact that some of shrimp are still spawning in May, that I also support moving the commercial opener back to fall.

If you believe that the spot prawn spawn is effectively done by May 15 – as ADFG contends and I dispute – then it shouldn't make any difference whether the harvest is in May or October. Either way, you're harvesting females. Take an example of two shrimp at the beginning of a calendar year, shrimp A and shrimp B:

Shrimp A releases its eggs in April/March then is harvested in May.

Shrimp B releases its eggs in April/March and then is harvested in October.

The only difference here is that next year's brood – the eggs on the shrimp in October – are not visible in May. I will repeat that some of Shrimp A will still have *this year's brood* on them when they are harvested.

ADFG responds to this argument with the assertion that 25% of spawning shrimp die through natural mortality after year 4, so why not harvest these shrimp that would naturally die. They're referencing the Rensel & Prentice study from 1977 where they held 4 spot prawns each in 8 tanks in a lab, for a total of 32 shrimp, fed them clams and waited to see how many would die post-egg release. 8 shrimp died. That's 25% and that's what ADFG is basing their contention that 25% of shrimp die post egg release. This study has LOTS of issues:

- The sample size of this survey is very close to not being statistically significant – 30 is the bare minimum for statistical significance.
- This study was done ONCE and has not been repeated.
- It didn't do a good job of controlling for variables. Instead of trying to replicate spot prawn natural habitat and change single factors, this experiment changed multiple variables at the same time.

I find it strange that ADFG is relying on this study that says shrimp have a 25% mortality rate when other studies conducted by ADFG indicate that shrimp have a maximum age of between 7 to 10yrs (Butler 1964; Kimker et al. 1996 and Armstrong et al. 1995). If shrimp had a 25% mortality rate, that implies a 75% survivability rate, which suggests that a 4 yr old shrimp has a 31.6% chance of reaching age 7 and a 13.3% chance of reaching age 10 without any additional mortality factors. To me it seems unlikely ADFG would find shrimp had a maximum age of 10yrs if the natural spawning mortality was 25% in addition to the high mortality rate they face by being pretty low on the food chain. A summary of this can be seen on page 12 of "Southeast Alaska Pot Shrimp Stock Status Prior to the 2019/20 Season" located here: <https://www.adfg.alaska.gov/FedAidPDFs/FDS20-19.pdf>

From an allocative perspective, this really disadvantages the personal use fishermen. Many commercial users are incentivized to fish as hard as they can to harvest the GHF as fast as they can, likely so they

can move on to other fisheries. This results in large amounts of biomass being harvested quickly, leaving really poor fishing for personal use fishermen. For example, Districts 9 and 10 often close in about a week, while other Districts with sizeable GHLS are done in under 2 weeks. This leaves poor fishing in those areas for the rest of the summer, which is the exact time period personal use fishermen are able to fish. I had a commercial fishermen respond to my point about poor fishing during the summer with the suggestion I go in October or November. I, as well as many other personal use fishermen, simply do not have a sufficiently large boat to safely handle the weather during that time period.

ADFG notes that personal use catch rates have trended upwards over the past several years, though that has NOT been my experience – I have noted way worse fishing in District 10. I realize that some commercial users would prefer to fish in May because it's better weather for them, and for some of them it fits their schedule better -- but that's not a reason to change the fishery dates. Though I am not happy with the impact commercial shrimping has had on personal user fishermen, I would like to point out that I'm not asking for an allocation change. Nor am I insensitive to the other fisheries they participate in, which is why I support BOTH proposals 224 and 225 (with 225 giving more flexibility in alternative dates). I simply want what is best for the fishery as well as a fair opportunity for personal use fishermen to access the fishery.

PC378

Submitted by: Nicholas Orr
Community of Residence: Juneau

I am opposed to both proposal 258 and 259. The commercial dungeness crab fleet has access to over 99% of coastline in Southeast Alaska with almost zero presence from personal use and sport crabbers. I fail to see what opening the last remaining areas that have been set aside for personal use and sport crabbers will accomplish other than foster ill will towards the commercial dungeness fleet.

PC378

Submitted by: Nicholas Orr
Community of Residence: Juneau

The vast majority of the the take prior to closure was from charter and commercial fishermen. The resident sports fishermen take was small and will continue to be small if this fishery is re-opened.

PC378

Submitted by: Nicholas Orr
Community of Residence: Juneau

I am against proposal 138 as the king and coho salmon passing through the Mendenhall Wildlife Refuge are raised specifically for sport harvest. Any regulation that would limit the methods of taking these fish seems counterproductive.

I realize that the proposal author has had issues with other anglers being disrespectful, but unfortunately I don't think that's something we can regulate out of the angling community. Furthermore, I can think of 4 examples where this regulation would apply to groups that the author does not mention in his proposal.

First, snaggers originating at DIPAC. The Mendenhall Wildlife Refuge excludes DIPAC, where many fish exclusively by snagging. However, there are times when the fish hold in the channel north of the hatchery and people walk out to snag them. Making this activity illegal makes no sense. Second, it is not uncommon for people to snag schooling salmon from boats, especially at the north end of the channel. Third, The Mendenhall Wildlife Refuge also includes Fish Creek Pond, which is fished almost exclusively via snagging. None of these groups appears to be the target of this proposal, but would see their activities limited.

Finally, the Mendenall Wildlife Refuge also includes an area on the north end next to Douglas Island that is heavily trolled for king salmon. Salmon that are inadvertently hooked in areas other than the head/mouth would have to be released - a change that anglers in that fishery would likely be upset about. The Mendenhall Wildlife Refuge is a large area and if someone is acting in disrespectful way, I think the best course of action is to move away as much as possible or find a new area. New regulation is not the answer.

Dear Chair Carlson-Van Dort and Board Members,

Thank you for taking time to read this letter. My name is Danya Ortega. I have been fishing since 2017 and have lived in Sitka since 2018 when I moved here from Oregon. Summer trolling is what brought me up to Alaska and is the first fishery I participated in. From there I got into longlining for Sablefish and Halibut. As well as the shrimp and dinglebar fisheries. Salmon has been an important part of my life for many years now as my main source of income, and as part of my subsistence use.

I am concerned about the direction that non resident sport fishing is taking. Sport fishing as a whole needs to be managed in season to keep the sport allocation in the 20% that they are allowed. It is becoming a trend that the sport sector is over harvesting. Which in turn takes away from our allocation and in some cases it takes away our August king opener. Kings make up a large portion of the troll summer income. With the many different costs of running a vessel and especially with how much these prices have hiked up the past few years. Losing that second king opener can drastically impact a summer troller's income.

Sport fisheries not only supply fish to the anglers that participate but also provide an experience. They can fall back on selling people with a magical Alaskan experience. As a troller we rely on the fish themselves. If we can't catch fish, we can't make a living. With a trend of low abundance continuing for the foreseeable future, all harvesters of king salmon need to be monitored and managed to maintain sustainability. To continue being able to harvest kings I want the sport sector to be held to the same standards as the commercial sector. To protect the resource and our way of life in the Southeast fishing communities.

I am in support of proposals 109, 110, and 111. I am in strong opposition to proposals 108 and 113.

Thank you again for reading and best regards,
Danya Ortega



(That's me pulling in a coho!)

Submitted by: Nels Otness

Community of Residence: Petersburg

Hello my name is Nels Otness i live in Petersburg along with most of my crew. We are career fisherman and fish most southeast fisheries. I have a red king crab permit for southeast and i am 100% opposed to prop #242. I paid to renew this permit every year for the last 14 years and only fished it once. I need more fishing opportunity not less.

I also want to express my full support of prop #243. This prop will give us an opportunity to have some sort of harvest without harming the biomass in any way nor losing them to aging or predation. We need an equal split.

Sincerely

Nels Otness

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 Willow Oya. I am the wife of a commercial fisherman and I oppose Proposal 156. This proposal would have a negative impact on my family and our business. 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,

Willow Oya

A solid black rectangular redaction box covering the signature area.



January 13, 2025

To: Alaska Board of Fisheries

RE: Opposition to Proposal 156

Dear Chair Carlson-Van Dort and Board Members,

Pacific Seafood Processors Association (PSPA) strongly opposes Proposal 156. PSPA is a seafood trade association comprised of major Alaska seafood processing companies that operate 34 facilities in 21 coastal communities across Alaska, from Ketchikan to Cordova to Unalaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include shore-based processors that have historically participated in and are fully dependent on the salmon fisheries in Southeast Alaska, particularly in the communities of Sitka, Wrangell, Craig, and Ketchikan. They have been at the forefront of supporting management systems based on sound science and sustainability principles and have invested heavily in infrastructure and operations in Alaska's remote communities.

