



## **Contents for Public Comments**

Richard G Blanc PC1  
Per Lund-Johansen PC2  
Gerald A Collins PC3  
United States Department of the Interior PC4  
Duane Fasen PC5  
Richard and Feryll Blanc PC6  
Peter Felber PC7  
Amy Fredette PC8  
Cordova District Fishermen United PC9  
Rick Metzger PC10  
Southeast Alaska Fishermen's Alliance PC 11  
F/V Ocean Gold PC12  
Richard G Blanc PC13  
Don Dumm & Susan Payne PC14  
Charles E. Evans PC15  
Tom Simkowski PC16  
Brad and Kay Underwood PC17  
Nelle Murray PC18  
John B. Murray PC19

2 October 07

**FAXED**  
 to BOF  
 10/4/07

RECEIVED  
 OCT 04 2007  
 BOARDS

Alaska State Board of Fish  
 Division of Boards  
 P O Box 25526  
 Juneau, AK 99802

RE: Proposal #58 Kodiak, a "restructuring proposal".

Dear BOF Members:

I am the author of Proposal #58 5 ACC 18.381 Gillnet specifications and operations, which has been identified by a board committee as a "restructuring" proposal. My proposal will allow a fisherman owning two CFEC Set Gillnet Permits to fish no more than two 150 fathom gillnets, 300 fathoms in the aggregate, no more than four set gillnets in accordance with existing regulations.

I will answer the eleven restructuring questions as they apply to my proposal.

1) *What regulatory area, fishery, and gear type does this restructuring proposal affect?*  
 The Kodiak regulatory area, salmon fishery, set gillnet gear type.

2) *A thorough explanation of my proposal.* My proposal will allow a fisherman owning two CFEC Set Gillnet Permits (as allowed by the Alaska State Legislature HB251) to fish no more than two 150 fathom gillnets, 300 fathoms in the aggregate, no more than four set gillnets in accordance with existing regulations.

- a. My proposal will require initial harvester qualification of owning two CFEC set gillnet permits. Owning two permits will allow you to fish two permit's worth of set gillnet gear within existing regulations (no extra fathoms of gear per permit or any new set gillnet sites that are not presently provided for under current regulation).
- b. There are no new harvesting allocations.
- c. Only present means, methods and permitted fishing gear are allowed in this proposal.
- d. There is no change in vessel length proposed.
- e. The transferability of permits or harvest privileges are not affected.
- f. There is no defined role for processors.
- g. This proposal will be a permanent change to regulation.
- h. My proposal if adopted will not require a change in monitoring and oversight by ADF&G.
- i. There will be no vertical integration (e.g. harvesting and or processing) or consolidation will not occur.
- j. I propose that the letter "D" be placed after the fisherman's name and five digit CFEC permit serial number to identify the gillnet as a dual permit set gillnet to

COMMENT# 1 <sup>1</sup>/<sub>3</sub>

RECEIVED TIME OCT. 4. 3:08PM

monitor the restructured fishery. There is no evaluation as there is no additional gear or set net sites.

k. There is no conservation motive behind this proposal.

l. I see no practical challenges that need to be overcome to implementing my proposal.

3) *The objectives of this proposal are:* To allow families who own multiple set gillnet permits to continue fishing their permits after their kids have entered other professions without having to sell a permit(s) to a crewman. The specific change will allow a fisherman to own two set gill net CFEC permits and fish both of the permits under current regulations.

4) My proposal will allow a fisher to operate two setnet permits and not have to sell a permit to a crewman in order to fish as his (her) set net camp has done in the past when a family member held the permit.

5) My proposal does not have allocative or reallocative impacts. Only the management plan identified in question #1 will be affected. My proposal will not change any existing regulation governing the set net fishery, other than a fisher being able to fish two permits.

6) All harvesters at set net sites that have multiple permits will benefit from this proposal. Processors will receive more fish, communities will receive more fish tax and support business, and more crewmen will be hired. This past season I did not hire an extra crewman because I would have had to sell a permit to the crewman in order to be able to use him/her in our operation. It is not a healthy situation when the crewman has ownership and feels he can't be replaced.

7) My proposal is better than the status quo by allowing multiple permit setnet sites to fish their permits without having to sell a permit to a crewman. The legislature has seen the need to restructure the number of permits a fishery can own and change the status quo so, we can continue to be fishermen.

8) *Identifying positive and negative impacts of my proposal on:*

a. *The fishery resource:* 1) *biological* – no impact; 2) *management system* – no impact; and 3) *economic utilization* – more crewmen and community support services will be needed.

b. *Harvesters:* 1) *economic efficiency of the harvesting function* – no impact; 2) *species interdependence impacts* – no impact; 3) *harvesting asset ownership impacts* – one owner will own and fish 2 units of gear. This is negative for those who only have a one permit setnet site; 4) *distribution of product value* – no impact; and 5) *market access* – no impact.

c. *Interdependence:* My proposal will not impact other gear types and fisheries targeting other species. My proposal will not affect interactions between regions and within the communities of the region.

d. *Safety:* My proposal will not have any affect on safety.

e. *The market:* 1) *market access and product form* – no impact; 2) *market timing* – no impact; 3) *competitive opportunities* – no impact.

RECEIVED  
OCT 04 2007  
BOARDS

*f. Processors: 1) economic efficiency of the processing function – each setnet site with multiple permits will deliver more product to the processor; 2) species interdependence impacts – none; 3) processing asset ownership impacts – none; 4) distribution of product value – no impact; and 5) market access – no impact.*

*g. Local communities: 1) employment enhancement – more crewmen and community support services will be needed, displacement – no impact, and loss – no impact; 2) municipal revenue impacts – none; 3) industry infrastructure impacts – none; 4) species interdependence impacts – none; 5) ownership of local harvesting – one fisherman will own two permits for harvesting and processing impacts – no impact on processing ownership; and 6) gain or loss of associated businesses – no impact.*

RECEIVED  
OCT 04 2007  
BOARDS

9) Rick Metzger and Jim Peterson helped develop this proposal. My proposal has "broad support" for all setnet sites that have multiple permits in the Kodiak management area.

10) My proposal will have no impact on conservation and development of fishery resources.

11) My restructuring proposal will have no legal, fishery management and enforcement implications that the Board will have to address before it can take action. This is a very benign proposal as it: does not add any extra gear or setnet sites; there is no increased efficiency; and no changes to existing method and means. My proposal will allow a fisher to operate two permits under present regulations.

I have answered the restructuring criteria to my best knowledge at the present time. I will continue to supply any addition information that you require.

Thank you for your consideration of my proposal, # 58,

  
Richard G. Blanc  
Kodiak Fisherman for 40 years

COMMENT# 1 3/3

TO FAX 1 907 465 6094

Per Lund-Johansen  
Professor of medicine MD  
Furudalen 3  
5098 Bergen  
NORWAY

Bergen Nov 1. 2007

ATTN: BOFG COMMENTS  
Alaska department of fish and game  
Boards Support Section  
PO BOX 115526  
Juneau , AK 99811-5526  
USA

Fax 10/25/07

RECEIVED  
NOV 05 2007  
BOARDS

During the last 15 years I have had the privilege to visit Alaska as a sports fisherman almost every summer ,most of the time on the Kodiak island and mainly fishing the Ayakulik river with either Dennis Harms and Dave Jones operations . I have usually had 3 friends from Norway with me. We have had some really wonderful days every time we have been there - except last summer.

Last summer we had been informed that the return of king was low ,and there was a risk of closure. Having fixed our vacations , bought non-refundable airline tickets long time ago , booked at the Ayakulik Lodge more than a year before ,we left Norway – and hoped for a catch a release solution –but to our great frustration the river was completely closed just when we arrived in Kodiak . ( Thanks to Mr. Harms efforts a substitute in the Bristol Bay area was finally found - after a period of great concern and uncertainty We were taken well care of – but the river was less suitable for fly-fishing – and the area not good for walking ).

I have read the new proposals for the Ayakulik river , and would strongly SUPPORT the proposals 65 - 70 – all suggesting catch and release if the escapement is low.

If such an arrangement is not introduced – and complete closure might happen – it will unfortunately be to risky for us to book in Ayakulik for the future .Having been fishing with Dave Jones and the guides from Ayakulik Lodge so many times , I have always seen them as highly professional guides , helpful and respecting the release methods .

