
ALASKA BOARD OF FISHERIES

Statewide Shellfish, Prince William Sound Shrimp, and Supplemental Issues

Anchorage | March 11 -16, 2025

On-Time Public Comments

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PC1

Submitted by: Susan A LaKowski
Community of Residence: Eagle River

I'm a consumer of AK shrimp - I enjoy and it's a delicacy that I'm able to enjoy here in AK. If no harm will be done to the fishery then you should allow the permits for the shrimpers to harvest the shrimp. I'm all for preventing unsustainable levels but if that does not apply in this case the permittees should be allowed to shrimp. Thank you for your consideration.

PC2

Submitted by: Virginia Adams
Community of Residence: Kodiak, AK

Proposal 315. Support

My family and I have had our west side set net site in Kodiak for 45 years. We have a 3 permit operation. We have used the joint venture option for 2 permits several times. The added flexibility has been helpful to us. It was an oversight at the Jan 2024 BoF meetings in Kodiak that the increased length is set Gil nets did not get adopted into the joint venture language. This is a simple fix and should be taken care of. We need all the tools available to us to attempt to make this fishery viable. Thank you Virginia Adams.



ALASKA SALMON ALLIANCE
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 Email : info@aksalmonalliance.org

February 24, 2025

State of Alaska Board of Fisheries
 c/o ADFG Board Support
 PO Box 115526
 Juneau, AK 99811

Re: Support of Proposals 312 and 313

Dear Board of Fish Members,

The Alaska Salmon Alliance (ASA) is a nonprofit organization representing commercial seafood processors, allied businesses, and fishermen. Our mission is to promote science-based salmon management to preserve habitats, ensure sustainable fisheries, and create predictable harvests for all salmon users in the Cook Inlet region. We are committed to supporting long-term economic opportunities for Alaska's coastal communities and future generations.

In the 2024 salmon season, alternative gear types—dip nets and set beach seines—were introduced and authorized to provide fishing opportunities while ensuring minimal impact on Kenai River late-run king salmon. These methods allowed for some level of participation in the fishery without compromising conservation directives. However, continued restrictions on setnet operations have led to massive over-escapements of sockeye salmon in both the Kenai and Kasilof Rivers, raising serious long-term conservation concerns.

Unmanaged high escapements pose risks to future sustainability and yield of these sockeye stocks. The current management approach—restricting set gillnets to protect king salmon—has severely hindered effective sockeye management and led to economic uncertainty for many in coastal communities.

Proposal 312 – Expansion of Dip Net Gear

Dip net gear is a highly inefficient method for harvesting sockeye salmon. However, its low impact on king salmon makes it a viable alternative under current conservation mandates. Given that weather, currents, and fish densities vary significantly across the fishery, an expanded daily dip net schedule will allow fishermen to adjust to localized conditions and optimize their efforts.

Sockeye escapements have exceeded upper goals for years, and without effective management tools, we risk long-term negative effects on stock sustainability. This proposal provides a measured solution...allowing targeted sockeye harvests while maintaining king salmon protections.

Proposal 313 – Authorization of Set Beach Seines

Set beach seines represent a potentially viable alternative gear type, but their effectiveness is constrained by weather conditions, tide stages, current strength, beach profiles, and obstructions. Even within a standard 12-hour fishing period, actual fishing time was reported at only 37% due to environmental limitations.

Despite these challenges, the 2024 experimental fishery demonstrated that set beach seines can harvest sockeye salmon while ensuring live release of king salmon. This gear type, though limited in efficiency, provides another opportunity for participation in the fishery while respecting conservation measures.

We strongly urge the Board of Fisheries to support and pass Proposals 312 and 313, allowing these alternative gear types within the stock of concern plan. While these methods offer greatly reduced fishing opportunities compared to historical setnet operations, they are crucial to ensuring that setnet permit holders—who have participated in this fishery for generations—retain a viable role in Cook Inlet salmon harvests.

Adopting these proposals would help balance conservation and economic sustainability, providing a path forward for both salmon stocks and the fishermen who depend on them.

Respectfully,



Norm Darch
Executive Director
Alaska Salmon Alliance

Alaska Scallop Association

PO Box 8989
Kodiak, AK 99615

Jim@AlaskaScallop.net



February 19, 2025

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

RE: Proposal 298 – Opposed

Dear Alaska Board of Fisheries members,

The Alaska Scallop Association represents the scallop fishermen of the Alaska Scallop fishery. Many of whom have been in the scallop fishery for generations.

Proposal 298 suggests closing off state waters to scallop dredges, thereby closing the fishery to our members. This proposal asks to eliminate observers, which means the Department would lack independent catch or bycatch reporting. Additionally, the proposal requests no VMS onboard, leaving the Department without a method to track the locations of the fishing boats or know where they are fishing.

The proposal-form asked, “What is the issue you would like the board to address and why?” The proposer answered, “Eliminate big trips of scallops coming from state waters.” However, the GHs are managed conservatively by ADFG, and the scallop biomass has remained healthy for decades. There is no indication of overfishing, raising questions about the necessity of excluding areas for our members that have been sustainably fished for decades.

Fishing scallops with pots is not a known method of commercially harvesting weathervane scallops and seems highly unlikely to us to have any economic viability.

Our members have been fishing on these beds since the 1970s. They comply with conservative management practices set by ADFG, adhere to all regulations, carry onboard observers at our own cost, use Vessel Monitoring Systems, supply ADFG with a vessel and crew for the annual Scallop Survey, and follow harvest and by-catch limits.

We request that you oppose this proposal.

Sincerely,

Jim Stone, President

Alaska Scallop Association

TO: Chair Marit Carlson-Van Dort
Alaska Board of Fisheries
Juneau, Alaska

2/20/25

FROM: David JG Capri
Ted Painter
Alaska Trojan Partnership

RE: Supporting Proposal #278 & 279

My name is David Capri and I am writing this letter on behalf of myself as well as my partner, Ted Painter.

I have been involved in all Alaska crab fisheries since I began fishing in Alaska in 1977. I spent 28 years fishing in the Kodiak area, the Bering Sea and the Aleutian Islands. I fished the Western Aleutians for Golden King Crab for 20 years.

Proposal #278 – Establish a pot limit for the Aleutian Islands Golden King Crab fishery.

There are currently no pot limits in this longline fishery. There are a limited number of vessels in this rationalized fishery and for over 20 years there were few issues with gear conflict between crabbing vessels. Most of our conflict regarding gear has been between our fixed gear and factory trawlers.

Traditionally vessels have fished under 2,000 pots. Currently there is a vessel fishing an excess of over 3,300 pots which is evidenced through shared line files. There are attempts to control prime fishing areas by grounds pre-emption. While this is allocative, there are conservation concerns. In our opinion, that large number of pots cannot be fished responsibly.

Our vessel currently fishes 2,000 pots and that number allows us to pull all of the gear each trip leading to minimal deadloss. To have an exorbitant amount of gear that cannot be pulled each trip, or every other trip, is an abuse of the crab stock. Crab pots sitting on the bottom and not being pulled doesn't help any vessel and negatively affects our CPUE in the long-run.

Proposal #279 – Amend vessel gear sharing and transfer provisions.

This proposal is closely linked to the pot limit proposal. Historically, the allowance for gear sharing was intended to allow for a vessel to share gear with another vessel at the END of the season. This would enable the second vessel to pull the pots and harvest the crab from the first vessel's gear. This makes perfect sense to ensure that the crab in the pots in fact gets harvested rather than rail-dumped, which could lead to injury or death of crab. We have practiced this intended use over the years, including this past season when the Aleutian #1 took our overage as a part of their landings.

Abuse of this provision has occurred with two vessels dropping pots in an area at the beginning of the season and then one vessel tied up for the season while the other vessel fished all of the gear throughout the season. This was a blatant attempt to lock up available fishing grounds in order to control prime fishing areas. This has caused a lot of discourse between vessels. We have made an earnest attempt to rectify this issue and reach an agreement to no avail. While this may not occur every season, the risk is definitely there without some restrictions. Given the fact that they aren't willing to rectify this problem now makes us believe that they want to continue this practice. The only exception to the rule of gear sharing should be in an instance of breakdown, where a vessel is unable to complete their allotment for the season.

In closing, it is important to remember that this fishery has been historically strong when everyone works for the best of the fishery. Greed does not need to become a component. We feel strongly that both Proposal #278 and #279 will benefit the fishery and clarify the integrity for all vessels involved.

Respectfully submitted,

David JG Capri

Submitted by: Jeremy Albright
Community of Residence: Anchorage

As an Alaskan resident that feeds a large family but does not have a personal boat, the ability to provide local sustainable healthy seafood options to my family is important. My wife, 3 kids and myself would all be negatively impacted if the PWS shrimp were not available to us.

I support the commercial shrimp fishery as it provides access to this resource for many Alaskans who can't shrimp on their own. Most of us don't own boats or gear for shrimping, making the commercial fishery the only way to enjoy this resource. Closing it removes this vital access. The Board should make changes to keep the fishery open when biologically appropriate and share conservation efforts across all user groups.

- I support Proposals 301, 302, and 303 that show that there is public concern with the current regulation, and we need a trigger based on biological information to open the commercial fishery when conditions allow to give more Alaskans access to the resource.
- I Support Proposal 304 to delay the season opener for conservation. By delaying the opening of the season to allow shrimp to drop their eggs it should help sustain the population
- I Support Proposal 299 for a comprehensive management plan.
- I want to Give ADF&G managers the flexibility to manage the fishery responsibly.

Submitted by: Grace Allan
Community of Residence: Kodiak

I support proposal 316 modifying the herring sac roe fishing season.

Submitted by: Lance Alldrin
Community of Residence: Chico CA/Kenai AK

Support 313

East side set netters have not a decent season since 2019 due to king salmon concerns. We have been told many times by the commissioner and Board of Fish that if we can come up with a way to catch sockeye and not kill kings, we will return to fishing. The beach seine fishery tested this year by two permit holders proved that the beach seine is the gear type that provides for sockeye catch with no harm to the species designated as one of non-retention.

Minimal changeover is needed to switch from set netting to beach seining, ensuring an easy transition to this new gear type.

Some S04H permit holders might be opposed to the beach seine fishery as they don't have beach fishing leases. I believe there is ample space along the East side beach to allow room for those who want to participate. Partnering up with an existing lease holder could also be an option for those without their own beach lease.

Submitted by: Lance Alldrin

Community of Residence: Chico CA/Kenai AK

Support 312

Last year's (2024) commercial dip net fishery proved that a small, low effort commercial fishery could be financially viable for those S04H permit holders who want to fish during the gill net closure action taken within the King salmon stock of concern plan.

A short coming of last years fishery was the limited number of days per week that the fishery was open for participation. With the limited days coupled with weather/sea conditions, safe days of fishing on the water were limited. Proposal 312 would give those that choose to commercial dip net, whether from shore or skiff, a safe opportunity to participate in the fishery during the season.

By abiding by the existing commercial fishing regulations (distances between fishing gear), there should be no conflict between those who choose to dip net or beach seine on any given day.

Submitted by: Luke Alldrin

Community of Residence: Clarksville, TN / Kenai,AK

I support proposal 313

East side setnetters have not had a prospective season since 2019 due to king salmon concerns. Since then, we have been told numerous times by both the commissioner and Board of Fish that if we come up with an alternative way to catch Sockeye salmon, without harvesting Kings as a by-catch, we will return to normal commercial fishing operation. The beach seine fishery tested this last season, has no doubt proved to be a viable means to harvest Sockeye salmon and not other salmon species of concern.

In addition to this new gear type, minimal alteration is needed to switch from set netting to beach seining. This will provide for an easy transition to this new gear type for all commercial fishermen. Some S04H permit holders may be opposed to the beach seine fishery as they do not have access to beach fishing leases. I believe there is ample space along the East side beach to allow room for all of those who want to participate in the fishery. I would also like to point out that partnering up with an existing beach lease holder could be an option for those without their own beach lease.

I support proposal 312

Last season's commercial dip net fishery showed that a low effort fishery could be viable for those S04H permit holders who want to fish during gill net closures due to the King salmon stock of concern management plan.

A shortcoming of last year's dipnet fishery, however, was the limited number of days per week that the fishery was open for adequate participation. Having only 2-3 days of allowable fishing each week, coupled with dangerous weather and sea conditions, many fishermen felt as though it was not a financially viable fishery. Proposal 312 would give those fishermen who choose to commercial dip net, whether from shore or in a skiff, ample opportunity to participate in the fishery regardless of weather.

By abiding by the existing commercial fishing regulations for distance between fishing gear, there should be no conflict between those who choose to dip net or beach seine on any given day.

Submitted by: Mary Alldrin
Community of Residence: Chico, CA/Kenai AK

Support 313

The beach seine fishery tested this year by two Cook Inlet set net permit holders proved that the beach seine is a gear type that provides for a commercial sockeye catch with no harm to the non-targeted species.

By using the majority of our existing gear, the changeover from set netting to beach seining should be straightforward, ensuring an easy transition to this new gear type.

Any S04H permit holder who doesn't want to operate a beach seine will have options such as possibly partnering with another permit holder who needs help or fishing in the commercial dip net fishery. Both of these would produce more income than not fishing as we've basically done since 2019.

Support 312

Last years (2024) commercial dip net fishery proved that a small, low effort commercial fishery could be financially viable for those S04H permit holders who want to fish during the gill net closure action taken within the King salmon stock of concern plan.

A short coming of last year's fishery was the limited number of days per week that the fishery was open for participation. With the limited days coupled with weather/sea conditions, safe days of fishing on the water were limited. Proposal 312 would give those that choose to commercial dip net, whether from shore or skiff, a safe opportunity to participate in the fishery during the season.

By abiding by the existing commercial fishing regulations (distances between fishing gear), there should be no conflict between those who choose to dip net or beach seine on any given day.

Submitted by: Eddie Alvarez
Community of Residence: Saldotna

Proposal 313

February 22, 2025
Matthew Alward
[REDACTED]
Homer, AK [REDACTED]

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

Re: Support for proposals 316

Dear Chairman Carlson-Van Dort and Board of Fisheries members,

I am a commercial fisherman living in Homer, AK and have operated my own vessel since 2005. I support proposal 316 to expand opportunities for the Kodiak herring fishery. I have owned a Kodiak herring permit since 2018 but have not been able to fish it because of a lack of a sac roe market.

Proposal 316 would change the name of the permit from “sac roe” to “herring” while expanding the season for herring permits to have an “A” season and “B” season which would greatly increase potential markets to utilize the large biomass of herring that has been available but not exploited. The herring sac roe markets have been greatly diminished in the last decade and expanding the season would allow for opportunities to supply other markets such as food and bait. There is a large demand for bait in Alaska and our cod and crab fishermen have had to import bait from the east coast and Europe to fill the demand while the large biomass of local herring have gone unused because of current season dates.

Expanding the season would only allow for harvest opportunity for permit holders who can secure a market while leaving in place all Emergency Order authority of Fish and Game (F&G) to manage openings for the biologically set allowed harvest. This would ensure that F&G would be able to manage and control the fishery as needed while allowing for more opportunities to harvest herring. I would like to note that there is one mistake in the proposal as written under 5 AAC 27.510(a)(1) the “A” season should have been from “April 1 through October 25” instead of “January 31”. Closing the A season from October 25th till December 1st would allow for the traditional “Food and Bait” fishery to operate as usual for those permit holders within the time frame that season has been executed over the last five years.

I strongly support anything that improves access to Alaska’s fishery resources and proposal 316 does exactly that. With the one correction mentioned above I encourage you to support proposal 316 and approve it.

Sincerely,

Matt Alward
Owner-Alward Fisheries, LLC

Submitted by: Margie Anderson
Community of Residence: Kenai

I SUPPORT PROPOSAL 313. I have lived in this community for nearly all of my 73 years, and it has been devastating to witness the decline of Kenai King salmon and the impact it has had on our East side setnetters over the past decade.

Proposal 313 offers a vital opportunity for these hardworking fisherman to continue their livelihoods by harvesting sockeye while having no impact on late run king salmon. These families are an essential part of our community, and this proposal allows them to maintain their way of life in a responsible and limited manner.

Please support and pass Proposal 313 to give these dedicated fishermen a chance to continue their tradition of harvesting abundant sockeye on the beaches of Cook Inlet.

Submitted by: Sam Anderson
Community of Residence: Vashon, WA

I SUPPORT Proposal 313.

We are excited for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

We feel that this is a new beginning for our fishery in times of king salmon conservation, and we are willing to change our harvest method while we are in the stock of concern plan.

My hope is that my 3 children can continue to have the opportunity to be raised harvesting salmon on Salamatof Beach, just as their Mother, Grandmother, Great Grandmother and Great-Great Grandmother did.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the Gabriel's, Every's and our family to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sam Anderson

Submitted by: Shayla Anderson
Community of Residence: Vashon, WA

My name is Shayla Anderson. I am writing today to SUPPORT Proposal 313.

I am a fourth generation fisherman and am proud to work alongside my parents, Jason and Sarah Hudkins, along with my husband and our 3 children. My Great Grandfather began fishing in Cook Inlet with Fish Traps and transitioned to Set Netting when Traps became outlawed.

I, along with my husband and children, SUPPORT Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.

We are hopeful for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

We would like to express our appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and our family to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sincerely,

Shayla, Sam, Sophia, Ava and William Anderson

We Support

Proposal 313



Sophia, Ava and William

Area M Seiners Association - Proposal 285 Comments

The Area M Seiners Association supports proposal 285. Area M Seiners Association represents the majority of participants in this fishery.

Adopting the principals of Area A harvest strategy into Area J would show the state supports a region with historical crab opportunity. The Southeast Alaska approach provides fewer conservation benefits but yet has consistently provided opportunity to local fishermen without decimating the resource. In a time with little winter opportunity, we ask for the same access to a resource when available thresholds are met.

Area J asks for at least three days for an initial fishing period in the core areas and would allow for a provision to close the fishery after the initial 3-day opening. This provision would take effect if catch data indicated the GHs were achieved in core areas. Abundance thresholds, defined as the average in a suite of years to be set by the Department, these years would be used as the basis to compute the long-term average. Area J would use the same two tiers of mature male biomass as Area A, 50% of the long-term average and approximately 120% of the long-term average, to determine the number of additional days to be added to the initial fishing period.

Area J currently has three tiers of “number of registered pots” available and would look to keep this in regulation for simplicity. Again, this is an opportunity for the state to provide an immediate expansion to the Tanner fishery in Area J when resource is available. Leaving as many current regulations as possible while adjusting them to the core principals of Area A management is the desired effect.

Area J currently has two “core” areas and would look to keep those in place. “Noncore” would be lightly surveyed areas. “Outside exploratory” areas would be areas that are un-surveyed.

10 additional days of fishing should be allowed in the noncore areas, and until regulatory closure in the outside exploratory areas.

We ask that the Board supports this proposal as it is the will and need of its stakeholders. Understanding it is not the job of the Board to ensure every fishing vessel is successful, it is the job of the department to create science-based opportunities so vessels have an opportunity to thrive. We feel it is a reasonable ask for the state to pursue this proposal while still providing ample opportunities for subsistence use of Tanner crab while giving the region a much needed economic boost. Current management has left a lot of legal crab in the water with little benefit to the resource to the detriment of users.

Area M Seiners Association would like to thank the Board for their consideration of proposal 285.

Thank you,

Kiley Thompson

President, Area M Seiners Association

PC18

Submitted by: Tuckerman Babcock
Community of Residence: Soldotna

Please allow allowable harvest of shrimp on PWS to be taken by both commercial and individual users. I enjoy AK shrimp but have no time or access to PWS. I depend upon local commercial shrimpers.

PC19

Submitted by: Samuel Bain
Community of Residence: Port Hadlock WA

I am in favor of proposal 314 to create a Kvichak River special harvest area. Perhaps it could run concurrently with an Alagnak River special harvest area in times when the naknek river is experiencing low escapement. I am a setnetter in the Kvichak. Than

PC20

Submitted by: Robert Baker
Family Friends

Community of Residence: N/A

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC21

Submitted by: Lauri & Jeffrey Bassett
Lauri & Jeffrey Bassett - Greenbanks Setnet

Community of Residence: Anchorage

We operate a family setnet operation in the Central Section of the Northwest Kodiak District. We support proposal 315.

We participate in a Joint Venture because it allows use to combine our total fathoms of gear fished into three fishing sites. This is not possible if we operate our permits independently. It gives us versatility in how and where we fish our gear. However, as the regulations are written currently, we cannot increase our aggregate fathoms of gear fished to 350 fathoms. It would be of great help to us if Proposal 315 was put into regulation. If Proposal 315 is not passed into regulation we will have to fish independently and lose the versatility that exists with the Joint Venture.

To: Board of Fisheries Chair and Members

From: Mark Beardsley

Date: February 22, 2025

Re: SUPPORT for Proposal 315

My wife and I have been Kodiak salmon setnet permit holders since 1995.

Having the ability to fish a joint venture, without being penalized with reduced fathoms of gear, has been a long-standing option for families and others wanting to combine their efforts under a 3-net "joint venture" configuration. Since the January 2024 BOF meeting, the joint venture option for Northwest Setnetters has been diminished. Those choosing to utilize a joint venture in 2024 lost 50 fathoms of aggregate gear. This change was unforeseen and was triggered by an RC, late in the 2024 Kodiak BOF meetings. This happened after the period for public input had ended and no questions came up for the Department to address the impact of this RC on joint ventures. We have operated a joint venture previously and feel it is an important option for us and many other setnetters in the Central Section of the Northwest Kodiak District.

I am glad the members of the Board of Fisheries unanimously decided to take up ACR#14 last Fall and let things be deliberated under Proposal 315 in the Spring of 2025. It is important to fix this now rather than wait until the next board cycle because it restores the consistency of things that have been in place since 1985 of equal aggregate gear lengths for individual operations and those that choose to operate 2 permits together in a three (3) net joint venture configuration. If not corrected now, we must wait until the next BOF cycle which creates an unfair situation for those who have historically fished joint ventures or would like to operate one during the 2025 season.

This proposal is not asking for something drastic or new, it just keeps things consistent regarding past practices and helps provide a tool for a struggling fishery.

Thank you for your consideration and support of Proposal 315.

Regards,

Mark Beardsley

PC23

Submitted by: Edin Berns
Community of Residence: Uganik Bay

I support Prop 315 because it is essential in supporting my family and the working class community of Kodiak Alaska

PC24

Submitted by: Galen Berns
Community of Residence: Uganik Bay

I have been a set netter my entire life and strongly support Proposal 315. It is essential to my community's way of life and ability to support ourselves.

PC25

Submitted by: Horace Blanchard
Community of Residence: P.O. Box 904 Soldotna, Ak. 99669

I support Proposal 313. Establish A minimum size of seine if adopted. 100 feet in length, 75 mesh deep, 5 pound lead line and 3 1/2 mesh size was spreader bar at each end to help open the net during extreme tides . Longer length and death size permitted as well as heavier lead lines. This is to avoid these people who cannot afford heavy equipment.

PC26

Submitted by: Laura Blanchard
For all the Blanchard family members

Community of Residence: [REDACTED] Soldotna, Ak. [REDACTED]

We support proposal 313. Our family is willing to beach seine as a alternative gear type. To have the opportunity to harvest sockeye. It would definitely help all of the fishermen families that are going through many generations to survive in this fisheries. While we are also protecting the stock (Kings) of concern.

Submitted by: Bruce Bowman
BB'S KINGS

Community of Residence: Kenny Lake, AK

There is ONE proposal that would get all of the interested parties to the table and that is proposal 299. A collaborative holistic Fishery Management Plan, inclusive of all stake holder and user group interests. If proposal 299 were to pass, there would be able guidelines for the department to make in-season management assessments and avoid or ideally stop over harvest by any user group. There are many tools that can be used to manage the fishery proactively instead of reactionarily. The key is a comprehensive FMP.

I would like a well managed resource, available now and in the future, where there is an equitable burden of conservation for all participants.

Submitted by: Jennifer Bowman
Community of Residence: Kenny Lake, AK

I am an Alaskan resident and have enjoyed PWS shrimp (an Alaska local resource) for many years as it has been available locally from commercial shrimpers. Last year there was very little shrimp available and this year there will be no commercially caught shrimp available this year due to the commercial fishery being shut down. Something needs to change so this resource is not lost forever. A well-managed resource, now and in the future, with equitable burden of conservation would ensure the availability of this resource into the future.

- 299 SUPPORT Comprehensive PWS Shrimp Mgmt Plan!!!!!!
- 300 SUPPORT Sport shrimpers to rotate areas, lessen impact
- 301 SUPPORT Close ALL fishing at 110K pounds harvestable floor
- 302 OPPOSE Raise harvestable floor to 150K pounds (science says 75K lbs)
- 303 OPPOSE Remove 110K pound floor all together (science says 75K lbs)
- 304 SUPPORT Delay opening to MAY1 (allows egg drop to take place)
- 305 SUPPORT Set a max number sport pots per boat, remove "unlimited"
- 306 OPPOSE Require 24-hr commercial harvest reporting (unnecessary)
- 307 SUPPORT Season opener start time set to 8:00AM for all groups
- 308 OPPOSE Commercial pot limit set to 25 pots (not needed, we have a quota)
- 310 OPPOSE Remove administrative area rotation (better met through 299 plan)
- 311 OPPOSE Allow catcher boats to be tenders as well (not allowed anywhere)

Submitted by: Christine Brandt
Community of Residence: Kenai Peninsula Borough

Proposal 312, I support this proposal. I participated in this dipnet fishery during the 2024 season and support the proposers comments regarding extending the amount of days. We had zero catches of King and silver salmon where we fished.

Proposal 313, I support this proposal. I support a clean and proficient fishery. An alternative gear type to harvest surplus sockeye salmon while having limited to zero impact to Kings and silvers. This is a positive way to help preserve a traditional and historic fishery that will keep escapements within the goals

Submitted by: Ellis Brock
Community of Residence: Chugiak

- 299 SUPPORT comprehensive PWS shrimp management plan
 - 300 SUPPORT helps lesson impact
 - 301 OPPOSE science says 75K lbs
 - 302 OPPOSE science says 75K lbs
 - 303 OPPOSE science says 75K lbs
 - 304 SUPPORT delaying until May 1st will allow egg drop to take place, we are still seeing allot of eggs till end of April.
 - 305 SUPPORT
 - 306 OPPOSE unnecessary
 - 307 SUPPORT
 - 308 OPPOSE not needed we have a quota
 - 310 OPPOSE done better through the 299 Plan
 - 311 OPPOSE this is not allowed anywhere
-

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

My name is Ezekiel Brown, and I am a lifelong resident of Cordova, AK, where I participate in sport, subsistence, and commercial fishing. I have run my own boat since 2011, engaging in commercial fisheries for Prince William Sound (PWS) salmon seine, Tanner crab, black cod pot, and halibut longline. I have also participated in the commercial spot shrimp fishery and had planned to do so again this year before the closure was announced. Additionally, I participate in the sport shrimp fishery every summer.

Unfortunately, I will not be able to attend this board meeting as I will be out on the water fishing. However, I fully endorse the positions of the Cordova District Fishermen United (CDFU) and urge you to give their comments the weight they deserve, knowing they represent the commercial fishing community of this region. The March timing of this meeting prevents many commercial fishermen from attending and providing input directly.

I believe the current shrimp management strategy is fundamentally flawed, leading to depressed shrimp populations throughout the Sound. By supporting **Proposals 300 and 310**, you can make meaningful changes to how shrimp are harvested in PWS, leading to a healthier population and increased opportunities for all user groups

Proposal 284 – SUPPORT

Allow catcher vessels to operate as tenders during the Kodiak District commercial Tanner crab fishery.

I have participated in the Kodiak Tanner crab fishery, and this change is both necessary and beneficial. It will result in a more profitable and safer fishery. The safety aspect cannot be overstated—having crab that must be offloaded is just one more factor that can push fishermen to travel in marginal conditions.

Proposal 300 – SUPPORT WITH AMENDMENTS

Modify the Prince William Sound noncommercial shrimp fishery management plan to split the TAH for noncommercial use into the same areas used for the commercial spot fishery.

As a longtime participant in the noncommercial shrimp fishery, I have witnessed firsthand the depletion of shrimp stocks when too much harvest is concentrated in a single area. Valdez Arm, despite being closed to commercial fishing, has been overharvested in recent years to the point that I no longer bother setting pots there.

Proposal 301 – SUPPORT

Close the sport shrimp fishery when the TAH is below 110,000 lbs.

This measure is necessary and will not significantly impact participation by myself or most Alaska residents, as they can still access the resource through the subsistence fishery.

Proposal 304 – OPPOSE

Delay the season opening by two weeks in the noncommercial and commercial shrimp fisheries.

I oppose this proposal because there is insufficient evidence that a two-week delay would meaningfully reduce the harvest of egg-bearing shrimp. I have caught non-egg-bearing shrimp in March during the Tanner crab fishery and, conversely, egg-bearing shrimp in June and July. This delay would directly impact my ability to participate, as it would overlap more with the summer salmon season.

That said, I do believe that shortening the season for both commercial and noncommercial shrimp fisheries would help protect the resource. However, this should not be done by delaying the start. Instead, I would support modifying season dates to limit the commercial fishery to no more than one month and to separate the commercial and sport shrimp seasons. The overlap between these fisheries creates enforcement challenges, as it enables commercial fishermen to set sport pots in closed areas and haul them alongside their commercial catch.

Proposal 305 – SUPPORT

Prohibit noncommercial shrimp participants from carrying additional shrimp gear.

As a participant in the noncommercial shrimp fishery, I have never carried spare shrimp pots on my boat. I have lost plenty of pots while commercial fishing, which has directly impacted my profitability, but I would never suggest that commercial boats be allowed to carry spare pots. The same principle should apply to noncommercial participants—spare pots encourage cheating and make pot limits unenforceable.

Proposal 306 – SUPPORT

Implement daily reporting requirements for Registration E.

Daily reporting is already required in many of the fisheries I participate in, and I do not believe it would be a burden for this fishery. More frequent reporting would allow managers to make timely closures when overharvest is evident, ultimately leading to a healthier fishery.

Proposal 307 – SUPPORT

Align the season start times of the Prince William Sound noncommercial and commercial shrimp fisheries.

I strongly oppose any regulation that mandates a 12:00 a.m. season opener. Midnight openers create hazardous conditions, as they encourage vessels to set gear in the dark.

Proposal 308 – OPPOSE

Modify lawful shrimp pot gear to reduce the number of pots allowed.

A 25-pot limit is unworkable for a commercial fishery. It would result in an extremely slow harvest rate, making it difficult for participants to earn a profit. Rising insurance costs make efficiency more critical than ever, and the Board should aim to streamline this and other fisheries to ensure they remain viable.

Additionally, small pot limits lead to increased hauling frequency, which results in higher rates of undersized shrimp being harvested.

Proposal 310 – SUPPORT

Remove the triannual rotation in the Prince William Sound commercial shrimp fishery.

This proposal, along with **Proposal 300** for the noncommercial fishery, offers the greatest potential to improve shrimp populations. The triannual rotation has caused overharvest in Area 3, leading to a significant decline in shrimp stocks there.

Proposal 311 – SUPPORT

Allow vessels participating in the Prince William Sound shrimp pot fishery to also operate as tenders.

The Board should prioritize making fisheries **safer and more profitable**. Allowing vessels to tender for others is a simple, effective way to achieve both objectives.

PC32

Submitted by: Trey Brown
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC33

Submitted by: Macdara Bryan
Community of Residence: Anchorage

I would like to see the Shrimp fishery shortened to May 15 - August 15. This would help protect the "egggers" which should help the population. I also think that commercial shrimper catchers should be able to tender other boats catches. It is silly and wasteful to have everyone running back to Whittier every three days. A catcher could register as a tender for the season, and report their tendering to fish and game. Groups of boats could take turns tendering and save fuel and expenses by collaborating.

PC34

Submitted by: Catherine Bubert
Community of Residence: Utah

I support the fishing industry

PC35

Submitted by: Rhett Buchanan
Community of Residence: Wasilla, Alaska

Dear Board,

I am writing in support of Proposal 314 to create a Kvichak River Special Harvest area. I am a setnet permit holder with 30 years of experience fishing the Naknek-Kvichak District. I have fished in both the Naknek River Special Harvest Area and the Alagnak River Special Harvest Area. This proposal satisfies many goals simultaneously:

1. It would allow protection of Naknek River stocks when needed.
2. It would provide a new, effective management tool for Kvichak stocks.
3. It would allow increased economic opportunity for fishing families like mine.
4. It could reduce conflicts between user groups while allowing more opportunity for all. For example, drift gear could be allowed farther up the Kvichak River while allowing established Kvichak setnet sites to continue fishing.
5. It would reduce hardship imposed on setnet fishers when the only fishing option is to move established camps on short notice.

This proposal provides a balanced approach that would benefit the resource, managers, and fishers alike. Thank you in advance for your consideration.

Respectfully,
Rhett Buchanan

Submitted by: Jayden Burfeind
Azarel

Community of Residence: Nikiski

I support Proposal 313, which requests that set beach steins be added as an alternative gear type. My family believes that we can fish with our existing equipment and shore fishery leases. We are excited to try the new method of set beach seines and welcome the opportunity for our family fishery.

Submitted by: Joe Carenter
Community of Residence: Chugiak

Prop #303

-As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

1

Submitted by: Dana Cervenka
Community of Residence: Dunwoody, GA

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table. We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

Sincerely,

Dana Cervenka and family

PC39

Submitted by: Heidi Chay
Kenai Local Food Connection

Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. I have participated in the East Side Setnet fishery since 1987 and observed demonstration beach seines in operation during the 2024 season. I would love to see this opportunity made available to other Eastside setnetting families. Please support Proposal 313.

PC40

Submitted by: Jamar Christian
Community of Residence: Shoreline

I support Proposal 313, which requests that set beach steins be added as an alternative gear type. My family believes that we can fish with our existing equipment and shore fishery leases. We are excited to try the new method of set beach seines and welcome the opportunity for our family fishery.

PC41

Submitted by: Mary Christian
Community of Residence: Shoreline

I support Proposal 313, which requests that set beach steins be added as an alternative gear type. My family believes that we can fish with our existing equipment and shore fishery leases. We are excited to try the new method of set beach seines and welcome the opportunity for our family fishery.



February 25, 2025

Board of Fisheries
 Art Nelson
 Executive Director
 PO Box 115526
 Juneau, AK 99811-5526

The Chugach Regional Resources Commission (CRRC) comments on statewide proposal 263 to open a subsistence Dungeness crab fishery in Cook Inlet.

CRRC **supports** proposal 263 to open a Cook Inlet subsistence Dungeness crab fishery. In that portion of the Cook Inlet Area outside the non-subsistence area described in 5 AAC 99.015(a)(3), in the subsistence taking of Dungeness crab, we propose opening the subsistence Dungeness crab fishery at a very small scale. CRRC is requesting a summer Dungeness crab fishery because we consulted with knowledge bearers in Port Graham and Nanwalek and they have traditionally only harvested Dungeness crabs from July-Sept because 1) The Dungeness crab come closer to shore to feed on pink salmon eggs/carcasses and generally feed in shallower waters during this time and 2) the waters are safer for the smaller skiffs these communities own and are only able to drop crab pots during these months. Since the Board of Fish meeting in 2022, the department has made no progress towards applying for grants with CRRC as a partner to conduct Dungeness crab surveys in the Lower Cook Inlet, as proposed by the department as a solution during the 2022 meeting. CRRC is an organization that supports and protects the subsistence resources of Port Graham and Nanwalek, and we have limitations to our capacity to apply for grant funding for every subsistence resource. Therefore, we strongly agree with [REDACTED] that issuing subsistence permits that would collect data on the Dungeness crab fishery would be an efficient and effective way to fill in data gaps and inform the department with harvest data on the Lower Cook Inlet Dungeness crab population. We have spoken with the Chiefs and community members of Port Graham and Nanwalek to learn more about the local and traditional knowledge of the Dungeness crab populations in English Bay and Port Graham Bay. The Native Village of Nanwalek has reported an abundance of mature Dungeness crab returning to the shallow waters of English Bay. The Native Village of Port Graham reported that they are not seeing Dungeness crabs in the shallow waters near their beaches like they used to. Both communities have a long history of harvesting Dungeness crabs for subsistence use. Nanwalek and Port Graham would both like to have the regulations changed to open the Cook Inlet subsistence Dungeness crab fishery under specific guidelines, as listed below in question 3. Both communities are committed to participating in citizen science programs to collect survey data (e.g. size, sex, location) on Dungeness crabs to inform fisheries management in collaboration with CRRC. CRRC has been actively working with the Native Village of Port Graham and the Native Village of Nanwalek, and ADF&G's Division of Subsistence to conduct subsistence household surveys in Port Graham where we asked household members questions about subsistence use of the Dungeness crab resource in Port Graham Bay (January 22-26, 2024). CRRC also hosted a Board of Fish Proposal Writing workshop in Cordova

A Tribal Organization Focusing on Natural Resource Issues Affecting the Chugach Region of Alaska

Chenega • Eyak • Nanwalek • Port Graham • Qutekcak Native Tribe • Tatitlek • Valdez Native Tribe



(February 27-28, 2024) where the second Chief of Nanwalek and Nanwalek Tribal Members attended and discussed this proposal as a group.

Proposal 263 to open a subsistence Dungeness fishery in Cook Inlet would be beneficial to not only the communities of Port Graham and Nanwalek but it would give the ADF&G needed information on the abundance and dispersion of Dungeness crab in Cook Inlet. Dungeness crabs were an important subsistence species before they were over harvested by commercial fishing in the 1980's.

We are thankful for this opportunity to comment on these proposals.

Thank you,

Willow Hetrick-Price

Willow Hetrick-Price
Executive Director
Chugach Regional Resources Commission

A Tribal Organization Focusing on Natural Resource Issues Affecting the Chugach Region of Alaska

Chenega • Eyak • Nanwalek • Port Graham • Qutekcak Native Tribe • Tatitlek • Valdez Native Tribe

Submitted by: Julie Cisco
Community of Residence: Sterling, AK

Good afternoon -- I am writing in support of Proposal 313 and Lisa and Brian Gabriel's proposal to allow beach seines as an alternate gear type for Cook Inlet setnetters. Faced with an ongoing problem, the Gabriels have invested time, money and effort into finding an alternative that saves the sockeye fishery but preserves the kings. Thank you for your support.

Submitted by: Russell Clark
Community of Residence: Kenai

ACR Proposal 312.

I am for proposal 312 that will increase the number of days per week and extend the season to Aug 15th for ESSN dieting for commercial fishermen. I participated in the 2024 commercial dipnet season and I was successful in my efforts. If I had more open days and if the season had been extended to Aug 15th I would have been more successful. One very important factor for this commercial dipnet fishery proposal is that ALL ESSN S04H permit holders may participate in the fishery if they so choose. If we are able to continue the dipnet fishery I am sure that we will get better with more experience and perhaps some future modifications that may be requested for BOF approval. So far, this is the only alternative available to all ESSN fishermen during the King Salmon stock of concern plan.

ACR Proposal 313

Set Beach Seines.

I support this proposal but with shorter nets that will accommodate DNR shore lease statutes.

Submitted by: Russell Clark
 Family that hold 8 Cook Inlet setnet permits

Community of Residence: Kenai

Proposal 313 Set Beach Seine Nets ESSN

My name is Russell Clark and my family has 8 S04H setnet permits in Cook Inlet. 6 of those permits are in the ESSN fishery. We have Shore Fishery leases 2 of which are beach leases. We have been fishing over 20 years.

In an earlier comment on this proposal, I expressed my support to proposal 313 with amendments. After gaining additional information on how the planned implementation and presentation of how the set beach seines will be prosecuted, we no longer support proposal 313 and feel that it will have long term consequences on different user groups and different stocks of salmon in Cook Inlet. As proposal 313 is currently being proposed, We cannot support it for the following reasons:

1). Section (D) specifies that openings will be 3 days a week. Under 5 AAC 21.382 Kenai King stock of concern plan, at no time is set nets allowed to be set 3 days a week. 313 does not meet these guidelines.

2). Section (E) specifies that “fishing with a set beach seine net may occur only from shore; fishing MUST occur at the location of a shore fishery tract identified in the recorded plat for that AS 38.05.082 lease or a Kenai City lease; or historic beach staked gillnet location.

(A). This violates 11 AAC 64.020 “No person is required to lease tide and submerged lands to participate in a shore fishery.

(B). IF DNR gives priority to shore leases in this NEW fishery which is actuality a beach seine fishery that has a separate gear code and separate Alaska permit classification and regulations, only a limited number of permit holders will be able to participate in the fishery. Lease holders although being restricted to one net (600 ft proposed), have expressed the desire to place running lines on all leased tracts in order to show “intent” and close what would otherwise be open unfished water available to other fishermen. Proposed regulations as expressed in KPFA meetings is to require beach seines to be set and retrieved using running lines only. If these practices are adopted, what normally would be open, unfished waters due to restriction, will now be closed because running lines will be in place by lease holders fishing another site and will preclude other setnetters from placing running lines in and being able to fish. This now become allocative and weaponizes the shore fishery program to restrict fishing and access to other fishermen. This also keeps fishermen from being able to set beach seines when the tide goes out past lease holders designated sites.

3). Section (F) of proposal 313 states “set beach seines may be up to 100 fathoms in length, 215 meshes deep”.

(A). 5AAC 39.105(d). “Unless otherwise provided in this title, the following are legal types of gear:

(B). 5AAC 39.105(d)(2) “a set gillnet is a gillnet that has been intentionally set, staked, anchored, or otherwise fixed.

(C). 5AAC 21.331(d) “A set gillnet may not be more than 35 fathoms in length and 45 meshes in depth”.

(D). 5AAC 39.105(d)(6) “a beach seine is a floating net designed to surround fish which is set from and hauled to the beach”.

(E). 5AAC 18.332(c) “Beach Seines no less than 100 fathoms nor more than 225 fathoms in length may be used, (d) “beach seines may not be less than 100 meshes in depth”.

(F). AS 38.05.082(a) “Fisheries development includes the utilization of shore gillnets or setnets for the taking of fish”.

(G). 5AAC 39.105. Types of legal gear (a) All gear shall be operated in a manner conforming to its basic design.