Hatcheries in southeast and across Alaska are critically important to both fishermen and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon. In terms of economic impact, hatcheries generate \$576 million in annual economic output and provide the equivalent of 4,200 jobs statewide (annual average 2018 – 2023). Hatchery salmon ex-vessel value was 20% of the statewide salmon total in 2023.¹ Southeast Alaska hatcheries alone account for 2,000 jobs (annualized), \$90 million in labor income, and \$237 million in total annual output, including multiplier effects.² Processors need the volume of salmon to stay viable and operational for all fisheries, and hatcheries provide the supplement to wild stocks they were intended to provide.

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

Opposition to Proposal 156 is grounded in the need to protect sustainable hatchery production in southeast Alaska and around the state. Reducing egg take by 25% will have a significant economic impact and harm resident fishermen of all types and processors dependent on this production. For commercial fishermen alone, ADFG estimates a loss of over \$13 million in pink and chum salmon harvest revenue as a result of the proposal, not including losses to processors, tenders, support businesses.

¹ McKinley Research Group (2024). Update of *The Economic Impact of Alaska's Salmon Hatcheries*.

² McDowell Group (2018). *The Economic Impact of Alaska's Salmon Hatcheries*.

sport fishermen, subsistence, or the resulting downstream effects on communities like Ketchikan and Sitka. This is not the time to harm salmon fishermen, especially for no benefit to any other fishery or stock. The proposal fails to acknowledge the public process and any scientific basis for action, and simply will not benefit Yukon River Chinook salmon returns as the proposal implies. In sum, PSPA opposes Proposal 156 for the following reasons:

Iterative Public Process: Hatchery-permitted egg take levels are established through an iterative and public process involving department staff, hatchery operators and stakeholders. This comprehensive process, the results of which many have made fishing business decisions, should not be negated or circumvented by this proposal. The Regional Planning Teams (RPT) are advisory to the ADFG Commissioner and have three main functions: 1) developing regional comprehensive salmon plans for salmon enhancement; 2) reviewing and advising the commissioner on salmon hatchery applications; 3) and reviewing and advising the commissioner if the commissioner is considering revocation of a hatchery permit. In Southeast Alaska, the RPT has the added responsibility to annually review the status of the enhanced salmon allocation plan and make recommendations to the commissioner on production changes to comply with the regional plan. This process is public and highly adaptable, such that the Commissioner can receive input and adjust management as appropriate to meet management or sustainability objectives.

Lack of Evidence/Conservation Benefit: The proposed reduction in egg take levels lacks a supported or demonstrated conservation benefit. No scientific evidence has been presented in the proposal to support the proposed reduction in PWS permitted salmon egg take levels, and certainly not for its impact on other wild stocks in the Bering Sea. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact. ADFG states there is no evidence to support that current permitted pink and chum salmon egg take levels adversely affect wild stocks, in or outside the southeast enhancement area (p. 219).

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

Lack of impact: The Southeast hatchery component is a small fraction of the total chum and pink salmon abundance across the Pacific. Please reference the 2018 Ruggerone et al paper,³ which includes data to show that all Alaska pink and chum salmon are a minor proportion of the total salmon competing for food in the marine ecosystem, let alone hatchery salmon (Fig. 6).

³Ruggerone, G. and Irvine, J. (2018). Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean, 1925–2015. *Marine and Coastal Fisheries: Dynamics, Management, and Ecosystem Science* 10:152–168.

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

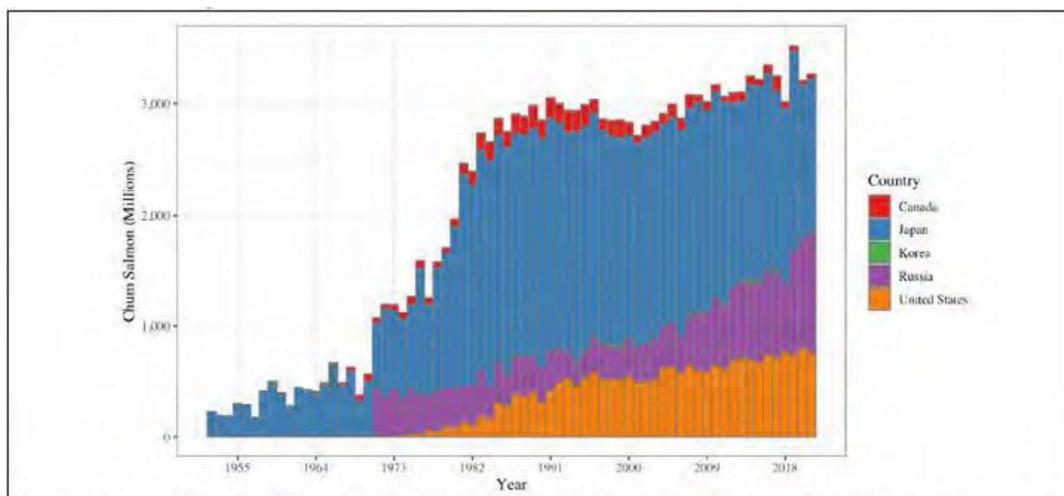


Figure 6-4 Total hatchery chum salmon production around the Pacific rim from 1952 through 2021

The Alaska seafood industry is facing economic conditions unlike any since the collapse of salmon value in the 1990s, except this time, it is across multiple species and challenging the long-term viability of Alaska’s fisheries. NOAA recently estimated Alaska’s seafood industry lost \$1.8 billion in 2022–2023,⁴ and the stress on the processing sector is evident through multiple processing plant closures, sales, and restructuring on a large scale. The economic impact is only one metric but is representative of the severe impact on thousands of Alaska businesses and fishing families.

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

⁴ <https://www.fisheries.noaa.gov/s3//2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf>

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

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Julie Decker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Julie Decker
President, PSPA

Submitted by: Joel Pasquan

Community of Residence: Haines

I am a lifelong resident of Southeast Alaska, currently residing in Haines, and a commercial fisherman. I have a SE drift gillnet permit, tanner crab permit, red king crab permit, SE sac roe set gillnet permit and halibut IFQ shares. I did not receive a permanent red king crab permit although I came close to qualifying (1 point shy) when they went limited entry. Therefore, I have purchased my current red king crab permit and would like an opportunity to fish it.

#242: OPPOSE

I oppose proposal #242 to reallocate all the 11-A red king crab to the personal use fishery only. 11-A is a district with significant red king crab stocks. Reallocating all the of District 11-A red king crab will harm all possibilities of a commercial red king crab opening from occurring in Southeast Alaska. As per the staff comments, elimination of the District 11-A red king crab from the biomass estimate would have resulted in 4 more red king crab fishery seasons being closed since 1994/95 out of the 11 fisheries that occurred in that time period.

When reading the proposal, the author states that if there is a commercial fishery, it then impacts the personal use fishery to the point that the fishery is then closed. This is flawed reasoning. If 100% of the guideline harvest is provided to the personal use sector for harvest the same effect would occur. The real issue is that more enforcement of the personal use fishery should occur.

#243 SUPPORT

I support proposal #243 to allow a commercial red king crab fishery in lower levels of abundance using individual catch limits. While this would be a modest fishery it still allows a permit holder to benefit from the permit they hold, particularly when they had to purchase the permit, and in some cases, fishermen still have loans against the permit.

Thank you for your time in considering my opinion on these proposals and the opportunity to have commented.

Joel Pasquan

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 Kellan Patrick and I am a commercial fisherman. I am a third-generation fisherman who lives in WA. I own a seiner. I have lots of family in Southeast mainly in Ketchikan and Wrangell. I have spent the 30 years fishing out of Ketchikan in the summer, and over those years have employed dozens of community members.

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.

Please do not pass proposal 156. The continuity of Hatchery fish in Southeast AK is vital to the survival of its entire salmon fleet. I may be able to survive a massive decrease in hatchery production long enough to make it to retirement age but a younger generation will not. This proposal may cause the salmon fleet of Southeast Alaska to wither and die.