COMMENT# 2 1/2

**It would be a great loss for us if the catch and release proposals are not implemented in the future .**

**But we would certainly come again – provided it will be permitted to fish - even if we catch very few fish and all will have to be released. It is the entire experience with the unique nature , wildlife and fly-fishing that makes the Ayakulik river trips special for us - not to harvest fish.**

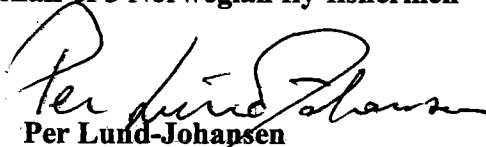
**This letter has been read by my two colleges who have been with me to Ayakulik many times , and they fully support its content and the proposals :**

- 1. Dr. Per Lund-Larsen MD , Joergens v . 19 , 1386 Asker , Norway and**
- 2. Professor John Kjekshus MD , Kollevn 4 c , 1344 Haslum , Norway**

**We are all three of us in our 70ties but we have sometimes had our grown up sons with us and they certainly agree with us.**

**We all hope for the possibility to return to this beautiful and unique part of Alaska in the future –and - like before - to be able to look forward to fly-fishing the Ayakulik river during the whole year before departing from Norway .**

**On behalf of 3 Norwegian fly-fishermen**

  
**Per Lund-Johansen**

**FAX 47 55 97 51 44**

**Email per.lund-johansen@med.uib.no**

**COMMENT# 2 1/2**

**CUILDARROCH, Nr.LOCHAILORT, INVERNESSHIRE, ph38 4na  
Scotland, UK.**

**Tel: 01687 470 232  
minnows1@aol.com**

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

**1st November 2007**

RECEIVED  
NOV 14 2007  
BOARDS

**Dear Sirs,**

**I live in Scotland, U.K., and have had the privilege and pleasure of fishing the Ayakulik River over the last few years, and enjoy the natural environment around it. This year after a lot of organisation for my vacation to Kodiak at considerable cost Flights etc.; when I arrived at the Lodge my very able host Dennis Harms explained to me that the River would be closed during my week because of a poor run of the King's to that date. I was quite astonished and thought how unfair considering the fish I have caught, and fellow Fishermen from New Zealand have been released carefully unharmed to carry on up the River to the Spawning grounds. This way of fishing has very minimal or no effect to the river, and still keeps it open to Sport Fisherman. Having fished and lived in Scotland I have sadly witnessed the dwindling runs of Salmon since the Sixties for many reasons, but thankfully due to Catch & Release imposed on many Rivers since the Nineties (with the help of Hatcheries in some cases), the numbers are making a great revival rejuvenating Rivers showing Salmon are generally best at what they do and the more they gather to get on with it the better. I have logged onto the proposed Fish Regulation changes for the Ayakulik and see a very well trodden path suggesting Catch & Release, and strongly support the proposals No. 65 by Mr.James David Jones and 67 by Mr.Dennis Harms a knowledgeable and very able guide.**

**These are realistic and very workable proposals and the interesting statistics enclosed within the proposals speak volumes for themselves for the future of the River Ayakulik with the Commercial Fishermen's venture not harmed. Everybody gains, and nobody loses.**

**If problems should arise in the future it should be easily equated from the Estuary mouth of the sea and, or, further to the feeding grounds by the biologists and Department of Fish & Game.**

**May I say Kodiak is a lovely and interesting Island worth travelling many miles to it. Long may it remain so. I look forward to another fishing trip in 2008 with no River closures on my arrival.**

**Yours very sincerely,**



**Gerald A Collins**

**COMMENT# 3**





# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
Office of Subsistence Management  
3601 C Street, Suite 1030  
Anchorage, Alaska 99503

RECEIVED  
NOV 28 2007  
BOARDS

FWS/OSM/BOF Kodiak

NOV 21 2007

Mr. Mel Morris, Chairman  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
1255 West 8<sup>th</sup> Street  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Morris:

The Alaska Board of Fisheries will deliberate 2007/2008 regulatory proposals that address Kodiak groundfish, and commercial, sport, and subsistence finfish fisheries beginning January 14, 2008. We understand that the Board will consider approximately 38 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and developed preliminary comments on proposals that may have an impact on Federally qualified subsistence users and Federal subsistence fisheries in this area. The enclosed comments address proposals 44 and 45.

We may wish to comment on other specific proposals if issues arise during the meeting which may have an impact on Federal subsistence users and fisheries. We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Peter J. Probasco  
Assistant Regional Director

Enclosure

Cc: Denby S. Lloyd, ADF&G  
Michael Fleagle, Chair FSB  
John Hilsinger, ADF&G, Anchorage  
Elizabeth Andrews, ADF&G, Juneau  
Charles Swanton, ADF&G, Juneau  
Patti Nelson, ADF&G, Juneau  
Rob Bentz, ADF&G, Juneau

Jim McCullough, ADF&G, Kodiak  
Jim Hasbrouck ADF&G, Anchorage  
Jim Fall, ADF&G, Anchorage  
Tina Cuning, ADF&G, Anchorage  
George Pappas, ADF&G, Anchorage  
Jim Marcotte, ADF&G, Juneau  
Interagency Staff Committee

COMMENT # 4 <sup>1/5</sup>

11/21/07

**FEDERAL STAFF COMMENTS ON  
ALASKA BOARD OF FISHERIES PROPOSALS  
for the  
KODIAK MANAGEMENT AREA**

**State of Alaska  
Board of Fisheries Meeting  
January 14-18, 2008  
Kodiak, Alaska**

## Table of Contents

<u>Proposal</u>	<u>Page Number</u>
Proposal 44	2
Proposal 45	3

### Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

**Proposal 44** requests regulations to restrict subsistence gillnets to obstruct no more than one half the wetted width of any stream.

#### **Current State Regulations:**

**5 AAC 01.520. Lawful gear and gear specifications.**

*(b) Salmon may only be taken by gillnet and seine.*

#### **Current Federal Regulations:**

*§ \_\_.27(c)(4) Except as otherwise provided in this section, you may not obstruct more than one-half the width of any stream with gear used to take fish for subsistence uses.*

**Is a similar issue being addressed by the Federal Subsistence Board (FSB)?** No.  
Current Federal regulations already prohibit gear used to take fish for subsistence uses from obstructing more than one-half the width of any stream.

**Impact to Federal subsistence users/fisheries:** Adoption of this proposal would not impact Federally qualified subsistence users or fisheries. Federal regulations already prohibit gear used to take fish for subsistence uses from obstructing more than one-half the width of any stream.

**Federal position/recommended action:** Support. Adoption of this proposal would align Federal and State regulations pertaining to obstructing streams while subsistence fishing, and reduce regulatory complexity and enforcement concerns. Allowing users to totally block salmon streams with fishing gear would obstruct salmon migration and could result in overharvest.

**Proposal 45** requests that regulations be amended to eliminate the harvest limits on subsistence fishing permits in a portion of the Kodiak Management Area.

**Current State Regulations:**

**5 AAC 01.530. Subsistence fishing permits.**

*(b) A subsistence salmon fishing permit allows the holder to take 25 salmon plus an additional 25 salmon for each member of the same household whose names are listed on the permit. An additional permit may be obtained if it can be shown that more fish are needed.*

**5 AAC 01.545. Subsistence bag and possession limits.**

*Currently no bag or possession limits are listed for salmon.*

**Current Federal Regulations:**

*§ \_\_.27(i)(9)(v) With a subsistence salmon fishing permit you may take 25 salmon plus an additional 25 salmon for each member of the same household whose names are listed on the permit. An additional permit may be obtained if it can be shown that more fish are needed.*

**Is a similar issue being addressed by the Federal Subsistence Board (FSB)?** No.

**Impact to Federal subsistence users/fisheries:** No direct impact anticipated. However, if this proposal is adopted it would make Federal regulations more cumbersome than State regulations, since people fishing under a Federal permit would continue to need to obtain an additional permit to taken more salmon than allowed by the permit limit.

**Federal position/recommended action:** Support. Adoption of this proposal is intended to provide more accurate harvest data and to increase participation in the department's subsistence monitoring program. There is currently no annual subsistence salmon harvest limit for the Kodiak area. There is a permit limit of 25 salmon per permit holder plus an additional 25 salmon for each household member. An additional permit may be obtained if necessary.

The Office of Subsistence Management (OSM) funded a two year study (FIS 04-457) to determine why there is a lack of agreement between data from subsistence salmon permits and data from subsistence salmon household surveys. While the report for this study is not yet complete, results provided to OSM indicate that permit limits are often mistakenly interpreted to be annual harvest limits. For this reason, some subsistence users choose to only report their permit limit even though they harvest additional salmon.