The purpose of listing these Alaska regulations and statutes is to display at how many points proposal 313 DOES NOT conform to given regulations for Cook Inlet. Where in Cook Inlet is a 600ft net over 100 meshes deep legal? Proposed regulations for use restrict commercial dipnetters from fishing within 600 ft of a set beach seines. With the proposed running line system required for beach seines, this will restrict commercial dipnetters to more than 1200 ft offshore. If running lines are set up to move the 600 ft beach seines out as the tide goes out then it will be even farther. This in essence diminishes the viability of the dipnet fishery which does not discriminate as to its participants and allocates inshore fish to the less than 10% of permit holders expected to participate in the beach seine fishery.

(4). The proposed running line system time of the beach seine fishery is up to August 15. Concerns have been expressed by Northern District setnet fishermen of the amount of Coho that will be harvested or potentially released in unviable condition. For the past two years Northern District setnetters have

been closed during the first part of August due to low Silver runs. Commercial dipnetters are not allowed to keep Silvers but yet discussion has been that beach seiners be allowed to keep silvers to sell up into August since other user groups are allowed the same. Pressure is now on the Northern District from other user groups for Silver conservation and as such many express grave concerns for Silvers harvested in beach seines.

Many fishermen feel that 35 fathoms is the recognized standard for setnets and would provide greater access, less conflict, greater King Conservation, greater Coho conservation, and greater access to more fishermen. If DNR shore leases are utilized in this fishery, they must be amended to allow access to a greater number of fishermen since only one net will be allowed in this fishery. Traditional setnet fishing techniques must not be denied to permit holders as those fishing techniques and traditional equipment are attached to the permit and have been since inception. Restriction to the use of running lines to set nets is not traditional and takes away the rights of many permit holders.

To: Alaska Board of Fisheries

From: Cory Cole
Captain, F/V Alaska Trojan

Date: February 20, 2025

Subject: Support for Proposals 278 and 279 – Improving Management of the Aleutian Islands Golden King Crab Fishery

Chair Märit Carlson-Van Dort:

I am writing to express my strong support for Proposals 278 and 279, which I believe are in the best interest of the Aleutian Islands golden king crab fishery. As the longest-active fisherman in this fishery, I have firsthand experience with the challenges we face. I began as a deckhand in 1994 on the F/V Kiska Sea, worked on three other vessels, and have served as captain of the Alaska Trojan since 2012. Over the years, I have witnessed significant changes in the fishery—some beneficial, but others detrimental to its sustainability and efficiency.

Proposal 278 – Establishing a Pot Limit

Currently, the golden king crab fishery has no pot limit, leading to serious issues, including gear conflicts with bottom trawlers, and other fisheries. The unrestricted number of pots has also contributed to inefficient fishing practices, where some vessels occupy grounds without properly fishing their gear. This directly impacts the catch per unit of effort (CPUE), a key metric used by Fish & Game to manage the fishery.

Last year alone, we experienced a 38% reduction in quota. I believe this decline was not due to a lack of crab but rather improper fishing practices caused by excessive gear in the water.

I am currently fishing 1,982 pots, the most I have ever fished, and I firmly believe that a 2,500-pot limit is more than sufficient to fish these grounds effectively while maintaining a strong CPUE. Implementing this limit would:

- Reduce gear conflicts
- Encourage responsible fishing practices
- Provide more accurate data for Fish & Game to manage quotas sustainably
- Promote long-term stability for the fishery

Alaska Board of Fisheries
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Proposal 279 – Amending Gear Sharing and Transfer Provisions

While gear sharing was originally introduced to reduce dead loss by avoiding rail dumping, it has unfortunately been exploited as a tool to monopolize fishing grounds. Some vessels are using this provision to spread pots out without actively fishing them, preventing others from moving into productive areas.

This misuse goes against the intent of the regulation and disrupts fair competition. I support an amendment that ensures gear sharing is used appropriately and not as a tactic to restrict access to viable fishing areas. Strengthening these provisions will:

- Create a level playing field for all participants
- Reduce unnecessary gear congestion
- Ensure the fishery operates as intended

Conclusion

The golden king crab fishery is the strongest crab fishery in Alaska, and I want to see it remain that way. These two proposals would reduce gear conflicts, promote responsible fishing, and provide Fish & Game with more accurate data for effective management. As someone committed to this fishery for another 15–20 years, I want to see it return to the stable quotas and strong fishing conditions we had 8–9 years ago.

I strongly urge the Board of Fisheries to pass these proposals for the benefit of the industry as a whole. Thank you for your time and consideration.

Sincerely,

Cory Cole
Captain, F/V Alaska Trojan

Submitted by: Victoria Coleman

Community of Residence: K beach set netter for 43 years my husband Kenny Coleman for 52 years

I support this proposal but think the net is to long to work. It is sad that not everyone can participate with this new gear type. My husband Ken Coleman died trying to save this fisheries and find a way to help all of his fellow set netters, He always worked hard to figure out a way to eliminate the catching of kings for his set net fisheries, but it fell on deaf ears. With this opportunity for only beach sites maybe the state could finally support the gear reduction my husband worked tirelessly on for the past 9 years for the set net community fisherman that are left out, since they do not have beach sites.



Märit Carlson-Van Dort, Chair, Alaska Board of Fisheries

Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

February, 2025

Re: Statewide Shellfish, Prince William Sound Shrimp, and Supplemental Issues Meeting Proposals

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

Cordova District Fishermen United (CDFU) is an industry-based nonprofit dedicated to strengthening commercial fishing in the Prince William Sound (PWS) region by advocating for the needs of community-based fishermen.

Our membership has long participated in the PWS spot prawn pot fishery and has expressed concerns regarding its modern management. In the past, there has been a concentrated effort by some fishery participants and managers to limit participation in the fishery by reducing its economic viability. Measures such as low pot limits, extended seasons, and seasonal overlaps with the salmon season have been implemented. Further restrictions are being proposed this year, not for biological reasons but as a means to reduce competition. We remain strongly opposed to this practice. Especially in the current economic climate, the Board of Fisheries should focus on improving the resilience and economic viability of our rural fisheries, through efficient and fair science-based management.

The current management strategy, in effect since 2010, is a significant departure from the historical fishery. Its triannual rotation system is unlike any other shrimp fishery management strategy on the West Coast, and sport effort is highly concentrated in two areas. This approach has likely contributed to the decline in shrimp abundance observed in Prince William Sound, by concentrating effort of both user groups rather than distributing it annually. We urge the Board of Fisheries and the Alaska Department of Fish and Game (ADFG) to take immediate action to

prevent the long-term closure of this fishery, rebuild the stock, and balance management measures across user groups.

We believe there are three fundamental problems with the current management strategy:

1. **Commercial fishery closure when the Total Allowable Harvest (TAH) is below 110,000 lbs.** There is no biological justification for this closure trigger, and no justification for applying it exclusively to the commercial sector. This contradicts the long-standing precedent that sport and commercial fisheries hold equal priority, and equal conservation responsibility. If the department concludes there is a Total allowable harvest and the sport fishery remains open, the commercial fishery should also remain open – and vice versa. It may be that both the Sport and Commercial fisheries could be executed sustainably at levels below the 110,000 closure trigger, *if* management strategies appropriate for low abundance levels were implemented.
2. **Localized depletion of shrimp stocks near population centers.** The TAH is set annually based on the shrimp population across the entire Sound. However, the majority of the harvest occurs in the sport fishery, which is concentrated near the ports of Valdez and Whittier. This has resulted in growing "dead zones" where shrimp populations near these towns are severely depleted, forcing fishermen to travel farther for their catch.
3. **Triannual rotation of the commercial fishery.** Under the current strategy, the commercial fleet must harvest its share of the TAH from only one-third of the area each year. ADFG survey data and CPUE (Catch Per Unit Effort) data clearly indicate that some areas of the Sound are significantly more productive than others. Nevertheless, the management strategy imposes equal harvest rates in the low-productivity Area 3 as in the highly productive Areas 1 and 2. We believe this practice could be harmful to shrimp populations. There is no biological benefit to harvesting an area every third year instead of annually. In fact, harvesting at a high rate every third year may be more damaging to the stock than a consistent, low-rate annual harvest.

Sincerely,



Ezekiel Brown
Board President
ezekiel.k.brown@gmail.com

Proposals 284 - Support

-Allow catcher vessels to operate as tenders during the Kodiak District commercial Tanner crab fishery

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. It would also improve safety in the fishery by reducing delivery runs and giving the ability to aggregate crab on larger vessels when needed. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries. ADFG has the ability to manage a fishery in which fishery participants can also be tender vessels. Tendering by fishery participants is already allowed in every Salmon fishery in the state under the transporter regulation and in the Kodiak Dungeness fishery through a similar regulation suggested by this proposer. This regulation would allow Crab from the Kodiak fishery to be more efficiently bought by processors throughout Alaska. Transporting crab to other ports for processing is important to ensure fishermen can achieve the best price for their crab, and increase options for processing capacity, which can be an issue as we saw in the 2023 Kodiak fishery.

Proposal 300 - SUPPORT-With amendments

Modify the Prince William Sound noncommercial shrimp fishery management plan, as follows: Split the TAH for noncommercial into the same areas used as harvest areas for the commercial spot fishery

The noncommercial fishery is allocated **60% of the Total Allowable Harvest (TAH)**, but in past years, it has significantly exceeded this allocation—harvesting **146% of its Guideline Harvest Level (GHL) in 2016 and 138% in 2020**. The TAH for spot shrimp is based on the total population across the entire Sound. However, noncommercial harvest is concentrated in a small section near ports, leading to **localized depletion** of shrimp stocks in these easily accessible areas.

While this proposal is necessary to address the issue, **a slight amendment is needed**. The regulation referenced, **5 AAC 31.210(a)**, **does not include the Eastern or outer waters of Prince William Sound**. As written, the proposal would inadvertently close these areas to noncommercial harvest. While only a small portion of the noncommercial harvest occurs there, these areas can open to commercial fishing under a commissioner's permit. To prevent unintended closures, the proposal should be amended to include **5 AAC 31.210(b)** in addition to **5 AAC 31.210(a)**.

Additionally, the proposal currently requires the department to **apportion the GHL based on pot survey data**. However, the department has informed us that the pot survey **lacks sufficient stations in some areas of the Sound** and that funding is unavailable for expansion at this time. Fortunately, the department already collects **ample data from commercial and noncommercial harvest rates** across the Sound, which could be used **alongside** existing survey data to apportion the GHL more effectively. **To provide the department with flexibility, we recommend removing the reference to the pot survey, allowing them to determine the most appropriate method for distributing harvest across districts.**

Recommended Amendments to Proposal 300:

(Amendments highlighted)

5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan:

(a) The department shall manage the sport and other noncommercial shrimp fisheries in the Prince William Sound Area as follows:

(1) The guideline harvest level for shrimp taken by pot gear in noncommercial fisheries is calculated as **60% of the total allowable harvest for the area. This GHL will be divided between each district described in 5 AAC 31.210(a) and the area described in 5 AAC 31.210(b) annually based on the estimated spot shrimp population in each district/area.**

Proposal 301- SUPPORT with amendments

Close the sport shrimp fishery when the TAH is below 110,000lbs

It is critical that conservation measures be applied equitably and effectively across user groups, based on science-based standards. We urge the board to reassess whether any harvest should be allowed on the spot shrimp stock when the TAH falls below 110,000 lbs. In late February, the commercial sector was officially closed for 2025 because the TAH is below 110,000lbs. However, the largest user group, the noncommercial sector, remains open. That management strategy implies that harvest below 110,000lbs *is* considered sustainable, and the full closure of the commercial fishery is unwarranted (see comments on Proposal 303). However, if the board believes that a closure threshold is an important management and conservation measure, and that 110,000 is an appropriate number based on stock and recruitment analysis, then that closure should apply to commercial *and* noncommercial. This proposal intends to tie commercial and sport together when

the fishery needs to be closed for stock recovery. Restricting harvest should support conservation, but the responsibility of conservation should not fall solely on the commercial fleet.

Recommended Amendment to Proposal 301:

This proposal does not restrict subsistence harvest, and if passed, it would likely result in increased participation in the subsistence fishery. If the board adopts this proposal, we urge them to direct the department to ensure that subsistence harvest remains within the amount reasonably necessary for subsistence, as previously determined by the board (9,000–15,000 lbs).

Proposal 303- SUPPORT WITH AMENDMENTS

Remove the 110,000lbs TAH closure trigger on commercial

We support this proposal to remove the 110,000 lbs TAH closure trigger on commercial harvesters, if the board determines that any harvest can occur sustainably below this level. Since the management plan currently allows noncommercial harvest below 110,000 lbs, it would be more appropriate to develop strategies for limited commercial and noncommercial harvest at times of low abundance, rather than full closure of one sector and zero change in another. Removing this trigger will allow ADFG to sustainably manage this fishery in times of low abundance using harvest limitation strategies for both user groups, adjusted for abundance. Keeping this fishery alive year to year provides some economic stability by allowing fishermen and processors to maintain their markets, while still maintaining strategies for conservation

We ask that the board request Department input as to an appropriate TAH closure trigger that is less than the current 110,000 lbs, that could be appropriately applied to both the sport and commercial sector. Rather than the sport sector alone operating below 110,000. We would also request Department input on management mechanisms that could restrict harvest by all user groups at times of low abundance, rather than eliminate one sector's opportunity. We believe that could be achieved through some amendments to this proposal.

If a version of this proposal were to pass, we hope that in season reporting would be required across all user groups in the future to ensure sustainable in season management of this resource during all estimates of shrimp populations in the Sound.

Proposal 304- Oppose***Delay the season opening by two weeks in the noncommercial and commercial shrimp fisheries***

We oppose delaying the season start date as it is purely allocative and is not likely to have an impact on the harvest of egg-bearing shrimp. The proposer claims that a higher percentage of egg-bearing shrimp are caught early in the season and that this indicates the shrimp have not yet dropped their eggs. However, it is well documented in spot shrimp fisheries that the larger female shrimp are harvested first and the size and female sex percentage decreases as the season progresses. The decrease in egg-bearing shrimp after the first two weeks of the season is a function of having a fishery, not the calendar date.

The shrimp in PWS act quite different from the shrimp in SE and we would caution the board from assuming their egg-bearing season is identical. PWS shrimp live at almost twice the depth of SE shrimp and seem to hold eggs for a far less consistent portion of the year. There also seems to be a large season-to-season variation in timing of egg dropping.

Moving the season start into May will severely limit our membership's ability to participate as the season will overlap with the salmon season. If the board does choose to shorten the season length we would suggest an earlier closure as we have seen evidence that the shrimp do start to put on eggs close to September and the shrimp go through molt mid-summer. Additionally if season dates are changed, effort should be made to separate the commercial and noncommercial season to reduce gear conflict and the potential for misreporting.

Suggest season dates: Commercial April 15th- May 15th, Noncommercial May 15th- August 15th

If the board must set a season start date of May 1st we ask they also include a season end date of May 15th to ensure our membership can fully participate before the salmon season begins.

Proposal 305- SUPPORT***Prohibit noncommercial shrimp participants from carrying additional shrimp gear***

This board ruled on a very similar proposal during the PWS Finfish Meeting in December 2024. Proposal 44 sought to allow subsistence fishing vessels in the Copper River salmon fishery to carry more than the legal limit of gear, including a spare net, in case of loss or damage. The Alaska Department of Fish and Game

opposed that proposal, stating that it “*increases the potential to illegally deploy additional gear and enforcement would be challenging due to the size of the fishing area.*” The board agreed with this assessment, and the proposal failed unanimously (0-7).

We support that decision and see no meaningful difference between a subsistence salmon fisherman carrying a spare net and a sport shrimp boat carrying spare pots. Allowing excess gear creates the same enforcement challenges and opportunities for abuse.

We urge the board to pass this proposal and close the spare pot loophole to ensure fair and effective management of the noncommercial shrimp fishery.

Proposal 306- SUPPORT

Reporting requirements for Registration E

CDFU strongly supports timely reporting in all fisheries. Even when immediate data is not essential for fishery management, daily reporting enhances accuracy and allows managers to detect concerning trends early.

We recognize that some opposition to Proposal 306 stems from concerns that eliminating the mid-season closures currently used to collect harvest information could accelerate the pace of the fishery. However, this perspective is primarily held by a small segment of the fleet that direct-markets shrimp locally. This group of direct-marketers has influenced PWS shrimp fishery regulations and management in ways that extends the season to their advantage, often at the expense of our members and the timely, effective prosecution of the fishery. For example, in 2021, it took 124 days to harvest a 70,000-pound GHL—a clear indication of inefficiencies in the current system.

The reality is that the spot shrimp market is global and highly competitive. There is no issue with absorbing PWS’s relatively small harvest over a shorter time frame. In contrast, the Southeast Alaska shrimp fishery consistently lands 400,000–550,000 pounds in just a two-week season.

Implementing daily reporting will bring PWS shrimp management in line with other pot fisheries, improving efficiency and reducing unnecessary costs for participants incurred during closures.

Proposal 307- SUPPORT***Align the season start time of the Prince William Sound noncommercial and commercial shrimp fisheries***

CDFU does not support any fishery opening by regulation at 12:00am as midnight openers create a dangerous situation with vessels setting gear in the dark.

Proposal 308- Oppose***Lawful shrimp pot gear***

We strongly oppose this arbitrarily low pot limit. At the SE BOF meeting in February you saw proposal 224 to lower the pot limit in SE from the 140 allowed. The department in their comments on that proposal stated *“The department is concerned that reducing the number of pots may increase the incidence of hauling pots twice a day, which would increase the handling and mortality of small shrimp”*

Shrimp pots have a minimum mesh size in order to allow the small shrimp to escape. However, the undersized shrimp do not leave the pot immediately and if the pot is hauled too soon after setting it will have a high proportion of undersized shrimp.

The pot limit under current regulations is set by the department each year with a maximum of 100. CDFU has repeatedly brought up concerns with the small pot limits in PWS resulting in multiple hauls a day. In the shrimp fishery in years when the department sets the pot limit at 25 pots it is not uncommon for boats to haul their pots 2 or 3 times a day. This is not what is best for the resource, with regard to the increased handling and mortality of small shrimp.

Proposal 310- SUPPORT***Remove the triannual rotation***

The current practice of setting a Sound-wide GHL and then allowing harvest in only a small portion of Prince William Sound each year is biologically unsound and contradicts well-established principles of sustainable fisheries management — particularly given the life cycle of shrimp and harvest dynamics in a pot fishery. There are two major flaws with this approach:

1. Unsustainable Harvest Timing

Instead of spreading out harvest pressure evenly over time, the current system allows for a massive harvest every three years in a single area, rather than smaller, sustainable harvests annually across all districts. If we removed the arbitrary district

boundaries and were presented with the two options below, the smaller, annual harvest would be the more sustainable approach.

- Opening the entire Sound once every three years with a 300,000 lb quota, or
- Opening the entire Sound annually with a 100,000 lb quota—

Shrimp pot fisheries naturally target the largest, oldest shrimp first, and as fishing pressure continues, the catch shifts to smaller, younger shrimp. The goal of responsible shrimp management is to maximize harvest of old, large shrimp that are near the end of their lifecycle while ensuring enough younger shrimp remain to replenish the population. The current rotational system fails in this regard, as it forces excessive pressure on localized populations in single years, rather than allowing for a balanced, steady harvest across all areas. This significantly increases the likelihood of depleting the younger shrimp in a single area, which would contribute to the long-term decline of the stock.

2. Mismatched Districts with Unequal Shrimp Populations

The existing district boundaries do not reflect the true distribution and productivity of shrimp populations. Under the current system, each district is treated as if it holds an equal proportion of the total shrimp biomass, when in reality, some areas (such as Area 3) have significantly lower shrimp abundance than others. By forcing a full GHM onto areas with lower productivity, we risk overexploitation and long-term depletion of these stocks.

A Better Approach

We support this proposal because it eliminates the ineffective tri-annual rotation and replaces it with a more adaptive and sustainable system—one that distributes harvest more evenly and ensures management decisions are based on real shrimp population densities and habitat conditions, rather than arbitrary geographic divisions that don't take those critical ecological factors into consideration. We encourage the board to adopt this change and work toward a shrimp management plan that prioritizes long-term sustainability over short-term convenience.

Proposal 311- SUPPORT

Allow vessels participating in the Prince William Sound shrimp pot fishery to also operate as tenders, as follows:

We support this proposal as it aligns with existing practices in other fisheries, such as salmon, where catcher boats are permitted to act as tenders under the transporter regulation. Allowing the same flexibility in shrimp fisheries would streamline operations and improve efficiency.

Fresh shrimp must be frozen or sold within three days of harvest, and it is inefficient for multiple shrimp boats to make frequent trips back and forth to town. Consolidating the catch on a single vessel would significantly reduce this logistical burden, saving time and resources, and increasing safety at sea.

Given the relatively low volume in shrimp fisheries, many operators cannot afford a dedicated tender vessel. Allowing catcher boats to serve dual functions would greatly increase the profitability of the fishery and help make it more economically viable.

Additionally, this change would benefit processors from more remote locations, such as Cordova, by allowing them to better compete in the market. Increased competition could lead to higher prices paid to fishermen, ultimately benefiting the entire industry.

Submitted by: Terry Coreson
Community of Residence: Kenai

Proposal 313. Beach seines in Cook Inlet.

As a commercial beach fisherman who has been in this community and fished all but a few years since then, I have seen many changes in regards to ways, means and timing of harvesting salmon here on the peninsula. User group size and demands push for that change and require action to achieve healthy returns. The main purpose of any action must weigh in on will it help achieve the main goal of being able to harvest the abundance in a manner and not threaten the stock needed to provide that. Having 4 of the 5 salmon species in the same system (Kenai) is a difficult challenge all in itself. Chinook and coho breed and live in the river for up to two years before going to saltwater for another two or more years before returning. Both being Predatorial by nature seems management would be most difficult. The sockeye also breed in tributaries but mainly spend their first two years in lakes and seem less effective by the other three species. One other group of fish that are Predatorial that live mostly full time in the rivers is the rainbow and Dolly Varden. The trophy size trout are only there because of the roe of salmon they feed on. The foot print of the river has changed from a few houses to almost very few lots left to build on which is undoubtedly the most detrimental to the whole ecosystem on how much each species will be able to survive in the rivers. As we look back and see that as breeding and barring grounds have depleted, yet we still raise our maximum and minimum goals. I believe any harvest of a species like sockeye, by any means, is more critical now than ever after witnessing the over run and waste of sockeye in the lakes in the past three years particularly. Running a boat from end to end on the tustamena and Skilak in August and September, propping fish (hitting fish with the prop of the motor) is telling me we must do something or we will soon crash the whole fishery. I visit spawning beds and lakes yearly and I have never seen the mess like the last 3 years save for 2012. Combined with a cold winter and flooding and with what ever we can't account for without change we will be in trouble. It is so easy to point out there and say that is the problem. I can say I see and hear people giving advice and spouting numbers but very few put their eyes and ears to witnessing the facts of what's happening. Just a thought. If say you had a known amount of king smolt you released in different areas around the Cook Inlet even in very small numbers say like the Homer spit and numerous other areas in the Cook Inlet. Now say that all these fish came back in numbers to be expected. Without any education you could determine that the problem of the return rate would be in our back door. I know that doesn't buy votes and yes nobody wants to hear that but who are you going to blame when the Sockeye crashes. Look at the hatchery programs around the state. It tells a much different story than what we are told.

I will vote for any method that can safely remove the abundance with out harming the breeding stock. As a fish board I would think you would come up with something as to not to have a repeat of the last 3 years.

Beach seining would not be my answer to this problem but it does appear to allow harvest of sockeye. Question I have is how many times can a king be handled before it becomes weak and not able to spawn? For the sockeye- will entire tributaries be harmed by this type of gear? How do you let the beach fish with no ways or means to the outside gear? I'm told we run with each advantage given to us and figure out the rest. I guess if anything does come out of this, the state has definitely made the commercial fisherman fight themselves - good job! I would look at the effectiveness of other beach seines that are

active in Alaska and see how that turned out. I realize most if not all fish board members think Cook Inlet has meanest commercial fisherman in the state. Here is where fish was and oil and gas came at the time of statehood. We have had years to develop our opinion's and ideas with long generations to back it. Maybe it is time for a change. What we saw was a promise to get rid of fish traps because that was going to be the end of fish. What we learned was Japan owed most the traps, canneries (at least held the note) and control of the fish markets. By becoming a state, we pushed Japan out and us in. Fish traps only catch fish when the gates was opened. This was just away to switch who controls the markets. The sad part is that now fish is used as a (vote). The first year after the commissioner announced that after shutting down traps fish was coming back in record runs. The appointed commissioner didn't even have the education to lead us in the fact it was at least 3 to 4 years after the closed traps would make a difference. I guess that leadership should of told us that money now runs the show.

I challenge any board members if you want to make a difference, there are families who would love to talk about real solutions. People who understand the area and what it means to all user groups, Political opinions aside, fishing is so miss understood. I heard a state senator that said last week that fishing has to give opportunity to subsistence and personal use first priority (he was from tok). He missed the first step by a mile.

Management is what allows fish to remain harvestable. That proper management is responsible barring any acts outside our control. Go back to natural runs is not what anyone wants.

The fish board has options at this point.

Manage fish to goals min. Max. For all species of fish. The unbalanced system is the cause of failure for all species. Right now kings called stock of concern. Think!!! Even the traps did not kill off the kings! Obviously the pressure of both sport and commercial isn't allowing their return like we would like to see. But it is more than that. The kasilof river is a model everyone should be looking at. For years it has had a hatchery fish program added to the natural habitat fish. This story if you look at it states that the natural fish have been endangered long ago, since this is a federal lake feeding this river only "natural" kings may parent the "hatchlings", even though the fish are the same genetics. So what you see is the natural fish have been slowly fading away but the hatchlings which are raised and released in counted numbers are still retuning at expected rates. This points out that the king issue here is habitat! No other reason. It is to the point there might not be enough natural fish to make fry for this River. I am not in favor of hatchery fish but this is telling me that our rivers are like anchorages and the valleys so we might have to run the same program as they have. Please review the state's history of hatchery fish when and amounts and look at demographics of people and traffic on the areas effected. One point I have to mention when managing and setting goals, you need to optimize those numbers by ratio of run to return. A fish lays how many eggs? So if we get a one to one ratio (which we are at now) how hard are we running our habits and how long can that survive?

The other option get votes and blame everyone and everything and then say we didn't know what happened.

I love working outside and Fishing is who I thought I was. My family was able to worked together and I would not trade those years for nothing. I very much appreciate all the time I have had fishing and even now when nothing seems to make sense I realize fishing was only the path that made me. I just want everyone to have the same opportunity I had. I'm one of the few who has lived at a place I call home and work. To see a salmon get plucked out of the water and somehow turn into uncirculated

money (actually it gives what has been printed value) is truly amazing. As managers of this natural resource you have the opportunity to keep this alive by not only participating in how this system works but you can step out and kickstart a wave of what really counts. Biologists and real history, you have the past to see why systems failed. You have the present to see what current situation we are in. And the future to watch your effects and efforts you accepted.

That's a long way to say I support prop-313 and yet if you leave at that, I don't see it as the solution.

Comments or suggestions are appreciated



PC49

Submitted by: Dave and Marianne Corrie
Community of Residence: Snohomish, WA

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table. We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

Sincerely,

Dave and Marianne Corrie

BERING SEA/ALEUTIAN ISLANDS CRAB OBSERVER OVERSIGHT TASK FORCE

Date: February 20, 2025

To: Tom Carpenter, Acting Chair
Alaska Board of Fisheries

From: Jamie Goen and Cory Lescher, COOTF Co-Chairs

Subject: Report to the Alaska Board of Fisheries
With Recommendations

The Bering Sea/Aleutian Islands Crab Observer Oversight Task Force (COOTF) was formed by the Alaska Board of Fisheries in 1999 and consists of crab industry stakeholders and representatives. The COOTF is charged with interacting and acting in an advisory capacity to the Alaska Department of Fish & Game (ADF&G or Department), as well as reporting to and being advisory to the Board of Fisheries on issues relating to the state managed BSAI shellfish onboard observer program.

The purpose of the COOTF is to review and recommend specific action for all aspects of the BSAI crab observer program, including the following:

- Funding mechanisms for observers
- Budget and reserve priorities
- ADF&G suggested program receipt requests

The COOTF meets annually each summer with ADF&G to review reports on the previous year's deployment of observers, along with budgeted and actual costs of the program. The COOTF also reviews and comments on Department recommendations for deployment and funding for the program through the test fish receipt authority.

The BSAI crab observer program is funded through legislative-approved test-fish funds and federal crab rationalization funds. The legislative authority for the test-fish fishery was at risk during the last session of the state legislature. Members of COOTF want to reiterate the importance of the test-fish authority and resulting observer program and thank those that worked hard to maintain the authority.

At the summer 2024 COOTF meeting, long-time member and founder, Linda Kozak, announced she was stepping down as co-chair and from membership on COOTF. The members of COOTF want to extend a heartfelt thank you to Linda for her leadership of, engagement with, and commitment to COOTF over the last 25 years! With this change, COOTF voted for Jamie Goen and Cory Lescher to be co-chairs of COOTF moving forward.

COOTF Continuation and Membership Recommendations

1. The members of the COOTF recommend and request consideration by the Alaska Board of Fisheries to approve the continuation of the Task Force.
2. The members further recommend the following individuals be reappointed for a term of three years. The Alaska Board of Fisheries has authorized the Crab Observer Oversight Task Force membership to be from nine (9) to fifteen (15) members. Currently the COOTF has ten appointed members.

Lance Farr
Jamie Goen
Cory Lescher
Craig Lowenberg
Gabriel Prout
Nikolai Sivertstol
Joshua Songstad
Jeff Stephan
Doug Wells
Paul Wilkins

The members of the COOTF believe this Task Force has been very successful working in cooperation with the department for the past 25 years and we are grateful for the support and exchange of information provided by the Department. We believe our input and ideas have helped shape the Bering Sea/Aleutian Islands shellfish observer program into a cost-efficient and effective program which provides valuable information for the management of the crab stocks of the BSAI.

Thank you for reviewing our report and recommendations.

Submitted by: Angie Cramer

Community of Residence: Kenai, Alaska

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

February 25, 2025

To: Alaska Board of Game
Re: Shrimp fishery

To Whom It May Concern:

I am writing with concerns regarding the allocation of the shrimp Guideline Harvest Level (GHL) between commercial fishing and sport fishing.

It is my understanding that:

- At present, 60% of the GHL is allocated to the sport fishery while 40% is allocated to the commercial fishery.
- The commercial fishery is highly regulated and patrolled to ensure that the fishermen stay within their allocated amount of shrimp while the sport fishery is not able to be enforced as strictly.
- There has been significant overharvesting by the sport fishery in the past several years.
- The sport quota of 60% is allocated to a very small percentage of Alaskans who have access to the boats and equipment needed for this type of fishing.

Since I do not have a boat and/or the means to catch my own shrimp, I support the commercial fishing industry for many reasons: It supports the Alaskan economy, it provides a livelihood for the commercial fishermen, and provides this Alaskan (me) with good-quality fish.

To address the current issue—that the GHL is less than 110,000, thereby cutting off the commercial fishermen this year—perhaps a comprehensive management plan for both fisheries is in order. I would like to see regulations that share the burden of conservation as well as a reallocation of the GHL so that it is more in line with the percentage of Alaskans with access to this resource and also adherence to the regulations.

As an Alaskan for over 50 years and one who appreciate our state's resources for the reasons stated above, I feel very strongly that everyone, sport and commercial, must do their part to protect the fisheries.

Thank you for your consideration,
Lena Crane

Submitted by: Susan Crane
Community of Residence: Soldotna

I am writing in support of Proposal 313 approving set beach seines tested during the 2024 season in the Cook Inlet.

Set net sites have provided a good alternative to use to help protect the king salmon of our region. These sites are often generational, owned and operated by families for many years. Our son worked on set net sites for five or six years starting in high school. This helped him in many ways including his college costs. He worked with other young people that were learning the value of hard work. As senior citizens now, catching fresh fish as a food source is more difficult. We have purchased FRESH, wonderful, quality fish from set netters for many years. I know that others depend on this as a great source of the freshest quality. The king salmon need protection now. Banning the set nets are not the one thing that will fix this...They have come up with a good solution until the counts improve. Please preserve this wonderful way of life that has been a staple for many years and many people.

Submitted by: Aaron Crookston
Community of Residence: Layton, UT

• I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

Submitted by: Alan Crookston
Tide Chaser Fishery, LLC
Community of Residence: Kenia Alaska

I support proposal 313.

I support prop 312

4th generation fishing family. I employ 10-15 local teenagers every summer, I have for decades. I spend tens of thousands of dollars every summer on my small business, and the fish I catch goes all over the world as a good source of protein. I believe I can use my existing historical fishing stakes, and modify my existing setnet lines to make the set beach seining work without killing a single king.

By doing this I can stay in business and continue this way of life. Please support proposal 313, the data should drive this decision and we need to get our allocation of fish back.

I also vigorously participated in the dipnet fishery. It is a viable gear type, but just the way it is written, it is barely viable. Extending the season to seven days a week until August 15 will allow me to feed my family.

PC56

Submitted by: Allison Crookston
Community of Residence: Layton, UT

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC56

Submitted by: Allison Crookston
Community of Residence: Layton UT

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC57

Submitted by: James Crookston
Community of Residence: layton ut

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC58

Submitted by: Lauren Crookston
Community of Residence: Layton ut

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC59

Submitted by: Laurie Crookston
Community of Residence: Kaysville, UT

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC59

Submitted by: Laurie Crookston
Community of Residence: Kaysville UT

I support 312 and 313

PC60

Submitted by: Lisa Crookston
Community of Residence: Layton, UT

• I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC61

Submitted by: Luke Crookston
Tide Chaser Fishery, LLCMy family

Community of Residence: Kenai, Alaska

I support proposal 313.
and

I support prop 312

4th generation fishing family. My dad is a disabled vet, fishing is one of the only jobs he can do. He has spent his entire life's savings investing in this fishery. My dad can figure out how to do this set beach seining and on days that we are not seining we can dip, and then I can go to college.

Please let us fish.

PC62

Submitted by: Matthew Crookston
Community of Residence: layton ut

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC63

Submitted by: Michael Crookston
Community of Residence: Layton

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC64

Submitted by: Nick Crookston
Community of Residence: Layton

• I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC65

Submitted by: Nina Crookston
Tide Chaser Fishery, LLCmy family

Community of Residence: Kenai Alaska

I support proposal 313.

and

I support prop 312

4th generation fishing family. I employ 10-15 local teenagers every summer, I have for decades. I spend tens of thousands of dollars every summer on my small business, and the fish I catch goes all over the world as a good source of protein. I believe I can use my existing historical fishing stakes, and modify my existing setnet lines to make the set beach seining work without killing a single king.

By doing this I can stay in business and continue this way of life. Please support proposal 313, the data should drive this decision and we need to get our allocation of fish back.

I also vigorously participated in the dipnet fishery. It is a viable gear type, but just the way it is written, it is barely viable. Extending the season to seven days a week until August 15 will allow me to feed my family.

PC65

Submitted by: Nina Crookston

Community of Residence: West bountiful Utah

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC66

Submitted by: Paul Crookston

Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC67

Submitted by: Sarah Crookston

Community of Residence: Layton ut

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC68

Submitted by: Ted Crookston

Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

Submitted by: Todd Crookston
Tide Chaser Fishery, LLCmy family

Community of Residence: Kenai, Alaska

I support proposal 313.

and

I support prop 312

4th generation fishing family. My dad is a disabled vet, fishing is one of the only jobs he can do. He has spent his entire life's savings investing in this fishery. My dad can figure out how to do this set beach seining and on days that we are not seining we can dip, and then I can go to college.

Please let us fish.

Submitted by: Wesley Crookston
Tide Chaser Fishery, LLC

Community of Residence: Kenai Alaska

I support proposal 313.

and

I support prop 312

4th generation fishing family. My dad is smart enough to figure out this new method of fishing, and we are confident it will not kill a single king. Our allocation of fish has been taken from us, please let us harvest.

Submitted by: Lisa Davis
Community of Residence: Novato, CA

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table. We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

PC72

Submitted by: Brent Deakins
Azarel Setnet Fisheries

Community of Residence: Nikiski

I support Proposal 313. Please let us fish again.

PC73

Submitted by: Lynn Deakins
Community of Residence: Nikiski

I SUPPORT PROPOSAL 313 - Our family intends to fish a set beach seine within our existing shore fishery leases at our historic staked sites (staked in 1961) We welcome this new opportunity to use our existing infrastructure and equipment. We will identify and ensure the safe release of all king salmon from our nets. We believe Proposal 313 will help our family business survive until the king salmon stocks return.

PC74

Submitted by: Sean Den Adel
Community of Residence: Cordova

I have read the proposals and have voted accordingly. I have no other comments.

PC75

Submitted by: Lindsay Dunn
Azarel Setnet Fishing

Community of Residence: Midland, TX

I support Proposal 313, which requests that set beach seines be added as an alternative gear type. My family believes that we can fish with our existing equipment and shore fishery leases. We are excited to try the new method of set beach seines and welcome the opportunity for our family fishery.

PC76

Submitted by: Daniel Eames
northern magic llc

Community of Residence: valdez

the board of fish needs to adopt a comprehensive management plan for the pws shrimo fishery proposal 299 as is evident by the last minute closure of the season this year. in addition other proposals to close both sport and commercial if either one is closed must be addressed

PC77

Submitted by: Dennis Eby
Community of Residence: Wasilla

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

PC78

Submitted by: Joe Echo-Hawk
Community of Residence: Montana

I am writing to support proposal 314 to create a special harvest area for the Kvichak River to protect Naknek stock and allow for harvest of the Kvichak River stock. I have set net fished over 2 decades in the Kvichak with some of those years primarily occurring in the Naknek special harvest area. I request that the Board create a policy framework that is dynamic and balances the goal of stock preservation with the economic opportunities for fishing families like mine. For example, a framework that allowed the Kvichak section to remain open to set net fishing as long as possible while concurrent drift openings took place further up the Kvichak River would provide less congestion and more fishing opportunities for all gear groups. Our district has unique attributes, and I hope the Board can craft regulations that fit our unique situation. I would request that if genetic testing is being used to determine if the Kvichak catches Naknek fish, that careful samples be taken from multiple areas of the Kvichak and the samples matched to the location they were taken in the Kvichak. While it may be anecdotal evidence, it seems apparent to us fishermen that what is caught and how the fish behave on the tide schedules indicates that set net fishermen further from the Naknek do not see significant Naknek numbers of fish and there would be an option to drastically decrease risk of catching Naknek fish in the Kvichak if plans and testing were done appropriately. Thank you for this consideration.

PC79

Submitted by: Aaren Ellsworth
Community of Residence: Kodiak

Dear Members of the Board of Fish,

I am writing to express my strong support for Proposal 315, which aims to address an oversight in the joint venture regulations for setnetters in the Northwest Kodiak District. During the January 2024 Board of Fish meetings, regulations were changed to allow setnetters 175 fathoms of gear instead of the historical 150 fathoms. However, the joint venture regulations were not updated accordingly, resulting in a cap of 300 fathoms in aggregate instead of 350 fathoms. This discrepancy creates a situation where those who choose to fish a joint venture are disadvantaged by losing 50 fathoms of allowable gear. This proposal is a housekeeping item and is not asking for any additional gear in the water. The change to allow setnetters 175 fathoms of gear was a last-minute consideration during the January BOF process and was brought up after the opportunity for public input had ended. Consequently, there were no questions directed to ADF&G, and the department had no chance to address this issue. The joint venture

regulation should be updated to match the total length of gear allowed per permit to ensure that joint ventures remain a viable tool for setnetters.

Importantly, this proposal is not allocative in any way. Despite the title given to the ACR, this proposal does not request any additional fathoms of gear in the water. All permit holders in the central section of the Northwest Kodiak District are currently allowed 175 fathoms. The joint venture regulation is simply about allowing two permit holders to combine their 175 fathoms of gear into three nets. The same amount of gear will be in the water, regardless of whether it is fished by two independent fishermen with 175 fathoms each or by two permit holders joint venturing their 175 fathoms so they can have three nets. The total per each permit would still be 175 fathoms of gear in the water.

The number of people using joint ventures has dramatically decreased because they would lose allowable fathoms of gear. Instead, they are fishing their permits independently to utilize the full 175 fathoms. If this issue is not addressed now, the joint venture becomes a useless tool. Setnetters need all the tools available to them, not have tools taken away.

Regarding the Policy for Changing BOF agenda, the ADF&G staff comments assert that this fits the criteria in (C) to correct an effect on a fishery that was unforeseen when a regulation was adopted. When the BOF adopted this RC, there was no joint venture language included; it was an oversight that needs to be corrected.

In conclusion, allowing setnetters to combine their gear through a joint venture is beneficial and crucial to their operations. I urge the Board of Fish to support Proposal 315 and correct this oversight to ensure that joint ventures remain a practical tool for setnetters in the Northwest Kodiak District.

Thank you for considering my comments.

Sincerely,
Aaren Ellsworth

Submitted by: Bryan Ellsworth
Community of Residence: Kodiak

I would like to indicate my support for Proposal 315.

This proposal helps maintain the utility of the joint venture option allowed to Kodiak set gillnet fishermen by allowing the additional 25 fathoms of gear that were granted to the NW Kodiak set gillnet fleet to be utilized in this cooperative arrangement.

Over my 25 years in the fishery, my site has joint-ventured numerous times with neighboring sites to help our family business operate safely with adequate crew. As our gear type struggles to survive the proactive measures that were taken in the last board cycle like larger hook size and additional total gear, should be allowed if fishermen are engaging in the joint venture option. Our fleet believes that not including the additional gear in the language for joint ventures was an oversight during the last board cycle, so this is a housekeeping situation.

In this difficult time, when proactive measures are being taken to provide support to our gear type, it is important to maintain the viability of the joint venture option for our fleet to help maintain the flexibility needed for some operations, like mine, to continue into the future.