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. Reducing hatchery production by 25% would have disastrous economic consequences for all southeast communities, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 156: Proposal 156 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to

the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations.

This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups.

I urge the Board of Fisheries to reject Proposal 156 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Kellan Patrick
Ketchikan, Alaska / Bellingham, WA

[REDACTED]

Submitted by: Wyatt Patten
Community of Residence: Craig

I oppose prop. 156, as a commercial salmon seiner I am directly supported by hatchery salmon in southeast Alaska and this proposal would be detrimental to my season. Hatchery salmon make up over 50% of my catch on average.

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 Marla Patterson and I am a personal use fisherman. I have friends who are commercial fishermen and they already have trouble meeting quotas and making expenses---in all my years supporting Mother Nature--I have never heard of a case where man interferes and it makes things BETTER??!!?? Fishermen and whales will tell you there is no such thing as too many fish in the ocean. I am opposed to any decrease in fish.

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,

Marla Patterson

A solid black rectangular redaction box covering the signature area.

Submitted by: Carson Pearce

Community of Residence: Garrett Park MD

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 maximum cap on 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.

I oppose proposals 182 and 183 to expand access of commercial permit holders to herring in Sitka Sound.

Submitted by: Jerrine Peeler
Community of Residence: Ketchikan

Proposal 167- I Oppose this proposal.

Proposal 224 and 225- I Oppose both proposals. I am a first generation fishermen and have been a permit holder for nine years. We have grown our clientele to where we direct market 100% of our product. Consistency in the fishery would allow us to observe whether or not the change in season helped to boost the biomass. We will ultimately lose more fishing time if we keep flip flopping back and forth between seasons. During the last change of season, we were not permitted to fish in 2022, losing an entire season. My observation of shrimp caught in the spring versus the fall is that they are less egg bearing. Since the change in fishery to the springtime, our feedback from our customers is that they are higher quality when cooked, ie. less mushy, as opposed to the ones caught in the fall, producing less waste of the product.

Justin Peeler

F/V Defiant
Defiant Fishing Company LLC
Po Box 184 Sitka Ak 99835
(907) 340-6106
justinpeeler79@gmail.com

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

I am a second generation fisherman from Sitka Alaska and have been involved in the salmon, herring and crab fisheries in Southeast Alaska all my life. As well as many other net, pot and hook fisheries on the West Coast and Gulf of Alaska.

I currently serve my gear group(seine) as a officer(Vice President) on the board of Directors for Southeast Alaska Sainers Association(SEAS). I am also a seine representative on the board of directors for Northern Southeast Regional Aquaculture Association(NSRAA) of which I currently serve as president and serve a representative on the southeast regional planning team. I am currently serving as a member of the Herring Fishery Revitalization Committee. I will be available at the meetings to answer or discuss any topics. I am writing to you on behalf of myself and my comments below are my opinion.

Salmon:

Oppose proposal 156

This proposal is a wide attack on Salmon enhancement and lacks any evidence of a problem besides opinion. The board of Fish does not have the power to do this. Any problems if any, should be heard first thru the Regional Planning Team and the commissioner of Fish and Game. Were they can work in their region to solve any problems thru the best science available. This individual continues to ignore this process in my 12 years on the Southeast RPT this individual has never been involved in the process.

Such a wide attack would have huge ramifications to all Salmon users in Alaska not just Commercial. Many of the enhancement programs benefit sport, substance and personal use. A cut of any kind would put the hatchery associations in a position stuck with current loan dept. With out the fish to pay for them causing a huge burden to commercial fishermen to repay these loans. A huge amount of our enhancement programs have direct implications with the Pacific Salmon Treaty.

I strongly urge you to recognize the system in place at the regional level to deal with any problems if any with are hatchery programs. I hope to be available to meet with any of you on this subject.

Oppose proposal 167

I do not believe the justification is justifiable.

Oppose proposal 168

I do not agree with the ban of aircraft or spotter pilots. They should be allowed to be a user of a state of Alaska resource just like commercial fishermen. I would ask you to think about lifting the current regulation banning the use of aircraft because of this reason.

Herring:

Support proposals 171 and 172

I stand behind the Alaska Department of Fish and Game in the management of Herring. The proof in this great management is the science and management of the fishery that has lead to the growth in the biomass of herring in Sitka Sound since the 70's.

Oppose proposals 173, 174, 178, 188, 189 and 190

These proposals are clearly written by a group set on ending the commercial herring fishery. Every proposal lacks scientific proof and is just counter productive for the cause they say to represent or any ability to work with industry. They continue to ignore the facts that ADF&G management has lead to a very strong well managed herring stock.

Oppose proposal 175

A harvest cap is just unnecessary as proof by the strong growth the stock has seen of the years. All of the current regulations have created this and with the passing of the new proposed ADF&G regulations. The herring stock is well protected from over fishing.

Oppose proposal 176,177 and 181

At the last board of fish meeting for southeast STA reps, industry reps and BoF members sat in a room looked at the biomass numbers and all the proposals at that time to change management of the commercial and substance fisheries. As one of the industry reps in the room I can talk to the out come of that meeting and the last BoF meeting. We talked about concerns on both sides respectfully we decided to take no action to change either fishery based on the overwhelming proof in the strength of the current biomass of herring. None of that has changed in the last couple years. As a industry rep I personally said we would be open for talks in the future and I would not submit or support proposals that could burden substance harvesters. It doesn't take long to read thru the proposals for herring and see the commercial industry held true to that. I hope to sit down with a group to discuss the current situation.

Oppose proposal 179

The ADF&G and industry work together to spot active substance users and sets. We then take measures to insure no impact occurs to substance users. By closing those water to commercial fishing. This action along with the current closed waters to commercial harvest protect the interest of substance users.

Support proposal 182

I support different product forms in the herring fisheries. With the use of the current limited entry permits. I hope we will get to this issue and solve it as a member of the Herring Fishery Revitalization Committee.

Oppose proposal 183

The biomass of herring in this area is already allocated fully. With current commercial limited entry permits and large substance fishery we do not need another user group in this area.

Shellfish:

Oppose proposal 251

I oppose this change as it would have a effect on many fishermen that rely on crab and Salmon for a living as it would cause conflict to do both. It would also impact buyers as it would put the the peak crab harvest at the same time salmon runs are happening, causing buyers to limit buying due to capacity problems to do both.

Oppose proposal 259

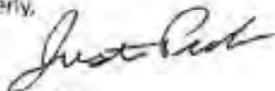
This would result in less crab harvested in the region and also less opportunity for smaller boats. The market could also suffer as the peak summer fishery comes at a down time in other fisheries.

Oppose proposal 260 and 261

These areas are open to commercial harvest during the fall winter season. It's hard to imagine that these few months are the cause of the problem as other users have all year to harvest.

Thank you for taking the time to read my comments and serving the State of Alaska on the Board of Fish. I look forward to working with you and other users.

Sincerely,



Justin Peeler



Dear Members of the Board,

I am Terry Perensovich from Sitka, born and raised in SE AK. I crewed on a troller as a young teenager. My main career has been as a shipwright for the past 40 years. I am returning to trolling after a long restoration project on a 1955 wooden double ender. I have great admiration for the storied men and women in the troll fishery. There is a regional appreciation of seeing a troller plying the waters along our coast.

I would like you to support proposals 109, 110, and 111. The protection of King salmon harvest for trollers helps stabilize this long held tradition. I urge you to maintain the 80/20 split between the troll fishery and the sport harvest. Guidelines should prioritize resident sport users over the non-resident harvesters. The important tool of in season management must be maintained for the ADF&G.

King salmon harvesting is critically important for the viability of commercial salmon trollers. This in turn helps support the communities in SE AK. The fishery is also important to the service sector that maintains the fleet. Protecting the working waterfront that defines our coastal communities.

Thank you for the time commitment and hard work that you do to manage our state's natural resources.

Terry Perensovich



**PETERSBURG BOROUGH, ALASKA
RESOLUTION #2024-18**

**A RESOLUTION OF THE BOROUGH ASSEMBLY OF PETERSBURG, ALASKA,
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 Petersburg; 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 Petersburg 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 Petersburg; 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;

THEREFORE, BE IT RESOLVED BY THE BY THE PETERSBURG BOROUGH ASSEMBLY, THAT:

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

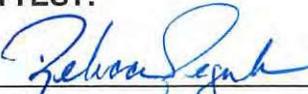
Section 2. The Petersburg Borough reaffirms its support for SSRAA, DIPAC, and NSRAA, acknowledging their essential contributions to Petersburg's economy, community well-being, and sustainable fishery practices.