If adopted this proposal would make Federal regulations more cumbersome than State regulations. The Federal Subsistence Management Program anticipates this divergence would be resolved by changing Federal regulations through a proposal to the Federal Subsistence Board that would be effective for the 2009 fishing season. No conservation concerns with affected salmon stocks were identified in the proposal.

December 1, 2007

ALASKA DEPARTMENT OF FISH AND GAME  
BOARDS SUPPORT SECTION  
P.O. BOX 115526  
JUNEAU, AK 99811-5526

RECEIVED  
DEC 05 2007  
BOARDS

To the members of the Alaska Board of Fisheries,

I am writing this letter in reference and support of Proposals 67, 68, 69, and 70.

I traveled to Alaska in 2005 for an unforgettable sport fishing trip on the Ayakulik River. This is a trip I would like to take again in the next few years. However, the significant cost of the trip can only be justified if there is the assurance of sport fishing during the entire season. As such, I urge you to establish a management plan to allow a conservation catch and release of salmon species on the Ayakulik River.

As a sport fisherman I have relatively little interest in harvesting salmon. As such I would have no reservation planning a trip to the Ayakulik, knowing that salmon kills would not be an option during a year in which the run falls below the biological escapement goals. The challenge of the catch in the incredible Ayakulik surroundings and a quick photo is all I need for a valuable experience. I support proposals 67, 68, 69, and 70 because they serve to guarantee the sport fishing experience without any appreciable compromise to the health and size of future salmon runs. During high run years, reasonable salmon harvest limits are simply a fishing trip bonus.

I also support the Proposal 65 as it specifically defines the timeline and institution of a conservation catch and release fishery for King salmon. However, I urge you to avoid any unnecessary limits on bait and lure restrictions. Part of the value in sport fishing is the freedom to explore various fishing techniques to compare the relative challenges and effectiveness. As long as the catches are returned quickly to the water the relative impact (of reasonable bait and lure choices) on the salmon run should be negligible.

Sincerely,



Duane Fasen

COMMENT# 5

2 October 07

**FAXED**  
TO BOF  
10/4/07

Alaska State Board of Fish  
Division of Boards  
P O Box 25526  
Juneau, AK 99802

RECEIVED  
OCT. 04 2007  
BOARDS

RE: Proposal #57 is a restructuring proposal.

Dear BOF Members:

Proposal 57 5 AAC 18.361 (a-d) Alitak District Salmon Management Plan. Change allocation to Olga Bay fishery as follows: is clearly a restructuring proposal according to BOF criteria, "A restructuring proposal is one that is likely to have substantial economic, social, or biological impacts and may require significant changes to the management of a fishery."

We encourage you to designate Proposal #57 properly as a restructuring proposal for the following criteria:

1. *Economic impact.* There is currently **NO** allocation scheme in Kodiak Area Commercial Salmon Fishing Regulations. We as S04K permit holders are free to catch as many fish as we can, including setting our nets in Olga Bay when the fishers there are not fishing (which happens regularly). We would suffer a huge economic impact to our harvest if we were regulated to a per capita allocation.
2. *Social impact.* There are three sections of set gillnetters in the Alitak Bay District who exert different levels of catch effort in time and duration during the salmon season. If we are regulated down to the level of fishermen whose level of catch effort is less than ours is not fair and will breed nothing but hate and discontent.
3. *Biological impacts.* There are no biological needs for this proposal. It is definitely an allocation proposal.
4. *Require significant changes to the management of a fishery.* Kodiak ADF&G would have a nightmare and a huge expense managing three sections of set gillnetters and one section of seiners to make sure that each section was able to catch their allocation.

What will be the compensation to a section(s) of fishermen who do not catch their allocation because of run strength and timing?

We urge you to categorize Proposal #57 as a restructuring proposal.

Thank you,

*Richard & Feryll Blanc*

Richard and Feryll Blanc  
Alitak Bay Set Gillnetters for 35 years

COMMENT# 6

RECEIVED TIME OCT. 4. 3:08PM

Peter Felber  
Blumenweg 4  
4143 Dornach  
Switzerland

Dornach, Dec 2nd, 2007

ATTN. BOFG COMMENTS  
ALASKA DEPARTMENT OF FISH AND GAME  
BOARDS SUPPORT SECTION  
P.O BOX 115526  
JUNEAU, AK 99811-5526

RECEIVED  
DEC 05 2007  
BOARDS

Ayakulik Sport Fisheries Management Strategy/Regulations

Since 1983 I have been making 21 trips to Alaska. Since 1995 I have been fishing the Ayakulik river. The upper part with Dave Jones and Sam Fejes. On most of my trips I fished with ATS (Dennis Harms) and Amy Fredette the lower part of the river. I rate the Ayakulik as the best river to find great flyfishing salmon and nature in its purest form. There is no combat fishing and wildlife viewing is excellent. All the above listed guides do a great job in conservation of this great place.

The protection of the of the salmon run is their and my most important goal!

Coming all the way from Europe (booking the whole trip one to two years ahead), it is very important for me, to be sure, that I can make the trip and fish. I usually come with friends and /ore Family members.

The last two years, due to the fishing closures, I had lots of trouble. The emergency closures caused chaos for me, my party, the other fisherman and the guides. The current regulations have to be reviewed.

I have studied the Ayakulik salmon escapements of the past 15 years and I calculated the annual number of fishermen on the river, to find out regulations, that help to reach the escapement goals better than the emergency closure, but also should prevent the whole fiasco caused by this fishing closure.

As the number of spawning Kings (average of 13000 over the last twenty years) and the number of spawning Socheys (over 3000'000 per year) are very different, the protection of the two species needs to be seen differently.!

a) Proposed regulations for Kings

- Start with catch and release. The fish saved in the beginning of the season would more than make up for the small catch and release mortality later in the season.
- If the escapment goal 50% by June 17<sup>th</sup> is not reached, further restrictions (artificial lures only, single hook) should be instituted.
- If by June 17<sup>th</sup> the escapement goal is barely reached, only two Kings per year may be harvested per person (annual limit of 2 Kings). If the following days show, that the run is weak, go back to catch and release.
- If the escapement goal is reached well above what ADF &G wants, two Kings per day, total of five Kings per year, should be allowed to harvest.

COMMENT# 7-1/3



RECEIVED  
DEC 05 2007  
BOARDSb) - Proposed regulations for Sockeyes

Explanation: Usually the escapement for Sockeyes is 200'000-500'000, except in the year 2006, when only 87'000 fish were counted.

During King salmon season about 100 fishermen fish the lower Ayakulik. If 15 Sockeyes per fisherman are harvested, the total number of killed fish is about 1500.

On the upper river, salmon can only be kept on the departure day.

During the 7 periods of 6 fishermen, 42 fishermen keep together a maximum of 210 Sockeyes. As there is no Sockeye fishing except at the confluence of the Red and Ayakulik rivers, the weir hole and at the tidal part of the river. Floaters do not really affect the mortality rate of Sockeyes.

The total of an estimated 1710 harvested Sockeyes make only 2% of the worst Sockeye run (87'000) of the last 20 years in the year 2006. This mortality rate is not significant! These calculations show, that a closure for Sockeye sportfishing makes no sense! A catch and release policy doesn't really help either to achieve the necessary escapement goal.

Conclusion:

-3 Sockeye salmon (instead of 5) may be harvested daily per person. The fish saved in the beginning of the season would help to reach the escapement goal, if the run turns out to be extremely bad.

- If the total escapement seems to be less than 100'000 fish, the limit should still be 2 Sockeyes per day per person.

- If a worst case scenario seems to take place, ADF&G should go to catch and release only!

- If the escapement goal ( by mid June ) is reached, 5 Sockeyes per day per fisherman should be allowed to be harvested.

If the Board of Fisheries doesn't consider my proposals as sufficient to protect the stocks of salmon, I also support instead of my proposals the proposals 65,66,67,68,69 and 70 !!

These proposals and my proposals will help to reach the escapement goal for salmon much better than a sudden in season closure of the river. These proposals also help all guides and fishermen to avoid the chaos and anger of the years 2006 and 2007.

I hope, that the Board of Fisheries will be wise to consider our proposals as very effective and will change the regulations for the Ayakulik.

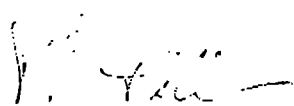
Commercial fishing for Sockeyes (accidental side catch of Kings) needs strict regulations to protect both salmon species, too!