Thanks for your service,
Bryan Ellsworth
Kodiak Set Net Fisher

Submitted by: Colby Engstrom
Community of Residence: Moose Point

Hello I am writing this comment in reference to proposal 313. I have some concerns that I would like to address that I don't believe have been taken into account as of yet.

The first and most important thing to me that I'd like to address is the possibility of the implementation of one hundred fathom seine nets. It's my understanding that the entire decision to utilize this type of gear is to mitigate the mortality of king salmon and make the fishery more viable. The issue that I see with the possibility of a 100 fathom seine is that firstly King salmon are more susceptible to trauma and stress-related mortality than other species of salmon and while I understand the option and availability of being able to flip a king out of a seine I do not believe that it is sustainable repeatedly, and there's also been no studies done that have been able to come up with quantifiable data to show that even though the king is able to be alive when released from the net, it has the ability to reach its destination, spawn and in propagate the species for another year. I believe the use of a 100 fathom net also brings in to question some other implications that haven't been addressed, such as the fact that and that a net that large is able to catch entire schools that are destined for a common location at the same time, which in the long run affects genetic diversity and the ability for the population to survive stressors in the future. I believe additional studies and data would be necessary to prove the long-term implications of this type of fishing and show that the mortality was actually decreased by this gear type and it wasn't just because of isolated circumstance in a limited trial. I think that a good option would be to start with tagging released Kings so that we can see if they do reach their

destination or if they do suffer an extended shock period which leads to mortality and in turn does nothing to help the stock in question.

The second thing that I would like to address is the ask of allowing additional days based on Historical allocation and the associated value or loss. Basing anything off of historical allocation I believe it's the wrong way to look at future management of this fishery. Firstly, we do not have the numbers to come anywhere near what historical allocation would have been based on all of the scientific data and numbers that we have about what our escapement and actual numbers are is highly diminished. We can no longer manage our fishery's and proposals on the fact that we think that we can legislate our way around the amount of fish that are actually in the inlet and the amount of economic viability associated to them. Additionally, I feel that this part of the bill is highly monetarily motivated with zero regard for mitigating king loss as any additional opening days other than the 2 allotted days would just be another day which would allow additional fish to be taken and additional detriment to be incurred. This specified regulatory gear change also only benefits a small percentage of cook inlet setnet fishermen and is highly contingent upon the geology and physical makeup of your beach site, the amount of people that you have available to work and being able to afford the costs associated with the appropriate additional gear. This is not a proposal that I believe would benefit the fisherman on a whole and I don't believe is proven would be beneficial to the mitigation of king salmon mortality which is the entire point of it. We must moving forward looking at regulatory implications and the associated data to make careful decisions being that our stocks are at the point where they are so compromised. With our 2023 cook inlet harvest totals for the setnet fishery being 263 kings in the 2024 totals being 169 Kings there is no room for errors and we are already on a downward slope which does not seem to be waning.

It's also worth note that this is a very specified and regulated fishery that has a historical gear type associated with it. When I personally bought into this fishery I did research and looked at the multiple factors which would affect my possible investment, including the fact that the fishery itself was in decline, there was political factors at play and that the future was somewhat unknown. One of the quantifiable factors that I looked at was the amount of people that would be fishing below me and the amount of nets and permits that was attached to each group or set of people. If I had to take to account the fact that there would be multiple people fishing below me with 100 fathom nets, I would recognize the fact that that could highly impact the amount of fish to which I would be able to catch and directly my bank account and in retrospect, having the current knowledge that I do I probably would have not made the investment if I would have had that information. I feel that I'm not alone in this assessment and believe that the management and proposals being taken into account for this fishery should benefit all the fishermen in not just a limited segment that are in an area where the gear type that they are pushing can be implemented. Additionally, I don't believe the data is there to justify the gear type as being the answer to preventing king mortality and increasing the days that the fishery is allowed to be open. I believe that everybody bought in to the same thing. And it should be regulated as such, and if we're talking about things such as gear changes, which also includes stipulations on date changes and time changes, and when the fishery opens and closes. Then that should be looked at as becoming a different fishery and not associated with the setnet fishery. though i could see consideration being taken to convert setnet fisheries to that kind of fishery, if that is what that set net fisherman wanted to do with his site. I'd also like to say that while I believe that there is the possibility that this kind of gear type could be an answer. I don't think that it is justifiable right now. And with the ask of the 100 fathom net it brings into account so many other factors. I would like to see the maximum net. Length for the

experimental phase of it be 50 fathoms, instead of the 100 fathoms, which is still 50% more net than you would have had in a setnet, but doesn't make it so large as to prevent escapement. I'd also like to again ask that the same amount of days and time periods are afforded if this gear set is allowed whether it's on an experimental basis or not, there should not be additional time afforded again because of somebody's physical setting and their gear type. Especially when all of these factors have been set in stone for decades.

Lastly, I'd like to address what I consider the elephant in the room. While we're debating gear changes, restrictions, closures, economic loss and the viability of the fishery and doing what we can to mitigate the king mortality and justify our existence as fishermen I'd like to offer an example. The cook inlet setnet fishery has taken a total of 432 Kings in the past 2 years, which have been sold processed and utilized. In the first 4 weeks of the trawl season the offshore trawl fleet has killed over eight thousand individual kings. To put that in

to perspective, the trawll fleet has destroyed without any economic or substantive benefit the amount of kings that, at the 2023 cook inlet catch rate would take 15 years to replicate by all of the fishermen setnet fishing on the inlet. It is wrong that while we fight for our lifestyles and the viability of our livelihoods our administration is allowing unmitigated destruction of our resources which are not utilized, which do not bring economic benefit to our region or state and which are destroying our future as well as our lifestyle of the past. I appreciate your time and reading my comments. I apologize that I'm a fisherman and not a poet. But I hope that I've expressed things in a fashion which you can understand, I welcome any questions if there's something that I can specify or possibly shed more light on or something that was just misunderstood and I hope that we can all come to a quality compromise that's beneficial to everyone but more importantly expresses the need for future viability and sustainability of our salmon populations and our opportunities associated to them. Thank you for your time.

PC82

Submitted by: Janie Evanson Henderson
Community of Residence: [REDACTED]

I support opening CI for east side set netters.

PC83

Submitted by: Jason Everidge
Community of Residence: Eagle River

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it. Thank you so much for allowing my input.

PC84

Submitted by: Amber Every
Community of Residence: Kenai

I SUPPORT PROPOSAL 313, which requests set beach seines be added as an alternative gear type only while in the Kenai River Later Run Stock of Concern Management Plan. I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which allowed my family to participate in testing set beach seines this summer. We were highly successful in harvesting an abundance of sockeye while having NO impact on late-run king salmon.

For generations, my family has spent summers on the beaches of Upper Cook Inlet harvesting sockeye, and we are excited for the opportunity to continue this tradition using the alternative set beach seine gear. My family is confident that we can operate a set beach seine within our existing shore fisheries lease at our historical state sites.

We respectfully request that the board support and take action to pass Proposal 313, allowing this historical fishery to continue in a limited capacity.

PC85

Submitted by: Dustin Every
Community of Residence: Kenai

I support proposal 313. King conservation is important, but this proposal provides an opportunity to harvest sockeye while the Stock of Concern Management Plan is in effect. This proposal provides harvest opportunities and stock conservation.

PC86

Submitted by: Gracee Every
Community of Residence: Kenai

I support proposal 313. I am 15 years old and I am a 4th generation Eastside Setnetter. The opportunity to use beach seines would help me continue earning money in the summer to save for college while also making lifelong memories with my family, just as I have always done. Please consider passing this alternative gear type- Thank you

PC87

Submitted by: Kristen Every
Community of Residence: Kenai

In support of proposal 313. We feel that this proposal is a new beginning for our fishery and we are willing to change our harvest method while we are in the stock of concern plan.

PC88

Submitted by: Travis Every
Conocophillips

Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

I was fortunate to be involved with the testing of this alternative gear type Under Commissioner's Permit 2024-01 this past summer. The results of that testing showed exactly what BOF members and ADFG staff have been requesting from the East Side Set Net fishery for the last decade. To think outside of the box and develop a selectable harvest method that would allow for the harvest of abundant sockeye, while conserving chinook. This alternative gear type provides the method and means to accomplish that objective.

Thank you to the members of the BOF for your consideration of Proposal 313. If passed Proposal 313 would have a positive impact on our fishery while king salmon are in low abundance and give our four-generation family business an opportunity to survive until the king salmon stock recover.

PC89

Submitted by: Jason Evoy
Community of Residence: Nikiski

We feel that this is a new beginning for our fishery in times of king salmon conservation, and we are willing to change our harvest method while we are in the stock of concern plan.

We are excited to try the new method of set beach seines and welcome the new opportunity for our fishery.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and [REDACTED] families to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

PC90

Submitted by: Alan Faerber
Community of Residence: West Bountiful, Utah

I support these proposals and the good they will do.

PC91

Submitted by: Skylar Fairchild
Dan Norman

Community of Residence: Clarksville

I support proposal 313. This will be great for the sustainable fishing community

PC92

Submitted by: Clydene Fitch
Community of Residence: Eagle River

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

PC93

Submitted by: Connie Forsgren
Community of Residence: Blackfoot Idaho

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC94

Submitted by: John Forsgren
Community of Residence: Blackfoot Idaho

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

Submitted by: Doug Frasher

Community of Residence: Soldonta

Public comment in support of allowing the Prince William Sound commercial shrimp fleet to participate in the 2025 shrimp pot fishery.

I started in the Prince William Sound non-commercial shrimp fishery in 2016 and transitioned to the commercial shrimp fishery in 2018.

In light of the commercial shrimp fishery closure this season, I have had several discussions with Area Management Biologist associated with the management of the fishery. I am under the impression there is a manageable level of shrimp biomass available to allow all user groups to participate in the 2025 fishery. The static TAH, (Total Allowable Harvest) set at a level of 110,000 lb (5 AAC 31.214) is the only barrier keeping the commercial fleet from participating in this seasons fishery. Due to cyclical tendencies of the fishery, (participation levels, geographical area of commercial harvest, environmental influence) a static TAH is not the best metric to determine participation of the commercial fleet. A more suitable metric would be a variable TAH with a minimum floor to better reflect the cyclical nature of the fishery. This would allow the commercial fishery and sport fishery to participate on paired restrictions and have no affect on the subsistence fishery. A variable TAH would also provide fishery managers a valuable tool to manage the fishery through its ebbs and flows.

The static TAH level of less than 110,000 lb triggers the closure of the commercial shrimp pot fishery but not the sport fishery. The Alaska Department of Fish & Game has no statutory obligation to provide a determined amount of poundage of shrimp to the sport shrimp fishery. The Alaska Department of Fish and Game regulatory responsibility to the subsistence law is to provide reasonable opportunity to harvest shrimp in the Prince William Sound Management area. The amount reasonably necessary for subsistence determined by the board is 9,000-15,000 pounds of usable weight of shrimp (5AAC 02.208). Closure of the commercial shrimp fishery and not the sport shrimp fishery is unjustly, due to the static 110,000 TAH trigger. Commercial and sport should be managed on paired restrictions allowing equal access to the resource. The commercial shrimp fishery provides access to a resource that many people do not have the ability to obtain themselves. The money generated by the commercial shrimp fishery through sales of harvested product, gear purchase, vessel related cost, etc. have a positive affect on many communities in the Prince William Sound region. The jobs and businesses created by the commercial fishery provide income for many individuals throughout Alaska. Licensing fees and taxes generated by the commercial shrimp fishery is also an import part of being able to generate funds to manage the fishery properly.

Since 2010 the TAH has a remarkable record of being within the set harvestable levels for all user groups. In a majority of the instances when the TAH exceeded set harvest levels, the Shrimp Pot Survey catch per unit effort, (CPUE) was elevated above normal levels as illustrated in Table 1 and Figure 2. The last overharvest of a TAH for all user groups during a high CPUE was in 2020, (A year when the CPUE, was the second highest level since 1992) when both commercial and non-commercial user groups exceeded the TAH. Even with the rigorous harvesting reporting required on the commercial side the TAH was exceeded by 3%. At the same time the non-commercial user groups exceed the TAH by 38% due in part to the requirements of after season reporting. This highlights the need to provide the managers of the non-commercial user groups a valuable tool of in season reporting requirements to assist in

managing the TAH in all cycles of the shrimp fishery. Implementing an in season reporting requirement for all user groups would ensure the subsistence fishery reasonable opportunity to harvest their board determined 9,000-15000 pounds of usable weight of shrimp.

Even though TAH has been exceeded several times since 2010 by both commercial and non-commercial users, harvest levels for the last 5 seasons for all user groups during this time period was 98% of the allowable harvest. Since 2010 the allowable harvest for all user groups has only been exceeded 3 times with 95% of allowable harvest harvested. These statistics reaffirms the fishery is well managed under all harvest cycles and justifies the need to implement an adjustable TAH allowing the commercial fishery and sport fishery to participate in the fishery on the basis of paired restrictions.

With the cyclical nature of this fishery and with a slight upwards trajectory in the CPUE testing results in 2024 it would be prudent to proceed erroring on the side of caution when setting the overall TAH for the upcoming season. Implementation of a variable TAH, in season reporting for all user groups, a cautionary TAH level and shortening the season, would only enhance the management of this fishery and allow all user groups to participate in the 2025 season.

Sincerely,

Doug Frasher

(Note, the information provided in the Table 1 and Figure 2 has been provided by the Department of Fish & Game through public publications).

Table 1: Total Harvest in the Commercial/Non-Commercial Fisheries in the PWS Spot Shrimp Fisheries

Year	Total of User Groups			Commercial			Non-Commercial		
	Allowable Harvest	Harvest	Harvest % of Allowable	GHL	Harvest	Harvest % of GHL	GHL	Harvest	Harvest % of GHL
2010	137,500	133,048	97%	55,000	45,349	82%	82,200	87,699	107%
2011	131,900	111,732	85%	52,760	52,550	100%	79,200	59,182	75%
2012	128,100	77,326	60%	51,240	21,561	42%	76,860	55,765	73%
2013	165,750	147,632	89%	66,300	61,644	93%	99,450	85,988	86%
2014	166,500	157,619	95%	66,600	68,464	103%	99,900	89,155	89%
2015	167,500	115,210	69%	67,000	23,138	35%	100,000	92,072	92%
2016	117,653	151,208	129%	47,061	48,423	103%	70,500	102,785	146%
2017	167,000	159,248	95%	67,000	67,421	101%	100,000	91,827	92%
2018	168,000	196,235	117%	67,200	67,375	100%	100,700	128,860	128%
2019	170,200	171,866	101%	68,100	68,947	101%	102,100	102,919	101%
2020	170,200	210,386	124%	68,100	69,898	103%	102,109	140,488	138%
2021	174,978	159,140	91%	70,000	70,168	100%	104,987	88,972	85%
2022	172,166	156,849	91%	66,900	66,900	100%	103,300	89,949	87%
2023	157,833	134,592	85%	63,100	63,100	100%	94,700	71,492	75%
2024	117,023	112,141	96%	46,809	34,309	73%	70,214	77,832	111%

Information Supplied by The Alaska Department of Fish & Game

Years Commercial/Non-Commercial GHL was exceeded represented in **Bold Print**

Table 2: Total Harvest in the Commercial/Non-Commercial Fisheries in the PWS Spot Shrimp Fisheries by 5 Year Periods

Years	Total of User Groups			Commercial			Non-Commercial		
	Allowable Harvest	Total Harvest	Harvest % of Allowable	Total Allowable Harvest	Total Harvest	Harvest % of Allowable	Total Allowable Harvest	Total Harvest	Harvest % of Allowable
2020-2024	792,200	773,108	98%	314,909	304,375	97%	475,310	468,733	99%
2015-2019	790,353	793,767	100.4%	316,361	275,304	87%	473,300	518,463	110%
2010-2014	729,750	627,357	86%	291,900	249,568	85%	437,610	377,789	86%
2010-2024	2,312,303	2,194,232	95%	923,170	829,247	90%	1,386,220	1,364,985	98%

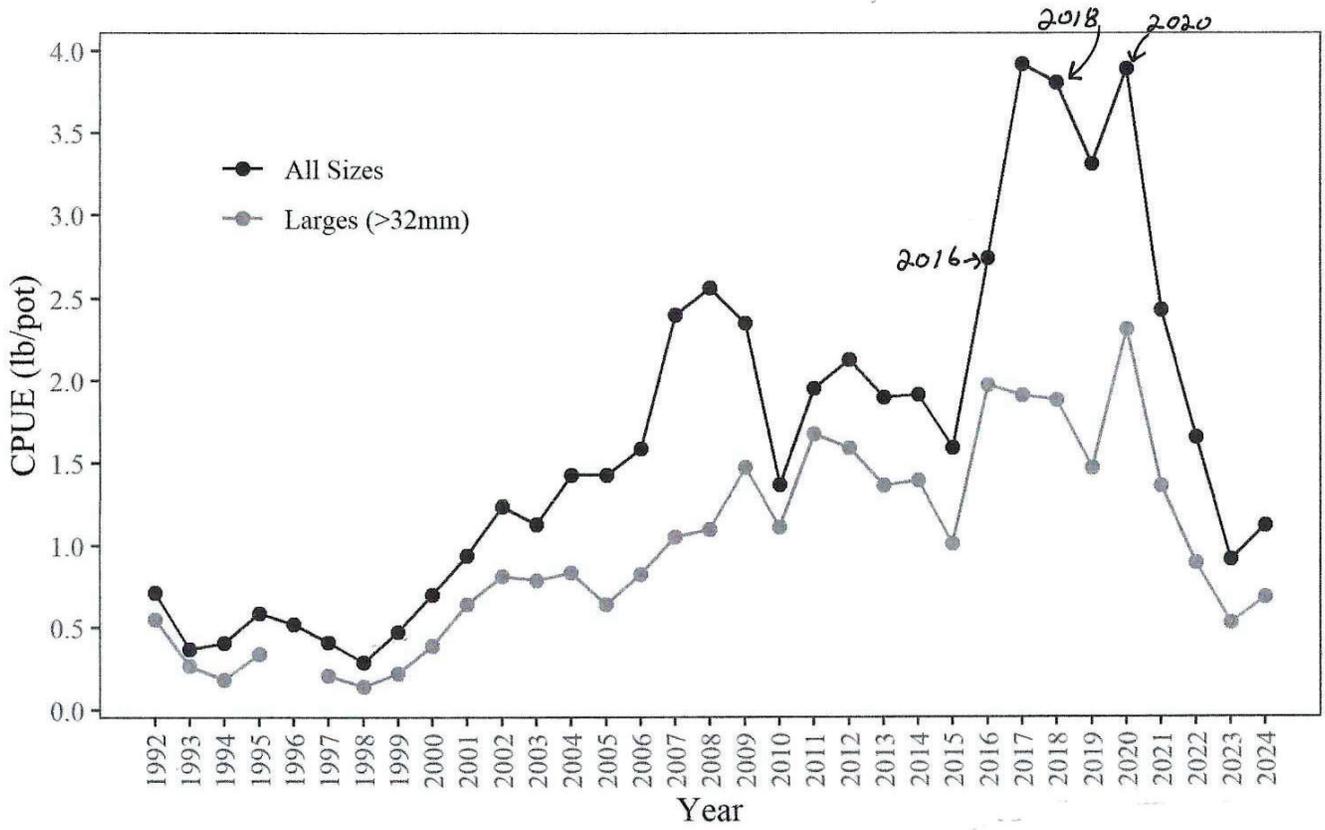


Figure 2.-Prince William Sound Area Shrimp Pot Survey catch per unit effort (CPUE) in pounds per pot for all commercial management areas combined, 1992-2024.

Submitted by: Brian and Lisa Gabriel
Kenai Peninsula Fishermen's Association

Community of Residence: Kenai

We Support Proposal 313

Brian and Lisa Gabriel

Kenai, AK [REDACTED]

Thank you for the opportunity to comment on Proposal 313.

We are the authors Proposal 313 formally ACR8, and one of the two families who were issued commissioner's permits to test set beach seine nets in Upper Cook Inlet this past summer. Our Commissioners Permit Number was UCI-2024-01. We thank the board for moving ACR 8 to the Statewide meeting as Proposal 313 and allowing us to share the results of our testing at a full board meeting.

In the past 7 years, the Eastside Set gillnet fishery has been severely restricted due to low abundance of Kenai River Late run king salmon. Those closures have resulted in disaster declarations for 5 or those years with the 6th year (2024) being submitted for consideration. At the March 2024 Upper Cook Inlet (UCI) meeting the Board of Fish and the Department of Fish and Game encouraged the public to explore potential methods and means that would harvest sockeye salmon while simultaneously allowing for the release of king salmon that are alive and healthy. We reached out to Commissioner Vincent-Lang during the March 2024 UCI meeting and started the discussion regarding a commissioner's permit to evaluate the feasibility of using set beach seine nets to harvest sockeye salmon in our fishery. After many conversations and meetings with him and our local ADFG manager, that permit was issued in May of 2024.

The stipulations of permit UCI-2024-01 included:

- Release all King Salmon alive
- ADF&G staff were to be notified when testing was scheduled and would be allowed access to the testing location.
- An observer was required to be onsite while testing was performed
- Cost recovery allowed on days that were open to commercial dipnetting
- Testing was allowed every day. On days closed to commercial dipnets, all salmon were to be released. In the case of dead loss on those days, fish were required to be processed at the testers' expense and donated to charity.
- Maximum seine dimensions were: 100 fathoms long, 215 mesh deep, 3-1/2" mesh size and 10 lb leadlines
- Set beach seine testing was allowed at different beach locations.
- A summary of the project was to be provided at the conclusions of the project

A very comprehensive report "Experimental Set Beach Seine Fishery Report, A Summary for Permits UCI-2024-01 and UCI-2024-03" was prepared for the department by Robert Begich, our observer. We submitted that report at the October work session and again with this comment.

The concept for the permit was to use our existing set gillnet infrastructure such as our stakes, pulleys and running line system to pull a seine into the waters of Cook Inlet and let the tidal current billow or

form the seine. The seine would then be held for a certain amount of time and then retrieved back to shore by reversing the pull direction on the running line. This is similar to traditional beach seining with the material difference being that a mechanical line/pulley system is used for deployment and retrieval of the seine instead of a boat. The running line system allows the controlled deployment and retrieval of the seine as it is brought back to the shoreline, allowing king salmon to be sorted in the seine while in the water. We feel that the running line deployment and retrieval system will help ensure the prosecution of an orderly fishery that protects our fishermen and king salmon.

The main objective of the project was to prove that sockeye salmon could be harvested economically while releasing all king salmon unharmed and alive. We applied the methods outlined in our permit application and were successful in that effort. Our permit allowed us to reach out to other fishermen and test the set beach seine at other beach locations. We tested at two locations on North K-Beach and one location on Salamatof Beach. We contacted and met with fisherman on Ninilchik beach and developed a plan to test at their site but were unable to complete that testing due to scheduling conflicts and no available running lines due to the 2024 gillnet season closure. Additionally, throughout our testing we invited and encouraged other fishermen to come observe the process and provide input.

We considered the estimated capital costs to the individual fisherman to convert from a gillnet to a set beach seine net and determined that the cost to fishermen will be nominal if they utilize their existing leadlines, cork lines, corks and add new seine web. We expect that seines nets will vary slightly from beach to beach because of water depth, currents, tidal fluctuations, tidal strength and beach dynamics. These variations will likely revolve around seine length, depth and leadline weight. Regardless of the variations, we feel that fishermen will have the basic components in their existing gear inventory to convert easily from gillnets to seines. While fisherman may not have seine webbing on hand to replace the gillnetting webbing, one processor expressed interest in providing seine web to their fishermen to help facilitate the conversion. The other element of the testing that we determined is that fishermen can use the equipment they currently have to deploy, retrieve and manage the set beach seine net based on their past required needs to deploy and retrieve a setnet on their existing infrastructure.

The results of the set beach seine net testing were very encouraging and aligned with the goals outlined in the Commissioner's permit application. We harvested approximately 15,294 sockeyes on permit UCI 2024-01, and permit UCI 2024-03 harvested 5,228 sockeyes during the testing openings. Additionally, we captured and successfully released 16 kings total, with one being classified as a large king (approximately 36 inches). All king salmon were observed and released alive and in excellent condition.

Since approval of ACR8 at the October 2024 Board of Fish work session, we have continued our stakeholder outreach and have heard their questions regarding our set beach seine project. We have provided a presentation to most of the agencies and groups below: In cases where we were not able to present, we had in depth conversations regarding our project.

- ADFG Staff and Managers and Commissioner Vincent-Lang
- Commercial Fisheries Entry Commission
- Department of Natural Resources
- Wildlife Troopers
- Kenai River Sportfishing Association
- Kenai River Professional Guides Association
- Kenai/Soldotna AC

- Homer AC
- Central Peninsula AC
- Fairbanks AC
- Matsu AC
- Tyonek AC
- Anchorage AC
- Cooper Landing AC
- United Cook Inlet Drift Association
- Kenai Peninsula Fishermen’s Association
- Alaska Salmon Alliance
- Eastside Setnet families
- Local, Statewide and National Media

Throughout our outreach we listened to stakeholders, answered questions and addressed their concerns. We found the process to be very educational and thank each of them for the time they took to meet with us to have productive open discussions. With the information we gathered from the stakeholder groups, we will bring an RC forward at this meeting that will reflect the results of our extensive outreach. Through this collaborative and transparent process, we feel that the elements of our RC will resolve many of their concerns.

The testing of Commissioner permit UCI-2024-01 and Proposal 313 have been an exciting opportunity for our family and the testing families that participated in the project this summer and over the past year as we prepared for the March meeting. Although the gear is new and different from our historic gillnets, we feel that it will help bridge the gap to a problem that is before our fishery right now. The continued closures and inability to harvest sockeye in a meaningful way, on a stock that is healthy and thriving, has had an extremely negative impact on the Eastside set net fishery.

Although we have heard and recognize that there are concerns regarding expanding this harvest method across our fishery, we feel that these issues can be addressed in ways that will alleviate those concerns. We appreciate Commissioner Vincent-Lang’s confidence and willingness to allow us the opportunity to test set beach seines in Upper Cook Inlet and thank the Board for their consideration of Proposal 313.

Sincerely,
Brian and Lisa Gabriel

PC97

Submitted by: Laura Garcia
Community of Residence: Soldonta

I support 312 and 313

PC98

Submitted by: LaVonne Garvey
Community of Residence: Chugiak

As an area resident without my own access to Prince William Sound, the only way me and my family have the opportunity to eat local shrimp is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

PC99

Submitted by: Donald Glaze
Community of Residence: Nampa

I support Proposal 313, which requests that set beach steins be added as an alternative gear type. My family believes that we can fish with our existing equipment and shore fishery leases. We are excited to try the new method of set beach seines and welcome the opportunity for our family fishery.

PC100

Submitted by: Patti Glaze
Community of Residence: Nampa

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PC101

Submitted by: Dan Green
Community of Residence: Soldotna

I'm writing in SUPPORT of Proposal 268 to stop commercial charter operators from including Tanner crab access as part of their service. This fishery was supposed to be a small subsistence opportunity and now several commercial charter operators are provi

Submitted by: Jarl Gustafson
Community of Residence: Homer

Re: Proposal 300 I support this only if sport and commercial would be different areas. To put all users into one area could lead to a lot of conflict.

Re: Proposal 308. I oppose the 25 pot limit

and would rather it be amended to 50 pots. This gives management more leeway.

Re: Proposal 310. I support this only if vessels are restricted to one area of their choosing for the season.

Submitted by: Mike Haggren
Community of Residence: Astoria, OR

I have been involved in harvesting Kodiak food/bait herring continuously in every open season since 1980. The fishery is a bait fishery. Several attempts over the years have been made to introduce the Kodiak herring into the food markets however always with the same result, the herring is actually of too high in oil content to be suitable for food markets. Fortunately, this is why the Kodiak herring is sought after for bait. Also, the transportation and processing costs to get the herring to food markets is too high to allow adequate financial return. There are much larger herring resources such as the Dutch Harbor fishery and the SE fishery but neither has been able to develop true food markets either. So disrupting and significantly changing an existing fishery, that prosecutes well, into an unknown quantity that wants to prosecute the fishery into goals and methods that have already been shown to have low successes, I will be against supporting.

Also, several fallacies have been put forward by CFEC researchers and ADFG. Since the mid 70's until mid 90's nearly all the food/bait harvest was done by trawl vessels. These harvests were done in the same areas as today. The quotas throughout this time period were fairly low, 50-200 tons, set by ADFG. The vessels I harvested with, which are two of the four used in the permit process, carry 75 tons and 90 tons respectively. The other vessel involved in the CFEC process is smaller than either of these two. The 120 ton average capacity stated is wrong. Also, in prosecuting the fishery with a trawl, the equipment involved has catch indicators on the net headrope and also on the codends providing real time information as to harvest amounts. I do not recall ever over-catching herring.

The reason trawls have not been used in the last 20 plus years is simply because ADFG cannot manage the fishery with their current lack of resources and the Bristol Bay mentality the influx of seiners brought into the fishery. Seinners are allowed to use tenders and most tenders hold 100-200 tons each. Throughout the 80's and 90's we were required to notify the ADFG manager of our harvest requirements, and upon harvesting had to notify on the single side band radio our location and catch. This all ended when a group of seinners massively overharvested and had to dump tons of overcatch without notifying ADFG. This led to the fishery closure, the limited entry program we have now, and to the co-op of the 9 permit holders. The regional director, [REDACTED], would not open the fishery unless a co-op was formed. At the beginning, a sort of lottery was done to choose who would harvest. At the time, the trawlers had fisheries to participate in and the salmon seasons had been weak. It was not an intentional decision to negate the trawlers from the fishery but to allow neighbors to take part in the harvest.

The season dates are also of concern to me. Historically, the season opened August 1 until February 28. Harvests occurred throughout those dates however processors typically wanted catch deliveries to coincide with their workforce needs, thus the later dates. Usually, the bait harvests were in November and December and into January. The herring can be hard to locate. The herring do not reside in the districts where they are sometimes caught but generally in areas such as the Shelikof Strait, Alitak, and the Eastside. The schools move around feeding in their winter migrations. To put a set time/date for the herring location most likely doesn't work. Thus the reason for a longer season managed with quotas.

Over the decades, there has been a couple spikes in harvest due to abundance but typically this is a 200 to 300 ton fishery. The bait markets historically fulfill the needs. The catchability of the existing permitted fleet is greater than the average allowable catch and a workable solution has been developed. These original nine permits were granted because of past participation in the fishery. This proposal would give permits to people who have never participated in the food/bait fishery and remove some that developed the fishery. If ADFG believes more vessels, including trawl vessels, are needed to prosecute the fishery there are already 8 permits in waiting.

Mike Haggren

PC104

Submitted by: Cindi Haller

Community of Residence: Kenmore, WA

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table. We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

Sincerely,
Cindi Haller

PC105

Submitted by: Angie Hamill
Community of Residence: Chugiak

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the Board of Fisheries will adopt it.

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

I don't have a boat, or shrimp pots, but I do love to be able to purchase and enjoy fresh local shrimp. Please find a way to allow both commercial and recreational shrimpers to access this fishery.

Thank you,
Angie Hamill

PC106

Submitted by: Johnny Hampton
Community of Residence: Boise, Idaho

I support Proposal 313.

PC107

Submitted by: Joye Hampton
Azarel setnet fisheries

Community of Residence: Boise Idaho

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.
 - My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.
 - We are excited to try the new method of set beach seines and welcome the new opportunity for our fishery.
 - My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites.
 - We believe our equipment/trucks will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with that equipment/trucks.
 - We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.
-

Submitted by: Michael Hand
Community of Residence: Cordova

Members of the Board of Fish,

My name is Michael Hand from Cordova, Alaska. I participate in various commercial fisheries around the State, but Prince William Sound shrimp is the one that I cherish the most.

The Sound's shrimp fishery is a small scale, short season fishery that I participate in with my family. I also operate a floating processor for this fishery that buys shrimp from multiple boats and we process and freeze shrimp on the grounds. The sustainability of the shrimp population is my top priority. As with all shellfish, there is a natural up and down cycle that our ADFG managers have to cautiously work around. I have talked extensively with ADFG staff regarding shrimp. I am confident that the management plan needs addressing. The current commercial TAH trigger of 110,000 lbs is an arbitrary number not based on any biological basis. This fishery can be sustainably fished at a lower threshold. It's important to note that although there is a current TAH trigger where the commercial fishery closes, there is not a closure for the Sport fishery even though they harvest a majority of the harvest every year. It is important to change the management plan to implement a TAH floor, where if the population drops to a certain point, no fishing will occur.

Thank you for taking your time to educate yourself and help determine the future of this important fishery.

Michael Hand
 F/V Seaview

Submitted by: Nelly Hand
Community of Residence: Cordova

My name is Nelly Hand. I'm a second generation commercial fisherman, born and raised in a commercial fishing family here in Cordova. I own an Area E gillnet permit and have been running a gillnetter since 2017 fishing the Copper River and Prince William Sound. I make my livelihood in the fisheries here, harvesting salmon, sablefish, and spot prawns.

I have fished the Spot Prawn commercial fishery for the last two seasons in a row. I run a boat harvesting spot prawns and also work with my partner to process at sea, freezing spot prawns out on the fishing grounds. We buy from other small boat families, creating opportunity in a fishery where there is very little commercial fishing support.

Please address the commercial and non commercial management plan. A lower TAH trigger for the commercial fishery is biologically warranted and a TAH floor where no fishing occurs is also needed.

Please take the time to educate yourself on this valuable fishery.

Nelly Hand

Submitted by: Rob Hartley
N/A

Community of Residence: Anchorage

For the record, I am a long time non-commercial shrimp fisherman in the Sound.

On Prop. 305: I have no problem limiting the number of pots on my boat, as I have no reason to carry more than the legal limit. Also with the current decline in stock, I would favor a reduction to 1 pot or a complete pause for 2 years.

On Prop. 306 and 307, I have no problem aligning the start time with commercial, but it is not feasible for me to pull pots every afternoon or evening. One alternative I would offer is restrict commercial and non-commercial to different alternating zones.

On all proposals, I see them very weak with regard to the current decline of shrimp stock. I witnessed the complete decline of shrimp in Kachemak Bay and also the long closure in PWS. I would favor at least a 2 year emergency order pause on all shrimping to allow stocks to recover. The shrimp stock in Kachemak was never allowed such a pause and stocks declined to a level where they never have recovered. It would be a shame to have a carefully managed fishery decline that far.

PC111

Submitted by: Ryan Hatt
Community of Residence: Soldotna

Wat was proven last 2 years as a drifter the drift fleet cannot catch all these fish.

PC112

Submitted by: Abigail Haughey
Community of Residence: Larsen Bay

I support proposal 315 because as a multi-permit family operation it allows us to maintain all of our historical sites that date back to 1985 when joint ventures were first introduced while also implementing the new gear regulations implemented by the Board of Fish in 2024. In the summer of 2024, the lack of this house keeping update prevented my family from harvesting at all of our historical shore lease sites while still maximizing the amount of gear we had in the water. This will fix the discrepancies currently present in the regulations after the last board cycle.

I am opposed to proposal 316, as it is currently written because it is creating permits for what is currently a limited entry permit fishery in which the quota caught is maximized yearly. There is no need of additional harvest, so it would be detracting from those already historically invested in, and supporting, the fishery. This is an unprecedented step that has negative implications for the livelihoods of those reliant on the herring fishery and other limited entry permit fisheries throughout the state going forward.

PC113

Submitted by: Rebecca Haughey
Community of Residence: Texas

Please correct this oversight. Thanks.

PC114

Submitted by: Scott Hipsak
Community of Residence: Anchorage

I am writing to urge the administration to keep the PWS (Prince William Sound) shellfish fishery open and available for both sport, and small commercial, use this season. I am for a sustainable shellfish fishery and I believe that can be accomplished and allow commercial operators in the PWS area. If needed I would strongly prefer to have smaller operators have a preference to opening times or being allowed to operate.

I do not have a boat that is capable of fishing in the Prince William Sound area. Having small operators that can commercially fish for shellfish in the Prince William Sound area allows me to have access to shrimp at reasonable prices while supporting local operators. Supporting local operators is important to me as that is how we keep both talent and money in the State of Alaska. Developing our resources, in a sustainable way is now more important than ever before to sustaining our economy, our people and our state given the all the change in Washington DC is seeing. Developing local resources with local talent pushes our economy forward and the fresh shellfish and other seafood from the Prince William Sound area is a bonus for all of us.

PC115

Submitted by: Bobbie Hjelmgren
Community of Residence: Homer

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

Nate Hoff

In Support of Proposal 312

This Proposal gives a concise and accurate description of the experimental dipnet fishery.

A set start and stop time of 7am- 7pm appeal to me as an excellent framework for an organized fishery wherein the default shall be scheduled fishing time.

Access to any day of the week seems imperative:

- 1) Due first and foremost to weather
- 2) Due to actual fish densities which can vary dramatically from one tide to the next
- 3) Due to scheduling. I will flesh this particular point out a bit to include the likelihood that (at least until I have been able to establish routine and success) the traditional FT crew I have worked with in the past will almost certainly need to expand to include more PT Individuals and I am assuming that fishing opportunities will be limited by the necessity of working around available crew's schedules. In the past, should any crewmember have had other commitments, it was understood that being available for each opener issued by F&G and other operational work assignments would be a primary obligation, but I will now be working to schedule PT fishers as well, leading to further constraints.
- 4) 84 Hours of "available" fishing time should not be misconstrued as to suggest that fishers would find it desirable or possible to dipnet the open ocean for 84 hours a week.

I do not know why the initial closure of July 31 was chosen. Perhaps it was to gather information for an experimental fishery, information that we now have. As the Proposer suggests, there are regularly abundant populations of sockeye salmon nearshore in early August, especially if schools have swum in deeper beneath the drift fleets' nets.

At this time of year, the nearshore areas are excellent areas to be targeting both sockeye and pink salmon. For the Direct Marketing aspect of my business, both early and late portions of the run are excellent times to land fish as local processors are not overwhelmed by the peaks of harvest in the commercial, sport and P/U fisheries and are able to provide custom processing services for our catch.

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2/3/2025

From: GATY L. Hollier

[REDACTED]

Chandler, AZ [REDACTED]
[REDACTED]

To:

ADFE\$

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Attention: Art Nelson

For: State wide Meeting

March 11-16

Fax # 907-465-6094

Telephone # 907-465-4120

2/1/2025

Alaska Board of Fish
Statewide Meeting March 11-16
Members of the Alaska Board of Fish,

I am Gary L Hollier. I have setnetted North Kalifonsky Beach (stat area 244-32) since 1971. I and my family own a large multi generational and multi-permit family operation.

In July of 2024, I applied for a Commissioners Permit, to Experimentally Use a Beach Seine in the Upper Subdistrict of Upper Cook Inlet. On 7/19/2024, I was granted an experimental permit, UCI-2024-03.

I am submitting my Beach Seine and data report for the set beach seine fishery I was involved in last summer.

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Pages 13-16, 2024 Experimental Seine Set Net Detailed Fish Counts.

Page 17, Rough diagram depicting set beach seine fishing on the flood and ebb.

In seven days of set beach seining, we harvested 5,228 sockeye, 205 pinks, 36 coho and we caught and released 3 king salmon, all under 34 inches. The three jack king salmon and all the coho were released alive and very healthy.

I have been involved with the BOF process, in Upper Cook Inlet for five decades.

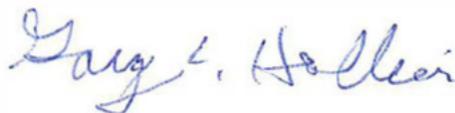
I feel that Set Beach Seining has definitely potential for harvesting abundant Sockeye Salmon, while at the same time not impacting returning King Salmon.

I am in full support of proposal, 313, or something similar, which would open set beach seining in the Upper Subdistrict. I will have additional comments, before the public comment deadline.

I will be attending the BOF Statewide meeting, March 11-16, and plan on participating in the process for proposals 312 and 313.

Thank you,

Gary L. Hollier [Redacted]
Kenai, AK





COMMISSIONER'S PERMIT

Permit Number: UCI-2024-03, Issued Date: 07/19/2024

Experimental Use of Beach Seines in the Upper Subdistrict of Upper Cook Inlet

1. The purpose of this permit is to test if beach seines can be fished (set and retrieved) using existing set gillnet methods and infrastructure in the waters of the Upper Subdistrict of Upper Cook Inlet (UCI) to harvest sockeye salmon and effectively release Chinook salmon.
2. For the purposes of this permit, a beach seine with the following maximum dimensions will be allowed:
 - i. Length not to exceed 50 fathoms
 - ii. Depth up to 100 meshes, to include chaffing strip on the leadline
 - iii. Mesh size not to exceed 3 ½ inch
 - iv. Leadline up to 5lb per fathom
3. The permittee may alter the beach seine prototype to improve functionality as suggested by field testing. Alterations will not expand beyond the elements in number 2 of this permit.
4. The permittee will be allowed to test the use of beach seine as a potential means to harvest sockeye salmon while releasing king salmon unharmed, as follows:
 - a. This permit is valid beginning July 20, 2024 through August 31, 2024 with the ability to renew annually as agreed upon by all parties.
 - b. The permittee will give a minimum of 24 hours' notice to ADF&G area management staff prior to fishing beach seines.
 - c. The permittee will be responsible for hiring and having a third-party observer on site during fishing activities to verify methods and data collection.
 - i. Observer Minimum Qualifications
 1. Bachelor or better college degree in the biological or natural sciences or similar field, or a minimum of 16 upper division credits in the biological or natural sciences or similar courses completed.
 2. Degree requirement may be substituted by at least two years of field sampling or data collection experience in a biological or natural science related field (professional or collegiate).
 3. Does not hold a CFEC limited entry salmon fishing permit.
 4. Is not in any form involved in current litigation against the State of Alaska.