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

PASSED AND APPROVED by the Petersburg Borough Assembly on December 2, 2024.



Mark Jensen, Mayor

ATTEST:


Rebecca Regula, Deputy Borough Clerk

**PETERSBURG BOROUGH
RESOLUTION #2025-02**

**A RESOLUTION OF THE BOROUGH ASSEMBLY OF PETERSBURG,
ALASKA, SUPPORTING ALASKA DEPARTMENT OF FISH AND GAME (ADFG)
PROPOSAL 243 AND OPPOSING TERRITORIAL SPORTSMEN, INC. PROPOSAL
242, BOTH OF WHICH WILL BE CONSIDERED AT THE JANUARY 28 -
FEBRUARY 9, 2025, ALASKA BOARD OF FISHERIES MEETING**

WHEREAS, the commercial Southeast Alaska Red King Crab fishery is almost exclusively an Alaskan resident fishery; and

WHEREAS, the Petersburg Borough has the largest commercial Red King Crab fleet in the State of Alaska and the largest crab processor in the region; and

WHEREAS, the current ADFG Red King Crab management plan does not allow for annual commercial Red King Crab harvest even when there is a harvestable surplus; and

WHEREAS, ADFG has proposed a new management plan in Proposal 243 that will allow for a commercial fishery when scientifically and biologically available; and

WHEREAS, the Borough supports the scientific analysis of the State of Alaska and ADFG, which protects and allows a sustainable harvest of the Red King Crab resource on which coastal communities like Petersburg depend; and

WHEREAS, when open, the commercial Red King Crab fishery supports 100 local fishing and processing jobs, and provides \$2 million in additional fishing income; and

WHEREAS, Proposal 243 was generated in collaboration with ADFG, the fishing community and processing community; and

WHEREAS, Proposal 243 will not hurt other user groups of Red King Crab, it will only allow access to Red King Crab already allocated to the commercial fishery; and

WHEREAS, Proposal 242 would reallocate the remaining commercial Red King Crab Guideline Harvest Level (GHL) in area 11-A to the personal use fishery; and

WHEREAS, personal use fishermen already receive 60% of the Red King Crab GHL in 11-A; and

WHEREAS, Area 11-A's biomass is important to the area wide stock assessment for the commercial fishery; and

WHEREAS, reallocating 11-A Red King Crab from the commercial GHL to personal use would lead to further season closures of the commercial fishery and would reduce harvest opportunity for the local commercial fishing fleet.

**THEREFORE, BE IT RESOLVED BY THE PETERSBURG BOROUGH ASSEMBLY,
THAT:**

Section 1. The Petersburg Borough Assembly strongly supports Proposal 243 and opposes Proposal 242, both of which are scheduled for consideration at the January 28 - February 9, 2025, Alaska Board of Fisheries meeting. The Assembly urges the Board to support Proposal 243 and oppose Proposal 242 to prevent detrimental economic and social impacts on Alaska's coastal fishing industry and communities.

Section 2. The Petersburg Borough reaffirms its support for ADFG and the commercial Red King Crab fleet, acknowledging their essential contributions to Petersburg's economy, community well-being, and sustainable fishery practices.

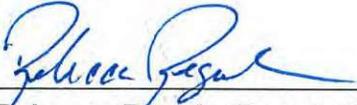
Section 3. The Petersburg Borough calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for Red King Crab management, working in collaboration with the Alaska Department of Fish and Game, the processing industry, and the fishing community to ensure that management decisions reflect the value and benefits Alaska's fishing industry brings to all residents.

PASSED AND APPROVED by the Petersburg Borough Assembly this 6th day of January, 2025.



Mark Jensen, Mayor

ATTEST:



Rebecca Regula, Deputy Clerk



January 14th, 2024

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

Re: Support for proposals 110, 157, 162, 163, 166, 168, 195, 204, 228, 233 – 239, 240, 241, 243 – 249, 252 and 253-257. Opposition for proposals 156, 173-176, 183, 198, 203, 207, 208, 226, 227, 242, 251, 260, and 261.

Dear Chairwoman Carlson-Van Dort,

Petersburg Vessel Owners Association (PVOA) is a mixed gear fleet of vessels that operate in State and Federal fisheries in Alaska and the West Coast. PVOA's members participate in fisheries of all gear types and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken position on the following proposals for the January 28th through February 9th Southeast and Yakutat Finfish Board of Fish meeting.

Proposal 110 – Support

PVOA supports Proposal 110. This proposal will put into regulation language that would require better in season management of the sport king salmon harvest and provide ADF&G management with the tools necessary to enforce the 80-20 allocation split between the commercial and sport sector. PVOA is supportive of groups representing both sides of the allocation working together to put forward a proposal that is beneficial to both user groups, the resource and the Pacific Salmon Treaty.

Proposal 156 – Oppose

PVOA is opposed to proposal 156. PVOA sees proposal 156 as being based on unfounded assumptions that there is a negative relationship between the release of hatchery reared and wild salmon. Current data shows that hatchery programs have minimal effect on the wild

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

While there is no data that there would be stock benefit of decreasing hatchery egg take by 25%, there is significant data on the deleterious financial effects on the harvesters, processors and communities that have built businesses on the track record of hatchery supplementation and sustainability of the coexisting wild stocks over the last 50 years. Yet, there is not enough evidence to prove that the 50 years of hatchery production in SEAK has led to any negative impacts on the AYK region salmon returns to justify such drastic and blunt cuts to an enhancement program that helps support hundreds of businesses, thousands of jobs and most communities in SEAK.

The Board of Fish is the wrong venue to make changes like this to the hatchery programs. The strokes are too broad and will likely cause more harm than any potential positives that could be drawn out. We encourage the State and other stakeholders to instead engage in the local RPT process, which is also publicly announced and offered so all can participate, as a more fine-tuned approach to hatcheries and hatchery management. In doing so, we believe that concerned parties will see that the hatcheries in SEAK are operating responsibly and providing incredible benefits to the businesses, fishermen and communities that rely on them and are not negatively impacting to the wild stocks, but are in fact coinciding, as they have the last 50 years.

Proposal 157 – Support

PVOA supports Proposal 157. Currently, there is no management plan for the Burnett Inlet THA, which can lead to surpluses of fish being stranded and only harvestable by cost recovery efforts. Proposal 157 will give ADF&G the tools to manage common property openings for any harvestable surplus following cost recovery efforts. This could lead to more opportunity among all three salmon fleets, troll, gillnet and seine to participate in the salmon production in the Burnett Inlet THA.

Proposals 160 and 162 – Support

PVOA supports proposals 160 and 162. These proposals look to amend the management plan for the Blind Slough THA and the struggling Crystal Lake Chinook hatchery run. We support both of these proposals as a means to get more Chinook to the hatchery for brood stock collection as the current level of harvest is too high. The major difference between these two proposals is the season dates and we look towards further work and deliberation from the board to see the season dates, but support the substance and rationale of these two proposals.

Proposal 163 – Support

PVOA Supports Proposal 163. Proposal 163 is a reasonable solution aid the Crystal Lake Hatchery broodstock issues. Currently, harvest of chinook in the Blind Slough THA do not count towards the 4 salmon annual bag limit for non-residents. With these fish not counting towards the annual bag limit, it incentivizes increased harvest pressure on the relatively small run of Crystal Lake Chinook. This proposal would help to limit harvest in the Crystal Lake THA and lead to better brood stock returns.

Proposal 166 – Support

PVOA Supports Proposal 166. Proposal 166 will provide the SE gillnet fleet another tool that can be used by those that choose to purchase a specific net to focus on coho salmon harvest after stat week 34. PVOA is supportive of proposals that provide tools to help fishermen better harvest their allocations.

Proposal 168 – Support

PVOA supports Proposal 168. Proposal 168 will create more continuity in the regulations around the use of airplane spotters directing commercial fishing efforts in the SE seine fishery. Currently, you can have a pilot spotting in THAs but no other areas during an open fishing period, but often times the THAs are near non-THA areas and when planes are transiting to and from town to refuel or resupply, they are flying over areas where they are not supposed to be communicating with the fleet for the purpose of directing fishing. This proposal will lead to less planes flying during active fishing hours, but will not restrict flying before or after fishing periods for the purpose of fish spotting, nor will it restrict flights for parts, medical, or management needs.