By the way, sportfish caught salmon are worth economically much more than commercially caught salmon. But that's politics! Sportfishing versus commercial fishing.

They both must have the same interest: good salmon runs for future generations. So many things ( bearviewing sportfishing, lifecycles of different animals, tourism, fishing industry, etc) depend on healthy salmon runs!

Sincerely,

Peter Felber



COMMENT#

7 4/3

Peter Felber

Dr. med. dent. P. Felber  
Kohlenberg 7  
4051 Basel  
Tel. 061/281 66 77

RECEIVED

DEC 18 2007

BOARDS

Basel, 11/12/07

In 2006 and 2007 ADF&G closed sportfishing for King salmon and Sockeye salmon on the Alyakulik river (Kodiak), due to bad runs of these two species.

This fishing closure created chaos for the fishing guides and the sportfishermen.

I think, that there are better regulations to protect the returning stocks of fish.

That's why I sent my proposals for new regulations to the Alaska Board of Fisheries. A meeting will be held on January 13<sup>th</sup>.

I really would appreciate it, if you could read my proposals and help the Board of Fisheries to make a good decision.

Thank you very much!

Sincerely, Peter Felber

COMMENT# 7 3/3



RECEIVED  
DEC 21 2007  
BOARDS

ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811 - 5526  
Fax: 907-465-6094

Written comments on Proposals #65, #66, #67, #68 & #70

Proposed by:  
Amy Fredette  
3901 Harry Nielsen Ave.  
Kodiak, AK 99615  
907-486-5999  
Fax: 907-486-6798



COMMENT# 8 1/4

Proposal #65

Support as amended.

Delete proposal #65 King Salmon Management Plan, section A., first paragraph and replace with:

A. The purpose of this plan is to manage the Ayakulik king salmon sport fishing harvest to obtain the current biological escapement goal (BEG). And, to allow a no harvest, catch and release sport fishery when the run is forecast to reach an optimal escapement goal (OEG) as defined in 5AAC 39.222. Policy for the management of sustainable salmon fisheries.

Delete proposal #65's King Salmon Management Plan, section B., paragraphs 2 through 6, and replace them with:

2. Pre-season. Unless otherwise prescribed by ADF&G for conservation purposes, the king salmon limit on the Ayakulik River is as defined in 5 AAC 64.022.

3. In season. ADF&G shall use common run strength indicators (weir counts, sport and commercial harvest data, visual surveys and etc.) to forecast the king salmon spawning escapement. ADF&G shall maintain a sport fishing harvest opportunity to the greatest extent possible but may use the following methods in an effort to obtain the minimum BEG.

A. Adjust the king salmon sport fishing bag, possession and annual limits.

B. Adjust the legal sport fishing methods and means.

C. Institute a no harvest, catch and release king salmon fishery requiring legal sport fishing methods and means, for all species on the Ayakulik, to include only artificial lures and flies with single, barbless hooks, and that all kings be released unharmed and that kings may not be removed from the water.

ADF&G shall maintain a sport fishing opportunity to the greatest extent possible but may, in an effort to obtain the minimum OEG, close all targeted king salmon sport fishing and require the sport fishing methods and means, for all species on the Ayakulik River, include only artificial lures and flies with single, barbless, and that all kings caught incidentally be released un-harmed and that kings may not be removed from the water.

Proposal #66, #67, #68 and #70

Support

COMMENT# 8 <sup>2/4</sup>

## IMPORTANCE OF THE AYAKULIK RIVER AND AN OPTIMAL ESCAPEMENT GOAL AMY FREDETTE

Implementing a chinook salmon Optimal Escapement Goal (OEG) along the the Ayakulik River would be beneficial to a variety of users along the river's fishery. A conservative catch and release with single/barbless hooks, no bait may take place with a OEG if fish returns fall under the Biological Escapement Goal (BEG) to allow users to access the river vs. a closure to the sport fishery while maintaining the natural resources of the salmon fisheries.

The Ayakulik River supports subsistence, recreational, sport guide and a commercial fishery.

The Ayakulik sport fishery is unique because of it's remoteness. No roads nor runways are available to visitors of the river. Access is provided by floatplane or helicopter charter. The total length of the river is 28 miles, in which 27 miles are within the Kodiak National Wildlife Refuge (KNWR) and the remaining mile is surrounded by private property divided between different ownerships including the Ayakulik Native Incorporation. Because of remote access and complex land management, fishing the Ayakulik River involves additional planning and expense.

While the remoteness and access of the river indicates a small percentage of subsistence use with a total of 113 chinooks harvested between 1992 to 2003, the recreational, sport guide and commercial harvest indicates the importance of the Ayakulik River fishery to these users.

YEAR	# OF ANGLERS	DAYS FISHED	SPORT HARVEST	SUBSISTENCE HARVEST	COMMERCIAL HARVEST	ESCAPEMENT
1992	1,010	3,340	776	0	4,909	8,359
1993	1,016	4,566	1,004	0	2,708	6,815
1994	1,472	5,473	948	3	0	8,187
1995	461	1,299	200	4	2,367	17,497
1996	677	1,524	419	0	3,722	9,925
1997	945	3,374	1,190	0	812	13,167
1998	597	1,314	259	0	3,722	13,779
1999	557	2,165	609	26	3,366	12,868
2000	437	1,808	803	38	3,206	19,686
2001	481	3,173	568	5	6,715	13,356
2002	366	1,715	362	37	63	12,153
2003	540	2,425	344	0	0	17,106
2004	513	1,792	304	0	0	24,742
2005	579	2,515	489	0	0	8,340
2006	361	2,807	169	0	0	3,085

#### CITED REFERENCES

Chinook harvest by sport, # of anglers, days fished: Alaska Department of Fish and Game (ADF&G), Participation, Catch and Harvest in Alaska Sport Fisheries During 1992 to 2006 (Mills 1992 to 1995, Howe 1994 to 2000, Fidler 1994 to 1995, Bingham 1995 to 2004, Olines 1996 to 2000, Walker 1996 to 2000, Sundet 1996 to 2004, Jennings 2001 to 2004 Sigurdsson 2001 to 2003)  
Commercial Harvest 1992 to 2006: ADF&G, KMA Commercial Salmon Fishery Annual Management Report 2006 (Dimocenzo, Spalinger, Walde - April 2007)  
Subsistence harvest: ADF&G, Review of Salmon Escapement Goals (Nelson 2004)  
Escapement totals: ADF&G weir counts

Only the Ayakulik and Karluk River support a wild chinook salmon run within Kodiak Island. Both rivers are under limited entry to commercial sport guided use. Permits are allocated to specific guides / limited numbers of guest guided per day. The Ayakulik River is managed by the Alaska Department of Fish and Game (ADF&G) while the land surrounding the river is managed by the KNWR.

2006 and 2007, the chinook sport fishery was closed to the Ayakulik River because of low fish returns. Unfortunately this was very disruptive to sport fishing users, both guided and un-guided. Options are very limited as to redirecting commercial and recreational sport fishery use along the river when closures take place. The river is limited to a freshwater fishery as to options to saltwater fishing, guided sport fishing as mentioned above is a limited entry as to redirecting clients to another chinook river, Karluk River was also closed for the 2006, 2007 sport fishing chinook season as to un-guided users accessing another river for chinooks.

COMMENT# 8  $\frac{3}{4}$

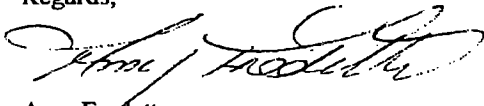
RECEIVED TIME DEC. 21. 3:21PM

Economical impact of loss revenue certainly affects not only Alaska but the local Kodiak economy and the sport fishing commercial industry. Many sport fishing users cancelled their planned trips to Alaska due to the 2006, 2007 Ayakulik River closure or the uncertainty of the river ever opening. These cancellations impacted hotels, air taxi/helicopter charters, retail/grocery stores by loss of spending expenditures, ground transportation, KNWR (collection of use fees), visits to museums, charters with other outfitters (boat charters/adventure trips), sport fish guide operations and employees. Indirect losses include less guided operational use of fuel, propane, groceries and wages. Much of the economic loss can be measured in dollars but the loss in marketing future fishing trips by guide operations to an uncertain or guaranteed fishing will cause the Ayakulik River guided industry to collapse. A visitor census conducted in 2003 and 2004 by ADF&G and KNWR indicated that 41% of visitors to the Ayakulik River were guided.