- ②
- d. The permittee will grant access to the fishing site to ADF&G or their designees at all times during activity authorized under this permit.
 - e. A beach seine may be used in statistical areas 244-32, of the Upper Subdistrict of the Central District, as defined in 5 AAC 21.200. The permittee may request additional areas inseason if additional set gillnet sites are made available for experimentation by contacting local ADF&G management staff.
 - f. No more than one beach seine may be fished at any time by permittee. *next colton with copy fish ticket - when start done*
 - g. If commercial fishing in the Upper Subdistrict of the Central District is open to S04H permit holders when the beach seine is fishing, all salmon except Chinook salmon, caught in the beach seine may be sold or kept for personal use and are also to be recorded on fish tickets, as required by 5 AAC 39.130. Chinook salmon must be released immediately and unharmed. If a Chinook salmon is mortally wounded or dead upon retrieval then the permittee will follow the stipulations under (h)(i-iv) for disposal of the fish.
 - h. If the Upper Subdistrict of the Central District is closed to commercial harvest of salmon by S04H permit holders, beach seines may only be fished per ADF&G's direction.
 - i. All salmon caught that are alive when the beach seine is retrieved shall be released unharmed back into the water.
 - ii. All salmon that are not alive are to be processed by a local processor or processed by the permit holder under their current direct marketing license and facility and donated to local charities.
 - iii. The name of the processor and the dates and numbers of fish by species donated and the name of the charity or charities the fish are donated to are to be provided to ADF&G within 24 hours of harvest.
 - iv. These fish are also to be recorded on fish tickets, as required by 5 AAC 39.130.
 - i. No retention of fish, other than salmon, is allowed while testing beach seines.
 - j. The permittee must be on site at all times the beach seine is being fished.
 - k. If the beach seine is operated when commercial fishing in the Upper Subdistrict of the Central District is open to S04H permit holders for set gillnet gear, the CFEC permit holder listed on this permit will not be allowed to operate another gear type. In addition, no part of the seine may be set or operated within 600 feet of any part of another commercial set gillnet, as required by 5 AAC 21.335(a).
 - l. The permittee will record data about testing of the beach seine on forms approved by ADF&G. Data will be submitted weekly to the area management biologist electronically or in person.
 - m. Permittee will follow best practices as directed by ADF&G for handling and release of salmon from the seine.
 - n. The permittee will provide, upon request, a copy of this permit to officers of the Department of Public Safety or to representatives of the Department of Fish & Game.
 - o. Failure to comply with the terms of this permit may result in permit revocation. Permit violations will be forwarded to the Alaska Department of Public Safety for enforcement action.

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- 5. The permittee reserves the right for any reason to cancel scheduled seine deployment. (Safety, mechanics, repairs, seine behavior, undesirable conditions, etc.)
- 6. This permit is not a guarantee that similar future permits will be issued, nor does it imply any priority access to State managed resources. A new permit may be issued provided harvest is known to be sustainable and otherwise consistent with conservation and management of the resource. Permits for future operations should be requested a minimum of 30 days prior to the start of operations for that year. If sufficient additional requests for permits are received to harvest *permitted species*, the *Management Plan for High Impact Emerging Fisheries* (5 AAC 39.210) may be invoked and the fishery could be closed to conduct research, develop a Board of Fisheries approved management plan, and secure the necessary funding to manage the resource in a sustainable manner. This permit does not absolve you from complying with all other applicable laws and regulations of other State agencies or governments that may apply to this business venture.
- 7. This permit does not absolve you of other applicable laws and regulations of other State agencies or governments that may apply to this business venture.
- 8. The permittee agrees to allow the Alaska Department of Fish and Game to publish harvest and catch information obtained under this permit.

504# 61284C

Permittee's Contact Information

GARY Z. HOLLIER
Name, (Please Print)

[Redacted] Kenai, AK [Redacted]
Address

[Redacted]
Phone Number

[Redacted]
Email Address

Gary Hollier
Permittee's Signature

7/19/24
Date

Department Use Only

Doug Vincent-Lang,
Commissioner

By Delegation to: [Signature]

Colton Lipka
Area Management Biologist

From: Gary Hollier [REDACTED] 5
Subject: Fwd: Beach seine UCI
Date: Aug 9, 2024 at 9:22:54 AM
To: Gary Hollier [REDACTED]

Hello Doug,

I would like to thank you, and ADF&G, for authorizing the Commissioner's Permit for use of an experimental beach seine in UCI.

I had many set net fishermen, from every statistical area, in UCI, come and observe the gear I was using. Everyone thought they could implement some similar type of gear on their beaches.

I am waiting for the final totals, from observer Sandee Simons, yet I feel the beach seine experiment was a huge success.

We harvested roughly 5000 sockeye and some pinks. We released the 4 kings, under 16 inches, all alive and well, that was in our seine gear. We released alive all the coho that we caught.

We fished 2 1/2 days with a 35 fathom net and 4 1/2 days with a 50 fathom net. That is the maximum gear that my permit allowed.

I do feel that I could have handled a 70 fathom seine quite easily.

In the 35 fathom seine, I had less than \$800 invested. Adding another 15 fathoms was less than \$400. The total for the 50 fathom seine I used was under \$1200.

Once I get the accurate totals, for all aspects of this fishery, I will send in a much more detailed report.

I am going in this Tuesday, for a hip replacement, so the final report will be submitted as soon as I can.

Beach Seine Permit Holder #3 Additional Report

This is an updated report of the Commissioners permit, permit number UCI-2024-03.

This was an experimental Use of the Beach Seine in the Upper Subdistrict of Upper Cook Inlet.

The preliminary report from Aug 3, 2024, was straightforward information it provided.

I applied for this permit on July 15, 2024, and it was approved on July 19, 2024.

We fished the beach seine gear for a total of seven days on an existing set net location.

I contacted fishermen if they wanted to observe this beach seine operation that they were all welcome to do so. There were many set netters from Ninilchik to East Forelands that stopped by and checked out the beach seine operation. All agreed that something like what I was doing could also work on their fishing locations.

I originally stripped a 210ft set net and put in beach seine gear. The beach seine web was 100 meshes deep of 3.5-inch gear approximately 29ft deep. I hung about 293 feet of beach seine gear on the cork line and the 4lb lead line. This beach seine net was hung "even".

I deployed the beach seine by attaching it to a continuous $\frac{3}{4}$ inch blue steel running line. The total cost of this 210ft beach seine was less than \$800. I fished this gear for 2 and $\frac{1}{2}$ days. After putting a hook into this beach seine net to prevent the fish from swimming out of the gear, this gear was fishing about 150ft offshore.

I was also able to fish this beach seine in the shallow water across the mud flats with little issue.

Mid-day of day 3, as per my permit, I added another 90ft of gear to my beach seine, The cost of the additional net was under \$400. The total cost of the entire 300ft net (50 fathoms) was under \$1200.

The added 90ft length of net worked better for fishing the beach seine. I was able to fish the net about 250ft offshore with an approximate 50ft hook in it.

I did not use a hook in the original setting of the beach seine gear. I used my tractor between the stakes above high tide to pull the net off the shore. The outside end was tied to a buoy on the running line. The inside end of the net had a buoy on it that was attached with about a 30ft Y line to it that was tied to another tractor.

The tractor which was tied to the inside end of the net would "walk" down the beach with the tide to make the net fish about 45 degrees to the beach. The inside end of the beach seine would then be between 200 to 300ft from the running line, north or south depending on if it was a flood or ebb set.

The total area covered by the beach seine on the flood to the ebb was up to 800ft.

After a few minutes, the tractor that pulled the net into the water would turn around and pull the outside end of the net in towards the beach to create a hook so the fish would net lead out of the gear.

The 300ft net gear was easy to handle using the existing set net locations and equipment. I believe that a 70 fathom, 420ft, could also be used successfully.

Upon review of the final observer report, 5228 sockeye fish were harvested. There were only THREE small jack king salmon in my beach seine from the 114 sets that were made. These jack kings were quickly identified while still in the water and released unharmed. All released fish were handled with non-cotton gloves, basically rubber gloves which do not harm the fish.

In conclusion, I would say that beach seining in the Upper Subdistrict during the hardship of low King Salmon abundance and while in the Stock of Management Concern has the potential for the ESSN fishery to weather these trying times.

Beach seining fishing could successfully harvest sockeye salmon while keeping the king salmon catch to zero.

Thank you again for granting me this experimental beach seine permit.



Gary L. Hollier
August 12, 2024

2024 Experimental Seine Net Fishery Report Hollier Beach Site

compiled by
Santee Simons, Observer

Between July 20th and July 31st, 2024, an experimental seine net fishery was permitted to operate at Gary Hollier's set net beach site on Kalifonsky Beach just south of the Kenai River mouth. Fishing occurred 7 days out of the 12 day window – July 20, 23, 24, 27, 28, 30, and 31. The project began with a 210' long net with 3.5" mesh. On July 25th in the afternoon shift, the net was extended to 300' long. The extended net was then used for the remainder of the project. The amount of shoreline in use during this project is approximately 800'. Existing set net running lines that have been in place since 1938 were used to deploy and retrieve the seine net. The top stakes are approximately 220' apart. The south side secondary stake is about 700' offshore. The running line then continues to the north at 45 degrees toward the outside end of the running line that is anchored to a rock approximately 800' offshore from the high tide mark. A diagram is included at the conclusion of this document.

At the start of each day (1st shift) and also after a tidal break (2nd shift), wind direction and velocity were recorded.

Date	Location	Wind		Comments
		Velocity	Direction	
07/20/24	Holliers	9.5mph	SW	1 st shift
07/23/24	Holliers	9mph	SW	1 st shift
07/23/24	Holliers	5mph	SW	2 nd shift
07/25/24	Holliers	7mph	SSW	1 st shift
07/25/24	Holliers	7mph	SSW	2 nd shift
07/27/24	Holliers	8mph	S	1 st shift
07/27/24	Holliers	15mph	SW	2 nd shift
07/28/24	Holliers	3mph	SW	1 st shift
07/28/24	Holliers	5mph	SW	2 nd shift
07/30/24	Holliers	2mph	NE	1 st shift
07/30/24	Holliers	2mph	NE	2 nd shift
07/31/24	Holliers	0-1mph	NE	1 st shift
07/31/24	Holliers	0-1mph	NE	2 nd shift

The net was deployed with two tractors using either the north or south end fixed running line, depending on tides. Net location is noted in the data tables. "Start Time" was recorded as soon as the first buoy hit the water. Once fully deployed, "Set" time was recorded. A hook (semi-circle) was created with the net to help contain fish entering the net area. The net "Hold Time" varied between 9 and 25 mins, depending on several factors, but mainly amount of fish hitting the net. Sometimes the net would get hung up on a rock or something and take more time to reach the closed stage. Number of sets per day was also variable, but averaged out to 16 sets per day. Once the designated amount of "Hold Time" time was reached, tractors began pulling in the net from the running line first and then from the "free" end and this is noted in the data table as the "Pull Time".

Seine net being deployed – outer end buoys can be seen in front of Mt. Redoubt and the incoming tide is helping form the “hook” as the net goes out. Crew ensures the leadline does not cross over the buoys as the net enters the water.



As soon as the buoy at each end was onshore, effectively closing the net, the “Close” time was marked down. Once closed, the shoreline tractor pulled the net further onshore, slowly drawing it in until the fish could be seen in the water.



Crew prepares to hand pull net closer to shore so observer can seek kings



Observer checking for kings before the net is pulled out of the water

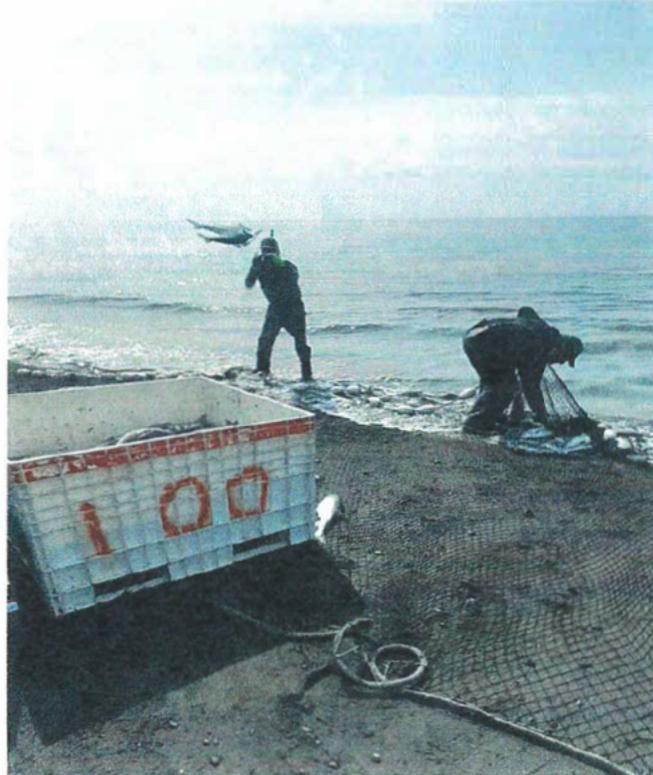


The observer searched the net for kings. If a king was spotted, it was handled with bare hands or rubber gloves and released immediately. When possible, the king was not removed from the water at all. If necessary, it was briefly removed from the water during the process. No kings were enmeshed in the net or gilled, all were swimming freely in the bag of the net and were able to be released unharmed.

Once the net was determined to be free of kings, it was hauled further up onto the beach and crew began to pick the net.



Using tallycounters, the observer counted the reds as they were pitched into the tote and the pinks that were placed in buckets or a separate tote.



Silvers were counted and released immediately. Other bycatch was removed from the net and returned to the water. When the "Last Fish" was removed from the net the time was marked down. Unless otherwise noted in the data table comments, the seine net was fully submerged for each set.

Throughout the entirety of this experimental seine net project location, it is important to note that only 3 small kings were caught. Two were verified less than 16 inches and one was estimated to be around 16 inches, but not verified as a true jack. No large kings were caught at this location and all evidence supports zero king mortality.

The data tables below and on the following pages provide a detailed account of the project results.

Experimental Seine Net Fishery Daily Catch Results – Holliers July 2024

Date	Harvested		Released		
	Sockeye	Pink	Pink	King <34" ¹	Coho
07/20/24	262	1	1	1	
07/23/24 ²	1052	29			2
07/25/24	1234	48			4
07/27/24	832	11	1		2
07/28/24	976	45		2	9
07/30/24	548	11			8
07/31/24 ³	324	60			11
Totals	5228	205	2	3	36

¹No large kings were caught at this location. Two kings were <16", one king was close to 16"

²Included in harvest are 52 reds which Holliers kept for personal use

³Included in harvest are 28 reds and 2 pinks which Holliers kept for personal use

Other species that were caught and released during this project:

Flounder, sole, dogfish (10), Dolly Varden (5), grey cod (2), skate (1), jellyfish (2), sculpin (2)

All other harvested fish were sold to the processor.

Experimental Seine Net Fishery Detailed Counts – Holliers Beach Site (Kalifornsky Beach) July 2024

Date	Observer	Set #	Start Set	Start Set	Start Pull	Close	Last Fish	Hold Time	Harvested		Released			Comments
									Red	Pink	Pink	Silver	King <34"	
7/20	Simons	1	13:52	13:54	14:03	14:07	14:14	0:11	38					1 <16" jack king, viable, low tide
7/20	Simons	2	14:16	14:19	14:27	14:28	14:35	0:11	33					
7/20	Simons	3	14:36	14:38	14:50	14:52	14:59	0:14	59	1	1			1 DV
7/20	Simons	4	14:59	15:01	15:16	15:18	15:24	0:17	31					
7/20	Simons	5	15:25	15:27	15:39	15:41	15:46	0:14	21					
7/20	Simons	6	15:47	15:49	15:57	15:59	16:04	0:10	27					
7/20	Simons	7	16:05	16:06	16:14	16:16	16:22	0:09	24					2 Dogfish
7/20	Simons	8	16:23	16:25	16:35	16:36	16:41	0:12	14					
7/20	Simons	9	16:41	16:45	16:55	16:57	17:02	0:14	8					
7/20	Simons	10	17:03	17:05	17:15	17:16	17:31	0:12	7					1 Dogfish
7/20	Simons	11	17:22	17:24	17:34	17:36	17:41	0:12	0					Nearing high tide
7/23	Simons	1	07:09	07:11	07:21	07:22	07:26	0:12	16					
7/23	Simons	2	07:28	07:31	07:40	07:41	07:45	0:12	42					
7/23	Simons	3	07:46	07:49	07:57	07:58	08:02	0:11	60					
7/23	Simons	4	08:03	08:06	08:16	08:17	08:22	0:13	58	1				
7/23	Simons	5	08:23	08:25	08:35	08:36	08:41	0:12	38	2				
7/23	Simons	6	08:43	08:45	08:55	08:56	08:59	0:12	30	2		2		
7/23	Simons	7	09:02	09:03	09:13	09:14	09:17	0:11	23					
7/23	Simons	8	09:20	09:22	09:32	09:34	09:35	0:12	16					
7/23	Simons	9	09:40	09:41	09:51	09:53	09:54	0:11	7					50' of net out of water, low tide
7/23	Simons	10	15:25	15:27	15:37	15:38	15:43	0:12	76					Incoming tide
7/23	Simons	11	15:46	15:47	15:57	15:59	16:05	0:11	121	1				
7/23	Simons	12	16:06	16:07	16:17	16:18	16:22	0:11	71	2				
7/23	Simons	13	16:26	16:27	16:36	16:38	16:43	0:10	76	5				
7/23	Simons	14	16:43	16:44	16:54	16:56	17:01	0:11	70	6				
7/23	Simons	15	17:01	17:04	17:15	17:16	17:22	0:14	64	4				
7/23	Simons	16	17:22	17:23	17:35	17:36	17:42	0:13	93	4				1 DV
7/23	Simons	17	17:43	17:45	17:57	17:58	18:06	0:14	124	1				
7/23	Simons	18	18:07	18:08	18:22	18:23	18:28	0:15	37					
7/23	Simons	19	18:31	18:33	18:43	18:41	18:49	0:12	30	1				Nearly high tide

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Date	Observer	Set #	Start		Start Pull	Last Close	Last Fish	Hold Time	Harvested		Released			Comments
			Set	Set					Red	Pink	Pink	Silver	King <34"	
7/25	Simons	1	07:00	07:01	07:14	07:15	07:22	0:14	32	1				Incoming tide, nearing high tide
7/25	Simons	2	07:22	07:24	07:36	07:38	07:44	0:14	16	1				
7/25	Simons	3	07:46	07:47	07:57	07:59	08:05	0:11	14	1				
7/25	Simons	4	08:05	08:07	08:19	08:20	08:25	0:14	10	1				
7/25	Simons	5	08:25	08:27	08:35	08:37	08:42	0:10	6					
7/25	Simons	6	08:54	08:55	09:08	09:09	09:13	0:14	11					
7/25	Simons	7	09:13	09:18	09:31	09:33	09:34	0:18	16					20' of net out, hung up, high tide
7/25	Simons	8	09:38	09:42	09:54	09:56	09:59	0:16	24	1				
7/25	Simons	9	10:00	10:04	10:17	10:18	10:23	0:17	42	1				
7/25	Simons	10	10:24	10:27	10:39	10:40	10:46	0:15	87			1		
7/25	Simons	11	10:46	10:48	11:00	11:02	11:07	0:14	110	1				
7/25	Simons	12	11:09	11:11	11:23	11:25	11:31	0:14	94	1		1		
7/25	Simons	13	11:32	11:34	11:48	11:49	11:52	0:16	18					Nearing low tide
7/25	Simons	14	16:19	16:23	16:33	16:35	16:42	0:14	76					Began using 300' net, low tide
7/25	Simons	15	16:43	16:46	16:56	16:58	17:03	0:13	59					
7/25	Simons	16	17:05	17:07	17:19	17:20	17:35	0:14	195	15		1		
7/25	Simons	17	17:35	17:39	17:50	17:51	18:05	0:15	215	16				
7/25	Simons	18	18:06	18:09	18:23	18:29	18:37	0:17	144	5		1		
7/25	Simons	19	18:37	18:39	18:52	18:54	19:03	0:15	65	4				Nearing high tide
7/27	Meyer	1	07:00	07:06	07:16	07:18	07:24	0:16	52	2		1		Incoming tide
7/27	Meyer	2	07:26	07:29	07:41	07:45	07:51	0:15	59	2				
7/27	Meyer	3	07:53	07:22	08:06	08:08	08:14	0:13	58					
7/27	Meyer	4	08:15	08:18	08:31	08:34	08:38	0:16	19	3				
7/27	Meyer	5	08:41	08:43	08:53	08:56	09:01	0:12	31	1				
7/27	Meyer	6	09:04	09:08	09:18	09:22	09:25	0:14	22	1				1 Dogfish
7/27	Meyer	7	09:26	09:32	09:43	09:44	09:48	0:17	19	1				
7/27	Meyer	8	09:50	09:54	10:06	10:09	10:12	0:16	22					
7/27	Meyer	9	10:17	10:19	10:32	10:35	10:38	0:15	18	1				Nearing high tide
7/27	Meyer	10	11:07	11:13	11:26	11:29	11:34	0:19	40					1 Sculpin; 50' net out of water
7/27	Meyer	11	11:57	12:05	12:19	12:23	12:30	0:22	67		1			High Tide
7/27	Meyer	12	12:31	12:34	12:49	12:51	12:59	0:18	30					
7/27	Meyer	13	13:05	13:11	13:22	13:23	13:31	0:17	118					
7/27	Meyer	14	13:32	13:39	13:56	13:59	14:10	0:24	53			1		
7/27	Meyer	15	17:14	17:18	17:28	17:31	17:38	0:14	45					1 Sculpin

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Date	Observer	Set #	Start		Start Pull	Close	Last Fish	Hold Time	Harvested		Released			Comments
			Set	Set					Red	Pink	Pink	Silver	King <34"	
7/27	Meyer	16	17:39	17:43	17:54	17:57	18:08	0:15	100					
7/27	Meyer	17	18:13	18:18	18:29	18:33	18:46	0:16	79					Low tide
7/28	Meyer	1	07:09	07:17	07:29	07:32	07:39	0:20	104	4		1		1 Dogfish
7/28	Meyer	2	07:41	07:45	07:58	08:00	08:09	0:17	123	4				
7/28	Meyer	3	08:11	08:14	08:28	08:30	08:37	0:17	83	3		1		Incoming tide
7/28	Meyer	4	08:39	08:43	08:55	08:57	09:07	0:16	123	9		2		1 <17" king, viable, 1 dogfish
7/28	Meyer	5	09:09	09:13	09:26	09:28	09:40	0:17	75	3				
7/28	Meyer	6	09:41	09:45	09:57	10:00	10:09	0:16	89	5				
7/28	Meyer	7	10:10	10:18	10:30	10:32	10:40	0:20	74	7				
7/28	Meyer	8	10:40	10:46	10:58	11:00	11:08	0:18	50			1		
7/28	Meyer	9	11:11	11:15	11:27	11:29	11:36	0:16	41	1		1		
7/28	Meyer	10	11:37	11:42	11:55	12:00	12:07	0:18	21	3				1 Dogfish; nearing high tide
7/28	Meyer	11	12:55	13:05	13:18	13:21	13:29	0:23	29	1		2		1 <16" jack king, viable, high tide
7/28	Meyer	12	13:30	13:35	13:49	13:50	13:58	0:19	41					1 Skate
7/28	Meyer	13	14:00	14:05	14:20	14:21	14:26	0:20	31					
7/28	Meyer	14	14:30	14:35	14:51	14:54	14:59	0:21	34					
7/28	Meyer	15	17:02	17:12	17:27	17:29	17:35	0:25	20	2				
7/28	Meyer	16	17:36	17:41	17:56	17:58	18:03	0:20	11					
7/28	Meyer	17	18:06	18:18	18:28	18:30	18:35	0:22	12	2		1		
7/28	Meyer	18	18:36	18:41	18:49	18:49	18:55	0:13	15	1				Low tide
7/30	Simons	1	09:12	09:16	09:29	09:31	09:36	0:17	26					Low, incoming tide
7/30	Simons	2	09:38	09:42	09:55	09:57	10:02	0:17	26					2 Dogfish
7/30	Simons	3	10:03	10:06	10:19	10:20	10:24	0:16	18	2				
7/30	Simons	4	10:26	10:28	10:40	10:46	10:51	0:14	34			2		
7/30	Simons	5	10:51	10:55	11:12	11:14	11:21	0:21	39			1		
7/30	Simons	6	11:22	11:24	11:39	11:41	11:47	0:17	67			1		
7/30	Simons	7	11:48	11:51	12:06	12:07	12:13	0:18	17	2		1		
7/30	Simons	8	12:15	12:18	12:31	12:35	12:42	0:16	44	1		1		
7/30	Simons	9	12:46	12:50	13:05	13:07	13:11	0:19	15	1		2		
7/30	Simons	10	13:14	13:19	13:39	13:43	13:48	0:25	29	1				1 DV
7/30	Simons	11	13:51	13:54	14:12	14:13	14:19	0:21	19	1				
7/30	Simons	12	14:21	14:24	14:35	14:44	14:47	0:14	7					
7/30	Simons	13	14:50	14:55	15:11	15:15	15:19	0:21	15					High Tide
7/30	Simons	14	15:22	15:28	15:44	15:47	15:52	0:22	14					1 Dogfish

continued on next page

Date	Observer	Set #	Start		Start Pull	Close	Last Fish	Hold Time	Harvested		Released			Comments
			Set	Set					Red	Pink	Pink	Silver	King <34"	
7/30	Simons	15	16:17	16:23	16:39	16:44	16:48	0:22	21					1 jellyfish
7/30	Simons	16	16:49	16:53	17:09	17:14	17:18	0:20	49	1				
7/30	Simons	17	17:19	17:24	17:43	17:48	17:52	0:24	59	1				1 small grey lingcod
7/30	Simons	18	17:55	18:00	18:16	18:20	18:23	0:21	32	1				
7/30	Simons	19	18:26		18:29			0:03	0	0				Leadline over buoys, pulled to reset
7/30	Simons	20	18:32	18:34	18:50	18:52	18:56	0:18	17					2 DV, small lingcod, nearly low tide
7/31	Simons	1	10:42	10:51	11:03	11:04	11:06	0:21	9	1				Low tide – incoming
7/31	Simons	2	11:10	11:13	11:25	11:27	11:32	0:15	21	4		2		
7/31	Simons	3	11:34	11:38	11:52	11:54	12:00	0:18	49	7		5		
7/31	Simons	4	12:02	12:06	12:18	12:20	12:26	0:16	20	14		1		1 Dogfish
7/31	Simons	5	12:27	12:31	12:45	12:47	12:58	0:18	129	22		3		
7/31	Simons	6	13:00	13:04	13:19	13:22	13:28	0:19	27	2				
7/31	Simons	7	13:31	13:34	13:47	13:49	13:55	0:16	26	6				
7/31	Simons	8	13:58	14:02	14:17	14:20	14:27	0:19	24	2				
7/31	Simons	9	14:29	14:33	14:53	14:58	15:05	0:24	13	2				
7/31	Simons	10	15:05	15:08	15:23	15:27	15:32	0:18	5					
7/31	Simons	11	15:32	15:36	15:57	16:00	16:04	0:25	1					Nearing high tide

TOTALS	5228	205	2	36	3
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187

1 inch = 100 ft ¹⁰ Cook Inlet

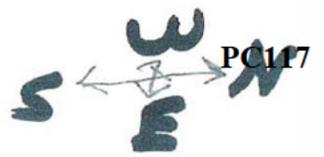
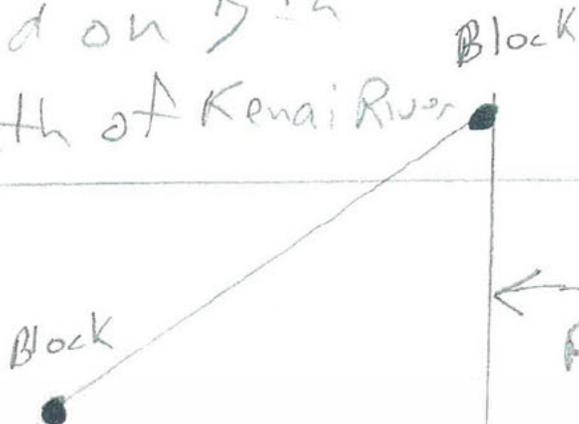


Diagram of Beach seine being deployed on 7th Beach set south of Kenai River

Extreme Low Tide



- Net deployed fishing
- Net pulled in - both ends on Beach
- "Money Bag" Fish in water



Mud Flats

Flood →
Ebb ←

Break

Ebb set

Flood set

Water Line

High tide

Tractor set →

Stake Tractor Stake

Retrieve



Beach

RIVER

PC117

Submitted by: Gary Hollier
Community of Residence: Kenai

To the Chair and Members of Ak BOF,
The ESSN fishery use to harvest 900,000 plus sockeye a year.
Dip nets in the ESSN fishery harvested 24,000 plus sockeye dip netting in 202
Two Commissioners Beach Seine permits harvested over 20,000 reds, with zero King Salmon mortality.
The BOF and ADFG stated at the Upper Cook Inlet meeting, for the ESSN fishery to come up with a
tool to harvest sockeye, with no King Salmon mortality.
Beach seining and dip netting are both management strategies that both harvest sockeye, while having
no impact on King Salmon stocks.
I urge the BOF to pass some version of proposals 312 and 313.
Thank you
Gary Hollier
Kenai, Ak

PC118

Submitted by: Carmen Hollier
Community of Residence: Kenai

I Support Proposal 313
We are excited to try something new and think its a great opportunity to catch sockeye and not catch
chinook.

PC119

Submitted by: Carrie Hollier
Community of Residence: Kenai

I support proposal 312 and 313 as these will allow for selective harvest of sockeye and pink salmon with
the ability to release chinook and coho salmon unharmed. These difficult times call for a new approach
to allow for some selective harvest to help our

PC120

Submitted by: Troy Hollier
Community of Residence: Kenai

I support proposal 313
My family is willing to invest in a new set beach seine with the options to use our existing lead lines,
corks and cork lines and use our existing infrastructure on our existing sites.

PC121

Submitted by: Catherine Honeycutt
Community of Residence: Honolulu

I am in full support for allowing fishing opportunity to harvest the plentiful sockeye salmon and avoid catching chinook salmon. Fishing families have shouldered the burden of conservation and this is a way to help them get back in the water in a sustainable manner. I have have a friend that direct markets fish in Hawaii

PC122

Submitted by: Jason Hudkins
Community of Residence: Kenai, AK

I'm writing in SUPPORT of Proposal 313. Last summer, my family and I had the opportunity to fish the Gabriel's test set beach seine on our Salamatof Beach site. Some things that we learned from participating in the process were:

Set beach seines allow for the taking of a target species with the option to release all non targeted species alive and viable. Both our hands-on experience and data collected proves this.

Our existing infrastructure and equipment is more than adequate to accommodate fishing a set beach seine.

Our existing set net cork and lead lines could easily and economically be converted into a set beach seine.

As a user group we fully understand the importance of conducting ourselves in an ethical and ecologically responsible way. It's our duty as stewards of this resource to ensure we are doing as little harm as possible. If Proposal 313 passes we will make the live release of all king salmon paramount in our fishing operation.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible to explore an alternative method of salmon harvest on the east side beaches.

Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive and meaningful impact on our fishery while king salmon are in low abundance. It will also help our family businesses survive until the king salmon stocks recover.

Thank you again for your consideration,
Jason Hudkins

PC123

Submitted by: Gavin Hudkins
Community of Residence: Kenai, AK

I am writing to you today to SUPPORT Proposal 313. I am a fourth generation fisherman and I am a SO4H permit holder in the Upper Subdistrict of the Central District.

I had the privilege to work with Brian and Lisa Gabriel as they conducted their Set Beach Seine with the Commissioners Permit. I participated on my family's historical beach site, Salamatof Beach, as well as on the Every's beach site on North K-Beach.

We know that our equipment will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed.

We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.

We will provide information requested during our fishing day from the Alaska Department of Fish and Game representatives or enforcement.

We are excited for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

The quality of the sockeye we harvest is important to our industry and we look forward to the opportunity to provide the freshest and highest quality sockeye salmon in Upper Cook Inlet while sustainably and responsibly harvesting.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and our family to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sincerely,
Gavin Hudkins

PC124

Submitted by: Sarah Hudkins
Community of Residence: Chelan, WA

My name is Sarah Hudkins and I fully SUPPORT Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

We had the opportunity to participate in the test set seine last summer with Brian and Lisa Gabriel and Travis and Amber Every, and we intend to fish a set beach seine on our beach within our existing shore fisheries leases and/or at our historic staked sites.

As a historical fish site, we are willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our site.

We know that our equipment will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with what we already own.

We also understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets. King identification and release is paramount.

We are also willing to train and share the knowledge that was collected this past summer and share that with fellow fishermen who are interested in participating in this new fishery.

We are excited for the opportunity to continue our family's legacy (over 100 years) of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

We feel that this is a new beginning for our fishery in times of king salmon conservation, and we are willing to change our harvest method while we are in the stock of concern plan.

The quality of the sockeye we harvest is important to our industry and we look forward to the opportunity to provide the freshest and highest quality sockeye salmon in Upper Cook Inlet while sustainably and responsibly harvesting.

In addition, the opportunity to have predictability in our fishery for our fresh market customers to secure and fulfill orders. We look forward to rebuilding our direct marketing businesses and customer base with the opportunity that the set beach seines will provide.

We greatly appreciate the support of our local processors who are left in Upper Cook Inlet and hope to encourage new processors to open their plants to support the processing sector with the return of opportunity for the Eastside setnet fishery.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and our family to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sincerely,
Sarah Hudkins

PC125

Submitted by: Steve Ivanoff
Community of Residence: Unalakleet

I speak against proposal 272, changing the opening date to July 1 from June 15. The earlier opener spreads a congested fleet working 40 pots per vessel. The run to the pots is shorter in distance and the weather improves is much clearer. We have actively crabbed since 1990 and do not have an issue with low meatfill. I have proposed the earlier date several cycles along with the boundary move and very much appreciated the nice change given the high price of fuel. Thank you for your time serving our lifestyle.

PC126

Submitted by: Faith Ivy
Community of Residence: Kenai

I support proposal 313. As a 4th generation Kenai set netter, I believe proposal 313 is the best opportunity to continue being economically viable, with close to zero king retention. My hope is with proposal 313, future generations will have opportunity to continue to enjoy our way of life.

PC127

Submitted by: Leah Jackson
Community of Residence: Kenai

I support the passage of proposal 313. Please take into consideration that it will be mutually beneficial to all concerned, but we cannot go into this with the expense for only a one year test fishery.

PC128

Submitted by: Tony Jackson
Community of Residence: Nikiski

My family and I are in support of proposal 313. We would welcome the opportunity to harvest salmon on our beach site once again. The set net fleet should have the opportunity to harvest using the beach seine gear, but it needs to be more than just one year. We need this to be implemented until such a time as the Kenai King stock has been declared extinct and we can go back to fishing our efficient set nets. Thank you to the board for considering proposal 313.

PC129

Submitted by: Bob Jenks
Community of Residence: Wasilla

Proposal 299- Oppose

The current system is working for the majority of sport shrimpers. It isn't perfect, but it works. Don't reinvent the wheel.

Proposal 300 – Oppose

All of the proposals seem to be from the commercial side to restrict sport.

Proposal 301- Oppose

Each time the shrimp population declines and commercial shrimping is closed, the population rebounds even with sport fishing pressure. History shows there is no need to close the sport fishery at 110K pounds to preserve the resource. The system is working.

Proposal 302/303- Oppose

Yea, let's increase the quota when the biomass is declining – NOT!

Or better yet, just eliminate the quota. Just say NO.

Proposal 307 – Oppose

Ever watched the Bristol Bay madness when the fishing is good?

This would just create more conflict between sport and commercial.

Not opposed to alternating years- open commercial at 8, sport at noon, then rotate every other year. All at once, not a good thing.

Proposal 310- SUPPORT

Doesn't seem like the southwestern area has ever supported good numbers of shrimp compared to the other areas. Taking less from each area each year and possibly taking more from northern areas would help with the decline in the southern district.

Submitted by: Brent Johnson
Community of Residence: Clam Gulch

I'm in favor of Proposal 313 which would allow beach seining for Cook Inlet east side setnetters. I have setnet in the Clam Gulch - Ninilchik area for 57 years and need a method to harvest salmon without impacting king salmon. I've also seined for herring in Cook Inlet and for salmon in Prince William Sound. I think this proposal would allow my family to harvest some salmon, but not nearly as much as we use to catch by setnetting.

Submitted by: Greg Johnson
Trish Johnson, Mason Johnson, Merrick Johnson, Zack Little

Community of Residence: Vancouver, Washington

Board Members

Our family operation encompasses 7 set net permits of which one is utilized on our beach nets ,we normally fish 21 set nets. If proposal 313 passes we intend to utilize one Set Beach Seine in the area we normally fish 3 set nets. In addition ,we would participate in the Dip net fishery. We fish on Kalifornsky Beach.

I support Proposal 312

- Increasing fishing periods in the Dip net fishery from three to seven days per week doesn't pose a risk to king salmon recovery as demonstrated by 2024 fishery performance. My family participated in this fishery last year, we caught nearly 900 red salmon and didn't handle a single king salmon. I believe this fishery provides a precautionary approach in providing ESSN families a small opportunity to harvest sockeye while protecting king salmon.

I support Proposal 313

I observed both Set Beach Seine Test Operations last summer and I believe my family can and would participate in this fishery if the proposal passes. For the most part we can utilize existing equipment and gear to prosecute this fishery. Based on the data collected and the low handle of king salmon ,especially large king salmon, this fishery would be taking a precautionary approach as it relates to king salmon concerns.

Thank You for your consideration

(Johnson Fishing Family)

Greg and Trish Johnson

Mason Johnson

Merrick Johnson

Zack Little

Submitted by: Levi Johnson
Community of Residence: Hyrum

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.
 - My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.
 - We are excited to try the new method of set beach seines and welcome the new opportunity for our fishery.
 - My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites.
 - We believe our equipment/trucks will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with that equipment/trucks.
 - We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.
 - We are willing to train and harness the knowledge that was collected this past summer by fellow fishermen who tested the set beach seine method and will educate ourselves on the best practices determined by the testers.
 - We will provide information requested during our fishing day from the Alaska Department of Fish and Game representatives or enforcement.
 - We are excited for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.
 - We feel that this is a new beginning for our fishery in times of king salmon conservation, and we are willing to change our harvest method while we are in the stock of concern plan.
 - The quality of the sockeye we harvest is important to our industry and we look forward to the opportunity to provide the freshest and highest quality sockeye salmon in Upper Cook Inlet while sustainably and responsibly harvesting.
 - Our family appreciates that we will have predictability in our fishery for our fresh market customers to secure and fulfill orders. We look forward to rebuilding our direct marketing businesses and customer base with the opportunity that the set beach seines will provide.
 - We appreciate the support of our local processors who are left in Upper Cook Inlet and hope to encourage new processors to open their plants to support the processing sector with the return of opportunity for the Eastside setnet fishery.
 - I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and [REDACTED] families to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.
-

PC133

Submitted by: Robert Johnson
Community of Residence: Nashville, TN

I support proposal 312 and 313

PC134

Submitted by: Chris Johnson
Community of Residence: Kodiak

RE: Support of Proposal #316

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

My name is Chris Johnson and I am a second-generation fisherman in Kodiak. I bought into the industry in 2011 with a 25-foot boat and the availability of the open access jig fisheries allowed me to move into the salmon fleet in 2013. I have continued to do my best to diversify my fishing portfolio to support my crew and family. I am writing in regard to proposals 309 and 316 as both are aiming for a similar goal to increase opportunity for the Kodiak area.

As the author of proposal 309 I would like to, for now, withdraw this proposal. Upon reading the Department's comments I believe there is more work to be done before it is fully ready to move forward. I still strongly believe in this proposal and I hope to recraft it with the Department's help in such a way as to assuage any concerns.

Regarding proposal 316 I believe the Board is inspired in its decision to author it. Access to Kodiak herring in the fall and winter months when the oil content is high has been monopolized for decades and it is time for the fishery structure to evolve and allow for greater community resilience. More people having access to this incredibly valuable resource will have profound benefits for our community. I recently purchased a herring gillnet permit and am very excited to pursue the opportunity and ask you to support proposal 316 at your March meeting.

I appreciate your time,

Chris Johnson, F/V North Star

PC135

Submitted by: Daher Jorge
Community of Residence: Coos Bay, OR

Dear Alaska Board of Fisheries members

Proposal 298- Opposed

I have fished for Alaska Weathervane Scallop for the past 15 years. Many of the beds lay in both state and federal waters. If the state side was closed to us it could be difficult to effectively fish on one side of the line without crossing into the state side. Restricting us to one side of a scallop bed may deplete that area and potentially make it more difficult to avoid bycatch.

I am also a crab and cod pot fisherman, and I have never seen a scallop swim into a pot. I have only occasionally seen one or two scallops get accidentally caught on top of the pot as it gets dragged across the bottom on the way up to the boat.

We are required to carry observers and VMS's at our own very expensive cost, to ensure we abide by the rules. This gives ADFG huge tools to manage the fishery. Why wouldn't another type of fishermen not have the same rules?

Please, do not let us lose access to this vital part of our fishery.

Thank you, Daher Jorge

PC136

Submitted by: Ty Kelly

Community of Residence: Kenai

Hello and thank your for allowing me to comment on upcoming proposals. As a crew member on an ESSN site. I fully SUPPORT PROPOSAL 313. Something needs to be done for all those effected by the current management and this is a step in the right direction. Thank you

Ty Kelly

PC137

Submitted by: Lisa Gabriel

Kenai Peninsula Fishermen's Association

Community of Residence: Kenai

Support for Proposal 312 and Proposal 313

To the Alaska Board of Fisheries,

On behalf of the Kenai Peninsula Fishermen's Association (KPFA), I am writing to inform you that our organization has met and approved a motion in unanimous support of Proposal 312 and Proposal 313. Proposal 312 seeks to extend the season dates and increase fishing opportunities for commercial dip net gear under the Kenai River late-run king salmon stock of concern management plan. Specifically, it proposes extending the fishery from July 31 to August 15 and allowing for daily fishing from 7 AM to 7 PM, rather than limiting openings to three 12-hour periods per week. These changes would provide greater opportunity for harvest for our fishermen while maintaining the conservation goals of the fishery.