Proposals 173-176 – Oppose

PVOA is opposed to Proposals 173-176. PVOA sees these proposals as attempts to close or greatly restrict the commercial herring sac roe seine fishery in Sitka Sound. PVOA is opposed to proposals that look to reduce or restrict fisheries without a biological need for restrictions and sees these as strongly allocative based proposals. The Sitka Sound herring population has shown to be very healthy both in recent and historic timelines and there has been enough stock surplus to support the commercial, subsistence and personal use fisheries for these herring.

Proposal 183 – Oppose

PVOA is opposed to proposal 183. PVOA sees this as a reallocation of the Sitka Sound herring stock to a different permit user group that did not historically have access to that stock.

Proposal 195 – Support

PVOA supports Proposal 195. PVOA is supportive of making the Clarence Strait sablefish fishery opening date coincide with the start of the IFQ fishery. This will provide more opportunity for fishermen, as the June 1st is currently in the middle of many other fishery start dates such as shrimp, May 15th, Dungeness crab, June 15th, and several salmon fisheries that start in early June.

Proposal 198 – Oppose

PVOA is opposed to proposal 198. PVOA is not supportive of shifting harvest pressure from one species to another as a management tool, but instead would look to better management tools for the distressed species as a conservation measure.

Proposal 203 – Oppose

PVOA is opposed to Proposal 203. This proposal would create more management needs from ADF&G to manage the split from unguided and guided non-resident anglers. This would put a larger load on the in-season management on the sport fish managers during their busiest season of the year in SEAK. This would also create differential harvest limits that benefit the unguided sport sector and restrict the guided sport sector and create a differential reallocation of the resource.

Proposal 204 – Support

PVOA supports Proposal 204. Proposal 204 will help to create more harvest tools for fishermen to use in the commercial pacific cod fishery in SEAK. You can currently fish for pacific cod by longlining with hook and line gear but cannot use longlined slinky pots, which many fishermen have already transitioned to for longlining their sablefish. This is already a low participation fishery, unlike the PWS fishery, so this would create more operational freedom for the few harvesters that do participate in the fishery.

Proposals 207 and 208 – Oppose

PVOA is opposed to proposals 207 and 208. Based on the limited stock data that ADF&G has and the likelihood that if sport harvest is to be reopened, it will exceed the OFL of the non-yelloweye DSR stock, these proposals have more potential for harm than the sport benefit would bring.

Proposal 226 – Oppose

PVOA is opposed to Proposal 226. PVOA is no supportive of drastic reductions in GHM and gear allowed without necessary biological determination that it would be necessary. Proposal 226

would bring a large shift to the way the fishery is executed, particularly the pot restriction, which likely would lead to an increased number of pot pulls and handling of smaller shrimp.

Proposal 227 – Oppose

PVOA is opposed to Proposal 227. The intention of Proposal 227 is to remove gear from the water as a way to reduce pressure on the shrimp stocks. PVOA does not believe that this proposal will lead to the expected goals as it would potentially lead to many of the inactive permits to re-enter the fishery as ride along permits on vessels that are already shrimping, leading to an increase in fishery participation, not a decrease.

Proposal 228 – Support

PVOA supports Proposal 228. Proposal 228 would allow commercial shrimp pot fishermen with another style of pot that they could choose to use. Slinky pots take up much less space on deck and the vessels that participate in the shrimp pot fishery are often smaller gillnet and troll vessels that do not have extra space onboard. This would allow for more operational flexibility in the gear that fishermen are able to use at all operational scales.

Proposals 233 and 244 – Support

PVOA Supports Proposals 233 and 244. These proposals work within the existing date range for the SE golden king crab and Tanner crab season start date, but establishes language that allows management to start the season on tides that are more beneficial to the fleet.

Proposals 234 and 245 – Support

PVOA Supports Proposals 234 and 245. These Proposals will provide for more daylight hours of operation on the start date of the commercial golden king crab and Tanner crab fishery in SEAK, allowing for increased vessel safety and decrease potential gear conflicts.

Proposals 235 and 246 – Support

PVOA supports Proposal 235. Proposal 235 will give ADF&G another management tool to delay the start of the golden king crab and Tanner crab season for dangerous weather conditions.

Proposals 236 and 247 – Support

PVOA supports proposals 236 and 247. These proposals would expand the pot storage depths in the commercial golden king crab and Tanner crab fisheries from 10 fathoms to 20 fathoms. This will allow for more operational flexibility and vessel safety in the winter crab fisheries in SEAK. Currently fishermen have to choose whether to store their gear near the fishing grounds or be able to anchor near their gear and fishing areas. This is a larger issue in the golden king crab fishery, but because of the dual registration nature of this fishery, it would lead to potential complications if this is passed with just golden king crab language.

Proposals 237 and 238 – Support

PVOA supports Proposals 237 and 238. PVOA believes that by expanding the fishing areas as defined in both proposals for the golden king crab fishery, they will provide more opportunity for fishermen by allowing the fishermen to spread their gear out, allowing for harvest in areas that may have more favorable tides, leading to less time spent waiting for buoys to surface and lead to less gear loss. These proposals also would expand to the historic range the commercial fishery used to operate in.

Proposal 239 – Support

PVOA supports Proposal 239. This proposal could help to spread the fleet and harvest pressure out through the creation of two distinct regions. This would allow for the fishery to be managed more prescriptively, as the northern district is currently 147 nautical miles from north to south. PVOA is supportive of the GHR split proposed in RC2, relying on historic catch data from the two proposed areas to inform the GHR levels if proposal 239 were to be adopted.

Proposals 240, 241, 248, 252 – Support

PVOA supports proposals 240, 241, 248, 252. These proposals would allow for crab pot fishermen to longline for pacific cod while fishing using slinky pots and not having their slinky bait pots counting as their fishable crab pots. This will allow for fishermen to use the equipment they already use for crab to set and haul their slinky pots for bait, whereas now they can only use hook and line longline for bait harvest during the season. This will simplify the harvest of bait by harvesters that prefer to catch their own rather than purchasing their bait and will provide more operational flexibility for the harvesters in these fisheries.

Proposal 242 – Oppose

PVOA is opposed to Proposal 242. If proposal 242 were to pass, it would potentially lead to the permanent closure of the commercial red king crab fishery in SEAK, a fishery that is incredibly local to SEAK fishermen, with only one non-resident permit holder in the fishery. The commercial red king crab fishery already sees limited openings based on a harvestable surplus of the available mature biomass. The commercial fishery currently relies on seven distinct survey areas throughout SEAK, with “Juneau,” which includes section 11-A, are vital to the total surveyed biomass to reach the fishery trigger.

By reallocating the current 40% of that stock that the commercial harvesters have access to only in years that a commercial fishery is allowed, 3 in the last 20 years, it would make reaching the already difficult harvestable surplus levels from difficult to virtually impossible. With this reallocation of the commercial sector’s 40% to the personal use sector, the overall surplus trigger of 200,000 lbs would not adjust for the historic input of Section 11-A, but would instead

put more pressure on the other areas in SEAK to produce crab and, if in the chance proposal 242 were to pass and a commercial fishery were to happen, it would put increased harvest pressure into a smaller area, an action that does not promote strong management.

Though this proposal is not flagged as costing the Department any additional expenses, it would be financially detrimental to the commercial harvesters who hold these red king crab permits for SEAK. These harvesters must renew their permits yearly to keep them out of latency on the off chance that there could be a commercial fishery. The value of the permits is based on the fact that there should be a commercial fishery, therefore causing the permit renewal price to be inflated above the value of a permit that very rarely gets to see any sea time anymore.

Proposal 242 is a reallocation with only negative benefits to the commercial sector that is incredibly local and spread throughout SEAK and will only benefit one community, Juneau, that is the most food secure community in SEAK.

Proposal 243 – Support

PVOA Supports Proposal 243. PVOA supports proposal 243 and the willingness of ADF&G to work with harvesters to develop a management plan that would allow harvesters to participate in the harvestable surplus of the red king crab biomass at varying levels as opposed to the hard capped 200,000 lb season trigger. The red king crab fishery only harvests the surplus biomass determined by ADF&G, promoting sustainability.