Most fisherman on the Ayakulik River are more interested in catching salmon than harvesting. During the 2003 chinook sport fishery 4,746 fish were caught with 4,312 being released (91%). The 2004 chinook sport fishery had 7,450 fish caught with 7,049 being released (95%). (ADF&G and KNWR 2003 and 2004 Ayakulik River Visitor Census). Many fisherman are unable to keep daily limits due to lack of refrigeration, many are foreigners which aren't allowed to bring salmon products back into their country, most are just fishing enthusiast which enjoy being on the river and enjoying Alaska. All would rather be on the river fishing with a conservative catch and release program set by an OEG than not fishing at all.

A conservative catch and release program set by an OEG would allow fish runs to reach their BEG, allow sport fishing users to visit the river as planned, allow guided operations to conduct business, allow the economy of Alaska and Kodiak to benefit while protecting the natural resource of the salmon stocks.

Regards,



Amy Fredette  
3901 Harry Nielsen Ave.  
Kodiak, AK 99615  
907-486-5999



RECEIVED

DEC 27 2007

BOARDS

December 27, 2007

Mr. Mel Morris, Chairman  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Sent by facsimile to 907-465-6094

**ATTN: BOF COMMENTS – KODIAK FINFISH PROPOSAL 72**

Dear Chairman Morris and members of the Board,

On behalf of the CDFU Groundfish Division, I am submitting comments on Proposal 72, which would create an exclusive use area for saltwater sport fishing charter operators in the Kodiak area.

The problems associated with unlimited growth in the saltwater charter fleet that is described in this proposal are also occurring in other areas of the State of Alaska. We identify with the proposers' concerns: In recent years, southwestern Prince William Sound has seen a substantial increase in charter vessel activity from operators based out of Seward.

However, in light of the NPFMC's action to limit entry into the charter halibut fishery (with implementation in 2010), and the work of the State of Alaska's task force on developing a limited entry program for charter fisheries in State waters, **we recommend that the Board of Fisheries take No Action on this proposal.** Federal action to limit entry into the charter halibut fishery is likely to limit expansion of charter fleet effort into Kodiak, since halibut is a significant component of the charter fleet's activity. Until the effectiveness of the pending Federal limited entry program is known, and State plans for a State waters limited entry program are more fully developed, this proposal is premature.

If the Board of Fisheries approves this proposal, there may be some expectation that a specific allocation of the annual charter halibut harvest would be tied to the establishment of a Kodiak exclusive use area. However, the NPFMC has not shown any interest in subdividing the annual charter allocation in any of the IPHC regulatory areas.

We support the State's efforts to consider development of a limited entry program for the charter sector throughout Alaska, and encourage all resource users to become engaged in this effort to address the kinds of problems identified in Proposal 72.

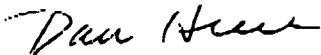
RECEIVED TIME DEC. 27. 12:00PM

COMMENT# 9 1/2

We also encourage the Board of Fisheries and ADF&G to take appropriate actions to improve effort and harvest data for the charter sector throughout Alaska. This will improve the Board's ability to take specific management actions, the public's understanding of how fish resources are used, and State's consideration of new management programs for the charter sector, which has been growing steadily in Alaska.

Thank you for the opportunity to comment.

Sincerely,



Dan Hull, Chairman  
CDFU Groundfish Division

COMMENT# 9 2/



ALASKA DEPARTMENT OF FISH AND GAME  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
To Alaska Board of Fisheries

RECEIVED  
DEC 24 2007  
BOARDS

Subject: Kodiak Salmon Management Plans and Issues

Dear Chairman Mel Morris and fellow Board members:

Please consider these comments at the upcoming Kodiak BOF meeting. I will list my comments in what I consider to be the order of importance.

1- proposals # 51-52 - 5AAC 18.362 Westside Kodiak Management Plan

The West side management plans needs to be changed to address the migration of Alitak bound salmon through west side waters. When the management plans were instituted, there was no consideration given to how one management plan affects other plans.

Recent years have shown significant drops in harvest and escapement numbers and quality in the Alitak area sockeye fishery. Data you will see shows a drop in the Alitak portion of the Kodiak harvest that corresponds with the length of extended openings in the Outer West side areas. Is this a coincidence or a consequence of the aggressive harvest strategy used on the west side? Returns have been so poor to the Alitak area in recent seasons that reduced escapement goals are only being met with nearly half the fish counted as escapement into Frazer Lake being jacks.

In 2007 about 1/3 of the set net permits that usually fish the Alitak area were not fished. Please question ADF&G staff and give serious regard to the relationship of the West side fishery and returns to the Alitak area.

There should not be a fishery on south bound fish in areas south of Sturgeon Head except in the Inner Ayakulik Section when escapements are not being met in the Alitak District.

2- Proposals # 38-39-40 Observers on trawlers fishing State waters

I have lived in Deadman Bay for most of the last 6 years. I have witnessed as many as 14 trawlers fishing the head waters of Deadman Bay in a single day. I have witnessed trawls being set and retrieved through schooled salmon inside of waters closed to salmon fishing and I have witnessed the discard of what appeared to be salmon from the decks of these vessels. It seems totally crazy that unobserved trawl fishing is allowed during salmon season in one of the most productive terminal salmon areas on Kodiak Island. Deadman Bay also hosts large over winter populations of sand lance and herring and the fish and sea mammals that prey upon them. Alitak Bay and Deadman Bay shelter one of last remaining brood stocks of king crab in the Kodiak area. 100% observer coverage and critical area closures are necessary in State waters to protect these resources.

COMMENT# 10 1/2

3- Proposal # 58 Gill Net specification and operations Allow a person to hold and fish 2 Kodiak set net permits.

The SO4K fishery is unique in that the total number of permits is low and there are very few latent permits and most of the permits are held by family members who work together in working partnerships. In effect our permits are the family jewels that have been passed down through the families and held in trust for future generations since implementation of the Limited Entry program. Recent market conditions and poor runs in some areas are forcing family members who hold permits out of the fishery. This leaves those left in the fishery with less means to operate their sites at a viable level or it forces them to seek creative means of transferring the permits to crew members that could jeopardize the permits.

I offer the follow quote for the nay Sayers:

"the true enemies of humanity's future are those who insist on prescribing outcomes in advance, circumventing the process of competition and experiment in favor of their own preconceptions and prejudices"

Virginia Postrel from The Future And Its Enemies

If proposal # 58 has passed the requirements of the Restructuring Committee It should be given very serious consideration as a way to save the family fishing business lifestyle.

4-Proposal # 56 Alitak District Management Plan Opening and Closure times:

The present open and closure schedule in the Alitak District works good for the seiners and the majority of the Alitak Bay, Moser Bay and Olga Bay fishers. It has improved the quality and efficiency of the harvest by staggering the delivery of fish to the tenders and processors. There is no need to change it.

5- proposal 57 Allocation of Alitak District Sockeye harvest.

This proposal offers no implementation plan nor am I aware of any recent discussions between the gear types and areas to develop a plan. Past attempts by the BOF to developed a plan through the Task Force Process failed miserably. To attempt a short notice plan would be disastrous.

Thank you for considering my comments

Rick Metzger  
Deadman Bay  
Kodiak Is.

COMMENT# 10 21

# Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone 907-586-6652

Fax 907-523-1168

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



E-mail: [seafa@gci.net](mailto:seafa@gci.net)

December 23, 2007

Alaska Department of Fish and Game  
Boards Support Section/ Board of Fish  
Mel Morris, Chair  
PO Box 25526  
Juneau, AK 99802

RECEIVED  
DEC 24 2007  
BOARDS

RE: Kodiak Board of Fish proposals

Mel Morris, Chair

Southeast Alaska Fishermen's Alliance (SEAFa) is a multi-gear non-profit fishermen's organization representing our members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Our salmon members involved fish gillnet, seine and/or troll gear.

Proposal #59 Convert Kodiak permits to troll permits.

SEAFa is opposed to this proposal as written. We believe that it would be a bad policy to change permit designations. In order to establish changing a seine or setnet permit to a troll permit you would need to re-designate the current statewide troll permits. If there are unallocated coho resources from August 1<sup>st</sup> to Sept 30<sup>th</sup> every year and the Board would like to establish a troll fishery in the area it should be done with the current statewide troll permit. The statewide troll fishery has a historical history of fishing in the Kodiak area and there are still individuals who hold permits in the troll fishery that participated in the Kodiak area in the past. The Board of Fish has not wanted to allow troll fishing beyond Cape Suckling because of the ramifications of an expanded fishery on the Pacific Salmon Treaty, gear conflicts and that the resources are fully allocated.