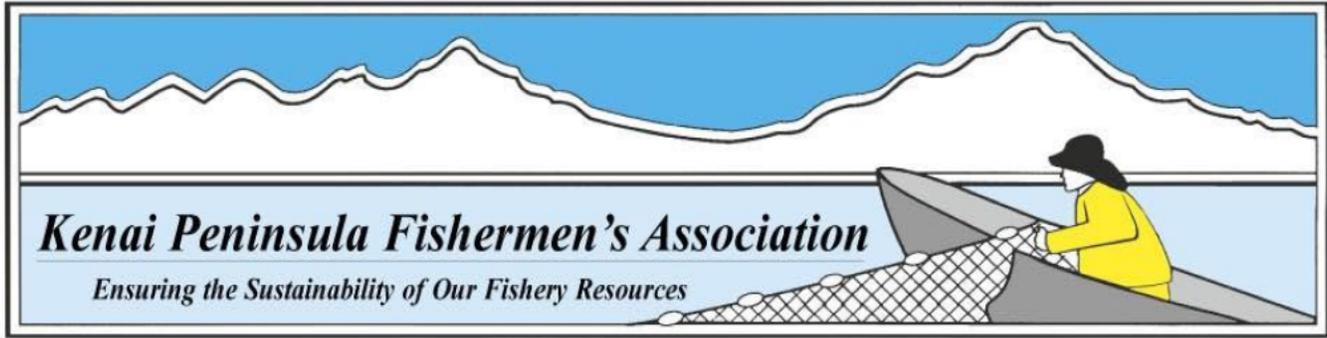
Proposal 313 seeks to add set beach seine nets as an alternative legal gear type for the East Side Setnet (ESSN) fishery while under the Kenai River late-run king salmon stock of concern management plan. This measure would provide a live-release option using existing setnet infrastructure, equipment and gear by replacing gillnet web with seine web to build the net. As demonstrated by the data produced from Commissioner's permits, UCI-2024-01 and UCI-2024-03, set beach seines have proven to responsibly harvest sockeye while releasing all king salmon alive. In doing so, they could restore some level of economic viability for the Eastside setnet commercial fishing families. With the fishery closed for the past three years, including 2023, 2024 and now 2025, this proposal presents an opportunity for responsible harvest practices that balances conservation with economic benefits to our local fishermen and their Kenai Peninsula communities.

KPFA recognizes the importance of responsible fisheries management practices and believes that both Proposal 312 and Proposal 313 offer solutions that align with conservation goals while ensuring our

fishermen have access to available harvestable sockeye while king salmon are in recovery. We commend the board for moving both ACR's forward to the statewide meeting for consideration as Proposal 312 and Proposal 313. In doing so, we urge the Board of Fisheries to adopt both proposals and appreciate your consideration of this request.

Sincerely,

Andy Hall
President, Kenai Peninsula Fishermen's Association



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276
 (907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

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

Subject: Support for Proposal 312 and Proposal 313

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KPFA recognizes the importance of responsible fisheries management practices and believes that both Proposal 312 and Proposal 313 offer solutions that align with conservation goals while ensuring our fishermen have access to available harvestable sockeye while king salmon are in recovery. We commend the board for moving both ACR's forward to the statewide meeting for consideration as Proposal 312 and Proposal 313. In doing so, we urge the Board of Fisheries to adopt both proposals and appreciate your consideration of this request.

Sincerely,

Andy Hall

President, Kenai Peninsula Fishermen's Association

Kenai River Professional Guide Association (KRPGA) Position Paper: Formal Opposition to Proposal 313 (ACR 8) - Legalizing Set Beach Seine Nets in the East Side Set Net Fishery

Introduction

At a time when Alaska's salmon populations face unprecedented threats, the Alaska Board of Fisheries must act with unwavering commitment to sustainability. The **National Oceanic and Atmospheric Administration (NOAA)** has recently determined that an **Endangered Species Act (ESA) listing for Gulf of Alaska Chinook salmon may be warranted** ([NOAA Fisheries ESA Listing](#)). Allowing an **unmonitored** catch-and-release King Salmon and Coho Salmon fishery in **saltwater** while the state faces this potential listing is reckless and threatens the future of all salmon species in the region. Furthermore, on **February 7, 2025**, the **Wild Fish Conservancy** notified NOAA Fisheries of its intent to sue for failing to meet legal deadlines under the ESA and delaying federal protections for at-risk Alaskan Chinook salmon ([Wild Fish Conservancy Legal Action](#)). This lawsuit underscores the urgent need for responsible management as the threat of endangered species listing looms larger than ever for the State of Alaska. A very sad but true example of mismanagement can be seen in the Northern Commercial Salmon District, which has historically prioritized sockeye salmon abundance over coho salmon sustainability. This same flawed management strategy is now being considered with the introduction of beach seines in the Cook Inlet. The disastrous consequences of this management approach are evident in the Mat-Su Valley, where coho salmon fisheries have suffered years of missed escapement goals and widespread sport fishing closures due to the mismanagement of prioritizing sockeye salmon abundance at the expense of coho and king salmon populations. ([Alaska Outdoor Council Article](#)).

The urgency of this matter is heightened by reports of **historically weak coho salmon runs** across the Kenai Peninsula in 2024. According to ADF&G, the **Anchor River saw returns 61% below historical averages** ([ADF&G Report](#)), while yet again the **Matanuska-Susitna Valley and Ship Creek fisheries were completely closed for coho** due to alarmingly low returns ([ADF&G Report](#)). By **August 19, 2024**, typically a period that would yield **800 coho**, only **181 fish** were counted for Ship Creek.

Meanwhile, ADF&G has recommended that sport fishermen avoid catching and releasing coho salmon due to low returns ([ADF&G Advisory](#)). It is inconsistent and irresponsible to recommend sport fishermen avoid catch-and-release coho fishing while simultaneously proposing to legalize a method that would result in large-scale coho bycatch in estuarine environments, where mortality rates are the highest. The [1993 Vincent-Lang study](#) found:

- **"Coho salmon which were caught and released in the estuary suffered a significantly higher rate of mortality (69%) than did either the coho salmon caught and held above the estuary (12%) or those which were dip netted and held at the weir (1%)."** ([Vincent-Lang, 1993](#))

ESSN Coho Harvest 2017: 82.5% Caught Between August 1st and August 15th—A Clear Threat to Fragile Runs

If we apply this mortality rate to actual ESSN harvest data from **2017**, when **24,273** coho were caught between **August 1st and August 15**, it would equate to **approximately 20,585 dead coho salmon**—a staggering loss for an already struggling fishery. Only **5,145 coho** salmon were harvested before August 1st, highlighting that 82.5% of the entire seasonal coho harvest occurred between August 1st and August 15th, aligning with their peak migration period.

Allowing additional beach seining in August during this critical period is alarming, especially given the already weak coho salmon runs. Implementing such a method during peak migration could further devastate an already vulnerable population

UPPER COOK INLET COMMERCIAL SALMON CATCH FOR July 31, 2017

Fishery	Deliveries	CHINOOK			SOKKEYE			COHO			PINK			CHUM			TOTAL	
		CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	Daily	Cum
Upper Cook Inlet Total	645	1	348	6,779	125	80,852	1,555,512	75	48,483	85,435	19	12,313	154,143	36	23,514	170,139	165,510	1,972,008
A. Northern District Total	39		1	2,114	93	3,625	42,993	123	4,790	15,245	18	719	8,998	6	244	3,393	9,379	72,743
1. Northern District West	22			1,672	73	1,603	19,251	173	3,809	11,753	3	63	2,039	7	159	2,889	5,634	37,604
a. Trading Bay 247-10	<4			538	23	23	700	73	73	404			14		3	96	1,659	
b. Tyonek 247-20	8			635	110	877	10,080	259	2,076	6,251	3	21	1,332		1	966	2,975	19,264
c. Beluga 247-30	<4			5	13	38	1,411	231	692	1,883			32	1	4	194	734	3,525
d. Susitna Flat 247-41	<4			45	81	244	2,438	118	354	1,227	10	31	352	14	41	892	670	4,954
e. Pt. Mackenzie 247-42	<4			142	92	184	2,730	54	109	584	5	11	309	13	27	363	331	4,128
f. Fire Island 247-43	5			307	47	237	1,892	101	505	1,404				17	86	471	828	4,074
2. Northern District East	17		1	442	119	2,022	23,742	58	981	3,492	39	656	6,959	5	85	504	3,745	35,139
a. Pt. Possession 247-70	8			332	78	621	8,746	88	708	2,049	54	433	3,713	10	82	454	1,844	15,294
b. Birch Hill 247-80	6			72	155	929	7,494	35	208	886	19	112	1,623		2	46	1,251	10,121
c. Number 3 Bay 247-90	<4		1	38	157	472	7,502	22	65	557	37	111	1,623		1	4	650	9,724
B. Central District Total	606	1	347	4,665	127	77,227	1,512,519	72	43,693	70,190	19	11,594	145,145	38	23,270	166,746	156,131	1,899,265
1. East Side Set Total	249	1	343	4,061	171	42,483	674,841	5	1,348	5,134	12	2,908	54,981		28	333	47,110	739,350
a. Salamatof/EastForelands	77	2	171	1,617	247	19,040	155,483	13	1,017	3,421	22	1,672	14,825		21	272	21,921	175,618
1. Salamatof 244-41	58	3	171	1,575	276	16,004	130,773	11	624	2,047	17	1,004	7,502		13	65	17,816	141,962
2. East Forelands 244-42	19			42	160	3,036	24,710	21	393	1,374	35	668	7,323		8	207	4,105	33,656
b. Kalifonsky Beach	56	2	124	1,161	173	9,695	129,198	1	83	374	3	192	4,211		1	6	10,095	134,950
1. South K. Beach 244-31	26	2	65	668	163	4,236	81,542	1	27	174	5	118	2,609		4	4,446	84,997	
2. North K. Beach 244-32	30	2	59	493	182	5,459	47,656	2	56	200	2	74	1,602		1	2	5,649	49,953
d. Cohoe/Ninilchik	116	48	1,283	119	13,748	390,160	2	248	1,339	9	1,044	35,945		6	55	15,094	428,782	
1. Cohoe 244-22	47		22	602	90	4,235	119,140	2	104	498	6	305	11,866		4	4,666	132,110	
2. Ninilchik 244-21	69		26	681	138	9,513	271,020	2	144	841	11	739	24,079		6	51	10,428	296,672
2. West Side Set Total	11			63	126	1,391	26,117	81	890	3,636	17	185	3,049	55	605	2,740	3,071	35,605
a. Little Jack Slough 245-50	<4			1	141	423	1,722	30	91	172	20	59	355	11	34	199	607	2,449
b. Polly Creek 245-40						457				11		76			2			546
c. Tuxedni Bay 245-30	8			62	121	968	23,938	100	799	3,453	16	126	2,618	71	571	2,539	2,464	32,610
3. Kustatan Total	<4			95	28	28	4,047	318	318	525	3	3	117	1	1	1	350	4,785
a. Big River 245-55				95			3,757			67		40					3,959	
b. West Foreland 245-60	<4				28	28	290	318	318	458	3	3	77	1	1	1	350	826
4. Kalgin Island Total	13			225	132	1,719	28,904	143	1,858	6,504	12	157	4,014	10	126	866	3,860	40,513
a. West Side 246-10	10			220	133	1,330	24,695	165	1,649	5,466	16	157	3,211	12	121	861	3,257	34,453
b. East Side 246-20	<4			5	130	389	4,209	70	209	1,038			803	2	5	5	603	6,060
5. Chinitna Bay Total																		
6. Central District Set Total	274	1	343	4,444	166	45,621	733,909	16	4,414	15,799	12	3,253	62,161	3	760	3,940	54,391	820,253
7. Central District Drift Total	332		4	221	95	31,606	778,610	118	39,279	54,391	25	8,341	82,984	68	22,510	162,806	101,740	1,079,012
b. East Side 244-50,60,70	332		4	111	95	31,606	480,136	118	39,279	43,510	25	8,341	30,928	68	22,510	107,717	101,740	662,402
c. East Side Corridor Total				110			298,474			10,881			52,056			55,089		416,610
2. Kasilof Corridor 244-61				20			10,631			12			915			25		11,603
3. E. Side Corridor 244-57				90			287,843			10,869			51,141			55,064		405,007

UPPER COOK INLET COMMERCIAL SALMON CATCH FOR August 15, 2017

Fishery	Deliveries	CHINOOK			SOCKEYE			COHO			PINK			CHUM			TOTAL	
		CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	Daily	Cum
Upper Cook Inlet Total	38		7	7,362	128	4,862	1,827,290	33	1,261	237,464	1	55	167,113		5	234,776	6,190	2,474,005
A. Northern District Total				2,119			50,939			33,000			10,549			4,286		100,893
1. Northern District West				1,674			21,918			22,603			2,870			3,605		52,670
a. Trading Bay 247-10				538			718			817			14			3		2,090
b. Tyonok 247-20				635			10,886			12,493			1,835			978		26,827
c. Beluga 247-30				5			1,435			2,192			32			231		3,895
d. Susitna Flat 247-41				45			2,829			1,912			494			1,150		6,430
e. Pt. Mackenzie 247-42				144			3,747			1,989			471			615		6,966
f. Fire Island 247-43				307			2,303			3,200			24			628		6,462
2. Northern District East				445			29,021			10,397			7,679			681		48,223
a. Pt. Possession 247-70				332			11,288			5,807			4,072			579		22,078
b. Birch Hill 247-80				74			9,102			3,313			1,912			79		14,480
c. Number 3 Bay 247-90				39			8,631			1,277			1,695			23		11,665
B. Central District Total	38		7	5,243	128	4,862	1,776,351	33	1,261	204,464	1	55	156,564		5	230,490	6,190	2,373,112
1. East Side Set Total	38		7	4,630	128	4,862	821,999	33	1,261	29,407	1	55	59,959		5	771	6,190	916,766
a. Salamato/ East Forelands				1,875			205,164			14,858			16,998			479		239,374
1. Salamato/ 244-41				1,829			166,230			9,223			8,520			141		185,943
2. East Forelands 244-42				46			38,934			5,635			8,478			338		53,431
b. Kalifonsky Beach	9	1	5	1,349	166	1,497	163,322	18	163	3,111	1	11	4,643			15	1,676	172,440
1. South K. Beach 244-31	9	1	5	766	166	1,497	98,831	18	163	1,237	1	11	2,858			6	1,676	103,698
2. North K. Beach 244-32				583			64,491			1,874			1,785			9		68,742
d. Coho/ Nimichik	29		2	1,406	116	3,365	453,513	38	1,098	11,438	2	44	38,318		5	277	4,514	504,952
1. Coho 244-22	10			658	132	1,325	144,508	39	387	4,333	1	10	12,718		3	48	1,725	162,265
2. Nimichik 244-21	19		2	748	107	2,040	309,005	37	711	7,105	2	34	25,600		2	229	2,789	342,687
2. West Side Set Total				63			31,499			9,352			3,454			4,206		48,574
a. Little Jack Slough 245-50				1			3,862			2,878			501			362		7,604
b. Polly Creek 245-40							457			11			76			2		546
c. Tuxedni Bay 245-30				62			27,180			6,463			2,877			3,842		40,424
3. Kustatan Total				95			4,062			820			121			1		5,099
a. Big River 245-55				95			3,757			67			40					3,959
b. West Foreland 245-60							305			753			81			1		1,140
4. Kalgin Island Total				225			42,784			15,651			4,188			1,289		64,137
a. West Side 246-10				220			35,123			12,686			3,360			1,229		52,618
b. East Side 246-20				5			7,661			2,965			828			60		11,519
5. Chinitna Bay Total																		
6. Central District Set Total	38		7	5,013	128	4,862	900,344	33	1,261	55,230	1	55	67,722		5	6,267	6,190	1,034,576
7. Central District Drift Total				230			876,007			149,234			88,842			224,223		1,338,536
b. East Side 244-50,60,70				115			560,977			132,482			36,538			162,861		892,973
c. East Side Corridor Total				115			315,030			16,752			52,304			61,362		445,563
2. Kasikof Corridor 244-61				20			10,631			12			915			25		11,603
3. E. Side Corridor 244-56,57				95			304,399			16,740			51,389			61,337		433,960

2. Lack of Regulation and Potential for Misuse

Proposal 313 fails to include necessary regulatory provisions to ensure responsible fishing practices. There are several glaring gaps in oversight:

- **No Requirements to Attend Nets** – Fishermen would not be required to remain with their nets, allowing the possibility of **unattended nets turning into fish traps**, increasing mortality rates and waste.
- **Unclear Fishing Boundaries** – There are no clear regulations on where beach seines can and cannot be used in a particular permit site.
- **No Observer Requirements** – This fishery would operate without mandatory third-party observers, meaning enforcement would be virtually nonexistent. The argument that the fishery can effectively self-enforce is insufficient. Not a single ticket has been issued in 50 years on the ESSN fishery, despite the harvesting of hundreds of thousands of king salmon under evolving restrictions—a clear reflection of inadequate enforcement. Their permits do not mandate observers, and during our meeting, it was stated that identifying a king salmon requires someone standing knee-deep in the water. Will each seine have a mandatory observer for king salmon identification? We observed 14 people, four tractors, and a custom-built seiner on a trailer in their demonstration video—an impractical setup for most commercial operations. As Mr. Gabriel himself stated, 'Commercial fishermen are businessmen.' Business-minded operators will prioritize efficiency, opting for cost-effective, small-team operations with no observers to maximize their catch and profit, which opens the door for widespread misuse of the gear.

3. Recent Dip Net Approval Proves a Viable Alternative

The Alaska Board of Fisheries **just approved** dip netting in the last cycle, providing a more sustainable and economically viable alternative for East Side Set Net fishermen. Dip netting has already proven to be a successful method, with some commercial set netters stating it was the only reason they remained in business. **Russell Clark**, similarly, said that he used to be in staunch opposition to the idea of commercial fishing with dipnets. But he tried with some friends this summer and turned a profit. He said he had drifted up and down the beach trying to chase schools of fish. 'We're not going to make the money that we used to make off our sites, but we can make some money, Clark said. It's better than sitting on the beach. Interestingly, these commercial dip netters observed diminished returns when the experimental beach seine fishery was operating this season, as noted during a meeting with Colton Lipka, the State Department of Fish and Game Commercial Fisheries Biologist, in November 2024. This raises additional concerns that beach seining, if approved, could negatively impact the newly established dip net fishery, affecting the 80-90% of permit holders who either cannot afford or do not have the beach conditions necessary to implement beach seining.:

- **Russell Clark, similarly, said he used to be in staunch opposition to the idea of commercial fishing with dipnets. But he tried with some friends this summer and turned a profit. He said he had drifted up and down the beach trying to chase schools of fish. "We're not going to make the money that we used to make off our sites, but we can make some money," Clark said. "It's better than sitting on the beach."** ([Peninsula Clarion](#))
- **Alan Crookston, a set netter, stated that dip netting kept him in business and that he would have been forced out of the fishery without this opportunity.** ([Peninsula Clarion](#))

It is premature and unnecessary to introduce a **high-risk method** like beach seining when a **more selective, sustainable method like dip netting has just been approved and proven effective.**

4. Unfair to Other Set Netters

Many traditional set netters **oppose this proposal** because it disproportionately benefits a select few who have access to **ideal beach sites** suitable for beach seining. According to feedback from within the industry, at least **25% of set netters cannot participate** right away in this fishery due to the physical limitations of their fishing locations, which are often offshore or unsuitable for beach seining.

This inequity creates an uneven playing field where a **minority of ESSN permit holders**—those with the resources and geographic advantage—stand to benefit, while the majority are left with no viable option to compete. Additionally, those without the financial capacity to invest in the necessary equipment (tractors, custom seines, and large crews to **observe for Kings**) are effectively excluded from participating in this method.

Furthermore, even if implemented, this method risks undermining the newly established **dip net fishery** that has provided an equitable alternative to many traditional set netters. As raised during a meeting with **Colton Lipka**, commercial dip netters reported diminished returns whenever beach seining operations were conducted nearby. This demonstrates that approving beach seining not only advantages a minority but could actively harm other commercial fishers who rely on dip netting as a sustainable livelihood and cannot use a beach seine at their site.

5. Coho Salmon Mortality Concerns

The Vincent-Lang Study (1993): Ignoring the Commissioner’s Own Science on Coho Mortality in Estuarine Environments

A more recent study by the Alaska Department of Fish and Game highlights further evidence of coho salmon vulnerability in estuarine environments. The study found:

- **"Coho captured at sea or shortly after entry into fresh water are mostly silver-colored on their sides and ventral surfaces (Sandercock 1991). Blush-colored fish could be considered osmoregulated to freshwater. [Vincent-Lang et al. \(1993\)](#) also observed that a large number of coho salmon handled in the estuary easily lost their scales, while those 32 km upriver did not lose their scales as readily when handled. Black (1957, 1958) reported that scale-loss and abrasion of the mucus coat were major factors contributing to mortality rates in coho salmon that were captured and released." ([ADF&G Study](#))**

These findings further demonstrate the physiological stress coho experience during estuarine capture and release, highlighting the potential for elevated mortality rates under the conditions introduced by Proposal 313.

The potential impact of beach seining on coho salmon mortality cannot be overstated. The [1993 Vincent-Lang study](#) clearly demonstrated the vulnerability of coho salmon in estuarine environments, revealing that:

- **"Coho salmon which were caught and released in the estuary suffered a significantly higher rate of mortality (69%) than did either the coho salmon caught and held above the estuary (12%) or those which were dip netted and held at the weir (1%)." ([Vincent-Lang, 1993](#))**

Given this staggering mortality rate, implementing beach seining during peak migration periods—particularly from **July 31 to August 15**—would likely result in devastating coho bycatch deaths. Applying these mortality rates to historical data, such as the **29,407 coho** caught during this period in 2017, could lead to over **20,000 dead coho salmon**.

Additionally, beach seining disproportionately affects coho due to the conditions under which the gear operates. Coho salmon are highly susceptible to handling stress, and releasing them in estuarine environments increases their risk of delayed mortality. Allowing this fishery to proceed, especially without mandatory observer requirements, could jeopardize the already fragile coho populations across the Kenai Peninsula.

Additionally, even with observer oversight, **fish handling in the experimental beach seining fishery raised concerns**. Footage from the experimental fishery showed questionable handling of bycatch species, including **flounder being thrown back with minimal care**, raising questions about how coho and king salmon would be handled if this method were fully implemented and unobserved.

Conclusion

The Kenai River Professional Guide Association strongly urges the **Alaska Board of Fisheries to reject Proposal 313**. The evidence is clear: adopting set beach seine nets in the ESSN fishery poses an immediate and significant risk to Alaska's **coho and king salmon populations**. This proposal lacks scientific support, introduces unacceptable risks of bycatch mortality, and undermines existing conservation efforts of an already recently passed Commercial Dip Net Fishery.

Additionally, given:

- **The pending ESA listing for Gulf of Alaska Chinook salmon,**
- **The 1993 Vincent-Lang study found "Coho salmon which were caught and released in the estuary suffered a significantly higher rate of mortality (69%) than did either the coho salmon caught and held above the estuary (12%) or those which were dip netted and held at the weir (1%)" (Vincent-Lang, 1993),**
- **The already successful approval of commercial dip netting, and its demonstrated effectiveness as a sustainable alternative, further underscores the lack of necessity for introducing a high-risk method like beach seining.**
- **The significant regulatory gaps and unfair advantage to select set netters highlight systemic inequities that would disproportionately benefit a small minority while leaving the majority of traditional set netters without the opportunity or resources to participate in the fishery,**

There is no justification for allowing an **unmonitored** fishery with such high mortality potential.

Recommendation: The KRPGA respectfully requests that the Board of Fisheries **vote NO on Proposal 313** to uphold responsible fisheries management practices and protect Alaska's invaluable salmon resources for future generations.

Kenai River Professional Guide Association (KRPGA)
02/25/2025



February 24, 2025

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

Re: KRSA Opposes Proposals 312 and 313 as written

Dear Chair Carlson-Van Dort and Board Members:

Kenai River Sportfishing Association (KRSA) is a 501(c)3 nonprofit dedicated to ensuring the sustainability of the world's premier sportfishing river -- the Kenai. KRSA's area of responsibility encompasses the Kenai River watershed, greater Cook Inlet Basin, and Alaska. Since 1984, the Association has been a leading advocate for fisheries conservation in Alaska, working diligently to ensure that Alaska's recreational and personal use fishery rights are protected and the fisheries are healthy for generations to come.

KRSA is concerned about any proposal for increased harvest of Kenai King salmon while they are designated by the Board of Fisheries as a stock of concern. Kenai kings have declined to critical low levels. Last year's Kenai late-run return was the lowest on record. This year's late run is forecast to be the second lowest on record.

KRSA recommends that the Alaska Board of Fisheries consider Proposals 312 and 313 together as a package beginning with the consideration of Proposal 313. Both proposals seek to increase commercial fishing opportunities by modifying the Kenai River Late-Run King Salmon Stock of Concern Management Plan. Proposal 313 seeks to authorize the use of beach seines for commercial fishing in the Upper Sub District of Upper Cook Inlet commonly referred to as the ESSN fishery. Once the Board has acted on Proposal 313, Proposal 312, which aims to add fishing periods and extend season dates for the commercial dip net fishery, can be addressed objectively.

KRSA opposes Proposal 313 as written. We recommend that no provision authorizing beach seining be placed in regulation at this time. The work conducted using the two Commissioner's permits during the 2024 season was commendable; however, it was not nearly comprehensive enough to allow for scaling up to potentially over 50 participants spread across the ESSN fishery. We recommend further research and development through a commissioner's permit or contract, like the 2023 net depth study by Kintama.

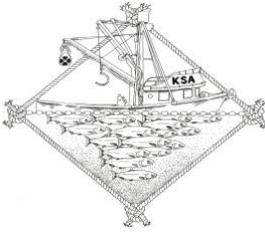
KRSA opposes Proposal 312 as written. This proposal seeks to amend the provision in 5 AAC 21.382 that authorizes the use of dip nets in the commercial fishery to significantly increase the amount of time during which the use of dip nets can be utilized. Based on the analysis of the

results from the 2024 season, KRSA believes that some increase of opportunities may be warranted but not 12 hours a day, 7 days a week, from June 20 through August 15, as sought in the proposal. At a minimum a 48-hour continuous closure per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday must occur, and the fishery must close after July 31.

Respectfully submitted,



Shannon Martin
Executive Director



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

February 25, 2025

Chairman Marit Carlson-Van Dort:

Alaska Board of Fisheries:

The Kodiak Seiners Association is grateful for the opportunity to comment on the Board generated **proposal 316**, which seeks to expand the fishing season for the current Kodiak sac-roe herring fishery to optimize the value of the fishery and expand market opportunity for the resource.

We would first like to express our gratitude at the willingness of the Board to consider this proposal, as well as give thanks to those that participated in the Herring Revitalization Committee that was formed following the January 2024 Kodiak Finfish meeting. The genesis of **proposal 316** came from the needs and concerns expressed during the committee and displays a proactive approach to changing the herring fishery management in Kodiak.

Proposal 316 seeks to expand market opportunity for the herring resource while allowing fishermen and processors to adapt annually to market variations so that herring harvest may be focused during periods when demand is high. The current fishery is structured with a regulatory pre-allocation to entirely separate spring and fall fisheries that allows no adaptation to real market conditions. The current structure was adopted decades ago when Japanese markets provided an insatiable demand and high prices for sac roe products. In retrospect it was clearly a short-sighted mistake to structure a fishery around bubble market isolated to a single foreign nation. **Proposal 316** provides the board and the industry with the necessary tools to remedy this regulatory error.

Currently, herring markets are far more varied and dynamic and therefore require a regulatory environment that, to the extent practicable, allows industry to respond to real market demand for the resource. Some years, especially when Sitka herring harvest is weak, Kodiak fishermen may see demand sufficient to utilize the full spring herring TAC, and alternatively, like the past season, may exhibit weak demand for spring-caught herring and high demand for fall harvest. This proposal allows for the necessary fluidity of harvest timing and generates an incentive for sac roe permit holders and processors to shift harvest to later season dates as market dictate. Adoption of this proposal would unequivocally improve the herring fishery and relieve the board from the economically sub-optimal duty of temporally pre-allocating harvest.

This proposal is an adaptation of **proposal 57** from the 2024 Kodiak Finfish meeting. That proposal received widespread support from the Kodiak community and approval from the Kodiak AC, however, the board chose to take no action on that proposal due to confusion stemming from an objection from the CFEC in a letter that was not received by the board or the public until the meeting had commenced, thereby leaving inadequate time for the Board or the public to address the CFEC's concerns.

The CFEC asserts that adoption of **proposal 57** would have been tantamount to allowing sac roe fishermen to harvest a separate resource that was already limited, since "sac roe herring" and "food and bait herring" are considered separate fishery resources by the CFEC, which defines the resource based on harvest timing. The Commission asserted that by their definitions and regulations if sac roe quota were harvested during an active Food and Bait season, then those fish would in fact be considered food and bait herring as defined by CFEC resource codes – in essence, according to the CFEC regulations which were adopted decades ago, the two seasons cannot overlap temporally. KSA firmly believes that the CFEC regulations overstep the CFEC's authority by defining a fishery resource based on season dates, which is not one of the parameters provided to the CFEC in the Limited Entry Act, and these regulations clearly infringe on the authority of the Board by limiting their ability to set season dates and thus preventing the Board, Department, and the industry from adequately developing the fishery. Nevertheless, until the CFEC updates its regulations concerning the dichotomous herring resource designation, the Board still has the option to adopt **proposal 316** which addresses the legal concerns brought up by the Commission at the Kodiak finfish meeting.

It is important to note that although herring harvested in the spring is designated as "sac roe" herring, this definition doesn't limit how the resource has been used in recent years. "Sac roe" herring have long been used for various food products and these fish, especially the males, are regularly sold as bait. In fact, neither the Board nor Commission have the regulatory tools or legal authority to determine how a fish may be utilized once harvested – the regulation of seafood products is outside of the scope of authority for both agencies and, as evidenced by the current herring quagmire, our industry is best off when those agencies do not foray into this field except to facilitate efficient markets, rather than direct or inhibit them.

If the Board were, however, to entertain arguments concerning potential market impacts of expanding the sac roe season, then we ask for a greater level of rigorous analysis than has been offered so far. While KSA still maintains that neither the Board nor the Commission should act as market regulators intending to limit the supply of specific products to buoy prices, we also contend that any attempt to regulate product supply should be taken with caution in the face of uncertainty. Contentions that the adoption of **proposal 316** would result in an oversupplied market harming the only vessel that currently participates in the food and bait fishery are unfounded. Ex-vessel prices for this fishery have remained remarkably stable even as the TAC has expanded dramatically and all available quota has been harvested, indicating that the fishery has not even begun to push the boundary of market saturation. In fact, KSA believes that the potential expanded harvest provided by the proposal would allow for greater market exploration by creating a more regular supply to all of the processors, and would additionally result in positive economic outcomes from the impacts of economies of scale. However, regardless of what impacts *may* occur from the adoption of the proposal, the only certain economic impact is the overall value of the herring fishery in Kodiak will increase through more efficient market supply.

Proposal 316 would breathe a little hope into the future for herring fishermen in Kodiak, as currently nearly all permit holders, both seine and gillnet have un-utilized assets tied to the herring fishery that lie in heaps around the town, meanwhile millions of pounds of harvestable surplus with real market potential cannot be accessed by these fishermen during periods when markets exhibit highest demand. Alaska needs to re-envision how to manage its vast herring resource and we need to escape the current antiquated regulatory structure that has entirely failed a new generation of fishermen who are simply asking for an opportunity.

Sincerely,

Darren Platt

KSA President

Submitted by: Matt Kopec
Community of Residence: SOLDOTNA

Hello.

My comments are in opposition to Proposal 299, 300, 301, 302, and 307.

From what I can tell by available data, the PWS shrimp population has never been significantly effected solely by the recreational fishery and the population had no issue until the addition of the commercial fishery. Additionally, each time the population declines, it rebounds quickly when commercial pressure is halted. I think you are hard-pressed to find reasoning to link commercial and recreational closures, or to further restrict recreational fishers while commercial fishers are allowed to continue.

Thanks.

Submitted by: Grant Kopplin
Community of Residence: Palmer

I noticed a lot of shrimp proposals proposed by Cordova district fishermen united. Obviously, this is a commercial use interest group and A lot of their proposals seek to limit or restrict the subsistence and personal use shrimpers opportunity. I understand that

Shrimp numbers are low and regulations may need to change to protect future shrimp populations, but that restriction and change should start with the commercial fishery. Cutting out the commercial fishery is a good first step in reducing harvest and protecting the future of the shrimp. Please remember that the that majority of your constituents are personal use and subsistence shrimpers We're just trying to provide enough shrimp for their family to enjoy throughout the year. They are not trying to make a personal financial profit from shrimp. It's worth noting that closing but the commercial fishery does affect the very small user groups that participates in it to make money, but they would still have the opportunity as an individual to harvest shrimp like everyone else a subsistence or personal use user. Yes subsistence and personal use shrimping does harvest more than the commercial fleet. I believe is 60% of allowed harvest to to subsistence and personal use and 40% to commercial? But we are talking about 60% of the harvest being shared between thousands of Alaskans who want to eat and provide food for their family harvesting over the course of a 5 month season, compared to 40% of the harvest being taken by a group of like 50 to maybe a 100 users who's sole propose is to make money over the course of 3 weeks? What's more important, protecting the right

And opportunity for individual Alaskans to have to opportunity to harvest shrimp for their family, or a very select user group making money? Removing the commercial harvest is a great step in trying to protect shrimp while maintaining opportunity for all the harvest shrimp for personal use .

Thank you

Submitted by: Vern Kornstad

Community of Residence: Nikiski

We support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

We intend to fish a set beach seine on our beach within our existing shore fisheries leases.

Due to the lack of fishing income in the last few years we are able to invest only a minimal amount into beginning a set beach seine net. We plan to use our existing lead lines, corks and cork lines. Hopefully we can find some used seine web of the appropriate size mesh to purchase. We believe that our existing equipment/trucks will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with our equipment/trucks.

King salmon conservation in the Kenai River system has an important impact on the state of Alaska tourism industry as well as the balance of the ecosystem in the river. We strongly urge the passage of Proposal 313 as it will have a positive impact on our fishery, as well as the Kenai River ecosystem, while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Vern and Jan Kornstad

Chairman Woods and Board Members,

My Name is Brian Koski. I am a third generation Fishermen in the Kasilof section of the ESSN fishery. I grow up on the beach. Started off as Grandpas helper, then picking down the beach nets, then running boats. I have had my permit sense my grandfather's passing. I have a son that just turned two and I look forward to teaching him how to become a fishermen. I witness this fishery go down hill since 2012. Everything is about the Trophy Kenai River King, or the Kenai River Sockeye. What about the Kasilof river?

I support a 600' Kasilof district commercial fishery during this low abundance of Kenai River Kings. There is already regulation in place about 600'. I would like to see this use more extensively, in 2015 we used it 6 times exclusively in the Kasilof section. It is high on harvest of Kasilof sockeye and low impact to the Large Kenai River bound kings.

A simple and affective plan could look like 4 periods a week at 12hrs around high tide to high tide, I know this is 48 hours a week, but it isn't because of how big the tidal range is in cook inlet. These nets go dry for most of the periods and are still extremely affective.

If the preseason forecast is between 13,500 – 15,000 then there will be limited fishing periods in the Kasilof 600' section will be no more than 48 hrs. a week with a mandatory closure on Friday. If it is projected at the midway point on or about July 27th that the SEG is not going to be met. Then immediately closure for the rest of the season.

I would like to see a plan that includes the Kasilof 600' section opened and Separated from the Kenai districts. This would be a helpful tool in controlling the large escapement into the Kasilof river. Many of my fellow fishermen worry about the 1 million sockeye escapements into the Kasilof river 2 years in a row. I have witness this firsthand how effective the Kasilof section 600' fishery can be in harvesting Kasilof sockeye and low harvest of large Kenai Kings.

Thank you,

Brian Koski

Submitted by: Evelyn Koski
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

- My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.
- My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites.
- We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.
- We are excited for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

Evelyn Koski

Submitted by: Gary Koski
Triple K

Community of Residence: Kasliof

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

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Gary Koski
S04H permit holder

Submitted by: Landon Koski
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

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Landon Koski

Submitted by: Laura Koski
Triple K

Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

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Laura Koski

Kozak & Associates, Inc.

P. O. Box 2684 - Kodiak, Alaska 99615

Cell 907-539-5585

E-Mail – lindakozak@gmail.com

Date: February 23, 2025
To: Alaska Board of Fisheries
From: Linda Kozak
Subject: Proposals 278 and 279

I am writing in support of proposals 278 and 279 which are in relation to the Western Aleutians golden king crab fishery.

For over 30 years I have worked with vessel owners in the Aleutian Islands golden king crab fishery on regulatory and resource management issues. I currently work with the owners of the F/V Alaska Trojan and submitted these proposals on their behalf. Both proposals are intended to help create a level playing field for the participants.

Proposal #278: This proposal would implement a pot limit for this crab fishery with a maximum of 2,500 pots. There is currently no pot limit in this longline pot crab fishery where vessels typically have up to 40 pots linked together with a single buoy line at each end of the string. Placement of this gear precludes another vessel from fishing in that area and can be used as a method to preempt grounds. It appears that is currently happening.

Historically, vessels usually fish around 2,000 pots, but a single vessel has in recent years been adding to that number and is now operating in excess of 3,000 pots. We believe this large number of pots is not being fished in a sustainable fashion and may be causing increased challenges for the department to manage this unsurveyed stock. With just a few vessels participating, the department depends on each vessel's performance to assist in determining stock status and catch limits.

This proposal is allocative as it would limit a vessel's ability to encroach on another vessel's traditional fishing grounds. The Western Aleutian Islands golden king crab fishery is conducted on the edge of the steep slope and there are limited areas where adult male golden king crab are available in abundance. By preempting the fishing grounds with 1,000 or more additional pots, the result is to push a vessel out of their traditional area and is creating conflict.

While we are not generally supporters of increased regulation, we feel there is no other option than to request relief from the Board of Fisheries for this difficult situation.

Alaska Board of Fisheries
February 23, 2025
Page Two

Proposal #279: The proposal would slightly modify the gear sharing provision for the Western Aleutian Islands golden king crab fishery to only apply at the end of a vessel's season. This rationalized fishery allows vessels to fish a certain amount of quota and when that is reached, their fishing must stop. The gear sharing provision was intended to allow another vessel to make a final pick of their gear. This reduces waste and deadloss which can occur when rail-dumping gear with crab in it.

Recently, this provision was abused with two vessels from the same company dropping pots at the beginning of the season and then adopting a gear sharing plan for only one vessel to prosecute the entire fishery for that season. We believe this behavior was not intended in the gear sharing provision and that clarifying language is needed.

By using two vessels to drop pots at the beginning the season, the result was to preempt another vessel's ability to put their gear in their historical fishing grounds. We believe this is a companion proposal to #278.

We are requesting the Board to provide clarifying language so that the intent of this provision is clear and abuse of the gear sharing allowance will not occur in the future.

PC150

Submitted by: Jo Krager
Community of Residence: Kenai, Alaska

I support proposal 313 , we are excited to try the new method of set beach seines, also we believe we can invest in a set beach seine using our lead lines and cork lines from our existing infrastructure on our existing sites.

PC151

Submitted by: Forrest Kuiper
Community of Residence: Fairbanks

I support a management of the Shrimp fishery in the PWS, as it seems unsustainable. There is no real enforcement of it, nor accurate counts. It might be better to account for shrimp harvest by number of shrimp instead of "gallons". I do not think most noncommercial folks account for this accurately, nor commercial. Please do not change the start date of April 15. There are very few vessels fishing before May (noncommercial) anyhow, and gives locals a chance to enjoy the PWS early.

PC152

Submitted by: Diana Kurka
Community of Residence: Anchorage

To Whom It May Concern, I would like to share my comments on the closure of the commercial shrimp fishery. Many years ago my husband and I would go to Prince William Sound and drop our pots for the wonderful spot shrimp. Now I am no longer able to do so but still enjoy Alaskan fish and shrimp. My sole means of obtaining them is buying them commercially. As farmed fish are not on my menu, I make it a point to support our local fisheries, I support the commercial shrimp fishery. Proposals 301, 302, and 303 demonstrate there is public concern with the current regulation. By supporting Proposal 304 and delaying the season opener so the shrimp are able to drop their eggs would be one positive step in sustaining the population. We need a comprehensive management plan so I support Proposal 299. We want our ADF&G managers to have flexibility in managing the fishery responsibly (Proposals 301,302 and 303). Thank you.

Kvichak Setnetters Association

400 Spruce St.

Sitka, AK 99835

kvichaksetnetters@gmail.com



February 25, 2025

ATTN: BOF Comments
Alaska Department of Fish & Game
Boards Support Section
PO Box 25526
Juneau, Alaska 99802-5526

Subject: BOF Record Comment regarding **Proposal 314: Establishing a Kvichak Special Harvest District**

The Kvichak Setnetters Association (KSA) **supports as amended** the creation of a Kvichak Special Harvest District in Proposal 314 in order to conserve Naknek sockeye while simultaneously providing harvest opportunities in the Kvichak Section of the Naknek/Kvichak district in the event of a historically low return of spawners to the Naknek river. We have drafted proposed language on the following three pages that we hope will provide management the tools to address this situation and provide fair opportunity between gear groups based on participation. Due to an unusually low forecast for the Naknek River in 2025, the creation of a Kvichak Special Harvest District may be critical to providing harvest opportunities for surplus fish in the Kvichak River that currently do not exist in the regulations.

The Kvichak Setnetters' Association (KSA) is an organization that was developed to represent set net fishermen of the Kvichak section of the Naknek/Kvichak district. Our mission is to present a unified voice for our members, especially at Board of Fisheries meetings. We work to ensure that set net fishers in the Kvichak section are given fair access to sockeye bound for the Kvichak River. Due to the nature of our district and our location at the end of Bristol Bay, we have unique needs and perspectives on the effective management of Kvichak River salmon.

Thank you for the opportunity to provide comment on this important proposal.