As in our rationale for 242, the red king crab fishery in SEAK occurs very sporadically, with only 3 fisheries in the last 20 years, 2 occurring in the last decade. The fishery is prosecuted on the harvestable surplus of the red king crab biomass, but only at or above a surplus of 200,000 lbs. Proposal 243 will provide more opportunities to harvest before the 200,000 lb surplus. If proposal 243 were to have been in place over the last decade, the fishermen would have had two additional fishing seasons, a 100% increase in opportunity, making it a more reliable fishery to participate in during the shoulder season.

Proposal 249 – Support

PVOA supports Proposal 249. Proposal 249 will allow for fishermen, once un-registered from the commercial tanner crab fishery, to go participate in sport and personal use pot fisheries and avoid a ticket. We see this as providing fishermen with a housekeeping action that allows Alaskan commercial harvesters to still partake in PU and subsistence fisheries.

Proposal 251 – Oppose

PVOA opposes proposal 251. This proposal would shift the start date of the summer Dungeness crab fishery by two weeks, changing the business models of the active participants in the fishery that have built their businesses on the June start date of Dungeness and their ability to maximize on Dungeness before switching over to salmon in early July. This proposal would

eliminate those fishermen from being able to operate the way they traditionally have and would make them have to choose between on fishery or another, as opposed to being able to participate in both. This change in season start date is not founded in sound biology, but on observations from one season. This proposal is trying to fix a perceived problem with a blunt tool, shifting hard season dates, to solve the issue of handling soft crab, that do not show up at regular/predictable times in the summer.

Proposals 253-257 – Support

PVOA supports proposals 253-257. PVOA recognizes the season time conflict created by the season shift from the fall to the May 15th start date in the shrimp pot fishery and the June 15th start date of the summer Dungeness fishery. The two-week limit between hauling pot gear before the start of a pot fishery was an oversight in the change in season start dates and is currently restricting harvest opportunity for the fishermen that participate in both fisheries.

Proposals 260 and 261 – Oppose

PVOA is opposed to proposals 260 and 261. These proposals look to create very large area closures in southern SE that are vital to commercial crab and shrimp fishermen. There is an ever-growing list of area closures for commercial Dungeness fishermen, pushing more and more of them into the same bays, these proposals would only intensify that trend. While PVOA supports personal use and subsistence harvest, we do not support and all one or an all-other approach. Areas should be able to support all three types of user groups and should be managed as such. The fisheries that these proposals would seek to close out do not start until late spring/early summer, May 15th for shrimp and June 15th for Dungeness. This means there is plenty of time when the weather should be good to go out and set personal use and subsistence pots before the commercial fishery begins.

Thank you for your time and consideration of PVOA's positions on these proposals and your service on the Board of Fisheries. We would be happy to answer any further questions by at pvoa@gci.net.

Sincerely



Nels Evens

Executive Director

Submitted by: Brandon Peterson

Community of Residence: Elfin Cove / Tenakee Springs

Brandon Peterson

F/V El Rayo

Dear members of the Board of Fisheries,

Thank you for your time and dedication in helping Alaska manage our fisheries in a fair and democratic way. I appreciate all of you taking the time to educate yourselves with the data and reading the public comments in order to make educated decisions on behalf of all Alaskans.

My name is Brandon Peterson, I operate my 36 ft. Salmon Troller based out of Elfin Cove during the summer fishery. I was a deckhand for 6 years before I bought a limited entry power troll permit and boat 3 years ago. I currently make 70% of my yearly income during the summer troll fishery (July 1-September 20). In the offseason I work part time doing construction in Tenakee Springs. Any extra down time is spent hunting and sportfishing to help supplement the high costs of living in a rural area.

I strongly agree with maintaining 80% commercial, 20% sport allocation for chinook (king) salmon.

I strongly agree there should be in season management of the sport caught king salmon in SEAK waters.

The July king openings accounted for 30% of my income during the 23' and 24' summer seasons. Only being allowed to catch 10 and 12 king salmon respectively during those years after the July opener was drastically less than would be expected in a normal competitive August king opener.

In 2023, 85% of troll permit holders were residents of Alaska(CFEC). Whereas 75% of the sport caught king salmon allocation in SEAK was harvested by non-residents(ADF&G). The past two seasons without competitive August king salmon openers trollers endured unexpected financial burdens. In my opinion this is directly correlated to the extreme growth of the charter fishing industry I've witnessed in my 9 years commercially trolling in SEAK waters.

Commercial troll permits are limited entry and we pay the CFEC for the right to participate in the fishery. Trollers are closely managed in season so we do not go over our allotted portion of the king salmon quota. There is nothing hindering charter operators from continuing to buy more boats each year thus giving them the ability to harvest more king salmon each season. Letting this continue is stealing from the long established salmon troll industry in order to support an exponentially growing charter fleet that caters to non-residents.

I strongly support propositions 109,110,111,114 with the amendments.

I strongly oppose propositions 108,113

Thank you for you time,

Brandon Peterson

Submitted by: Torin Pfundt
Community of Residence: Petersburg

Proposal 156

I am opposed to proposal 156. There is no scientific evidence that the release of hatchery fish adversely effects the wild stock, in fact the current data says that there is very little effect. I believe that if this proposal were to pass, the negative consequences on the commercial fishing fleet, as well as the local communities, would be very large.

Proposal 226

I am opposed. A drastic change without fish and game determining that there is a need, is not the right thing to do. Also pot reductions would just lead to more double hauling within the fishery which would put increased pressure on smaller shrimp.

Proposal 227

I am opposed. I believe that this proposal would have the opposite effect and rather than remove some of the gear that is in the water. This proposal would pull the inactive permits out to re-enter the fishery and we would end up with an increase of pots in the water during the fishery.

To: Alaska Board of Fisheries

Public comment (PC) for **Southeast and Yakutat Finfish and Shellfish meeting** to be held in Ketchikan, Alaska. Scheduled for: January 28 – February 9, 2025

Re: 1. **I SUPPORT: proposals 109 and 111 with RC amendments.**
2. **I also support proposals 111, 112 and 114.**

3. **I OPPOSE: Proposals 108 and 113.**

Dear Chair Carlson-Van Dort and Board Members,

My name is Ben Phillips and I am an Alaska resident, registered to vote in Alaska, currently in Westport WA for family reasons. I participate in the commercial salmon troll, dinglebar troll and spot prawn pot fisheries in SE Alaska. Our operation is a family affair and is dependent on these fisheries. Two of my sons born in Petersburg fish with me, as well as my step son Devon Thornhill from Westport, WA who is a troll permit holder and serves on the ATA board as an out of area representative. Our year around F/V home port is Sitka, Alaska.

Passing on this fishing livelihood to the next generation intact and fostering wise stewardship of Alaskan fisheries resources, for all Alaskans, is a legacy part of the State of Alaska and our State's constitution. Resisting non resident (NR) takeover, control, or reallocation of these fisheries resources is foundational to what we as Alaskans have stood for since statehood, as evidenced by the very first legislative act of our fledgling state: to enshrine in the new state constitution a permanent ban on largely NR fish traps. By way of

reminder I have included the following excerpt from the Alaska Constitution:

“Ordinance No. 3 - Abolition of Fish Traps.....As a matter of immediate public necessity, to relieve economic distress among individual fishermen and those dependent upon them for a livelihood, to conserve the rapidly dwindling supply of salmon in Alaska, to insure fair competition among those engaged in commercial fishing, and to make manifest the will of the people of Alaska, the use of fish traps for the taking of salmon for commercial purposes is hereby prohibited in all the coastal waters of the State.”¹

As Alaska salmon trollers we collectively view the reallocation of treaty chinook from our historical percentage of the treaty chinook quota to commercial sport fish operations, who are also largely NR, as a despised symbol of outside control of our fisheries in the same way fish traps were viewed 60 years ago. We have watched these threats recently increase exponentially as out of state lawsuits, petitions and commercial sport fish enterprises seek to influence how our fisheries are managed and how our state’s fish resources are allocated. We are asking the board of fish to protect the troll fishery from unsustainable and expanding growth of the NR sport fishery and to make manifest the will of alaska fishermen. This is the understanding, sentiment and belief of every SE troller I have had the honor to fish alongside since I lost my first gaff 40 years ago.