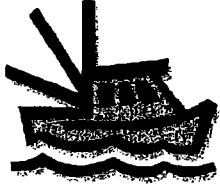
Proposal #72 Create an exclusive use area for saltwater charter fleet

SEAFa is neutral on the adoption of this proposal but would like to caution the board of the fish that if they are going to adopt this proposal to consider how halibut charters will or will not be a part of the exclusive area and how the actions of the NPFMC and options under consideration would be affected.

Sincerely,

  
Kathy Hansen  
Executive Director

COMMENT# 11



# F/V Ocean Gold

**Ed Hansen**  
**Phone: 907-586-6652**  
**Fax: 907-523-1168**

**9369 North Douglas Hwy**  
**Juneau, Alaska 99801**  
**Email: gillnet@ak.net**

December 24, 2007

Attn: Board of Fish Comments/Kodiak & Chignik  
Alaska Dept of Fish and Game  
Board Support Section  
PO Box 115526  
Juneau, AK 99811

RECEIVED  
DEC 24 2007  
BOARDS

SENT VIA FAX: 907-465-6094

Mel Morris, Chair and Board of Fish members,

RE: Proposal #59 – Kodiak Troll Permit & Proposal #34 Chignik Troll Permit

I am opposed to the proposals as written. I do not feel that permits should be changed from one gear type to another. This request is similar to the idea of converting my SE sac roe herring gillnet permit to a seine or pound permit because I could get better value for the fish using an alternative gear type. By starting the precedent of converting permits to an alternate type, the Board of Fish will be swamped with proposals for gear conversions.

If the Board believes that there is sufficient fish to allocate to a troll fishery, the fishery should be re-opened using the current statewide troll permits. The makers of these proposals could purchase and use in this area a statewide troll permit if a fishery is established. The troll fishery at one time fished all over the state and over time has been moved out of areas such as Kodiak etc. until trollers are only allowed to fish east of 144° longitude. When limited entry was implemented on the troll fleet, history from around the state was used to issue permits, now that the troll fishery has been limited to a small area and been affected by

COMMENT# 12

the Pacific Salmon treaty there are many latent permits in the troll fishery. Trollers have tried many times through the Board of Fish (Southeast cycle) process to regain some of the lost area west of 144° longitude.

Sincerely,



Ed Hansen

COMMENT# 12

RECEIVED TIME DEC. 24. 10:15AM

24 Dec 07

Alaska State Board of Fish

Dear BOF member:

I urge your support for the following proposals:

RECEIVED  
DEC 26 2007  
BOARDS

- **Proposal 58 - 5 ACC 18.381 Gillnet specifications and operations.** (I am the author of this proposal) My proposal will allow a fisherman owning two CFEC Set Gillnet Permits (as allowed by the Alaska State Legislature HB251) to fish no more than two 150 fathom gillnets, 300 fathoms in the aggregate, no more than four set gillnets in accordance with existing regulations.
  - a. This proposal will not create new harvesting allocations.
  - b. Only present means, methods and permitted fishing gear are allowed in this proposal.
  - c. There is no change in vessel length proposed.
  - d. The transferability of permits or harvest privileges is not affected.
  - e. **THERE WILL BE NO ABSENTEE OWNERSHIP.**
  - g. This proposal will be a permanent change to regulation.
  - h. My proposal if adopted will not require a change in monitoring and oversight by ADF&G.
  - i. I see no practical challenges that need to be overcome to implementing my proposal.
  - j. *The objectives of this proposal are:* To allow families who own multiple set gillnet permits to continue fishing their permits after their kids have entered other professions without having to sell a permit(s) to a crewman. The specific change will allow a fisherman to own two set gill net CFEC permits and fish both of the permits under current regulations.
  - k. My proposal does not have allocative or reallocative impacts.
  - l. My proposal will not change any existing regulation governing the set net fishery, other than a fisher being able to fish two permits.
  - m. My proposal will have a positive economic impact as more crewmen and community support services will be needed.
  - n. My proposal will not impact other gear types and fisheries targeting other species.
  - o. Processors will benefit, as each setnet site with multiple permits will have the opportunity to deliver more product to the processor.
  - p. My restructuring proposal will have no legal, fishery management and enforcement implications that the Board will have to address before it can take action.
  - q. My proposal will allow some consolidation of the set gillnet permits allowing greater economic potential for those still involved in the fishery. This season there were at least 18 set gillnet permits in the Alitak District that were not fished.
  - r. My proposal does not exclude anyone from participating in the fishery.
  - s. There is broad support for this proposal. The only negative comments I have heard from are those who do not want any restructuring to occur. And those who have perceived fear as to what could happen if this proposal is enacted.

COMMENT# 13  $\frac{1}{3}$

RECEIVED TIME DEC. 26. 3:45PM 1

t. There is no pool of latent set gillnet permits available for someone to buy another permit. The only permits available are those for sale with a site.

The merits of this proposal far out weigh perceived fears about what could happen. Proposal 58 will help set gillnet sites to be economically viable.

Please support proposal 58.

- **Proposals 51 & 52 - open up the Westside Management plan for changes.** I propose that when the sockeye escapement is lagging in the Alitak District that there be closures to extended fishing time in the Westside Management Area to allow for pulses of fish to migrate to the Alitak District.
  - a. According to "Tyler, R.W., Malloy, D. Prokopowich, and K. Manthy. 1981. Migration of sockeye salmon in the Kodiak Archipelago, 1981. Alaska Department of Fish & Game, Commercial Fish Division, Informational Leaflet No. 245. Kodiak". "Olga Bay stocks migrated principally down the west coast of Kodiak Island".
  - b. In 2002 when there were no gillnets that fished in the Alitak District there were 1,726 net marked sockeye salmon in the Frazer escapement that year. That is 1.6% of the 105,988 fish actually counted through the Dog Salmon Weir.
  - c. The average Sockeye harvest in the Alitak District compared to the Kodiak Island harvest from 1979-2007 is 24.45%.
  - d. The average Sockeye harvest in the Alitak District compared to the Kodiak Island harvest from 1979-1998 is 29.46% (prior to extended openings in the Westside Management Area).
  - e. The average Sockeye harvest in the Alitak District compared to the Kodiak Island harvest from 1999-2007 is 13.87% (extended openings in the Westside Management Area).
  - f. Each Area Management Plan is to achieve escapement and harvest objectives of sockeye returning to that Area. **NO CONSIDERATION IS GIVEN FOR FISH PASSING THROUGH THAT AREA TO ANOTHER.**

Please vote to allow for pulses of fish to migrate to the Alitak District when the sockeye escapement is lagging in the Alitak District by implementing some closures to extended fishing time in the Westside Management Plan.

- **Proposal 56 - 5 AAC 18.361(b-c). Change opening and closure times.**
  - a. I believe that all fishermen in a district should start at the same time. If you have to ask the BOF for a head start because you can't catch enough fish, you need to find another vocation.
  - b. The intent of the 2005 BOF action on fishing periods starting and stopping at different times for the sections in Alitak were to give equal time (to prevent mop up fisheries) **NOT** to spread the resource out, increasing harvesting percentages in Moser & Olga Bay.
  - c. Having all sections starting and ending at the same will give ADF&G more flexibility in managing the resource.
  - d. Some advantages to staggered starting and stopping times:
    1. Deliveries after the closures are more orderly and conducted during daylight hours.

2. I can fish in Olga Bay 12 hours before I can put my net out in Alitak Bay, when the fishers in Olga Bay are not fishing. This occurs often and is very profitable.

Please vote for proposal 56, as you feel inclined, as long as the starting and stopping times are the only things changed in this regulation.

- **Proposal 57 - 5 ACC 18.361 (a-d), Alitak District Management Plan.**
  - a. According to Grunert II the State Board of Fish does not have the authority to allocate to individual fishermen in the same fishery based on their catch histories.
  - b. Proposal 57 is clearly a restructuring proposal according to BOF criteria, "A restructuring proposal is one that is likely to have substantial economic, social, or biological impacts and may require significant changes to the management of a fishery."
  - c. What allocation percentage will Cape Alitak be given according to the number of permits fished in Cape Alitak since they are seiners and the number fluctuates during each fishing period?
  - c. This proposal puts a tremendous burden on F&G to monitor and regulate the fishery to assure that each section achieves its allocation.
  - d. What compensation is given to a section that does not achieve its allocation?
  - e. Olga Bay fishers should not be asking for an allocation until their catch/unit of gear effort improves. Presently they do not fish the duration of a fishing period and many quit fishing mid-August or before. I have fished in Olga Bay when there were more fishermen fishing from set net sites outside Olga Bay than Olga Bay fishermen.
  - f. An eight-day cycle fishing period will result in increased mop up fisheries in the terminal areas. The present regulation put into regulation by the 2005 BOF was to prevent openings in the terminal areas.
  - g. Have Mr. Prior verify the 5% reduced catches in the Olga Bay Section, which is a 40% reduction in catch to the individual permit holders in the Olga Bay Section.