Sincerely,

Corey Arnold
KSA President

Kvichak Setnetters Association

*Proposed Amendment for the creation of a **Kvichak Special Harvest District - Proposal 314***

5 AAC 06.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan.

The goal of this plan is to achieve Naknek River sockeye salmon spawning escapement goals, while providing opportunities to harvest Kvichak River and Alagnak River salmon stocks that are in excess of spawning goals. It is the intent of the Board of Fisheries that salmon in the Naknek-Kvichak District should be harvested in the fisheries that have historically harvested them, including the methods, means, times, and locations of those fisheries, using the best biological management techniques and practices. This plan has been adopted to provide management alternatives that can be used by the department when differences in salmon run strengths would preclude the achievement of the goal of this plan using only the fisheries that have historically harvested those salmon.

On or after July 4, when the department projects that the sockeye salmon escapement into the Kvichak River will exceed the minimum biological escapement goal and the Naknek River escapement projection is one or more days behind schedule for reaching its escapement goal, the commissioner may open, by emergency order, the Kvichak River Special Harvest Area (KRSHA). For purposes of calculating whether the minimum biological escapement goal has been met, fish estimated in the river should be added to those already past the counting tower.

(a) If 50% of the Naknek River's minimum biological escapement goal has been reached then the department will allow set net fishing within the boundaries of the Kvichak section of the Naknek Kvichak district concurrent with openings in the KRSHA defined below. All set gillnet fishing within the Kvichak section of the Naknek Kvichak district if allowed will be governed by the existing regulations for set gillnet fishing in the Kvichak district as defined in AAC 06.331 except the aggregate length of set gillnets operated by a permit holder may not exceed 37.5 fathoms in length.

(b) The Kvichak River Special Harvest Area (KRSHA) consists of the waters of the Kvichak River between a line from 58° 52.63' N. lat., 157° 00.23' W. long. to 58° 53.98' N. lat., 157° 04.16' W. long. upstream to a line from 58° 59.90' N. lat., 156° 51.90' W. long. to 59° 00.24' N. lat., 156° 53.39' W. long.

(c) To ensure adequate Kvichak River king salmon escapement, the department shall, to the extent practicable, manage the KRSHA to minimize the harvest of king salmon.

(d) Salmon may be taken in the KRSHA with set gillnet and drift gillnet gear. Salmon harvested in the KRSHA will not count against the allocations of sockeye salmon to the gillnet fisheries specified in 5 AAC 06.364(b).

(1) If provision (a) is triggered and set gillnet fishing in the Kvichak section of the Naknek-Kvichak district is open then openings in the KRSHA will be for both drift and set gear groups concurrently.

(2) If provision (a) is not triggered, then to the extent practicable, drift gillnet and set gillnet fishing will open separately, with openings alternating between the two gear groups. After a total of four openings, the openings will alternate between the two gear groups with a ratio according to the participation during the most recent opening:

(i) Drift permits delivered were greater than 500 or set net permits delivered were less than 100 then 3:1 (drift gillnet to set gillnet)

(ii) Drift permits delivered were greater than 300 but less than 500 then 2:1 (drift gillnet to set gillnet)

(iii) Drift permits delivered were less than 300 then 1:1 (drift gillnet to set gillnet)

(e) When the KRSHA is open under this section the Egegik River Sockeye Special Harvest Area Management Plan (5 AAC 06.359) will be implemented as well to preserve Naknek River stocks as long as the Naknek section remains closed to commercial fishing.

(f) When the KRSHA is open under this section, a gillnet within the KRSHA may only be operated as follows:

(1) no more than 37.5 fathoms of set gillnet may be used to take salmon;

(2) a set gillnet may not be set or operated within 300 feet of another set gillnet;

(3) a set gillnet must be operated in a substantially straight line perpendicular to the nearest bank of the Kvichak River;

(4) all gear and equipment associated with set gillnet fishing in the KRSHA must be removed from the water when it is not being used to fish in the KRSHA;

(5) no more than 75 fathoms of drift gillnet may be used to take salmon;

(6) a drift gillnet vessel may not have more than 200 fathoms of drift gillnet on board the vessel;

(7) 5 AAC 06.331(i), (m), (o), and (p) do not apply except that the anchoring device may not be more than 75 feet from the web of the net;

(8) a set gillnet may be set or operated seaward of another set gillnet unless set gillnet and drift gillnet openings are taking place concurrently;

(9) If set gillnet and drift gillnet openings are taking place concurrently then a set gillnet must be set on an area of a beach that at mean low tide, is connected by exposed land to the shore or to land not covered at high tide, and no part of a set gillnet may be more than 500 feet from dry land;

Kvichak River Sockeye Salmon Management Decision Tree Summary:

1. **Is it on or after July 4th?**
 - **No** → KRSHA remains closed.
 - **Yes** → Proceed to step 2.
 2. **Does the department project that Kvichak River sockeye salmon escapement will exceed the minimum biological escapement goal (including fish estimated in the river)?**
 - **No** → KRSHA remains closed.
 - **Yes** → Proceed to step 3.
 3. **Is the Naknek River escapement projection behind schedule for reaching its escapement goal by one or more days?**
 - **No** → KRSHA remains closed.
 - **Yes** → Commissioner may open KRSHA by emergency order. Proceed to step 4.
-

Fishing Provisions

4. **Has 50% of the Naknek River's minimum biological escapement goal been reached by July 4th?**
 - **Yes** → **Provision (a):**
 - Set net fishing is allowed in the Kvichak section of the Naknek-Kvichak district concurrently with openings in KRSHA.
 - Openings in KRSHA allow both drift gillnet and set gillnet fishing simultaneously.
 - **No** → **Provision (b):**
 - Drift gillnet and set gillnet fishing will alternate. After four openings, alternation follows these ratios based on recent participation:
 - **Drift permits delivered > 500** → **3:1** (drift gillnet to set gillnet).
 - **Drift permits delivered > 300 but < 500** → **2:1** (drift gillnet to set gillnet).
 - **Drift permits delivered < 300** → **1:1** (drift gillnet to set gillnet).
-

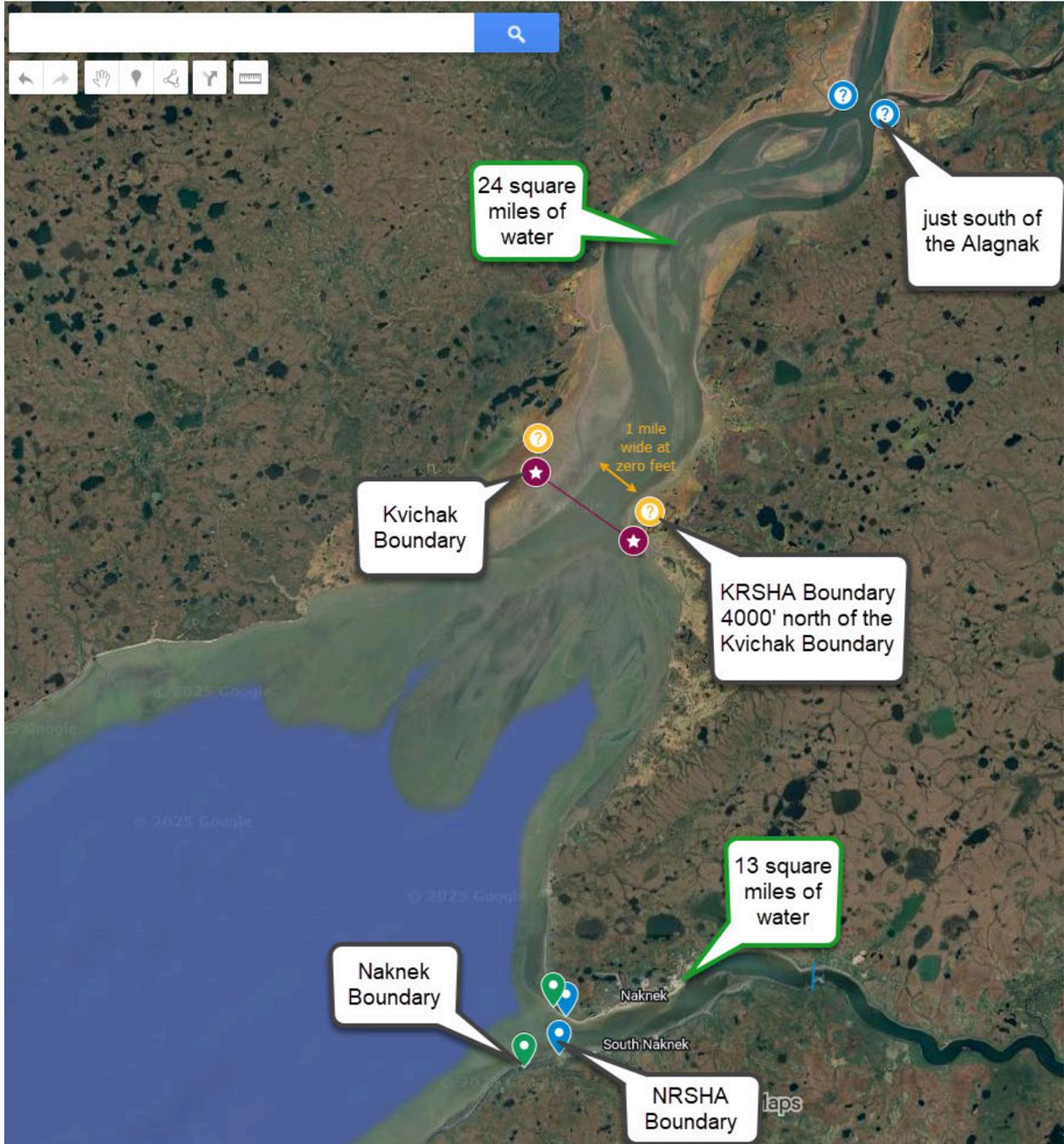
Gear and Harvest Rules

5. **Fishing Gear Allowed in KRSHA:**
 - Set gillnet 37.5 fathoms.
 - Drift gillnet 75 fathoms.
6. **Other Considerations:**
 - Minimize the harvest of king salmon in KRSHA to ensure adequate escapement.
 - Salmon harvested in KRSHA do not count toward allocations of sockeye salmon specified in 5 AAC 06.364(b).

Interaction with Other Management Plans

7. If KRSHA is open
 - Implement **Egegik River Sockeye Special Harvest Area Management Plan (5 AAC 06.359)** to preserve Naknek River stocks.

Relevant boundaries on a map:



Submitted by: Boyd Leman
Community of Residence: Ninilchik

Proposal 313... Beach Seine Cook Inlet. I am in total opposition to this change from set nets. How can this benefit anyone except the few with locations by the mouths of both rivers and heavy equipment needed for this change. While the test fisheries showed mild success..... what is going to happen when you scatter over 400 permit holders and there crew and machinery in the open areas to fish. I fish just north of the Ninilchik River and am constantly battling the elements such as rocks, coal , sticks and kelp and moss . This proposal will benefit a few to the detriment off most all. I urge you to respectfully reject this proposal and let’s keep working for a fishery that is vfair to all fishers. Thank you Boyd Leman

Submitted by: Ben Ley
Community of Residence: KIng Cove, AK

I support proposal 285 and 286. I would like to see the state give Area J the same opportunities as other regions when it comes to harvesting Tanner crab. I feel that we are under utilizing the resource and operating under an outdated management strategery. If we are able to model after southeast management, we should be able to increase harvest opportunities without compromising sound resource sustainability.

Submitted by: Cora Linebaugh
Community of Residence: Chugiak

- 299 SUPPORT
- 300 SUPPORT lessen impact
- 301 OPPOSE science says 75K lbs
- 302 OPPOSE science says 75K lbs
- 303 OPPOSE science says 75K lbs
- 304 SUPPORT allows the eggs to drop we are still seeing allot of eggs until end of April
- 305 SUPPORT
- 306 OPPOSE unnecessary
- 307 SUPPORT
- 308 OPPOSE not needed we have a quota
- 310 OPPOSE this is done better with the 299 plan
- 311 OPPOSE not allowed anywhere

Submitted by: Oystein Lone

Community of Residence: Arlington, WA

Subject: Comment on Proposal 283,Allowing Crab Boats to Longline Pots in the Bering Sea.

I am against this proposal at this time due to the potential introduction of more vessels competing for leased crab quotas. The Bering Sea crab fleet has suffered immensely over the past few years, and now that we are finally seeing some recovery with quotas starting to increase, our fleet has a chance to become profitable again.

My two vessels fish exclusively leased quotas, and opening up the fishery to longlining will introduce smaller vessels that can compete in an already stressed fishery. This would drive lease rates even higher, making it more difficult for the existing fleet to turn a profit.

If an amendment were added to this proposal imposing a minimum vessel size of 70 feet or more, it would ensure that quotas remain within the existing fleet, and I would support such a change. However, if no size limit is included, I strongly oppose this proposal.

Oystein Lone

F/V Pacific Mariner & F/V Confidence

Submitted by: Katie Loomis

A loved one

Community of Residence: USA

I support proposal 313.

I am also in support for allowing the fishing community to harvest the plentiful sockeye salmon and avoid catching chinook salmon. Fishing families have shouldered the burden of conservation and this is a way to help them get back in the water in a sustainable way.

I Oppose Proposal 316

I have held a Kodiak Food and Bait limited entry permit continuously since implementation, awarded for past participation in the fishery.

I oppose this proposal as written. Some, but not all, of my reasons for this opposition are;

By potentially allowing any Kodiak Sac Roe permit holder to take part in the Food and Bait fishery during the expanded season would only be slightly more restrictive than returning to open access, would also devalue the existing F&B permits drastically, and conversely increase the value of roe permits for a good number of permit holders with no prior history of participating in F&B, thus resulting in severe economic impacts to those of us who have stayed in the fishery for many years.

With regard to Seasons, 5 AAC 27.510 (a) would define the Sac Roe season in (1) the "A" season as April 1-January 31, and then (2) a "B" season from December 1-January 31, and under (b) our Food and Bait limited entry fishery running from October 26-November 30.

The proposal coming out of the last BOF meetings in January defines that same Sac Roe "A" season as April 1-October 25, not January 31. Possibly this is just an editing error, however it is significant because, under this proposed rule change, our existing Food and Bait fishery would be overlapped by the Sac Roe fishery during October 26-November 30.

Regarding the proposal season dates, Sac Roe permit holders would be allowed to fish about 8 & 3/4 months out of the year. The Food and Bait permit holders would only be allowed to fish 36 days of the year, a significant reduction of fishing opportunities to us. And while it may be true our herring have been delivered over the past 5 seasons from October 26-November 30, bait herring has historically been delivered over a wider range of days and months prior. We would like to see a larger window of opportunity than described in this proposal, as market demand and processor availability has dictated when the fishing occurred.

If there were to become changes from status quo and uncaught herring become rolled over following the spring sac roe season into the fall, I believe it is fair and equitable that a significant portion of such rollover tonnage be allocated to our existing limited entry Food and Bait fishery.

With respect,

Dan Macdonald

PC160

Submitted by: Peter Macdonald
Community of Residence: Ancortes

As a permit holder in the Kodiak food and bait fishery I oppose proposal 316

PC161

Submitted by: Kenneth Mack sr
N/A

Community of Residence: King Cove

proposal 285 this will bring us current with southeast tanner crab fisheries
proposal 286 this will help us utilize the resource of older crab that just get older and die
proposal 294 this will bring all our fisheries equal all our crab and salmon vessels already
are 58 foot limit this started in 1959

PC162

Submitted by: Branda Madrid
Community of Residence: Kenai

I support Proposal 313.

I grew up on the beach harvesting salmon with my family using our setnets. This fishery is important to me and my family.

My children and I had the opportunity to participate in the set beach seine test fishery this summer with the [REDACTED] and [REDACTED] families. We actively participated in the fishery and believe that it is the solution to get the Eastside Setnet fishery back in the water again to harvest plentiful sockeyes with the protections for kings that this selective alternative gear type offers while in the Stock of Management Concern plan.

I fished beside my 87-year-old grandfather, my parents, my husband, daughters and my 5-year-old son. It was an amazing summer for our family, and we look forward to the opportunity to continue this family fishery.

Thank you,
Branda Madrid

PC163

Submitted by: Julian Manos
Lady Elias LLC

Community of Residence: King Cove/Anchorage

Myself along with four other fishermen drafted and put forth two proposals regarding the Area J South Peninsula District tanner crab fisheries. They were proposals 285 and 286. These proposals were put together quickly and as a means to address a situation that was and has already unfolded in front of us.

The under-utilization of our legal male tanner harvest over the last 12 years has proven frustrating. We started both seeing in the surveys and learning about newer recruitment classes that indicated large potential harvests the last few years. In our peak winter however, 3 years ago, we had about 1.1 million crab to harvest. After this year a large portion of fully mature males are going to die off, not have been harvesting. This frustration at what we had hoped for and the reality of our fishery is what lead to these proposals. I am not sure what needs to change, but something has got to eventually change. Maybe our modeling or surveying needs to be adjusted etc. But the reality is we have been under harvesting legal adult male crab and its costing us. Unfortunately this last big recruitment is on its way to crab retirement so anything we do now will not likely bear fruit for many years to come. However starting a dialogue and examining how some of these other areas and/or species are doing it doesn't seem all that unreasonable. Is it the exact solution, maybe not, but our current system doesn't appear to be anymore stable for the stocks, and is certainly not stable for the fisherman.

Respectfully,
Julian Manos

PC164

Submitted by: Jake Markham
Community of Residence: Kenai

I SUPPORT proposal 313

PC165

Submitted by: Taylor Markham
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.

PC166

Submitted by: Zach Markham
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.

PC167

Submitted by: Sara Martinez
Community of Residence: Kenai

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites.

PC168

Submitted by: Anna Maus
Community of Residence: Palmer, Alaska

Please support proposal 303. To support families that depend on fishing these waters.

PC169

Submitted by: Eileen Maus
Community of Residence: [REDACTED]

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

PC170

Submitted by: Betty McGahan
Community of Residence: Kasilof

I support Proposal 313.

I had the opportunity to participate in the set beach seine test fishery this summer with the [REDACTED] and [REDACTED] families. I was able to participate in the fishery and believe that it is the solution to get the Eastside Setnet fishery back in the water again to harvest plentiful sockeyes with the protections for kings that this selective alternative gear type offers while in the Stock of Management Concern plan.

I loved being on the beach with my kids, grandkids and great grandkids.
Thank you for your consideration of Proposal 313,
Betty McGahan

PC171

Submitted by: Jackie McGahan
Community of Residence: Kasilof

I support Proposal 313.

I had the opportunity to participate in the set beach seine test fishery this summer with the Gabriel's, Every's and Hudkins' families. I was able to participate in the fishery and believe that it is the solution to

get the Eastside Setnet fishery back in the water again to harvest plentiful sockeyes with the protections for kings that this selective alternative gear type offers while in the Stock of Management Concern plan. I am 87-years-old and it allowed me to be an active participant in the fishery. I loved being on the beach with my kids, grandkids and great grandkids.

Thank you for your consideration of Proposal 313,
Jackie V. McGahan

PC172

Submitted by: Karen Sue McGahan
Community of Residence: Nikiski, Alaska

I SUPPORT OF PROPOSAL 313

Our family is willing to invest in a new harvest opportunity for our fishery in these times of king salmon conservation.

We believe we can safely harvest sockeyes while conserving kings with this method and appreciate the board considering this new method.

PC173

Submitted by: Kirk McGee
Community of Residence: Anchorage

Board of Fisheries

My comments are to the proposed Shrimp Regulations in Prince William Sound.

I'm a 73 year Alaska resident who loves the PWS Spot Shrimp. (who doesn't ?) The only way I can get them is to buy from a Commercial Fisherman. It's just a small percentage of folks who own a boat, and then are able to take part in the Sport Fishery. If you completely stop the Commercial guys , then you're cutting off the vast majority of Alaskans from being able to enjoy the finest Shrimp on the Planet.

Got no problem with shutting down Everyone when the Biologist get worried.

(just share the pain equally)

My 5 cents. Thanks,

Kirk McGee

PC174

Submitted by: Ava Suzanne Metcalfe
Community of Residence: Anchorage

Comments on Proposals 299, 301, 302, 303, 304

I support the commercial shrimp fishery as it provides access to this resource for many Alaskans who can't shrimp on their own. Most of us don't own boats or gear for shrimping, making the commercial fishery the only way to enjoy this resource. Closing it removes this vital access.

My family and I treasure the delicious PWS spot shrimp each season. Such a uniquely Alaskan dish.

I'm asking the board to make changes to keep the fishery open when biologically appropriate and share conservation efforts across all user groups.

- Proposals 301, 302, and 303 show that there is public concern with the current regulation, and we need a trigger based on biological information to open the commercial fishery when conditions allow to give more Alaskans access to the resource.
- Support Proposal 304 to delay the season opener for conservation. This proposal delays the opening of the season to allow shrimp to drop their eggs to help sustain the population.
- Support Proposal 299 for a comprehensive management plan.
- Give ADF&G managers the flexibility to manage the fishery responsibly.

PC175

Submitted by: Tom Minio

Community of Residence: Kodiak

Dear Alaska Board of Fisheries members,

I am opposed to the scallop Proposal 298. It would eliminate me and my family from fishing scallop beds that we have worked since the 70's. I do not understand why the proposer who himself used to operate a scallop dredge vessel that he sold, would now try to push a proposal that would remove us from the fishery. We have never heard of anyone having success fishing with pots other than occasionally catching one or two on top of a crab pot. It does not seem possible that fishing scallops with pots would even earn enough to pay expenses.

We have fished these beds responsibly for decades working closely with the department, paying for observers, tracking our boats with VMS, using our boats for ADFG scallop surveys. Please reject this proposal.

Sincerely, Tom Minio, FV Provider

PC176

Submitted by: Tollef Monson

Community of Residence: Kodiak

I am writing in support of proposal 315. This is a simple fix to an oversight that occurred in the rush of the Kodiak meeting in January of 2024 and will ensure that setnetters can continue to use the joint venture provision without missing out on web. I have setnetted in Kodiak since 2001. Thank you. Tollef Monson

Submitted by: Stanley Montgomery
Community of Residence: Anchorage

First off, ban all bottom trawl fishing. The grotesque resource wastefulness from bycatch and bottom ecosystem damage is appalling. It's highly unsustainable and greatly affects the directed fisheries of bycaught fish and shellfish as well.

PWS non commercial shrimp fishery should be curtailed. 2 pot limit with a shorter season from May 1-July 31st should help further protect the resource with all the added personal use/ sport pressure. I personally notice the shrimp I harvest very early and late season contain more egg bearing shrimp than during mid summer.

Submitted by: Michael Mooradian
Community of Residence: Chugiak

Commenting on Proposal #303.

I love Alaska wild foods. I purchase a fishing and hunting lic. every year. I take advantage of as much wild caught food as possible. Fish, shellfish and shrimp are among my favorites and my favorite seafood is spotted shrimp. However, in the last few years I have become disabled and i am only able to enjoy spotted shrimp through small commercial fisheries. I am also very passionate about sustaining these great resources. one thing i would like to point out is that every year many individuals who are able to catch shrimp do not, for many reasons, allergies, preferences, not enough time etc. So if there are shrimp allotments accounted for that are not taken by individuals then these allotments should be available to those small fisheries that can make these foods available to those that would catch if they could but can't. Even if it is a small window of opportunity at the end of the season when we know how many individuals did not fish perhaps, we could allow a few days of fishing for the small commercial fisherman that supply to their local customers. I would not be in favor of commercial fishing in these incidents to be available for mass profit out of state but for those like me who can only enjoy them by purchasing from my local, small suppliers, please allow us to have some shrimp. Thank you,

Submitted by: Kevin Morrison
Community of Residence: Kenai

Proposals 269, 270, 271.

Recommend making the east side Cook Inlet a personal use fishery open to Alaska residents only. This would significantly reduce harvest efforts and allow ADFG to more easily manage the impacts of harvest to clam populations. With clam populations still low, priority should be given to Alaska residents for harvest. Basically treat the east side razor clam fishery like the Kenai River dipnet fishery: Permit required, annual limit per house hold, resident only, short season and required to submit a harvest report.

Submitted by: Doreece Mutch
Community of Residence: Kodiak

I oppose proposal 316 as it is written. I own a food and bait herring permit and the dates written on the proposal now allows all the roe herring permits to fish at the same time as the food and bait fishery. Traditionally the food and bait herring fishery has taken place from September to December 15. This proposal should be rewritten to give some of the unused quota to the existing limited entry food and bait fishery that has been utilizing it successfully for over 30 years

Submitted by: Doreece Mutch
Community of Residence: Kodiak

I support proposal 315 because we are a multi-permit family set net site and joint ventures allow us to utilize all of our shore leases. This is just a housekeeping proposal that needs to fix the wording on the original proposal.

Submitted by: Sam Mutch
Community of Residence: Kodiak

Opposition to Proposal 316

I am a Kodiak Food and Bait Herring permit holder and have participated in the fishery for over 30 years. I oppose Proposal 316 as it would significantly impact the existing limited-entry Kodiak Herring Fisheries, specifically the Food and Bait Fishery, by introducing new permits and altering the established framework.

There are currently two separate, limited-entry Herring Fisheries in Kodiak—the Sac Roe Fishery and the Food and Bait Fishery—distinguished by their timing, with the seasons several months apart. While the Board of Fisheries (BOF) does have the authority to change seasons, Proposal 316 would essentially add 70 new permits into an already limited-entry fishery without going through the necessary process we followed in 2000 when the fishery went limited entry. The proposal would also impact the value of existing Kodiak Food and Bait Herring permits, which cannot be overlooked. With 70 Sac Roe limited-entry permits and only 9 Food and Bait permits, the imbalance is evident.

Proposal 316 would allocate an additional 6,000 to 7,000 tons of herring into the Food and Bait market, going to fishermen who have not participated in the Kodiak Food and Bait fishery. This new allocation is approximately ten times the amount current permit holders are allocated. To maintain fairness and reward those who have consistently participated in this fishery, at least 50% of the new allocation should be directed to the existing Food and Bait permit holders. This allocation would help them remain competitive in the market and maintain processor market share. Kodiak Food and Bait fishermen are the only group in the state consistently harvesting their quotas in recent years and should be rewarded with an increased allocation.

The Kodiak Food and Bait Herring fishermen should also be allowed to fish exclusively during our traditional season, which runs from September through December 15. Proposal 316 limits our season

from October 26 to the end of November, which is insufficient and does not align with the traditional harvest. A compromise would be to allow the Food and Bait Herring fishery to take place in October and November exclusively. Kodiak's processing capacity is shrinking, and allowing a two-month season is necessary to accommodate these limitations.

Comparatively, Dutch Harbor's 4,000-ton bait herring quota is fished by fewer than five boats, and Southeast Alaska's 7,500-ton quota is also fished by fewer than five boats. In contrast, Kodiak's 800-ton quota is split between just nine permit holders, the lowest ratio of permit holders to quota in the state. This further justifies the need to allocate 50% of the rollover directly to the Kodiak Food and Bait Herring Fisherman.

Respectfully submitted,
Sam Mutch

PC182

Submitted by: Sydney Mutch
Community of Residence: Kodiak

I strongly oppose Proposal 316. As a current permit holder who actively participates in the food and bait herring season, I am deeply concerned about the potential consequences of this proposal. Under the current regulations, there are 9 permit holders for food and bait herring, and the proposal would allow 70 sac roe permits to fish during our season. This is a significant change, and we must carefully consider its potential impact on the sustainability of the fishery.

The income I rely on from the food and bait herring season is essential to my livelihood. While I recognize and welcome the growth of herring markets, and the value that new markets can bring to our fishing community, it should not come at the expense of current food and bait permit holders. I believe at least 50% of any new allocation should be reserved for those of us who have invested in and maintained the health of the fishery.

The careful, sustainable harvesting practices employed by current food and bait permit holders, under the management of ADF&G, have been a key factor in making the Kodiak food and bait herring fishery both stable and successful. The limited entry system for food and bait herring has proven to be a model of effective fishery management, and it should be expanded, not disregarded.

PC183

Submitted by: Christopher Nicolson
Community of Residence: Naknek (during commercial fishing season), New York (during winter months)

Proposal 314

Greetings. I am writing in support of Proposal 314: to create a special harvest area for the Kvichak River that would protect Naknek stock and also allow for harvest of Kvichak River stock. I have set net fished in the Naknek for six years. Prior to that, I spent three decades set net fishing in the Kvichak section. My family has participated in the Bristol Bay commercial salmon fishery since the 1940s. (During the 1990s

and early 2000s, I fished nine seasons in the Naknek River Special Harvest area, as a "homeless" Kvichak set net fisherman.)

I would like to request that the Board create a policy framework that is dynamic and balances the goal of stock preservation and that continues to support economic opportunities for fishing families like my own. For example, I think that a framework that allowed the Kvichak section to remain open to set net fishing, as long as possible, while concurrent drift openings took place further up the Kvichak River, would result in less congestion and more fishing opportunities for all gear groups. The Kvichak district has unique attributes, and I hope the Board can craft regulations that fit its unique situation.

Thank you for your consideration of Proposal 314 and of my comment (& thank you also for your work in balancing the many interests that comprise these tightly-knit districts.)

PC184

Submitted by: Tori Norman
Community of Residence: Kenai

I support 312 and 313. Thank you

NORTH PACIFIC CRAB ASSOCIATION

To: Alaska Board of Fisheries Members

Re: OPPOSITION to Proposals 287 and 288 Comments

Dear Chair Carlson-Van Dort

The North Pacific Crab Association (NPCA) is a small trade association comprised of holders of crab processing quota under the state/federal Crab Rationalization Program (CRP). The CRP was enacted by the North Pacific Fishery Management Council and requires the holders of processing quota to match with crab harvesters to prosecute each Alaska commercial crab fishery opened by the Alaska Board of Fisheries. Our members directly process and have custom processed all commercial crab species in the Bering Sea and Aleutian Islands. Our members process the entire crab Total Allowable Catches (TAC) in processing plants located in the fishery dependent communities of Akutan; Dutch Harbor/Unalaska; and St. Paul in the Pribilof Islands. Our members coordinate landings with crab harvesters and then market the processed crab into international and domestic markets.

The Alaska crab industry is suffering from low catches and market variances. Additionally the high costs of processing in the Aleutian Islands have caused mass reductions in commercial processing capacity. Finding and retaining labor is very difficult and costs of travel in Alaska has increased rapidly. Those costs continue to skyrocket in these uncertain times.

Proposal 287.

This proposal would reduce the preferred size for bairdi crab harvested in the Western Bering Sea statistical area and would suggest changing to a different size reduction for bairdi crab harvested in the Eastern Bering Sea statistical area. Reducing the preferred size will cause ADFG to adopt changes in the harvest strategy that could cause further uncertainty in the management of the species. If adopted, these different changes will cause disruption to the processing of bairdi crab because different sizes would be harvested and brought for processing. The increased costs resulting from sorting and separating multi-sized crab would be enormous. Additionally, the smaller crab sizes would impact the market because smaller crab yield smaller clusters and the buying customers are not attracted to smaller crab clusters. This proposal will add confusion to the market place at exactly the wrong time.

We support the comments of ADFG and look forward to working with the crab industry; ADFG and this Board of Fisheries to ensure that the correct changes are made to the bairdi crab fishery. Now is not the time to approve a proposal that is not well structured and defined.

Proposal 288

Like Proposal 287, this proposal seeks to reduce the preferred size for opilio crab. That reduction in the preferred size will cause unknown changes in the ADFG harvest strategy. Those changes will increase

uncertainty to the opilio species and have the same damaging processing and marketing impacts to the opilio markets. Because the opilio fishery is in a rebuilding phase, conservative measures must be taken to ensure that the species will continue to rebuild. Changing the preferred size for opilio will damage that stability.

Alaska opilio clusters, with the current preferred size, are larger and more desired in the crab marketplace. That preference will be lost if the size is reduced and Alaska opilio is combined with other, foreign crab producers. Additionally, as in the case of processing bairdi crab, smaller retained and delivered sizes of opilio will cause increased costs for processing these smaller crab. And the market for smaller crab will be less so the costs cannot be covered by increasing the price of crab.

We support the ADFG comments in opposition of this proposal and look forward to working with the department and the Board of Fish to continue rebuilding the opilio fishery in a sound and well designed manner. Proposal 288 does not meet the definition of a sound and well designed proposal and should not be adopted by the Board of Fisheries at this time.

Thank you for considering our comments. I cannot attend the Board meeting in person but can be reached anytime for comments or questions.

Sincerely,

John Iani

A solid black rectangular redaction box covering the signature of John Iani.

North Pacific Crab Association



To: The Chair and Members of the Board of Fish

From: Northwest Setnetters Association

Date: February 24, 2025

Re: SUPPORT for Proposal 315 (formerly ACR 14)

The Northwest Setnetters Association appreciates the opportunity to provide comments in SUPPORT of Proposal 315, which the Board of Fish voted unanimously to take up during its fall work session (as ACR 14).

This proposal is the result of an oversight during the January 2024 Kodiak Board of Fish meeting and seeks nothing more than to correct that oversight, since it accidentally negatively affected the ability for setnetters in the Northwest Kodiak District to utilize the joint venture provision that has been in effect since 1985.

Comments from the Department of Fish and Game will corroborate that this was not foreseen at the time of the meeting and is an error that should be corrected.

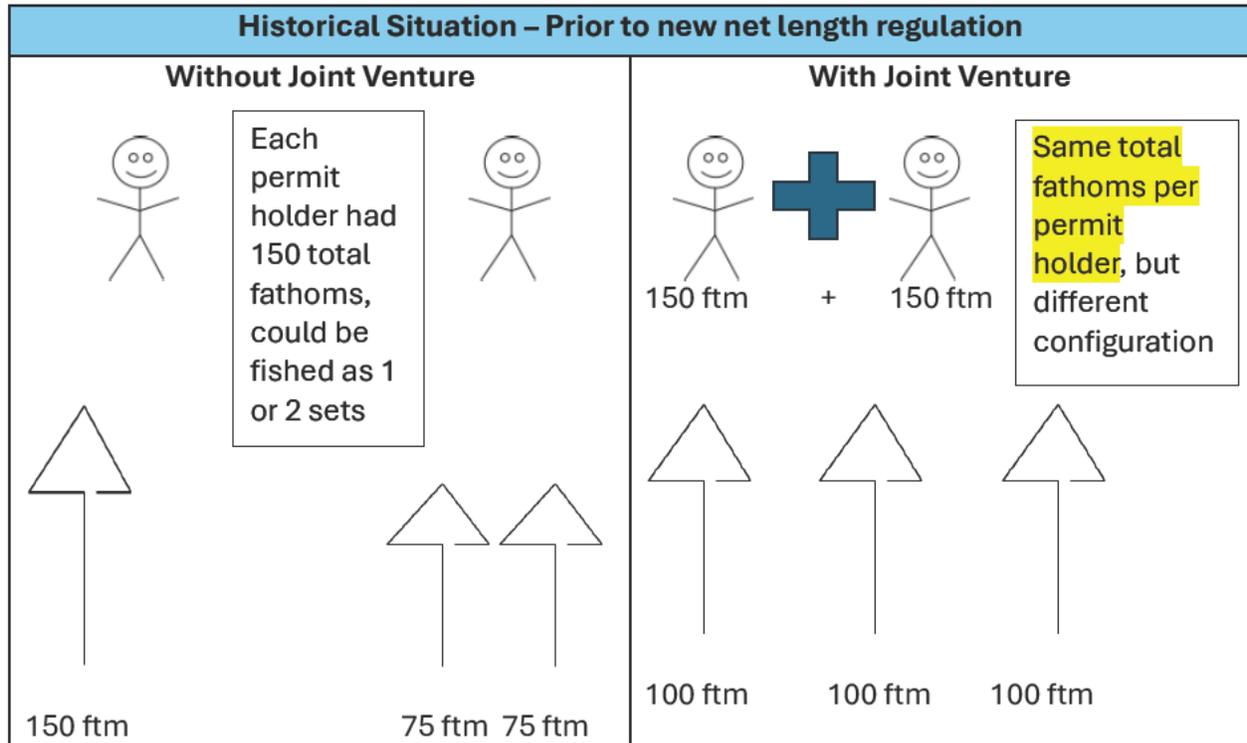
The Kodiak ADF&G Advisory Committee voted unanimously to support this proposal at its February 12th 2025 meeting.

Background on joint ventures in the Kodiak setnet fishery from 1985-2023

The joint venture regulations on the books (5 AAC 18.331 (e)) went into effect in 1985. The regulation allows two Kodiak setnet permit holders to combine their allotted fathoms of gear into a maximum of three nets. Both permit holders are legally responsible for fishing all the gear. From 1985-2023, the length of web allowed an independent permit holder and a joint venture participant was exactly the same. A joint venture did not mean a loss of fathoms, it simply meant a different configuration of web. A permit holder could fish 150 fathoms independently (choosing 1 long net or 2 shorter ones), or team up with another permit holder to fish 300 fathoms split among three nets in a joint venture. The total

amount of web for two permit holders, whether fishing on their own or in a joint venture, was 300 fathoms.

The graphic below illustrates the scenario that was in effect from 1985 through the 2023 season. Note that the total amount of fathoms is the same in both situations.



*Not to scale

The Problem

The regulation on length of gear per permit holder in the Central Section of the Northwest Kodiak District was changed at the January 2024 Kodiak Board of Fish meeting to 175 fathoms (5 AAC 18.331 Gillnet specifications and operations, subsection a). However, the joint venture regulation (subsection e) was not updated to follow along. So now, a permit holder can fish 175 fathoms independently, but only 150 fathoms if joining with another permit holder for a joint venture. Until this is fixed, a joint venture is capped at 300 fathoms in aggregate, thereby depriving those participants of the opportunity to fish the extra 25 fathoms available to all other independent permit holders. Currently, the total amount of fathoms is less for people fishing with a joint venture than without.

This inconsistency came about because this RC was taken up at the very tail end of the January 2024 Kodiak BOF meetings, after the period for public input had ended. There were no questions to the Department of Fish and Game about how the regulation would affect joint ventures; the only questions were regarding conservation concerns, of which none

were noted. Fishermen assumed that the joint venture regulations were tied to the length of gear per permit as they had always been and would change automatically.

Effect of problem on fishermen

According to the Department of Fish and Game, in the setnet fishery in the Central Section of the Northwest Kodiak District, the 10-year average of joint ventures from 2013-2023 was 11. In 2024, that number dropped to four. Those who had historically participated in joint ventures but chose not to in 2024 cited the loss of opportunity relative to non-joint venture permit holders as the driver of their decision making. They have 25 fathoms LESS per permit available to them (50 fathoms in total per joint venture) than other fishermen.

Until the inconsistency between the length of fathoms of a single permit vs a joint venture is resolved, the joint venture will not be an effective tool for setnet fishermen in our area. It will become useless.

This is concerning because the setnet fishery is struggling to remain viable and cannot afford to lose any tools that may help its participants.

Indeed, the reason the BOF voted unanimously to increase the fathoms of gear allowed per permit holder was due to the board's recognition of our setnet fishery's loss of harvest percentage over the years. It was a tool deemed appropriate to help our gear type while not impacting other gear types.

Solution proposed in Proposal 315 (formerly ACR 14)

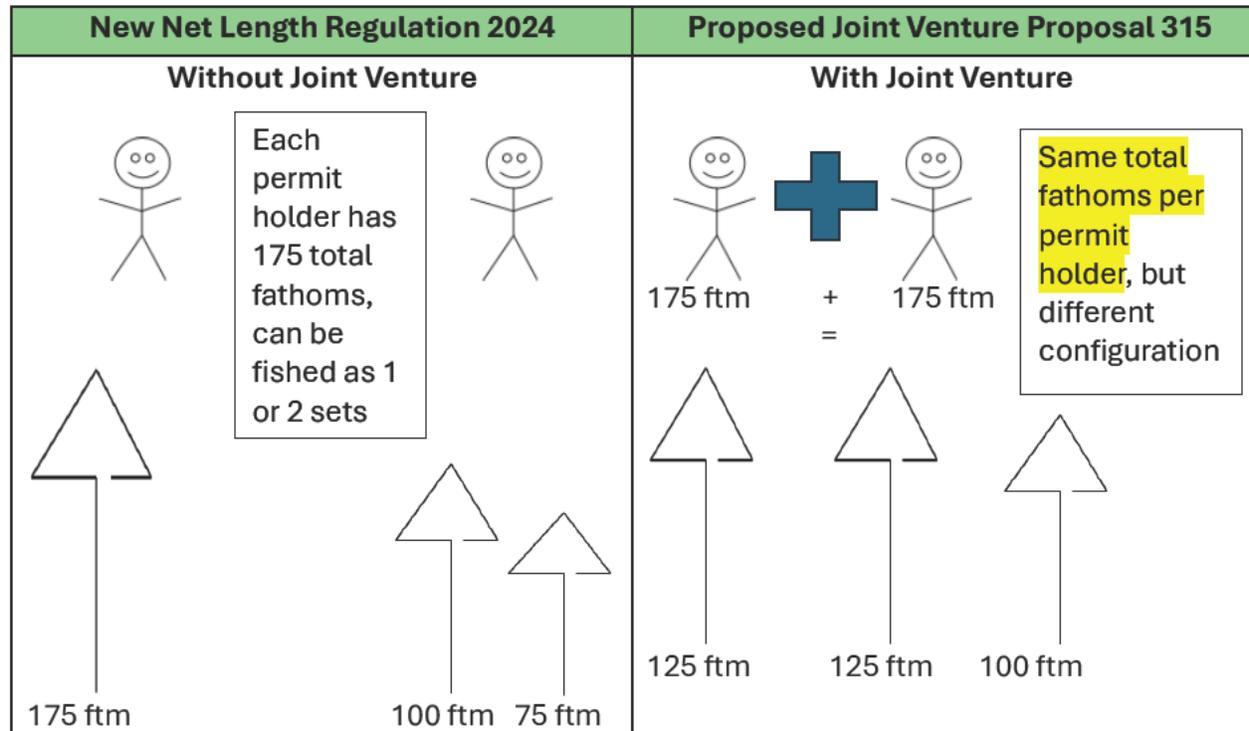
Proposal 315 seeks to update the joint venture regulations for the Central Section of the Northwest Kodiak District so that they match up with the new length of fathoms allowed per permit holder.