¹ <https://law.justia.com/constitution/alaska/constitution-19.html>

REASONS I SUPPORT PROPOSALS 109, 110 WITH RC AMENDMENTS, 111, 112 and 114:

- Accomplishes the critical objective to maintain the 80/20 allocation split between the troll fishery and the sport sector with each sector managed to stay within its allocation,
- Accomplishes the critical objective to authorize in-season management by ADFG to ensure the sport allocation is not exceeded,
- Accomplishes the critical objective of maintaining resident sport harvest within the sport allocation by controlling non-resident harvest.
- Accomplishes reaffirmation of the alliance and the respect all Alaskans have for Native Alaskan Residents (NAR) and their way of life. If these proposals are passed they would have the effect of recognizing that Indigenous people of Alaska have a high percentage of commercial salmon troll permits and participation in the Alaska troll fishery and have been invaluable partners in the legal defense of the commercial troll fishery.
- Accomplishes protecting small, predominantly NAR villages in SE Alaska by maintaining the argument presented by the State of Alaska/the Alaska Trollers Association and affirmed by the 9th circuit court of Appeals memorandum dated August 16, 2024:

“....the district court, however, glossed over these significant economic consequences as well as the downstream social and cultural harms to fishing villages and Alaska Natives.....”²

² <https://cdn.ca9.uscourts.gov/datastore/memoranda/2024/08/16/23-35322.pdf>

- Accomplishes the objective of promoting strong environmental policy. By capping the sport fishing tourism industry allowable catch at 20 percent the board of fish would be promoting sustainability and stewardship in a developing fishery while protecting Alaskans and our established way of life.

Reasons I OPPOSE 108 and 113:

- By contrast, these proposals that promote increasing catch allowances in any way for NR commercial sport interests sends an opposite environmental policy message by advertising Alaska does not hold sport fisherman to the same high standards for catch allowances as other sport fishermen in other salmon treaty states and provinces.
- It's a red herring. It just looks and smells bad.
- These proposals would continue to promote an unfair and unpopular management interpretation on an otherwise stellar management resume for the board of fisheries and ADFG.
- The unforeseen consequences of these proposals are unthinkable. At the very least these proposals would cause long term, large scale economic changes to the very fabric and culture of SE Alaska.
- These proposals commit the same error as the WFC vs ATA district court decision in Seattle by glossing over significant economic impacts to already established fisheries and the unintentional downstream social and cultural impacts to small fishing villages and Alaska Natives.

Thank you for your time and consideration!

Submitted by: Greg Phillips
Phillips Fisheries LLC

Community of Residence: SE AK seine

I want to write most specifically to oppose 156. It is opinion based instead of fact based. Hatcheries are good for all the stakeholders in southeast Alaska and we lack the science to say they have a detrimental effect on wild stocks or even ocean biomass.

I also oppose:

134: intentional abuse of Chinook management is unknown to me.

167: Purse seines lengths are effective and we have no need to change them. Our ability to catch fish efficiently is proven, our ability to market them domestically is what hinders us.

168: There is too much grey area around spotter planes. They should be explicitly banned and consequences should match that necessity.

I support 157 and 158.

Thank you for the work you all do on behalf of the rest of us.

Submitted by: Cary Pitcher
Community of Residence: Thorne bay alaska

I oppose 156. I don't believe that salmon hatcheries should produce less fry. We

Need lucrative salmon hatcheries

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

My name is Lance Preston. I have fished aboard commercial trolling vessels out of Sitka, Alaska every summer since 1993; I've been a captain since 2001. As of 2006, salmon trolling has been my sole significant source of income; I have not needed to participate in other fisheries. In 2016 I moved into a house in Sitka built entirely with what I earned trolling for salmon in SE Alaska waters. I have served my fellow fishermen on the Board of Directors of Seafood Producer's Cooperative since I was elected in 2013. I am now its Vice Chairman.

Members of the Board, I submit that leaders in this allocative arena are by definition public servants, responsible for the sustainability of valuable natural resources primarily, and to a majority of current stakeholders secondly. In sight of the public, leaders in this arena could abdicate their responsibility if they continue to allow a relatively new and under-regulated nonresident sport sector to over-harvest king salmon, or threaten to over-harvest king salmon, at great expense to all other longstanding stake-holding sectors: resident anglers, tribal communities, potentially commercial net fishermen, and certainly commercial trollers. The anxiety and politely subdued irritation that I read in many of these King Salmon Management Plan proposals are not based in irrational fear or idle speculation. A near majority of these 31 proposals seek to redress or maneuver around injustices that have already been allowed to take place. Eleven of these proposals directly seek to prevent continued over-harvest by non resident anglers, and many refer explicitly to a staggering lack of in-season management for the nonresident sport industry and the increasing desperate need for it. Until leadership addresses this lack, the remaining sectors will continue to lose cultural, nutritional and financial resources, and an already palpable sense of injustice will only simmer with the passage of time.

The Board of Fish should be very aware that due to the lack of in-season management the nonresident sport sector was allowed to exceed its 20% annual allocation twice in a row, in the summers of 2023 and 2024, which resulted in very consequential losses to hundreds of individual small trolling businesses, 85% of which are Alaska based and contribute importantly to SE Alaska's year round economy. In the teeth of the very recent and chilling lawsuit disingenuously launched by the Wild Fish Conservancy in 2020, the City and Borough of Sitka, the City and Borough of Ketchikan, the Cities of Juneau, Craig, Wrangell, Yakutat, Pelican, Tenakee Springs, and Port Alexander, the Central Council of Tlingit and Haida Indians, Alaska's Congressional Delegation, countless businesses and countless individuals came to the invaluable aid of the commercial troll industry, financially and politically, only to watch transfixed as a disquieting chunk of the resource they successfully defended from one opponent, 34,000 chinook, was reallocated to another. Modest sole proprietorships and family businesses in SE Alaska's coastal communities, during two consecutive difficult seasons in the wake of that lawsuit, had untold thousands of dollars simply taken off their individual tables when ADF&G, interpreting the current King Salmon Management Plan in newfound ways, reallocated troller's August king salmon openers to out of state anglers (and the lodge and fleet owners who cater to them). The optics weren't very heartwarming, and unfortunately trust in the Department has reached an all time low among the fleet and in commercial fishing communities that depend on a viable troll fishery for their economic survival.

The Board of Fish should know that trollers and other stakeholders who seek to move beyond these unfortunate events have put proposals before you that can prevent them from reoccurring. In particular they are proposals 109, 110, 111, 112, 114, 115, 116, 117, and 118. That said, as a commercial troller, as a sitting member of the Board of Directors of Seafood Producer's Cooperative, and as a long term resident of Sitka who wants to enjoy a sense of fairness among king salmon user groups in my community, I am ultimately in favor of the RC put before you by the Alaska Troller's Association (ATA) and Territorial Sportsmen Incorporated (TSI), which I think draws from the merits and respectable intentions of all the above. I will briefly list these and other proposals that I support or reject below.

For all of us who are reliant on king salmon, whether we are resident anglers, subsistence users, tribal communities, charter operators, commercial vessel operators, crewmen, or those employed in the commercial sector's processing plants, it is incredibly important that there is

broad trust in the Board of Fish process. We simply cannot properly manage our finite resources, maintain our economic well being, or live in culturally harmonious communities without this trust. Fortunately there are proposals before the Board which can achieve equity and fairness for all stakeholders, and renew good will where it has been allowed to lapse. I would like to thank you very much for your public service.