Please vote no for proposal 57.

- **Proposals 38-39-40 trawl fishery.**
  - a. There should be observers on board or there should not be any trawling in Alitak during the salmon season.

Please vote for observers on board trawlers.

Thank you for your consideration of these proposals,



Rich Blanc  
Set gillnetter  
Alitak Bay



December 17, 2007  
ATTN; BOF Comments  
ADFG  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

RECEIVED  
DEC 26 2007  
BOARDS

Dear Advisory Board and Board of Fish members,

We have comments on several proposals. Comments follow:

**Proposal 51: Opposed** to delay opening West Side fishery until June 16. This proposal, contrary to Karluk IRA Tribal Council comments, will definitely impact West side setnetters who cannot move their gear closer to the Karluk river. This proposal would result in the loss of half of our June fishing time which is unacceptable. Fish are already arriving earlier in the spring. Subsistence can already take place in the lagoon, and the lagoon is not open to fishing other than subsistence. Also, we understand that the residence of Karluk is getting ever smaller, so how many fish are necessary to fulfill the subsistence allotment?

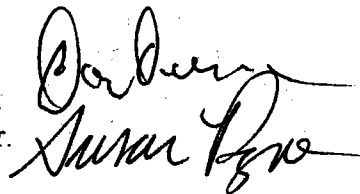
**Proposal 58: We are opposed** to this change to allow the fishing of two permits by one permit holder. What we see is that family operations are becoming Family Dynasties in the setnet fisheries. If you allow this change then these same people will want more, adding permits to these existing operations. This proposal is the logical next step from allowing anyone to own two permits, and we feel that it was unwise to allow that change. There will be next steps to allowing one person to fish two permits. This proposal will further limit the ability of young fishermen to enter the fishery and will impact setnet sites adjacent to these Family Dynasties as they will continue to "protect" their space in ever larger circles.

**Proposals 38, 39, 40: We are for** all three of these proposals to protect crab, herring, and salmon from bycatch by trawlers. It has seemed highly irregular to see trawlers targeting our bay in mid-August when we know that salmon are still moving into the bays. Trawler bycatch directly affects our fishery, and it is clear that Observer coverage should be 100% so that the information gets back to other fishers and management. We know that midwater gear is often fished hard on bottom as we have chain (rope trawl foot rope) with worn sides sitting on our beach and because we have fished on trawlers in the past. Bycatch is just as important or more so in State waters as in Federal waters as these bays are prime nursery grounds and the terminal destination for these species. We would like you to expand this rule to all bays around Kodiak Island!

Sincerely,

Don Dumm, salmon setnet and beachseiner permit holder.

Susan Payne, salmon setnet and beachseiner permit holder.



COMMENT# 14

27 December 2007

Alaska State Board of Fish  
Division of Boards  
P O Box 25526  
Juneau, AK 99802

RECEIVED  
DEC 27 2007  
BOARDS

RE: Support for Proposal # 58, 51 & 52

Board Members:

My family has been involved in the set net fishery on Kodiak Island for the past thirty-two years. During this time period we have fished two permits and have faced, on several occasions, the need to transfer permits with-in the family. Each time a permit transfer situation arises, the process is time consuming with shore lease transfers etc. and cost several hundred dollars. Secondly, in our particular situation where heads of household hold the two permits it called for each permit holder to be present and on site to fish the permit during fish openings. This requirement is very restrictive and can causes hardship and loses of income on head of household when family medical and/or business issues forces an absence of a permit holder from the fishing grounds.

Should Proposal # 58 be implemented it would be less restrictive and save head of household hundreds of dollars in fee applications. It would also reduce possible financial loss due to the absence from the fishing grounds of one permit holder. As such, one permit holder could then operate both permits.

Proposal #58 is a logical solution to remove restrictive requirements that now hobble family operated set net fisheries.

I encourage the Board of Fish to use wisdom in their deliberation when considering the passage of Proposal # 58. I also encourage the board to consider passing Proposals 51 and 52.

Sincerely,



Charles E. Evans

Support for Proposal #58, 51 and 52 by:  
Charles E. & Valene Evans  
Fish camp location, Amik Island, Alitak Bay

COMMENT# 15

RECEIVED TIME DEC. 27. 12:13PM

RECEIVED  
DEC 27 2007  
BOARDS

ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811 - 5526  
Fax: 907-465-6094

Written comments on Proposal #70

Proposed by:  
Tom Simkowski  
18668 E. Knik River Rd.  
Palmer, AK 99645  
907-746-5318

COMMENT# 16 1/4

RECEIVED  
DEC 27 2007  
BOARDS

Proposal #70

Support

I'm writing in support of Proposal #70. I've sport fish guided on the Ayakulik River from the months of May through September for the last seventeen years. I'm familiar with the Alaska Department of Fish and Game (ADF&G) weir operations and all the aspects of fishing the river.

The ADF&G needs more options than a total closure to the sport fishery if the Biological Escapement Goal (BEG) is not met for king and sockeye salmon.

A conservative catch and release needs to be applied along with methods and means. If the sport fishery started with a catch and release, single barbless hook, no bait restriction, fewer fish would be caught with these restrictions and a lower mortality rate would occur. The unharvested fish numbers would make up for the low mortality rate later in the fishery season. When the BEG is achieved, then harvest of fish, methods and means could return back to the Kodiak Island Alaska Sport Fishing Regulations.

Conservative catch and release would protect the natural salmon fishery and allow all sport fishing users of the Ayakulik River and Kodiak National Wildlife Refuge to visit as planned.

2006 and 2007 sport fishery was closed to both king and sockeye fishing due to fish returns not meeting the BEG. This was very disruptive to users of the river, guide operations and the economy.

Biological Escapement Goal for the Ayakulik River:

Kings: 4800 to 9600

Sockeyes: 200,000 to 500,000

June 15<sup>th</sup>, 2006 - Emergency order reduced bag limit of king salmon on the Ayakulik River to one daily, one in possession.

Fish Count:

King - 668

Sockeye - 29,632

Projections by ADF&G from 10 year average fish return timing indicate that 60% of the BEG should be counted through the weir by June 20<sup>th</sup>. Daily limit lowered to achieve goal.

COMMENT# 16 2/4

RECEIVED  
DEC 27 2007  
BOARDS

July 1<sup>st</sup>, 2006 - Emergency order closed the Ayakulik River to king and sockeye sport fishing.

Fish Count:

King - 2213

Sockeye - 42,012

ADF&G deemed 60% of BEG by June 20<sup>th</sup> has not been met. Fishery closed. Once fishery is closed, the full BEG per species must be met before fishery per species may be reopened.

Sport fishing for sockeyes remained closed for the remaining 2006 season.

August 18<sup>th</sup>, 2006 - Ayakulik weir closed for season due to high waters.

Fish Count:

King - 3085

Sockeye - 86,963

Coho - 278

Pink - 451,178

August 20<sup>th</sup>, 2006 - Commercial fishing opened within the Inner and Outer Ayakulik sections for pinks. 17,142 sockeyes were incidently caught. Sport fishing users felp unjustified as to sport fishing closure to sockeyes. Sockeye sport fishing couldn't be targeted nor fish retained, yet 17,142 sockeyes were incidently commercially caught and could be retained.

June 1<sup>st</sup>, 2007 - Emergency order reduced bag limit of king salmon on the Ayakulik River to one daily, one on possession.

Fish Count:

King - 27

Sockeye - 106

June 27<sup>th</sup>, 2007 - Emergency order closed the Ayakulik River to king and sockeye sport fishing.

Fish Count:

King - 3081

Sockeye - 79,195

60% of BEG has not been met by June 20<sup>th</sup> per species, sport fishery closed.

July 2<sup>nd</sup>, 2007 - Emergency order reopened Ayakulik River to king sport fishing. Sockeye sport fishing remains closed.