To be clear, proposal 315 is not asking for additional web in the water. All permit holders are already allowed 175 fathoms. Whether they are fishing their permit independently or choose to joint venture for a 3-net configuration, they will have the same number of fathoms: 175.

Currently, the number of joint ventures has dropped dramatically; instead, people are fishing their full 175 fathom allowance. This web is already in the water. Allowing joint ventures the same amount will not increase the length of what is already being fished.

There were no allocative or conservation concerns when the regulation for extra web was put into place. Updating the joint venture regulations will not change this because it is web that is already permitted to be fished.

The graphic below shows that, with the proposed update, we will be back to parity between joint ventures and non-joint ventures. As was the case from 1985-2023, the total amount of fathoms will be the same in both situations.



*Not to scale

Rationale: Why Now?

This proposal is being submitted out of cycle to correct an oversight that impacts fishermen. If we must wait until our next board cycle, permit holders fishing a joint venture would have to fish 50 fathoms less gear in total than they are allowed. This renders the joint venture provision useless. An already struggling fishery will lose a tool.

According to AF&G staff comments on ACR 14 in RC 2, page 14, the proposal met the criteria for an ACR because, “Gillnet specifications for joint venture set gillnet operations were not considered when the amount of lawful gillnet gear that may be operated in the Central Section was increased during the 2023–2024 board meeting, creating an incongruity between single permit and joint venture operations.”

As you voted unanimously to take up this ACR as a straightforward proposal to correct an unforeseen consequence, which does not affect any other users or impact the amount of gear allowed in the water, we hope that you will also vote to pass proposal 315 and correct this mistake. Thank you for your consideration.

Submitted by: Eric Nyce

Community of Residence: Homer

I would like to voice my support for proposals 312 and 313. Setnetter's were instructed to come up with an alternative to harvest sockeye without killing kings. This mandate has been achieved with beach seines. I believe a beach seine could be utilized on my operation on Salamatof. If given the opportunity by the board, my families fishing operation will participate in this alternative gear type during the stock of management concern.



To the Chairperson and members of the Alaska Board of Fisheries:

We at OBI Seafoods would like to support the consideration and passage of proposal 313 and 312.

Proposal 313 would allow Beach Seines as an alternative gear type to be available to S04H permit holders in the East Side Set Net fishery when the Kenai River Late Run Chinook Management Plan is in effect and traditional set gillnets are not available gear type to prosecute a fishery.

While beach seines will never replace the economic viability of a directed Set Gillnet fishery the hundreds of small businesses that the S04H permit holders represent may experience some ease in the strain that the closure of the East Side Setnet Fishery under the Late Run Chinook Salmon Management plan has imposed on their businesses; support industries and the processing sector.

One of the unintended but beneficial outcomes of the passage of # 313 would be the return of the tool that the S04H permit represents to ADF&G biologists in the management of local salmon escapement goals.

We would like to commend Commissioner Vincent-Lang for his forethought in the issuance of Commissioner's permits that allowed for the experimentation and development of Beach Seines as an alternative gear type while Chinook are under a Stock of Concern management plan. The permit holders were able to demonstrate that a reduced fishery could take place while adhering to strict ADF&G guidelines regarding the capture and release of Chinook salmon while under the scrutiny of independent fisheries biologists' thus allowing for the harvest of the target species, Sockeye salmon. OBI Seafoods would also like to support the passage of proposal 312 allowing additional time in the S04H dipnet fishery. This may allow for the development of small-scale direct market opportunities that match up with the reduced harvest abilities that the Dipnet gear type provides.

Thank you for considering these proposals,

Janet K Carroll/OBI Seafoods
Upper Cook Inlet Fleet Manager
842 Fish Dock Road
Homer, Alaska 99603
907-235-8107 office
907-435-7128 mobile

Submitted by: Erik OBrien

Community of Residence: Larsen Bay / Anchorage

I support Proposal 315.

At the 2024 BOF meeting in Kodiak, a general consensus was established that the Kodiak Salmon Setnet (SO4K) fishery was in danger of becoming uneconomical for participants. Several controversial proposals were dropped; however, one successful proposal was put forth with general support from setnet and adjacent gear types (seine). That proposal allowed setnet permit holders to add 25 fathoms to each eligible permit. Unfortunately, given the intense nature of that BOF meeting, an oversight forgot to apply those extra 25 fathoms to the long-established joint venture tool.

Almost all remaining SO4K operations fish more than one permit, and while not all utilize the joint venture provision allowing two compliments of gear to be fished among 3 sites, it is a very valuable tool for many operations. Not all setnet sites fish the same, and in many circumstances, fishing adding gear to 3 good sites is better than fishing 4 sites, one of which underperforms.

We are not asking for anything new that BOF has not already granted SO4K setnetters; we are simply asking to fix an oversight that may allow participants the best chance of participating in a struggling fishery.

Please pass Proposal 315 and allow SO4K setnetters to fish our eligible complement of gear per permit, while also utilizing a joint venture provision.

Thank you,

Submitted by: Nicholas Olzenak

AMDS

Community of Residence: Whittier

Proposal 301

Under no circumstances should commercial harvest have the same priority of sport and personal use Shrimp Pot regulations including quota and closures. Residents of Alaska sport or personal use fisheries should remain prioritized over commercial fishing.

Submitted by: Jackie Ostroy

Community of Residence: Nikiski

I support Proposal 313. My family has been fishing as east side set net fishermen for 4 generations and we would like the opportunity to continue the work with our kids.

Submitted by: James Ostroot

Community of Residence: Nikiski

I SUPPORT proposal 313.

We are excited for the opportunity to continue our family's tradition of spending summers on the beaches of Upper Cook Inlet together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

**PACIFIC NORTHWEST CRAB INDUSTRY
ADVISORY COMMITTEE (PNCIAC)**

February 25, 2025

Art Nelson
Executive Director, Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Re: PNCIAC Recommendations to Board of Fisheries on Proposals 283 & 287

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (BOF) and the North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors¹. PNCIAC, since its beginnings, has worked with the BOF, Alaska Department of Fish and Game (ADFG), the National Marine Fisheries Service (NMFS), and the NPFMC. Together, PNCIAC and the agencies have worked together to improve resource management.

Proposal 283 (*Allow longlining of pots for Bering Sea snow and Tanner crab*)

PNCIAC supports this proposal as an option that some vessels might choose to increase efficiency and safety. PNCIAC notes it would be helpful for technology, such as pingers or satellite buoys, to be used for longlined pots to reduce any potential gear conflicts.

Proposal 287 (*Amend preferred size of Bering Sea Tanner crab in harvest strategy*)

PNCIAC supports this proposal with an amendment. Specifically, PNCIAC supports a set 4.5 inch industry-preferred size west of 166° W longitude (or ELMW in the harvest strategy at 5 AAC 35.508) for ADFG's consideration in the Bering Sea *C. bairdi* Tanner harvest strategy. PNCIAC supports this change because it more closely aligns with the smaller 4.4 inch legal size in the west, better matching the biology of the stock with smaller sizes in the west, and would reduce discarding. PNCIAC does not support any changes to the harvest strategy and TAC considerations for industry-preferred size in the east. In other words, the east would remain at 5 inches.

Thank you in advance your consideration.

Regards,

Sean Dwyer
Chair, PNCIAC

¹ Current PNCIAC membership – Sean Dwyer (chair), Lance Farr (vice chair), Dana Rudy (Secretary, non-voting), Mark Casto, Dean Fasnacht, Jake Jacobsen, Steve Minor, Gary Painter, Edward Poulsen, Brett Reasor, Elizabeth Reed



February 24, 2025

To: Alaska Board of Fisheries

RE: Opposition to Proposals 287 and 288

Dear Chair Carlson-Van Dort and Board Members,

The Pacific Seafood Processors Association (PSPA) opposes Proposals 287 and 288 to remove the current minimum size limits for Tanner and opilio crab at this time. PSPA is a seafood trade association comprised of Alaska seafood processing companies that operate 34 facilities in 21 coastal communities across Alaska, from Ketchikan to Cordova to St. Paul to Unalaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include the shore-based processors that historically participate in the Bering Sea crab fisheries (Unalaska, Akutan, and St. Paul). 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.

Opposition to Proposals 287 and 288 is based on the uncertainty of how ADFG would set minimum size limits that fluctuate annually, given that their sampling is relatively low (<1% of landed Tanner crab), and the direct effect this calculation would have on future productivity of crab. In sum, how it would affect harvest limits, exploitation of large male crab, and spawning biomass. The proposals remove the minimum size limits, but the calculation or process to determine minimum size limits annually is not described in the proposals or the ADFG comments. It is clear there is the likelihood of a higher harvest limit by lowering the minimum size limit, but that depends on the size and shell condition composition of crab, and with so few crab being sampled, it seems a fairly risky change. For opilio (snow crab) in particular, a fishery that has just now reopened in 2024/2025 after a stock collapse due to marine heatwaves, it seems especially worrisome to reduce the minimum size limit, which may result in increased harvest limits and higher exploitation on large male crab. ADFG opposes both proposals, and for opilio, stresses the need for a comprehensive review of the overall harvest strategy before making a change to this vulnerable stock.

In addition, shoreside processors are already under stress to realize any margins under the federal BSAI crab rationalization program requirements, and this stress is exacerbated by the currently low crab stocks (less volume to cover fixed costs to open and staff a processing plant in rural Alaska, let alone help cover significantly increased operating costs). Yet changes to increase harvest limits in this way are not supportable at this time. We also note that ADFG comments state the proposals would result in additional direct costs for fishermen in changing pot gear and escape rings to accommodate smaller crab retention size; *it will also add additional costs to the processor, as it will cost more to produce the same amount of finished product.* Finally, processors need to be able to sell the crab to make it a commercial fishery, and there is little market interest in smaller crab clusters, creating greater risk of lower value for smaller crab. We should not be promoting regulations that result in lower value for the fishery and State of Alaska tax revenue.

Thank you for considering our comments.

A handwritten signature in black ink, appearing to read "Julie Decker". The signature is fluid and cursive, with the first name "Julie" being more prominent than the last name "Decker".

Julie Decker
President, PSPA

PC195

Submitted by: Alexandra Packa
Community of Residence: Palmer

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat of local shrimp is to buy them from one of the small commercial fishermen in our community. We support Proposal #303 and hope that the BoF will adopt it.

PC196

Submitted by: Debbi Palm
Community of Residence: Nikiski

I support proposal 313

PC196

Submitted by: Debbi Palm
Community of Residence: Nikiski

I support proposal 313.

PC197

Submitted by: Joseph Person
Community of Residence: Anchor Point

Members of the Board,

My name is Joseph Person and I am a participant of a variety of small boat commercial fisheries in Prince William Sound and Cook Inlet. I have 4 proposals at this board meeting. Three in-cycle shrimp proposals and an Agenda Change Request that was accepted regarding Upper Cook Inlet Salmon. I will attend the meeting and address these in committee as appropriate, but I would like here to present a brief introductory overview of my thoughts on PWS Shrimp, which I have extensively both fished and participated in the regulatory/management process throughout the entire 15 year history of this fishery. The Prince William Sound (PWS) Spot Prawn Fishery is an extremely unique small boat fishery that is prosecuted in a region of the state with good access to large population centers. This makes it a fairly popular recreational fishery with roughly four thousand permit holders (significantly fewer participants) on a high participation year, and it also presents the unique opportunity for a small boat commercial fishery in which a large percentage of the harvest is direct marketed by fishermen to local area residents giving people without the requisite expensive boats and gear access to the resource. It's about the closest thing I know of to a modern market garden that exists in the Alaskan commercial fishery sphere. The fishery is allocated 60% non-commercial to 40% commercial.

In 2009 the current management plan was developed and while it has been modified multiple times since then most of the core fundamentals have remained unchanged. Both commercial and non-commercial fisheries have been successfully prosecuted for the last 15 years, and while I would characterize management as mostly successful there have been a few issues. Fundamentally at issue is the question of determining how many shrimp are present in the sound (total biomass), how many shrimp the sound can

support (carrying capacity), and consequently how to set the total allowable harvest for both commercial and non-commercial fisheries (TAH). As with most small fisheries, Department of Fish and Game (ADFG or department) resources to accomplish these objectives have been limited. Primarily the department uses an annual pot survey, and harvest information from the non-commercial and commercial fisheries. From 2010 to 2023 the TAH was set using a surplus production model in which those were the only three inputs, and the fishery was successfully managed to achieve those recommended levels of harvest. For quite some years it has been obvious that this method of setting the TAH was quite lacking as it basically maintained a relatively consistent level. It did not respond to fluctuations of abundance (or lack thereof) as they appeared in the annual survey. As the model produced the TAH the harvest numbers fed back into it were generally the same numbers it had spit out, and so it just perpetuated itself. This is obviously suboptimal. During a time of extremely high observed abundance from 2017-2020 it did not allow for utilization of the extra productivity, and during the subsequent years of falling abundance since it has responded too slow to lower results in the annual department survey. This caused the department in 2024 to "manually" adjust the TAH downward due to concerns about continuing to harvest at historical levels and in 2025 to extensively modify the entire model and process. However, there is almost no evidence to support that these changing abundance levels are due to fishing pressure rather than normal population fluctuation. These new and improved methodology changes by the department require some corresponding changes to the management plan. I care immensely about the health of this stock and these fisheries. I have invested a significant portion of my adult life to PWS shrimp both commercially and non-commercially and want to continue to do so and pass this resource on to future generations. Fundamentally, I want the department to be able to set the TAH at the appropriate level using the best available science and manage both fisheries to their respective guideline harvest levels (GHL) to insure both continued access to the resource and continued long term health of the stock. As with most shellfish, population dynamics are fairly variable with PWS shrimp and there will naturally be both periods of relatively high and relatively low abundance. We need a management plan in regulation that is flexible to that. The current 110,000lb minimum TAH for the commercial fishery to take place was originally put in for purely allocative reasons in 2009. At that time it was thought that the non-commercial fishery could not be managed to 60% of a smaller quota and at levels below 110,000lbs it would require the entire TAH. There was no conservation reason in the slightest. The TAH is by definition ALLOWABLE HARVEST above and beyond required biomass and it is safe and responsible to fish on a TAH below 110,000 lb. In fact the non-commercial fishery remains unrestricted by this threshold, but somewhere around 2017 due to concerns and questions that were brought forth during the Board of Fish (board, BoF) process regarding the clearly uneven burden of conservation potentially being borne by the commercial sector, management doctrine for the non-commercial fishery was changed by the department and the intent was stated that in the case of a TAH below 110,000 lbs the non-commercial fishery would still be managed to 60% of that TAH so that it did not blatantly benefit from the closing of the commercial fishery. I am assured by the department that this continues to be the situation today. However, this means that in times of relatively lower abundance, 40% of the ALLOWABLE HARVEST is not being allowed to be harvested. Which does not seem to make a lot of sense. In the past despite my repeatedly bringing this before the board, this was not considered a problem because the old model was thought to be extremely unlikely to ever produce a TAH below 110,000, the threshold had never been put into effect, and I was literally told by a board

member "if it ain't broke why fix a problem that isn't there". Well this short-sightedness is now very problematic as the department adopts a new more flexible methodology for setting the TAH.

I support the department using the best available science to set the TAH and would like to see the board catch the current management plan up to speed with the new and evolving picture developing with PWS shrimp. At its crux this has two primary components as I see it:

1) Remove the 110,000lb threshold for the opening of the commercial fishery. (Proposal 303) This is outdated and has no relevance as long as the recreational fishery is managed to 60% of the TAH even if the commercial fishery is closed. It is unfair and punitive to the commercial fishery with no legitimate conservation or even allocative justification at this point. The TAH is by literal definition ALLOWABLE HARVEST and safe to fish on. I would potentially support a lower threshold, maybe in the 20,000-40,000 lbs range but I would defer this to the department, under which both fisheries would be closed in order to potentially assist faster recovery of the stock in times of very low abundance. However, even this is of dubious conservation benefit. The TAH is set by a surplus production model and is basically inherently safe to fish on and exploitation rates in this fishery are absurdly low in general.

2) Take some other conservation measures in order to help the long term health of the stock and insure the continued availability of the resource to all Alaskans. Specifically I suggest:

a) Reduce the regulatory pot limit in the commercial fishery from 100 to 25 pots. (Proposal 308) While this sounds very extreme, in practice this fishery has been shown to be prosecutable with pot limits of this size and small pot limits have many advantages. They reduce gear loss and ecological impacts of gear in the water and on the sea floor, reduce gear conflict between fishermen and across user groups, and make it extremely unlikely for severe over fishing to ever occur. This is because at small pot limits, it requires quite good fishing to maintain economic viability and encourages movement and fishing on healthy numbers of shrimp. It also absolutely is economically viable to fish with these sorts of pot limits on healthy stocks.

(b) Adjust the season dates in both fisheries. (Proposal 304) As was discussed at the recent South East Alaska Board of Fisheries meeting, there is conservation concern about harvesting shrimp in early spring and fall/winter seasons. I would support restricting both opening and closing dates in the PWS fisheries in order to do our best to optimize harvest in such a fashion as to limit impacts on the resource. I generally oppose the rest of the suite of shrimp proposals and while a few have some merit I think they are either impractical or simply not a significant problem.

Thank you for your time and consideration.

Joseph Person

Submitted by: Lillian Person
Community of Residence: Chugiak, AK

My family participates in the PWS Spot Prawn Shrimp fishery. It is an important part of 3 household's income. Our fishery provides access to this excellent resource that our customer base does not otherwise have. Most Alaskans cannot afford a boat and the time and expense that is required to harvest this product.

Please support Proposal #303 that would allow ALL ALASKANS to benefit if there is any Allowable Harvest (TAH)

Submitted by: Richard Person
Community of Residence: Chugiak

Madam Chair and members of the board, the following are my positions on some of the proposals on the agenda during the approaching meeting.

303 SUPPORT This proposal seeks to remove the 110,000-pound total allowable harvest (TAH) threshold from regulation. Currently, if there is not more than 110,000 TAH the commercial fishery closes, and the non-commercial fishery is prosecuted. I believe that if there is any "allowable harvest" both fisheries should proceed at their existing 40% commercial and 60% non-commercial split. Please keep in mind that there are many many Alaskans who don't have the boat's gear and time to go catch their own shrimp. these Alaskans depend on the commercial shrimp fishery.

312 SUPPORT The ESSN fishery has been reduced to far less than 1% of its traditional gear. Additionally, dipnets are more disrupted by rough seas than set nets. Having daily openings allows individual fishers to capitalize on good weather and tide opportunities when they occur and lessens the burden on department staff to schedule openings around the weather.

313 SUPPORT As stated in the previous comment, ESSN has lost most of its harvesting ability. The use of set beach seines would restore some portion of that harvesting potential. By use of a commissioner's permit, they have shown the ability to harvest some amount of red salmon, while allowing the release of chinook salmon.

I have additional thoughts and comments I hope to share during the upcoming meeting some of which are represented below. I am looking forward to a productive discussion and am hoping Covid stays out of the house and there is no mechanical bull riding between now and the meeting.

Thank you.

PC200

Submitted by: Jane Petrich
Community of Residence: Kodiak

Proposal 315-Joint Ventures language

I am writing in support of Proposal 315.

Proposal 315 is a housekeeping measure. An oversight that occurred during the chaotic ending of the Kodiak BOF meeting in January 2024. The Board voted to add 25 fathoms of net to each setnet permit in the Central Section, increasing the allowable fathoms of net per permit from 150 fathoms to 175 fathoms. But the Joint Venture (e) of the regulations was not updated to reflect the additional 25 fathoms per permit (or and additional 50 fathoms for the Joint venture nets).

As a Northwest setnetter for 45 years my family has routinely used and fished Joint Venture nets/permits. Due to the oversight of addressing the aggregate net length of nets fishing JV my family did not use joint ventures in the 2024 season. The JV gave us flexibility to fish a longer uniform net which helps with fish catch, efficiency picking the nets and maintaining the gear. But in 2024 the positives offered by a JV were out weighed by the 50 fathoms of net we would have lost due to the JV language not being updated to reflect the additional 25 fathoms awarded at the 2024 BOF meeting. Currently using the the JV is a tool that does not help us.

Jane Petrich
Kodiak, Alaska



PC201

Submitted by: Abby Pittman
Community of Residence: Ogden UT

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC202

Submitted by: Kenny Pittman
Community of Residence: LAYTON UT

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

PC203

Submitted by: Thomas Pittman
Community of Residence: Ogden UT

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.
-

PC204

Submitted by: Amber Price

Community of Residence: Chugiak Alaska

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

PC205

Submitted by: Clifford Price

Community of Residence: Chugiak

Our family doesn't have access to the prince William sound fishery. Our only chance to get our seasonal spot shrimp is to buy them from local small fishermen in our community. We support proposal # 303 and hope the board of fisheries will adopt it.

Thank you

The Price family

PC206

Submitted by: John Rathert

Community of Residence: Eagle River, AK

I am writing concerning a number of the proposals for shrimp management in PWS. I am a life long Alaskan and have been actively taking part in the sport side of shrimping in the sounds since 2011. I have seen a steady decline in the number of shrimp in the sound and over the last 3-4 years it has gotten worse. I stopped shrimping in areas set aside for sport harvest only years ago after the numbers started dropping. I have set post from Whittier to the South end of the Sound looking for shrimp and to be honest they are getting hard to find in numbers that are worth fishing.

Here are my comments on individual proposals:

Proposal 299 - Fully support a FMP for shrimp in the sound.

Proposal 300 - I would support the change to split the TAH for non-com shrimping across the same areas as the commercial harvest. I realize this would require way more reporting and tracking and I doubt there is money available for that but support it non the less.

Proposal 301 - I do not support shutting down the sport harvest when commercial harvest is shut down. There are several thousand residents who take part in the sport shrimping and they represent a greater percentage of the population than the people served by the commercial harvest. I would support lowering the TAH for sport in years where commercial is shut down. My suggestion for that would be to shorten the season on both ends, start May 1 and shut down Aug15th. This would also allow more of the females to spawn and reduce the catch of the sport fishery at the same time.

Proposal 303 - I do not support allowing shrimping to continue at any TAH level, ie keep shrimping until they are gone.

Proposal 304 - I fully support a later opening of shrimp season (May 1) and would further recommend closing the season earlier as well. May 1 to Sept 1 would be a good start. I see way more female egg

bearing shrimp in the last month of the season and always leave an area where I catch "egggers" as they are the future of the fishery. A later start really does not effect that many people as the weather is usually not great for the opener. The late season shrimping is also somewhat reduced as hunting season is in full swing so closing it sometime in mid August to Sept 1 would not be unreasonable.

Proposal 305 - Fully support the removal of the "extra" pots allowed on board. Agree completely that they are being abused by many. I have seen boats with 4-6 extra pots and gear on the roof going out and seen the same boats 80 miles from Whittier with no pots on board. I do disagree that this would make the enforcement easier as with the two pot area and the three pot areas I often have my third pot on the roof as I am fishing the two pot area. It is probably no feasible to have a no extra line/bouy rule to make enforcement easier. A practical solution might be to make one extra pot allowable but in reality enforcement is lax at best so its all probably a moot point.

306 - Requiring daily report of commercial catches does not seem unreasonable. I would also like to see more frequent reporting of the sport catch so in season adjustment could be made based on catch.

Maybe require sport to report after each trip or monthly.

Proposal 307 - This proposal seems kind of silly, the sport shrimpers do get an 8 hour head start to shrimp but is 8 hours that big of a deal.

Proposal 310 - Doing away with the 3 commercial areas and allowing them to shrimp the entire sound each year seems reasonable when the shrimp survey to determine the TAH is based on the whole sound but the commercial fishery is only done in one of three areas. I do not support this as we all know the entire commercial fleet is going to descend on the areas with the best shrimping every time until that district is closed based on catch levels.

311 - Allow boats participating in harvest to act as tenders - I support this as I understand the need to get shrimp back to port to sell ASAP prior to them spoiling. I would save them \$\$ and time to be able to consolidate on the water. I don't see how many of them are going to take part in this as so many of them act as their own processor and sell in a value added way, it would mostly just cut into there own profits having to pay someone to haul there shrimp to town but I don't see a downside from a management prospective.

Overall I would support anything that helps bring the numbers of shrimp up in the sound. Shortening the season for all shrimping to May 1 to Aug 15 (or Sept 1) would be a good start. It may impact the commercial side more as many only shrimp until salmon fishing starts. More reporting of sport catches (monthly, weekly or mid season) would be good if the ADFG has the time and \$\$ to make adjustments to the season to prevent over harvest by the sport side. Having the harvest, both sport and commercial tracked by "district" and closing districts based on catch allowed in each would also be a good plan, however complicated and difficulties in getting the closure notifications out to sport fishers probably makes this unwieldly.

Regards,

John Rathert

PC207

Submitted by: Nick Ray
Azarel Fisheries

Community of Residence: Nikiski

Proposal # 313

Support!

Azarel is a family operated commercial fishing business that has been around for around 65 years. The family has been fishing the same beach for a long time and being shut down the last 2 years has been a real shame. We would very much love to see the opportunity come back!

PC208

Submitted by: Holly Reid
Community of Residence: Utah

I support proposal 312 & 313

PC209

Submitted by: Danielle Ringer
Community of Residence: Kodiak

RE: Support of Proposal #316

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

My name is Danielle Ringer and I'm an Alaskan resident originally from Homer and have lived in Kodiak for 15 years. I'm a fisheries anthropologist who has studied regulatory access and community well-being for over a decade and own and operate the F/V North Star with my husband.

I support proposal 316 as it seeks to modernize this fishery structure and increase opportunity and resilience for Kodiak.

Thank you very much,

Danielle Ringer, F/V North Star

PC210

Submitted by: Ivan Rivera
Community of Residence: Anchorage

For those who don't have a way to harvest their own shrimp this is a devastating announcement. You guys don't regulate the sport shrimpers out of Whittier AT ALL! I know more than a few people personally who brag about setting as many pots as they want because no body checks them. The fact that you allow them to have twice as many pots onboard as they are allowed to drop is one major issue. Commercial shrimp boats are the only boats reporting what they caught accurately. I can say I have seen with my own eyes five 5-gallon buckets of just tails come back on one guys 22' Hewescraft in one trip last year. I asked him about his limit and he said NO ONE CHECKS! This is BS. You should cap the amount of shrimp sport fisherman can take and make the report their catch EACH TIME THEY

CATCH! A simple online form can help with that. Then set up a routine check by fish and game wardens to pull the history on a boat to see if they have been reporting. The crux of this issue is that you have no regulation over the average joe dropping pots in PWS. You're not even trying to regulate them. Now, there are a lot of people who have grown used to getting their shrimp from commercial guys that are out of luck now. Stop being complacent and look at the issue from a practical point of view.

PC211

Submitted by: Renee Rogers

Community of Residence: Anchorage

As a senior I would ask the department to allow some of the 5000 permits for open shrimp fisheries. Not all Alaskans have boats and means to enjoy our bountiful fresh seafoods. For the past 6 years I've purchased from a family owned permitted company (Comset fisheries) and they have been such a professional family owned business.

Nate Rose

[REDACTED]
Kodiak Alaska

2/25/2025

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

RE: Support for Proposal 316

Dear Chairwoman Carlson Van-Dort and members of the Board:

Thank you for the opportunity to comment on proposal 316, the Board generated proposal to extend the herring sac-roe season. As a sac-roe permit holder in Kodiak, I am very excited and grateful for the opportunity this proposal would provide.

I have participated in the sac-roe fisheries in Sitka, Kodiak, and Togiak as a crewmember with aspirations of one day adding the herring fishery to my repertoire of fisheries, as herring fishing is one of the most exciting and fun fisheries to participate in. In 2023 my wife and I purchased the vessel we have today, as it contained a sonar for finding herring, a necessity for competitive herring fishermen. We purchased this boat just in time for the seafood industry to take the most drastic crash since the early 2000's when salmon prices stooped to an all-time low. The difference between that era and now is the value the herring fishery provided for many fishermen to weather the decreased salmon value. Currently, there is no value in herring, and the opportunity to diversify into the fishery is closed due to a non-existent market demand for herring roe.

Proposal 316 provides opportunity for me to possibly gain some value from the herring fishery. One of the most interesting facts to come from the Herring Revitalization Committee created by the Board in March of 2024, was comments from processor representatives stating that interest in food markets for herring has always been an intrigue, however the lack of consistent supply of high oil content herring is the largest barrier to entry. By liberalizing the time period herring may be harvested, the Board may create a favorable supply situation that could be utilized by processors to create a new food product from herring.

We are in unprecedented times in the seafood industry, and I greatly appreciate the Board taking the time to consider Proposal 316 as it provides potential opportunity for Kodiak fishermen.

Sincerely,

Nate Rose
F/V June Sea

February 23, 2025

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

Comments Submitted By:

Brett Roth
PWS Commercial and Noncommercial Shrimper
██████████
Anchorage, AK ██████████

Dear Members of the Alaska Board of Fisheries,

I appreciate the opportunity to comment on proposals regarding the Prince William Sound (PWS) shrimp fishery, a resource I deeply value and my favorite fishery. This year offers a critical chance to implement measures that sustain the fishery and support Alaskans who depend on it. The current commercial shrimp fishery closure has created significant economic challenges and while harder to quantify, a loss of “joy” for many Alaskans.

Two key points warrant attention: First, the majority of Alaskans benefiting from this resource do so through the commercial fishery, so its closure disproportionately affects many people. Second, shrimp are available for sustainable harvest, and the Board’s responsibility is to allocate this resource equitably while ensuring conservation across all user groups.

SUPPORT Proposal 304 - Protect Vulnerable Shrimp During a Critical Period

Having participated in the PWS shrimp fishery for 19 years in the noncommercial sector and 11 years commercially, I support delaying the season start to allow egg-bearing females to release their eggs before harvest. Evidence suggests this will benefit shrimp populations by reducing natural mortality during molting and mating. The Department of Fish and Game (ADF&G) supported this concept in 2018 in Southeast Alaska staff comments, and PWS is now ready for similar measures.

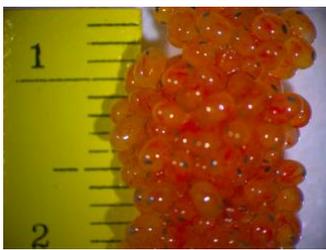
In 2022, Southeast Alaska implemented this measure, moving the season start date to May 15 as a response to Proposals 171-174, based on supporting biological evidence. The ADF&G staff comment from 2018, seen below, jumps off the page:

DEPARTMENT COMMENTS: The department **SUPPORTS** the concept of this proposal, but notes that egg hatching for spot shrimp often occurs in mid to late April and recommends the board consider an opening date of May 15 in order to maximize potential benefits of this proposal.

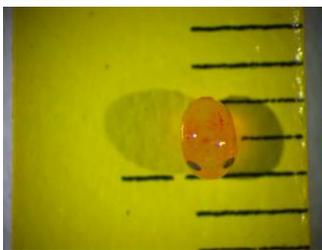
Changing the initial season start date to May 15 would enhance biological conservation and fishery management. Fishing during this time period may allow for increased GHGs in the future because the fishery would occur before the high natural mortality periods of molting, mating, egg development, and egg extrusion. The current fall fishery occurs after these processes are complete.

2018 SE AK Finfish and Board Staff Comments on Proposal 79

In 2018, I co-authored Proposals 218 and 219, which sought to delay the shrimp season start date in PWS. Since this is a quota fishery, delaying the season start does not reduce overall harvest opportunities—it simply shifts them to a more biologically optimal period. In researching the proposal, I learned from Laurie Convey, a B.C. shrimp management biologist, that the British Columbia Spot Prawn fishery intentionally delays its season start until shrimp have successfully released their eggs (2017 personal communication). Equally interesting was something I learned through observation, there is a big difference in the level of development in the eggs we see on shrimp in April from those we see during the summer. These spring shrimp are not only egged up, the eggs are almost completely developed and only need a couple more weeks to be dropped and potentially contribute to biomass. I have a tough time believing it isn't stupid to harvest these shrimp. Take a look at these photos!



Shrimp caught 1st opener, Area 2 during 2017 Season



4.16.17. Eyes clearly visible and eggs well developed



4.16.17. Black dots are eyes. Very well developed, give them a week or two to drop!

Although ADF&G's 2024 data showing 7% egg-bearing shrimp is I'm certain honest data, my observations suggest significantly higher percentages (25-35%), and the Board should consider historical data and input from other fishermen to assess this properly. Delaying the season start would be a low-cost, high-impact conservation measure for the fishery.

SUPPORT Proposal 299 - Establish a Shrimp Management Plan for PWS

A management plan would:

1. Enhance shrimp stocks through conservation and recruitment measures.
2. Allocate harvest opportunities fairly, particularly during stock rebuilding.

A tiered harvest control rule (HCR) should be implemented based on biological stock assessments, ensuring a sustainable harvest while balancing conservation and access. Example structure for illustration purposes as real numbers should be biologically determined as much as possible:

- **No surplus production:** All fisheries closed.
- **Below 30,000 lbs:** 50% harvest rate for subsistence only (target ~15,000 lbs).
- **Below 60,000 lbs:** 50% harvest rate, split evenly between commercial and noncommercial. (e.g., 11,250 lbs each if 45,000 lbs available).
- **At 60,000 lbs:** 65% of surplus production, split evenly sectors (e.g., 19,500 lbs each if 60,000 lbs available).
- **At 80,000 lbs:** 80% surplus production, split evenly. (e.g., 32,000 lbs each if 80,000 lbs available).
- **At 110,000 lbs:** 60/40 split favoring noncommercial. 80% of surplus production of stocks are declining, 100% if increasing.
- **Above 135,000 lbs:** 50/50 split between commercial and noncommercial

These tiered rules ensure equitable access while protecting stocks.

SUPPORT BUT MODIFY Proposals 301 & 302, OPPOSE but learn from Proposal 303

Should the board not want to take on a full management plan through proposal 299 at this time, proposals 301 and 302 provide an opportunity to implement conservation and allocation triggers that are biologically appropriate and support equitable access. However, Proposal 303 should be opposed, as it doesn't allow for adaptive management. Still, it is an important proposal for this cycle because it underscores the concern for lost fishing opportunity and a desire for more stability and certainty in the fishery.

Thank you for considering my comments. I urge you to support Proposals 304 and 299 to ensure sustainable management and equitable access to the PWS shrimp fishery.

Sincerely,
Brett Roth
PWS Commercial and Noncommercial Shrimper

Submitted by: Roy Rudy

Community of Residence: Soldotna

I am commenting on Proposal 305 which seeks to restrict the amount of pots on a sport vessel. I think this is pretty common sense way to ensure regulatory compliance. You don't let a commercial vessel have surplus pots on it for the same obvious reasons.

Considering when I was camped out on an island in Hummer Bay, a sport fisherman came into the cove. He greeted me. Then asked if his stash of pots was still in the brush a little way behind my camp as he walked through and started pulling them out. I had no idea they were there!

I doubt the regulation will prevent all sport fishermen from overfishing their allowable amount of gear, but it may help. Please vote yes on Proposition 305.

Another proposal I wanted to comment on is 306 which seeks to make daily reporting of catch a requirement.

I understand the business model that makes the "hit it and quit it" mentality desirable. I am against making the fishery more burdensome with additional reporting requirements from a regulatory standpoint. Paperwork each day logging weight, time, GPS location, additional notes, when you leave the port, when you're getting back to port, the statistical area your going to fish in, along with the multiple business licenses and their associated complexities necessary for operation make it an enterprise where the government is heavily involved like an overbearing parent looking for any possible law violation.

Adding a daily reporting requirement makes an ADDITIONAL regulation that creates another instance where someone can break an unnecessary rule. Why? So, someone can hit it and quit it. Why would someone possibly break this new daily unnecessary rule???? I don't know... Maybe their phone died, fell in the water, or screen broke. Having to quit mid opener and go back to town to buy a phone, so you can report to Uncle Sam DAILY should be an option not a requirement. Please vote, No on Proposal 306. I don't mind the break to direct market shrimp, BTW.

The third and last proposal I'd like to comment on is Proposal 308 which seeks to restrict the freedom of the biologists to allow only 25 pots.

The proposal says that they are doing this in anticipation of the commercial fisheries limitation. The limitation fell through last year, so this is a moot out of order proposal. Shouldn't a fishery be limited before the Board writes regulations as though it is limited?

Also, I don't have an issue with the "hit it and quit it" business model if there is opportunity available or the less productive areas warrants additional gear than 25 pots for commercial viability. The small artisanal direct marketer narrative is cute and alluring to a favorable ear, but using the government as a tool to protect your business model from competitors violates the foundations of free trade, capitalism, and open competition and attempts to make a more planned economy such as communism possesses. Please trust the Biologists to do their job and do not limit their freedom to 25 pots in Area 3. Please vote No on Proposition 308.

Thank you for consideration of my thoughts!

February 24, 2025
 ADFG Board of Fisheries
 March 11-16, 2025 meeting.
 Anchorage, Alaska

Proposal 316

1). As a Kodiak Herring fishermen of 45 years, I completely support this proposal! It is similarly supported by all but 1 of the Alaska herring fishermen relative to this proposal, as is the Kodiak Advisory Committee (11-2). The ADFG and the processing sector are onboard, as they too look for new opportunity with Alaska herring.

2). This last year has seen new, voluntary interest in Alaska Herring from around the world. Japan, Europe, East coast USA, and even Iceland and the US Department of Agriculture are all asking for/about Alaska herring. Most are also needing a sustainability certification which will be done for Wild Alaska Herring in the Fall of 2025. Sustainability certifications are nearly nonexistent but for just a few other herring fisheries or parts of those fisheries in the world.....**These market interests represent a realistic sales volume of Alaska Herring that exceeds the amount of Herring available relative to this proposal.**

3). Alaska herring will be certified by Fall of 2025 with the Responsible Fisheries Management (RFM) certification scheme.

4). This proposal does not encroach on or otherwise function during the Kodiak “Food and Bait” fishery as was the concern by some with the proposal last year. In fact, the “other” (food and bait) herring fishery in the Kodiak area will continue to fish at their traditional time of the year, which is also the optimum time for both fish fat content/quality and the best availability of processing capacity. Any concern for the small food and bait fishery is quite misplaced as they will carry on their harvest during this time with their own official and separate quota (10%). This proposal additionally seeks to modify the “Food and Bait” season to simply match the fishery’s actual harvest activity timing of the last 5 years. Currently about half of their harvest is saved for some of local users while the other half is simply sold to an international broker that could and would easily purchase 30 times the volume!

Food and Bait First and Last Delivery and Harvest by Year				
Year	First Delivery	Last Delivery	Season Length	Harvest (tons)
2020	15-Nov	27-Jan	73	339
2021	11-Oct	27-Oct	16	685
2022	8-Nov	16-Nov	8	912
2023	27-Oct	6-Nov	10	665
2024	5-Nov	20-Nov	15	725
AVG	31-Oct	25-Nov	24	665

Source: Kodiak ADFG

5). This proposal, through the ADFG’s expressed authority to set seasons and harvest amounts, simply makes available, the “stranded” quota and extreme investment of the traditional Kodiak herring fishermen and processors. Due to the collapse and failure of the market (beginning in 1997) we, the traditional Kodiak herring fishermen, the local processors and the community, have no access to this growing biomass when the nutrition profile is most desirable for the variety of new market interest.

All, while the growing biomass is larger than anything seen since the 1940s. This proposal will remedy these issues with no adverse market or infrastructure effect to any other fishery.

6). This proposal and the new product it makes available, simply opens the door for the ability to look at new markets and new products that are currently not possible to address within the current, outdated management plan. Without this slight modification, any and all possibility to move our Wild Alaska Herring out of the past and into the future will not be realized.

7). Without the passage of this proposal, it is beyond my ability to understand that one active fisherman and 8 other passive/share participants, with a mere 10% allocation of the resource, could be able to control and eliminate the other 90% of the resource and fishermen from their allocation, investment and market access.

8). As Processor/buyer “management” has evolved over the last 25 years, there is no concern for “over-harvest” or for more harvesters to be out fishing than is needed by the buyers. **The fishermen simply cannot fish unless they first have a committed buyer for their harvest and the buyer’s permission to harvest the fish!**

Passage of this proposal will allow these stranded herring fishermen to harvest some of their traditional herring. It will also allow for additional processing opportunity for plants, workers and the community’s access during this late time of the year when fishing is so slow for the end of the year, that plants simply shut down.

FYI,

This Proposal, as published by the ADFG, is mistakenly incorrect. The Ketchikan meeting’s RC067, that was quoted and used to discuss and pass this proposal, has a specific closure included for the “A” season (Oct 25 - Nov 30) that was missed in the process of publishing the proposal for public notice.

“5 AAC 27.510 (a) Unless otherwise provided for by emergency order, herring may be taken during the **herring** [sac roe] season from

1) **April 1 through January 31** [April 1 through June 30] as follows:

A). **“A” season - April 1 through October 25. “B” Season - Dec 1 through January 31**

2) Herring may be taken during the “Food and Bait” season from: **October 26 through November 30** [September 1 through February 28]”

Bruce Schactler (recovering Wild Alaska Herring fisherman)

Kodiak Alaska



Submitted by: Jill Schlosser
Community of Residence: Mukilteo, WA

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table. We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

Sincerely,
 Jill Schlosser

Submitted by: Gordon Scott
Community of Residence: Girdwood, Alaska

To the Honorable Chair of the Board of Fisheries

The recent closure of the PWS Commercial Shrimp Pot Fishery has finally punctuated efforts to make this fishery sustainable for the people of Alaska, who own this resource.

Now approximately 99% of Alaskans have lost their access to PWS Shrimp. Yet the 1% of people who own or have access to a boat in Prince William Sound are not sharing in the BURDEN OF CONSERVATION for this resource. They are allowed to go catch as many shrimp as they can. They are told how many pots they can use, and they are told that they can have unlimited number of pots on board. And they do not have to report their catches until long after the long season is over.

Only then (and it takes 4 months) does the department know how much they catch. This has resulted in the Non-commercial fishery overfishing their annual quota in roughly half of the last 12 years, by as much as more than 40% over. Last year they were 12% over their quota.