Sincerely, Lance Preston

- 105 Oppose. This would only exacerbate over-harvest by nonresidents.
- 106 Support. Addresses a loophole that would increase over-harvest by nonresidents.
- 107 Support. Addresses a loophole that would increase over-harvest by nonresidents.
- 108 Oppose. This would only do further damage to long term resident stakeholders.
- 109 Support. Support in principle, but prefer the RC drafted by ATA and TSI.
- 110 Support. Support in principle, but prefer the RC drafted by ATA and TSI.
- 111 Support. Support in principle, but prefer the RC drafted by ATA and TSI.
- 112 Support. Support in principle, but prefer the RC drafted by ATA and TSI.
- 113 Oppose. This would only do further damage to long term resident stakeholders.
- 114 Oppose. I prefer the RC drafted by ATA and TSI.
- 115 Support. A simple method to eliminate over-harvest by nonresidents.
- 116 Support. Support in principle, but this is addressed by the RC drafted by ATA and TSI.
- 117 Support. Support in principle, but this is addressed by the RC drafted by ATA and TSI.
- 118 Support. Support in principle, but prefer the RC drafted by ATA and TSI.
- 119 Support. Another simple method to eliminate over-harvest by nonresidents.
- 120 Support. Another simple method to eliminate over-harvest by nonresidents.
- 121 Oppose. The current KSMP is flawed. I don't wish to see it extended before it's repaired.
- 122 Support. Reduction of king mortality benefits all user groups.
- 123 Support. Reduction of king mortality benefits all user groups.
- 125 Support. All user groups should share the burden of rebuilding Stocks of Concern.
- 126 Support. All user groups should share the burden of rebuilding Stocks of Concern.
- 127 No Action.
- 128 No Action.
- 129 Support. Cannot hurt other user groups. Safer for fishermen.
- 130 Oppose strongly if a fair and equitable KSMP is adopted for all user groups.
Support reluctantly if an unfair and inequitable KSMP, like the current one, is adopted. I would only choose to forgo August king openers if it were the only way to maneuver around an under-regulated nonresident sport sector over-harvesting beyond their allocation as they have these last two seasons.
- 131 Support. Equal share fisheries are less disruptive than one or two day king openers.
- 132 Support. Will lessen king mortality and eliminate ambiguity within the current law.
- 133 Support. Will lessen king mortality and eliminate ambiguity within the current law.
- 156 Oppose. Will have strong negative impacts on hatcheries and commercial fishermen.

173,174,175,176,177,178,179, and 181 Support. I support all proposals that seek to minimize the harvest of herring in the Sitka sac roe fishery. It makes less and less sense to harvest forage fish at the base of the food chain while humpback whale populations rapidly expand, while herring roe declines in value, and while herring remains of great cultural value to tribal communities.

- 199 Support. Will be safer for fishermen and allow for a more equitable harvest.
- 202. Oppose. This proposal creates ambiguity about what a line is and what spare gear is.



Prince of Wales Chamber of Commerce

PO Box 490 • Klawock, AK 99925-0490

Phone: (907) 755-2626 www.princeofwalescoc.org

Email: info@princeofwalescoc.org

Dear Members of the Board of Fisheries,

On behalf of the Prince of Wales Chamber of Commerce, we write to express our strong opposition to Proposal 156, which seeks to impose a 25% reduction in chum and pink salmon production from Southeast Alaska hatcheries.

This proposal threatens to undermine the economic stability and sustainability of our communities, which rely heavily on hatchery-supported fisheries. Based on the information presented at our community forum, the proposed reduction would lead to an estimated \$13 million loss in revenue from chum salmon production and an additional \$300,000 loss from pink salmon harvests. These losses would significantly impact the cost recovery programs that are critical for supporting the release of coho and chinook salmon, which are not self-sustaining.

The stated objective of Proposal 156—to improve Chinook salmon stocks on the Yukon River and throughout Alaska—is not supported by scientific evidence. Experts, including those from the Alaska Department of Fish and Game, have opposed the proposal, noting that it lacks a sound scientific basis and would fail to achieve the intended conservation outcomes.

The Southeast Alaska hatchery programs are essential to the vitality of commercial, sport, and subsistence fisheries across our region. These fisheries are a cornerstone of our local economy, supporting businesses, families, and entire communities. A 25% reduction in production would have devastating ripple effects, harming not only fisheries but also the broader economic and social fabric of Southeast Alaska.

We strongly urge the Board of Fisheries to reject Proposal 156. Maintaining current hatchery production levels is vital to preserving the sustainability and prosperity of our fisheries and the livelihoods they support. These programs are an invaluable resource that benefits all Alaskans and must be safeguarded.

Thank you for your time and consideration.

Sincerely,

Abigail "Taa'lye" Twyman, M.Ed., LBA
President, Prince of Wales Chamber of Commerce

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

Dear Members of the Alaska Board of Fisheries,

My name is Rob Endsley and I own and operate Prince of Wales Sportfishing in Craig, Alaska, along with my family. Thank you for taking the time to review the public comments and oversee the development of another three-year king salmon management plan.

The following is a list of the proposals we support and oppose, as well as a few that we would abstain from voting 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 SEAGO's proposal 108 that adds a sport harvest cap not to exceed 25% of the troll/sport allocation on any given year. The proposal also adds a 9-year rolling average that would trigger reduced limits if sport exceeds a 22% average for two consecutive years to bring allocation back into alignment. This allows the historical flexibility the sport sector has always needed to have reasonable fishing opportunity in low abundance.

Other king salmon management proposals that ask for a hard 20% cap result in a loss of allocation and opportunity for sport over time. Sport has historically fallen short of allocation in times of high abundance. No consideration is given when the sport catch is under its allocation. In 2022, for instance, the sport catch was 13.9% of the allocation, and this is only one example. There are many years over the last 25 years that the sport catch was well below its allocation. Additionally, a 25-year snapshot of the sport catch in Southeast shows an average annual sport harvest of 20.5% during that timeframe.

There are several proposals that suggest lower king salmon limits to start off the season. Proposals resulting in a one fish limit before July would be devastating to the sportfishing businesses in Southeast Alaska and would seriously impact sales tax and license revenue to local communities and ADFG itself. Fishing guests simply won't travel halfway across the country to retain a single king salmon in June, and if the silvers are late there won't be

much in the way of salmon to retain in early July either. Guests will end up going elsewhere or they won't fish at all, turning to other activities for their recreational pursuits.

Once these customers are lost it's nearly impossible to get them back. Given the reduced limits of halibut, lingcod, and rockfish it's already very difficult to fill May and June dates. Dropping non-resident annual limits below where they are now would reduce our early-season clientele to nearly nothing.

Our charter business and the other charter businesses in the Craig city limits contribute a significant amount of sales tax revenue to the city. A member of City Council once told me that 30% of the budget during the summer months was derived from sales tax generated by charter businesses. Sales tax is generated on the entire value of our fishing packages.

The City of Craig recognizes this strong economic driver and recently enacted a sales tax increase from 5% to 7% during the summer months to capture additional revenue from the influx of tourism that charters bring to Craig during the prime fishing months. Sales tax revenue is not only derived directly from our charter businesses, but also from the fuel dock, grocery store, outboard shop, sporting goods shop, car rentals, gift shops, restaurants, and other local businesses. All of this is achieved with a minimal 20% allocation.

A loss of the June fishery would result in a devastating loss in sales tax revenue to the small communities in Southeast that simply don't have large and diversified economies. This loss would trickle over into July and August, as well. Despite what some may think, the pool of fishing guests willing to spend a great deal of money to travel to Southeast Alaska for a fishing trip is dwindling.

We've operated in Southeast Alaska for nearly 25 years and have deliberately kept our business small and nimble. Along the way we've been able to absorb many of the economic downturns and fishery restrictions that have come along. I'm afraid that a drastic reduction in king salmon retention would cause a Covid-like gutting of the charter industry in Southeast Alaska. During the Covid year Alaska was closed to outside travel most of the month of June. The travel closure along with complicated travel restrictions caused us to lose 50% of our business that year. If king salmon retention were to be severely restricted in June I see a similar outcome.

While some may welcome this, I urge them to consider the reduction in services that would most likely result from a reduction in king salmon limits and the resulting loss in sales tax

revenue. In addition to my company's sales tax contribution to the City of Craig nearly all of the captains, staff, and the fish processing company that we use are all local to Craig. The income they earn working during the summer months goes directly back into the local economy.

Even a small increase in allocation, or a 9-year averaging of the allocation goes a longways to support the strong economic engine that is sportfishing in Southeast Alaska. SEAGO's proposal 108 provides the nuance needed to keep this engine running and I strongly encourage the Board of Fish members to pass it this cycle.

Lastly, the model used to determine the Chinook Salmon Abundance Index has changed the last three years in a row. If an average was taken of the three model runs would it have resulted in the same 27% and 29% overage in the sport catch the last two years, or would this number have been less?

Since Prince of Wales Island doesn't have the high volume of cruise ship traffic needed to support a vibrant ecotourism industry we rely heavily on fishing to pay the bills. Ninety percent of the tourism dollars spent here comes from sportfishing. I urge you to look at creative ways to keep both the sport and troll sectors fishing in the coming three years.

Thank you for your time and dedication to preserving these resources for all stakeholders.

Rob Endsley
Prince of Wales Sportfishing, LLC
Craig, Alaska