This is harming the resource. And the Board of Fish is in a large part responsible for this. Over the last few Board cycles, there have been proposals which in one way or another have asked the Board to add in season catch reporting for this fishery, and to give the Department authorization to close this fishery when they have met their quota. What has the Board of Fisheries done about this; Reject these proposals. There have been proposals to annually adjust their quota with penalties or bonuses due to the previous years over or under harvest, in effect potentially keeping the fishery closer to catching their allotted quota. What has the Board of Fisheries done with them: Reject them.

There have been other proposals to effectively hold the noncommercial fishery to their quota. What has the Board of Fisheries done: Reject these proposals.

The noncommercial fishery currently has an allocation of 60% of the GH, the majority share. SO these overfishing years by the largest user group which only represents 1% of Alaskans have undoubtedly hurt the resource. Yet this year when the stocks are down a little bit from before, This overfishing sector shares no Burden of Conservation, and 99% of Alaskans lose their access to the Prince William Sound Shrimp. One can only assume by the track record, there an approximately 50% chance that the will overfish their allotted quota, FURTHER harming the resource.

And the Board of Fisheries by their inaction in the past to control this fishery are very culpable to causing this damage, by not putting any teeth into regulations to manage this fishery to its allotted GH effectively.

And it is extremely unfair that 99% of Alaskans suffer when the commercial fishery closes while the non-commercial fishery is over-exploited by 1% of Alaskans Legally.

I am imploring you, the Board of Fisheries to change this situation by regulating the Non commercial fisheries to their quota and not beyond, and to allow the commercial fishery to proceed – even this year.

This way you, the Board of Fisheries, would no longer be partly to blame for harming the resource

There are some different proposals in front of you this year that can solve this problem.

I support any of them that share the burden of Conservation equitably, and that create responsive management of the non commercial fishery.

The one that really provides the effective answer to this is Proposal 299, which provides for creating a Comprehensive PWS Shrimp Management Plan – similar to one that has been working well in Southeast Alaska for a while.

Proposal 309, to delay the openings for both fisheries is a very good one. This will considerably lower the catch of egg bearing females very close to dropping their eggs. Theoretically, this should considerably help recruitment for the future.

Proposal 310 proposes to get rid of the 3 area rotation of the commercial fishery, and set quotas and manage by Stat Areas.

I generally support this proposal..

I would like to add a little history note here to my comments. During the creation of the current Commercial Fishery regulations for the modern commercial fishery, there was a certain ADFG statistician that proposed and pushed hard for, and ended up getting into regulation this 3 Area Rotation. I do not remember all of his reasoning, but I remember well that he viewed it as an Experiment, to be evaluated after a few cycles. I have not seen any such evaluation now that there have been a dozen years. From the actual prosecution of the fishery, I see some advantages to having a 3 year area rotation, but I see many more disadvantages.

The Board should lead an evaluation of this experiment at this meeting. And let that guide the decisions. And this should not be just an I like it or not evaluation, but one based on science, just as the proposer of this idea envisioned. I would be happy to be involved in this.

Thank you for the opportunity to Comment.

Sincerely, Gordon Scott

PC218

Submitted by: Christopher Scott
Community of Residence: Wasilla

Proposal 299: I support this proposal because a comprehensive management plan is needed to address stock assessment, reporting measures, in-season management, and conservation goals.

Proposal 304: I strongly support this proposal, because it would allow for more shrimp eggs to be released before the fishery opens each year.

PC218

Submitted by: Christopher Scott
Community of Residence: Wasilla

Commercial and sport fisheries should both be regulated on an equal playing field to conserve the shrimp population. Why can't both commercial and sport fisheries be opened and then closed at the same time once a certain amount of shrimp have been caught? Why do commercial fisherman and their customers have to take all of the hit when it comes to conservation?

PC219

Submitted by: Eli Sheridan
Community of Residence: Soldotna

I am in full support of proposal 313. I support this proposal for a few reasons. One being it is a way to harvest sockeye salmon safely without any kings being caught. The beach seine system allows for fishermen to sort out any kings before taking them out of the water. This would protect the king salmon in upper Cook Inlet while allowing the opportunity to harvest sockeyes. The second reason for support is that this would be a safe way to possible control or slow down the sockeye escapement in the Kasilof and Kenai rivers. Any way that we can slow escapement while not harming any kings should be something that is considered and passed. This is a great proposal that would allow fisherman to get nets in the water without the threat of any kings being harvested.

PC219

Submitted by: Eli Sheridan
Community of Residence: Soldotna

I am in full support of proposal 313. I support this proposal for a few reasons. One being it is a way to harvest sockeye salmon safely without any kings being caught. The beach seine system allows for fishermen to sort out any kings before taking them out of the water. This would protect the king salmon in upper Cook Inlet while allowing the opportunity to harvest sockeyes. The second reason for support is that this would be a safe way to possible control or slow down the sockeye escapement in the Kasilof and Kenai rivers. Any way that we can slow escapement while not harming any kings should be something that is considered and passed. This is a great proposal that would allow fisherman to get nets in the water without the threat of any kings being harvested.

Submitted by: Philip Sheridan
Community of Residence: Kasilof

Proposal 313

I am completely in support of Proposal 313. The time has come for an alternative gear type to be implemented in the Cook Inlet Set Net fishery that will allow that user group to get back into the fishery. The beach seine is the perfect solut

Submitted by: Philip Sheridan
Community of Residence: SOLDOTNA

Thank you for considering Proposal 313. I think that this proposal is the best possible way to allow Cook Inlet setnet fisherman back in the water and harvest sockeye salmon without harvesting or hurting a single king salmon. The beach seining system has been proven to work in multiple fisheries around the state and in Cook Inlet last Summer under the Commissioners special permit. If you are serious about an alternative gear type, this is by far the most effective and possibly the ONLY solution. I have gillnetted and seined extensively over the last 40 years in Alaska and I can tell you that seining is a fantastic way to harvest salmon in a selective way. The salmon are never caught, just trapped until the fish are examined and king salmon can be easily released without harm. We are allowing way too many sockeye salmon to escape into the Kenai and Kasilof river systems and its simply a gross waste of the resource. Massive escapement over the designated goals will occur this Summer if the ADFG projection turns out to be accurate. Implementing beach seines will provide an excellent harvest tool that will be significant and can be utilized without harming our king salmon. Thank you for your consideration.

ShrimpPros Association
PO Box 512
Girdwood, AK 99587



February 21, 2025

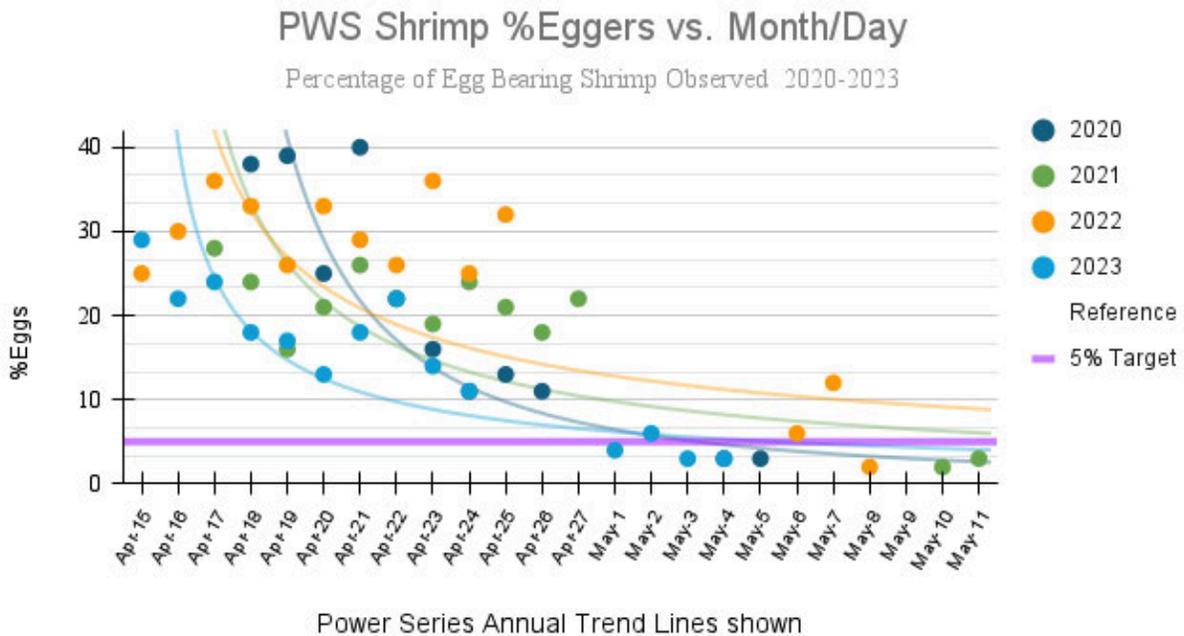
Alaska Department of Fish and Game Boards Support Section
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Subject: Proposal 304 - Change PWS Shrimp Season Start Date to May 1

To the Members of the Alaska Board of Fisheries,

Changing the start date for Prince William Sound shrimp will allow shrimp eggs to be released before the start of the season and improve the shrimp stock. With the current assessment of the PWS spot shrimp stock being in decline, conservation efforts need to be focused on low barrier, low cost, and uniform measures that will have a positive effect on the resource. This can be achieved by starting the regular PWS shrimp season on May 1 annually.

ShrimpPros Association members have worked independently and with Department of Fish and Game staff to verify sampling methods, collect samples and compile data about the number of egg-bearing shrimp that are being harvested in Prince William Sound at the regular season start date of April 15.



From April 15 through April 22, the **first week of the regular season averages 26% egg bearing shrimp**. By May 1, that average drops significantly and reaches the target of 5%. The impacts of allowing shrimp to drop eggs before harvest could be significant with the potential to rapidly increase shrimp stocks.

It is impossible to determine how quickly changing the season start date would lead to improved shrimp recruitment in PWS. However, it is predictable that doing nothing will continue to put harvest pressure on egg-bearing shrimp. The impact of a continued April 15 start date reduces the contribution to the shrimp stock from the last two weeks of the spring shrimp egg drop.

Method

All shrimp from each complete gear cycle were pooled into three separate tanks equipped with circulating water to maintain viability and prevent stratification by reproductive status or size. To ensure an even distribution of shrimp, the contents of each tank were thoroughly mixed. A single scoop was then taken from each tank, with scoop size calibrated to yield approximately 100 shrimp per sample. This sample size was chosen to minimize selection bias while maintaining statistical reliability. Each sample was examined, and the number of egg-bearing shrimp was recorded as a percentage of the total count.

Method Validation

The sampling method was validated by comparing the proportion of egg-bearing shrimp in the approximately 100-shrimp subsamples to the proportion in the entire harvest from multiple pot cycles. Variance between subsample estimates and total harvest counts was consistently less than 1%.

Data

The data was collected over a four year period beginning in April 2020. The number of pots sampled annually was determined by the number of pots allowed and days fished. The sample size ranged from a high of 1475 to a low of 960 pots with over 5000 total pots sampled. Percentages of egg-bearing shrimp were calculated daily.

During the sampling years, the commercial season paused in late April and resumed in the first week of May. In all but one sampling year, the egg percentage dropped below the study threshold of 5% by the resumption of the commercial season in the first week of May.

Based on these field observations, there is an opportunity to allow a substantial amount of shrimp eggs to be released prior to opening of the general Prince William Sound shrimp pot season by delaying the regulatory opening date to May 1.

Respectfully Submitted,



Brett Wilbanks, Chairman
ShrimpPros Association

PC222

Submitted by: Eric Simonich
Community of Residence: anchorage

- 99 SUPPORT Comprehensive PWS Shrimp Mgmt Plan
 - 300 SUPPORT Sport shrimpers to rotate areas, lessen impact
 - 301 SUPPORT Close ALL fishing at 110K pounds harvestable floor
 - 302 OPPOSE Raise harvestable floor to 150K pounds (science says 75K lbs)
 - 303 OPPOSE Remove 110K pound floor all together (science says 75K lbs)
 - 304 SUPPORT Delay opening to MAY1 (allows egg drop to take place)
 - 305 SUPPORT Set a max number sport pots per boat, remove “unlimited”
 - 306 OPPOSE Require 24-hr commercial harvest reporting (unnecessary)
 - 307 SUPPORT Season opener start time set to 8:00AM for all groups
 - 308 OPPOSE Commercial pot limit set to 25 pots (not needed, we have a quota)
 - 310 OPPOSE Remove administrative area rotation (better met through 299 plan)
 - 311 OPPOSE Allow catcher boats to be tenders as well (not allowed anywhere)
-

PC223

Submitted by: Russ Simonson
Community of Residence: Deckhand

My votes on the proposals below signify the best opportunity the fishery has for enhanced recovery and to provide for a sustainable shared resource for all. Thank you.

PC224

Submitted by: Alisa Smith
Community of Residence: Eagle River

As a local without access to fish Prince William Sound for shrimp, the only way I get to enjoy the fresh spot shrimp is purchasing through our small commercial fisherman every year. I support proposal #303 and pray BoF will adopt it.

PC225

Submitted by: David Smith
Community of Residence: Eagle RIver

There are less than 5,000 permits issued every year to people privileged enough to go shrimping for themselves. For the rest of us, continued access to shrimp is dependent on the small commercial fishery. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. Please adopt Proposal #303 to represent all users.

PC226

Submitted by: Robert Smith
Community of Residence: Sterling

I support proposal 313

I am an east side set netter at Clam gulch and would like to have this gear type as an option. Thanks

PC227

Submitted by: Mike Soik
Community of Residence: Anchorage

Mike Soik

Proposal #303

I support proposal #303. As a southcentral area resident who does not have the equipment required to access Prince William Sound, my only option to procure shrimp is to buy them from one of the small commercial fishermen in our community. If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well. I ask that you please adopt proposal #303.



Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

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

February 20, 2025

Alaska Dept of Fish & Game

Board of Fisheries

PO Box 225526

Juneau, AK 99811-5526

SUBMITTED VIA ONLINE PORTAL

RE: Misc Business – Delegation of Authority to Change Regulations to Create a New Discretionary Exemption on the Importation and Release of Live Fish to Stock Lakes

Dear Marit Van Dort, Chair and Board of Fish Members,

SEAFA is opposed to the Delegation of Authority as written to allow the importation of live fish from out of the state. The language in the bill implied the use of local hatchery produced salmonoids for stocking of lakes. This belief is based on the language in the bill, listening to the hearings and 5AAC 41.070 (a)¹ which prohibits the importation of live fish into the state for purposes of stocking or rearing in the water of the state.

While HB 295 did not specifically prohibit importation of salmonoids from out of the state, it did not **specifically grant authority for importation of live fish from out of state**. The testimony during public legislative hearings would have had strong opposition stated to importation from out of state.

SEAFA is concerned about the importation of live salmonoids from out of state and the potential effect on our sustainable wild stocks. With the concern the Board of Fish has been expressing over the hatchery programs, it seems strange that they would allow for importation of out of state salmonoids into state waters. It only takes a bear or eagle to pick up a fish from a lake and drop it in other state waters to create an impact on our wild salmon since even triploid salmonoids are not 100% sterile.

¹ 5AAC 41.070 – Prohibitions on importation and release of live fish

(a) Except as provided in (b) – (d) of this section, no person may import any live fish into the state for purposes of stocking or rearing in the waters or the lands of the state.

SEAFA was monitoring the legislation and assumed being the Governor's bill that the State of Alaska hatcheries would likely be providing the salmonoids for private lake stocking.

We would recommend if Delegation of Authority is given to allow out of state importation of live salmonoids that the language in the Delegation of Authority and the specify only stocking "landlocked" lakes under 5 AAC 41.070 and that **only triploid salmon** may be imported as additional safeguards. An additional concern we have is a fish transport permit (FTP) is a process that does not go to the RPT but is between the individual and ADF&G and therefore no public comment within the process. For hatcheries, in Alaska the hatchery permit, and permit alteration requests go through the regional planning team process and then a FTP is issued from the Department. Stocking of private lakes does not have a public process component.

Please take careful consideration of this delegation of authority to allow the importation of live salmonoids from out of state.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director

Submitted by: Briana Springer
Community of Residence: Kodiak

Support of Proposal 315

Joint venture

This support would greatly impact and support our family set netting

Submitted by: Richard Starr
Community of Residence: Kodiak

Opposition to proposal 316

My name is Richard Starr. I am submitting my letter in opposition to proposal 316. I have been involved in the Kodiak Food and Bait Herring fisheries since the early 1980s. I have participated in this fishery as a crewman, captain, and a current permit holder.

The Food and Bait Herring fishery has successfully operated for many years as a co-op due to its small quota. My recollection, prior to limited entry permits, is that there were management challenges (several boats were fishing... Small quota, a lot of different areas.) There has been effort over the years to establish a larger market for Food and Bait Herring. Management has been a challenge. Kodiak Food and Bait Herring fisherman are the only group in the state consistently harvesting their quotas in recent years and should be rewarded with an increased allocation.

This proposal is not justified to give, alter or devalue, limited and entry Food and Bait Herring permits to people who have never participated in this fishery or sold their Food and Bait Herring permits and want them restored without cost to them. At a minimum and to maintain fairness and reward those who have consistently participated in this fishery, at least 50% of the new allocation should be directed to the existing Food and Bait Herring permit holders.

Proposal 316 would essentially add 70 new permits into an already limited entry fishery without going through the necessary process we followed in 2000 when the fishery went limited entry. The proposal would also impact the value of existing Kodiak Food and Bait Herring permits, which cannot be overlooked. With 70 Sac Roe entry permits and only nine Food and Bait Herring permits, the imbalance is evident.

I oppose proposal 316 as it would significantly impact the existing limited entry, Kodiak herring fisheries, specifically the Food and Bait Herring fishery, by introducing new permits and altering the established framework.

With respect,
Richard Starr

Submitted by: Jordan Steed
Community of Residence: Cook Inlet

This work is necessary for families and other residents within the Kenai peninsula.

PC232

Submitted by: Larry Steed
Community of Residence: Kaysville UT

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River King Salmon Late Run Stock of Concern Management Plan.
-

PC233

Submitted by: Ruth Steed
Community of Residence: Kaysville UT

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River King Salmon Late Run Stock of Concern Management Plan.
-

PC234

Submitted by: Staci Steffy
Community of Residence: Woodinville, WA

My name is Staci Steffy. I SUPPORT Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. I have commercial fished with the Hudkins-Frostad family for upwards of 10 years on Salamatof Beach. We are excited to try the new method of set beach seines and welcome the new opportunity for our fishery. We also understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the [REDACTED] and [REDACTED] families to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sincerely,
Staci Steffy

Prince William Sound Shrimp

Comments regarding the Area E Shrimp Fishery

Support and encourage the board to consider the following:

1. Proposal 302:
 - A. Support “The Total Allowable Harvest (TAH) for the waters described in 5 AAC 31.210(a) is set at 150,000 pounds of spot shrimp by round weight.”
 - B. Proposal 302 new regulation to read:
The Department will, to the extent practicable, manage the fishery to allow no more than 50% of the Guideline Harvest Level (GHL) be taken by the recreational sector from any one statistical area in one year.
2. Proposals 299 – 311, Selected portions:
 - A. Support for maintaining the 60% recreational and 40% commercial harvest rates, unless board wishes to change to a 50% to 50% allocation.
 - B. Support – Suggest: Both recreational and commercial pot shrimp harvests shall be managed under the 150,000 TAH level.
 - C. Support – Suggest: Both recreational and commercial openings be coordinated to the same dates and times.
 - D. Support – Suggest: All user groups be equitable in the sharing of any conservation measures.

To accomplish the above may require a board generated proposal. Many of the above suggestions are from the current proposals before the board.

Submitted by: Charlie Stephens
Community of Residence: Kenai

Proposal 313

I have on the Kenai Peninsula since 1967. As I grew up in the Moose Pass/Seward I saw how important the commercial fishing industry was to the economy and culture of the area. When it came time for me to earn money for college I turned to the commercial fishing. Some of my friends made a career of commercial fishing.

After college I moved to the Western Kenai Peninsula and took a teaching job. The rift between commercial and sport fishing was heating up at that time. The East Side set netters were believed to be the cause of declining king salmon stocks. A few years after my arrival I moved into a home on the Kenai River. I watched the decline of the first run of kings during my time on the River. This was despite the fact that the set netters were not allowed to fish during the first run. It was obvious to me there were multiple factors in the decline of king salmon runs on the Kenai.

Currently, East Side set netters are working hard to do their part to protect the precious king salmon runs. Brian and Lisa Gabriel are stellar examples of this effort. Their method of beach seining as opposed to gill netting enables them to catch sockeye salmon without harm to incidentally caught king salmon. Those kings are released to make their way toward the river and on to spawn. Their unique method does not land them the same numbers of sockeyes that gill nets once did, but it is a viable endeavor none the less.

I have purchased fresh salmon from the Gabriels for a number of years. It is a service I have come to depend on to fill my freezer. The fish I receive from them are very high quality.

I strongly recommend that the Board of Fish approve proposal 313 and make beach seining an on going option for the East Side fishery. The king stocks will be protected, the economy will benefit from a valuable resource and the fishing culture will be preserved.

Submitted by: James Stewart
Community of Residence: Chugiak

Proposal #303

I seems very unfair to only allow for personal use fishing and no commercial fishing We are all in this together and should protect and share in the harvest of this amazing sea creature

Submitted by: Ivan Stonorov
Community of Residence: Homer

To the Board of fish,

I strongly oppose, PROPOSAL 284, This proposal, proposes to allow catcher vessels to operate as tenders during the Kodiak District commercial Tanner crab fishery. I feel that this is a bad idea. The author compares the Tanner fishery to the Dungeness fishery. There are very few similarity's other than both fisheries involve crab. Very few boats participate in the Dungeness fishery and they are allowed to use 700 pots and the season is open for months. The Tanner crab fishery typically uses 20 pots and lasts one week or less and there are a large number of participants.

I feel that allowing boats to act as tenders and also participate in the tanner fishery could lead to these larger boats fishing multiple pot limits, especially if they were fishing offshore where it would be hard to regulate. The tanner fishery is a fairly fast paced fishery where the catch and pace of the fishery is limited by the 20 pot limit. Giving a few bad actors the potential to cheat by fishing more pots than their limit could have a drastic effect on the rest of the fleet. This has been a problem in other fisheries like the Prince William Sound shrimp fishery, where people have registered two boats so that they could operate two pot limits, by allowing all the crab to be held on one vessle it could be hard to prove if the other vessle was actually actively fishing.

I do support catcher vessels tendering after the season closes if all of their gear is removed from the water or put in wet storage 25 fm or less with bait jars removed. This would provide opportunity to deliver crab to other ports besides Kodiak.

I strongly support PROPOSAL 289, The 20 pot limit keeps the fishery harvest at a slow steady rate giving all participants a chance to harvest crab and not just a few larger vessels. There has been great success with achieving the guide line harvest with just 20 pots due the high levels of participation in the fishery.

I strongly oppose, PROPOSAL 290, this proposal, proposes to change the start date of the tanner crab season from January 15 the February 20. The author says that sea ice in Homer is the reason that start date should change. After the tanner crab fishery closes in Kodiak, I fish out of Homer in the winter, I can personally tell you that often times the ice in mud bay and the Homer harbor is actually worse in February than in January because the ocean temperatures have cooled giving the ice more chance to form and the ice is often times actually harder and thicker in February and early March than it is in January.

Tanner crab fisheries have always traditionally started in January. Many of the boats that participate in the tanner fishery also participate in local cod fisheries. By changing the start date this would have a adverse effect on boats that participate in the local state cod fisheries because the cod start to school up in February and cod fishing is usually at its peak late February early March.

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Ivan Stonorov

Submitted by: Pam Sundberg
Community of Residence: Virginia area

I am in favor of Prop 312 and 313

My daughter, son-in-law, and grandkids all fish in Kenai Alaska, they have done so their entire lives, but many years have been complete disasters, not from a lack of fish, but because the state will not allow the to fish. Please let them try this new way of fishing to survive.

I support proposal 314 to create a special harvest area for the Kvichak River. Our family income has been cultivated from the Bristol Bay fishery since the late 1940's on both my family's side (homesteaded Iliamna), and my wife's (Native Alaskan). Currently, we own and operate tenders, set net ourselves, and direct market our catch. We began direct marketing 20 years ago and have grown our operation to include five other families who also set net near us.

For nine years before we were married my wife and I each fished in the Naknek River Special Harvest area, and it brings out the worst in fishermen because it creates such combative fishing as everyone fights over the line sites. We have had guns pulled on us, violent threats made, and been regularly harassed by both drift and set net fishermen.

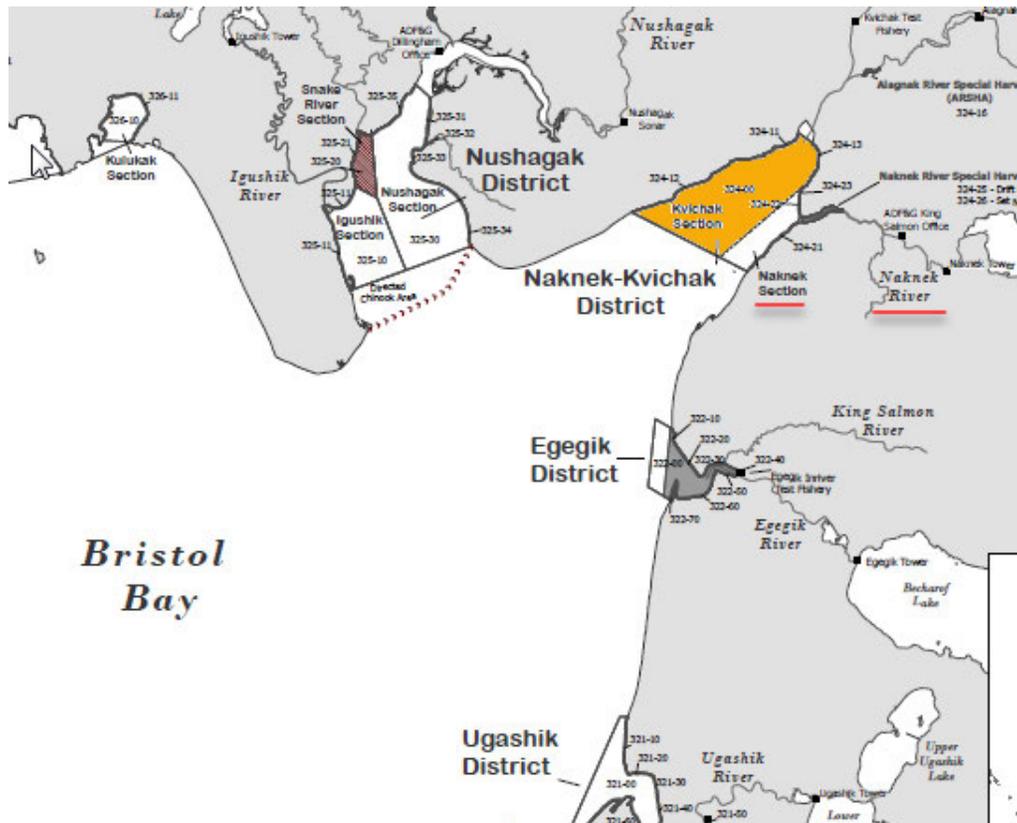
If the incidental harvest of Naknek fish could be kept below a de minimus level, it would be of great value to our fishery if the Board could craft the wording in such a way that on years of concern for the Naknek stock that we could keep the Kvichak section open for set net fishing concurrent with fishing opportunities further up the river.

This would spread out the fish over a far greater area and minimize the 'line fighting' at least among the approximately 330 set net permits.

Since the Kvichak district beaches are sparsely fished, it would create fishing opportunities for Naknek permit holders to fish without requiring them to commute over 15 miles to the narrower part of the Kvichak river. This might allow them to live in their cabins or homes in Naknek rather than petition the local village corporation for camping permits along the banks of the river (historically no such permits could be obtained).

Wayward Naknek fish are bound to be caught in districts as far flung as the Nushagak, so certainly they would be caught by set nets in the Kvichak section but at minimal amounts. We do not have a closed-loop system in Bristol Bay with a perfect accounting of every fish, but we do our best to accommodate a vibrant commercial fishery will still leading the world in sustainable salmon returns.

Here is a map showing the Kvichak section of the Naknek / Kvichak district and our relation to the rest of Bristol Bay.



Submitted by: Wende Tindall
Azarel Fisheries, LLC

Community of Residence: Nampa, Idaho

- I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.
- My family believes that we can fish and we intend to fish a set beach seine on our beach within our existing shore fisheries leases or at our historic staked sites.
- We are excited to try the new method of set beach seines and welcome the new opportunity for our fishery.
- My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites.
- We believe our equipment/trucks will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with that equipment/trucks.
- We understand the importance of king salmon conservation and king salmon recovery and will deploy and retrieve our set beach seine, focusing on the identification and safe release of all king salmon from our nets.

Submitted by: Mark Tvenge
Community of Residence: Chugiak

Proposal 303

I support

I think it is really unfair to simply close the shrimp fishery completely. I think as long as it's open to recreational use it should be open to all. 2 years ago you closed the set net fishery in Cook Inlet.

People's livelihoods are at stake not to mention Alaskans whom won't eat farmed seafood products.

Very disappointed in the fact you will let the big business out of state fish for salmon at the cost of local fishermen. Where is your loyalty.



UNITED FISHERMEN OF ALASKA

Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

February 25, 2025

Alaska Dept of Fish & Game
Board of Fisheries
PO Box 225526
Juneau, AK 99811-5526

SUBMITTED VIA ONLINE PORTAL

RE: Misc Business – Delegation of Authority to Change Regulations to Create a New Discretionary Exemption on the Importation and Release of Live Fish to Stock Lakes

Dear Chair Van Dort and Board of Fish Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. UFA is opposed to the Delegation of Authority as written to allow the importation of live fish from outside the State of Alaska. UFA does not believe that the Legislature's intent was to allow the importation of salmonids from outside of the state, particularly non-native species. Our understanding is based on the language in the bill, listening to the hearings, and 5AAC 41.070 (a)¹ which prohibits the importation of live fish into the state for purposes of stocking or rearing in the water of the state. While HB 295 did not specifically prohibit importation of salmonids from out of the state, it did not authorize importation of live fish from out of state or contemplate future discussions of such importations given the current regulation 5 AAC 41.070 (a) prohibiting this activity.

UFA is concerned about potential negative effects on our sustainable wild stocks resulting from importation of live salmonids from out of state. The Board of Fish has expressed concerns over current hatchery programs within the state, and it seems incongruent to consider allowing importation of out of state salmonids into state waters. It only takes a bear or eagle to pick up a fish from a lake and drop it in other state waters to create an impact on our wild salmon.

¹ 5AAC 41.070 – Prohibitions on importation and release of live fish

(a) Except as provided in (b) – (d) of this section, no person may import any live fish into the state for purposes of stocking or rearing in the waters or the lands of the state.

The Governor's bill clearly contemplated that State of Alaska hatcheries would be providing the salmonids for private lake stocking, rather than risking negative consequences from importing non-native salmonid species from out of state.

If the Board of Fish approves this delegation of authority for importation and release of live fish to stock lakes, we recommend that, (1) the language limit the release of live fish to stock **"landlocked"** lakes under 5 AAC 41.070, (2) that only triploid salmon may be imported to provide additional safeguards, and (3) a public process to be added for private lake stocking activities. As the bill is written, only a fish transport permit (FTP) would be necessary. An FTP is a process that does not go to the regional planning team (RPT) for consideration, but is between the individual and ADF&G. In contrast, for an Alaska hatchery, the hatchery permit and permit alteration requests (PAR's) go through the regional planning team process and department review before an FTP is issued. Stocking of private lakes does not have a public process component.

Please carefully consider the portion of this delegation of authority to allow the importation of live salmonids from out of state and ensure appropriate safeguards and public process are in place.

Regards,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition
Fishing Vessel Owners Assn • Groundfish Forum • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association
Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association

Submitted by: Morgan Voss
None

Community of Residence: Anchorage

no comments

Submitted by: Gavin White
Tide Chaser Fisheries Alan Crookston

Community of Residence: Nikiski

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

Submitted by: Daniel Wichers
Community of Residence: Kenai

DATE: February 24, 2025
TO: Board of Fish Members
FROM: Daniel Wichers

[REDACTED]
Kenai, AK [REDACTED]

RE: Proposal 313,

I Support Proposal 313, which requests that set beach seines be added as an alternative gear type only while we are in the Kenai River Late Run Stock of Concern Management Plan.

I have fished as a setnetter in Cook Inlet with my family for over 30 years and had the opportunity to help participate in a few periods of beach seining last summer. After this experience, I believe that with a little modification we can have our beach sites ready to sein fish this summer. We have the trucks and equipment we need, and we would be happy and thankful to get started. Last summer was the first time in many years that I felt hopeful again about our fishery. I could see that Sockeye Salmon could be harvested, and King Salmon could be identified safely and released from our nets.

I would like to thank the board for your consideration of passing Proposal 313

Daniel Wichers

Submitted by: David Wichers
Community of Residence: Kenai

DATE: February 24, 2025
TO: Board of Fish Members
FROM: David Wichers

[REDACTED]
Kenai, AK [REDACTED]

RE: Proposal 313,

I Support Proposal 313, which requests that set beach seines be added as an alternative gear type only while we are in the Kenai River Late Run Stock of Concern Management Plan.

I have fished as a setnetter in Cook Inlet with my family for 40 seasons and had the opportunity to help participate in beach seining last summer. After this experience, I believe that with a little modification we can have our beach sites ready to sein fish this summer. My family is willing to invest in a set beach seine net with the option to use our existing lead lines, corks and cork lines and use our existing infrastructure on our existing sites. We believe our trucks and tractors will be sufficient for our beach and that a set beach seine can be safely and responsibly retrieved and deployed with the equipment we have.

Last summer I could see the potential in fishing again, it was the first time in a long time that I felt hopeful again about our fishery. I could see that Sockeye Salmon could be harvested, and King Salmon could be identified safely and released from our nets.

I would like to thank the board for your consideration of passing Proposal 313

Respectfully
David Wichers

Submitted by: JoAnn Wichers
Community of Residence: Kenai

DATE: February 24, 2025

TO: Board of Fish Members

FROM: JoAnn Wichers

Kenai, AK [REDACTED]

RE: Support for Proposal 313

I Support Proposal 313, which requests that set beach seines be added as an alternative gear type only while we are in the Kenai River Late Run Stock of Concern Management Plan.

My family and I have fished as setnetters in Cook Inlet for over 39 years and had the opportunity to watch and participate in beach seining last summer. This was a great experience and gave us hope for our fishery in Cook Inlet. Setnetting has been a way of life for us and many other families in Cook Inlet. The loss of fishing time over the past years has been devastating.

Our family and setnet neighbors discussed the opportunity of beach seines last summer and we believe that this would be something we could do and scale to our own beach sites. We would welcome the opportunity to invest in a beach seine net and use our existing infrastructure on our existing sites so that we could have it ready to use this summer. We have the equipment and trucks necessary for our beach and feel confident that we could safely set and retrieve a beach seine with the equipment we currently have.

We understand the importance of King Salmon conservation and believe we have the knowledge and skills to identify and safely release all King Salmon from our nets. We will take the knowledge that was collected this past summer from the set beach seine method and will continue to educate ourselves on the best practices in ensure the success of our Cook Inlet beach seine.

We are excited for the opportunity to continue our family's tradition of commercial fishing on the beaches of Upper Cook Inlet and look forward to doing that with the new alternative set beach seine gear.

I would like to thank the board for your consideration of passing Proposal 313

Respectfully

JoAnn Wichers

Submitted by: Todd Winter
Community of Residence: Anchorage

Leave the THA the way it is don't spread the commercial boats everywhere then you will have a lot more conflicts between user groups and leave the start and stop times the same as they are now do not tie commercial and recreational together #301 don't let commercial boats fish more than 25 pots #308 there was no problem with shrimp numbers in the sound till it was opened to commercial fishing then the pot number for rec started dropping and dropping commercial shrimping should end in the sound so numbers can build back up

Submitted by: Teresa Winter
Community of Residence: Anchorage

Close Prince William sound to commercial shrimping
Leave the THA the way it is now
#301 don't tie subsistence or rec shrimping to commercial
#307 leave start time for subsistence and REC the way they are now don't tie it to commercial start and stop times end commercial shrimping in the sound
#308 don't increase pot number for commercial shrimping they are already decimating the areas they cover with 25 pots
#310 don't open up the whole sound to commercial shrimping every year they will plug up every part of the sound and there will be a lot of conflict between user groups this will be the fastest way to wipeout the shrimping in Prince William Sound

Submitted by: Thomas Wischer
Community of Residence: Kodiak

Proposal 315
I support this proposal. At the last Kodiak BOF meeting the length of a Kodiak gillnet was increased from 150 fathoms to 175 fathoms, but this change was not addressed in the Joint Venture regulation. This was an oversight. If not corrected, permit holders wishing to form a Joint Venture would have to fish 50 fathoms less than legal allotment of gear. This would effectively negate any reason for permit holders to utilize the Joint Venture provision.

PC252

Submitted by: LaCinda Witt
Community of Residence: Anchorage

Dear BOF,

As an Anchorage resident without my own access to Prince William Sound, my only opportunity to eat the wonderful Alaskan seasonal treat that local shrimp are, is to buy them from one of the small commercial fishermen in our community.

We support Proposal #303 and hope that the BoF will adopt it.

If there isn't a conservation concern and there is enough shrimp to allow the recreational fishery, then the commercial fishery should get to fish as well.

Please adopt Proposal #303 to represent all users.

PC253

Submitted by: Donald Witzel
Community of Residence: Palmer, AK

We support Proposal #303 and hope the BoF adopts it. We do believe in the need to sustain our marine resources, but as an Alaskan resident who does not have access to the fishery in the Prince William Sound, our only opportunity to enjoy these shrimp is to buy them from a small local commercial fisherman. It's our belief that if there are enough shrimp to allow recreational fishing, then commercial fishermen should be allowed to fish as well. There needs to be a solution that spreads the catch around between recreational and commercial fishermen. Please adopt Proposal #303 to represent all users.

PC254

Submitted by: Jana Wolf
Community of Residence: Idaho

I support Proposal 313.

I am excited for the opportunity to continue my family's tradition of over 60 years of spending summers in Alaska working together harvesting sockeye and look forward to doing that with the new alternative set beach seine gear.

PC255

Submitted by: Natasha Woodside
Community of Residence: West Jordan, Utah

I am writing today to SUPPORT Proposal 313, add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382).

Our family has purchased beautiful Wild Alaskan Sockeye Salmon from Frostad Fisheries, for the last few years and have been so impressed with the quality of the salmon that we receive. We plan to continue supporting this fishing family with future purchases. We value knowing where our food comes from and trust the source and care that their family puts into delivering a pristine salmon for our table.

We have had many conversations about the struggles of the Kenai Late Run King Salmon and the abundant Sockeye Salmon run and fully believe that the Upper Cook Inlet set netters that participated in the test set beach seine fishery last summer have found a very good compromise in times of low King abundance.

The family that we purchase our salmon from have been commercial fishing in Cook Inlet for over 100 years, a true Salmon with a Story. We hope that the Alaska Board of Fisheries would also SUPPORT Proposal 313 so that we can continue purchasing salmon from them and they can continue to evolve with their legacy fishery.

Sincerely,
Natasha Woodside

PC256

Submitted by: Samaira Yamuni
Community of Residence: San Diego, CA

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan.

I had the opportunity to participate in the test set beach seine this past summer and we feel that this is a new beginning for our fishery in times of king salmon conservation.

The quality of the sockeye we harvest is important to our industry and we look forward to the opportunity to provide the freshest and highest quality sockeye salmon in Upper Cook Inlet while sustainably and responsibly harvesting.

I would like to express my appreciation to Commissioner Vincent-Lang for issuing UCI Permit 2024-01 which made it possible for the Gabriel's, Every's and our family to test the set beach seines this summer. Also, thank you to the Members of the Board of Fisheries for your consideration of Proposal 313. If Proposal 313 is passed, it will have a positive impact on our fishery while king salmon are in low abundance and will help our family businesses survive until the king salmon stocks recover.

Sincerely,
Samaira Yamuni

PC257

Submitted by: Peter Yoo
Community of Residence: Anchorage

As an area resident without my own access to Prince William Sound, my only opportunity to eat the wonderful seasonal treat that local shrimp are is to buy them from one of the small commercial fishermen in our community We support Proposal #303 and hope that the BoF will adopt it.

Submitted by: Sewall Young
Community of Residence: Olympia, Washington

I support Proposal 313, which requests that set beach seines be added as an alternative gear type only while in the Kenai River Late Run Stock of Concern Management Plan. I have fished on a family setnet site on Salamatof Beach since 1963. The Kenai River sockeye salmon population has been managed for sustainable production at least since my family began fishing there and that often it has provided harvestable surpluses that supported the local economy and fed four generations of our family. The setnet permit holders in Cook Inlet have equipment to work gear in the tidal environments on their beaches. Harvest data from beach seine sockeye fishery openings, that are compatible with live releases of Chinook salmon, would fit neatly into existing population dynamics models for the Kenai River subpopulations so that the people could continue to benefit from the healthy sockeye population. Allowing the use of set beach seines on eastside setnet sites would enable the beach-based fishing community to continue to provide benefits to the local economy while avoiding substantial impacts on the Chinook population.

Submitted by: Edward Zehring
Community of Residence: Kenai, Alaska

I am submitting this comment in support of: Add set beach seine nets as legal gear under the Kenai River Late-run King Salmon Stock of Concern Management Plan (5 AAC 21.382). Proposal 313, formerly ACR 8!

Our home is located above the East Side Set Net fishery and we have watched with dismay as the commercial fishermen and fisherwomen have lost their ability to fish totally or been severely restricted over these last years.

Last year we watched with interest the Beach Sein Test Fishery and saw a little light in the dark tunnel of the past. Plentiful sockeye were harvested in the thousands without killing a single King Salmon!

There is NO downside to adding this new gear type and it may even enhance the sockeye survival and returns in future years!

Please approve this new gear type!!!

Submitted by: David Zink
Community of Residence: Chugiak

Keep at least 3 pot or more rule for personal private boat shrimping.