Fish Count:

King - 5128

Sockeye - 107,805

BEG (4800) was met for king salmon, fishery reopened to kings. Users could not target nor retain sockeyes as sockeye sport fishery remains closed.

COMMENT# 16 3/4

RECEIVED  
DEC 27 2007  
BOARDS

July 21<sup>st</sup>, 2007 - Commercial fishing opened to Inner and Outer Ayakulik sections. 96,285 sockeyes harvested.

Fish Count:

King - 6493

Sockeye - 187,710

Sport fishing users felt unjustified as the sport fishery for sockeyes still remains closed while commercial fishing is open. BEG (200,000) has yet to be met.

July 28<sup>th</sup>, 2007 - Emergency order reopens the sockeye sport fishery.

Fish Count:

King - 6515

Sockeye - 203,195

BEG (200,000) was met. Unfortunately the reopening came at too late of a date as most users are off the river at this time frame. King salmon fishing is the main attraction. Sport fishing for kings is closed every year on July 26<sup>th</sup> in order to protect spawning king salmon.

September 14<sup>th</sup>, 2007 - Ayakulik River weir closed for season.

Fish Count:

King - 6535

Sockeye - 282,433

Coho - 13,312

Pink - 31,795

Cited Reference

Weir totals - ADF&G weir fish counts web page

Commercial harvest - 2006 & 2007 ADF&G, KMA Commercial Salmon Fishery Annual Management Report (Dinnocenzo, Spalinger, Wadle - April 2007 / Wadle - November 2007)

BEG - ADF&G, Review of Salmon Escapement Goals in the KMA (Nelson, Witteveen, Honold, Vining, Hasbrouck 2004)

Emergency Orders - ADF&G Emergency Order web page

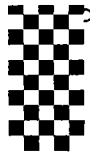
Starting the fishery season with a conservative catch and release vs. bag limit reductions would allow for a greater number of fish in the river. Continuing a catch and release would allow users to access the river for the sport fishery, be beneficial to the economy by users not cancelling planned trips due to closures. Implementing restrictions with the catch and release to single barbless hooks, no bait would limit the total number of fish caught which would then apply to a lower mortality rate ADF&G calculates in, the natural salmon resource is preserved.

Regards,



Tom Simkowski

COMMENT# 16 4/14



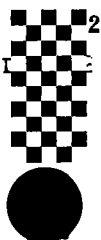
RECEIVED  
DEC 27 2007  
BOARDS

To Members of the Alaska Board of Fisheries  
Related to Proposals 51 and 52

The Alitak District of Kodiak Island has been struggling to meet salmon escapement levels for the past several years. We know that many of these fish travel down the West side, where they are intercepted in areas open to fishing. It is our concern that the lengthy openings in the Northwest District ("until further notice") are having a negative impact on the survival of the struggling Alitak systems. We believe that a closer look at this impact is needed and that fishing time restrictions could be adopted if warranted. Brad and Kay Underwood



A/C Comment# 17



**ALASKA DEPARTMENT OF FISH AND GAME  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Alaska Board of Fisheries**

**RECEIVED  
DEC 27 2007  
BOARDS**

**Subject: Kodiak Salmon Management Plans**

**Dear Chairman Mel Morris and fellow Board members:**

**I would like to make the following comments regarding proposals of importance to the south end set gillnet salmon fishery.**

**Proposals # 51-52 - 5AAC 18.362 Westside Kodiak Management Plan**

**There are presently only six set net camps on the south end of Kodiak that depend on the commercial salmon set net fishery as an important part of their livelihood as opposed to 36 camps in the 1990's and before.**

**As the west side salmon fishery increased in strength and thus the openings became longer, the runs on the south end of the island decreased. Information will be shown during the Board work sessions that will provide evidence of this occurrence.**

**The Board may want to consider staggered openings (such as the Board instituted on the south end fishery) or a general closure south of Sturgeon Head (except Inner Ayakulik section) in order to allow south end fish safe passage.**

**Proposals # 38-39-40 Trawlers fishing State waters**

**This area should have critical closures necessary to protect salmon.**

**Prop**

**osal # 58 Gill Net specification and operations**

**Considering the poor returns on the south end of the island this is the only way that some families will be able to retain their ability to fishing as part of their livelihood.**

**Proposal # 56 Alitak District Management Plan**

**This is an allocative proposal. The present plan was the result of years of conflict. It works.**

**Proposal # 57 Allocation of Alitak District Sockeye harvest.**

**This is an allocative proposal. The present plan works.**

**Thank you for your time in considering my comments**

**Nelle Murray  
Alitak Bay Setnet fisherman  
South end of Kodiak Island**

**COMMENT# 18**



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

December 27, 2007

RECEIVED  
DEC 28 2007  
BOARDS

**Subject: Kodiak Area Finfish Proposals 39, 40, 51, 52, 56, 57, 58 and 59.**

**Dear Mr. Mel Morris (Chairman) and the Board of Fisheries:**

**Please consider my comments on proposals 39, 40, 51, 52, 56, 57, 58 and 59 when you make regulatory changes at the January, 2008 BOF meeting in Kodiak, Alaska.**

.....  
**Proposal 39. 5AAC 28.450. Closed waters in Kodiak Area. Proposal 40. 5AAC 28.xxx. New Section. Observer coverage.**

**Alitak Bay should be closed to pelagic trawl gear all year unless observers are on board at all times to assess the incidental by-catch of non-target marine life: e.g., king crab, salmon, herring, other food forage fish (capelin and needle fish) and other marine life.**

**Justification: Trawl fishing is known to have a high by-catch of non-target marine wildlife. Creditable data should be collected on the trawl fishery to assess negative impacts it may have on wildlife resources before it is allowed to continue.**

.....  
**Proposal 51. 5AAC 18.362. Westside Kodiak Management Plan. Proposal #52 . 5AAC 18.310. Fishing Seasons.**

**Kodiak Commercial Salmon Management Staff should employ management tools (specific time and area closures) to reduce the high harvest rates of Olga Bay sockeye salmon on the north, west, and southwest sides of Kodiak Island when Olga Bay sockeye runs are forecasted to be low. Available data in the below list either documents or suggests that significant numbers of Olga Bay sockeye salmon are caught in the distant areas of Kodiak, Island:**

- 1. About 100 years ago commercial fish managers reported the probability of Kodiak sockeye salmon migrating down the west side of Kodiak Island from north to south. It was suspected that large sockeye catches off Karluk and/or Ayakulik Rivers were a result of intercepting Upper Station sockeye (US Fisheries Reports, 1920's).**
- 2. Sockeye salmon tagging studies conducted by ADF&G suggest that as much as 25% of the Olga Bay sockeye salmon stocks are caught on the Westside of Kodiak Island. (Manthey, etal., Commercial Fish Tagging Summary, 1981.)**
- 3. In 2002, approximately 1700 gillnet marked sockeye salmon were observed passing through the Upper Station Weir (N=105,000+/-). These net marked sockeye escaped from the gillnet fishery on the west and north side of Kodiak**

RECEIVED TIME DEC. 28. 1:14PM

COMMENT# 19 1/3

RECEIVED  
DEC 28 2007  
BOARDS

Island. Note, a commercial gillnet and seine fishery did not occur in the Alitak Bay District in 2002 because the Olga Bay sockeye runs were severely depressed.

4. I have commercial gillnet fished in the Alitak Bay District for the last 18 seasons (except 2002) and have observed old, scarred gillnet marked sockeye in my catch every year.
5. A cursory observation of the return per spawner for Karluk sockeye vs. Upper Station sockeye suggest a high return for Karluk and a lower return for Upper Station. This positive difference for Karluk sockeye is probably a result of Upper Station and Frazer Lake sockeye contributing to the sockeye catches on the west side of Kodiak. Please note, an in depth study of the return per spawn and a comparative analysis completed to confirm this observation.
6. I worked for ADF&G during the years of 1969 to 1990. It is my recollection that few salmon openings and small sockeye catches occurred during June in the Northwest District during the early 1970's. The District was managed primarily as a pink salmon fishery and was not normally opened to fishing until the General Pink Opening in early July. Ayakulik River (Red) and Karluk River were the primary sockeye runs where most of the fleet fished on the early sockeye openings. In the mid 1970's Ken Manthey (Kodiak Comm. Fish Mgt.) decided to open the entire Kodiak Management Area on the first opening to take some pressure off Ayakulik and Karluk. This opening stands today with increased openings in the NW District.
7. When sockeye migrate down the west side of Kodiak Island they move into the major bays traveling along the south beaches. Then they turn around, go back out the bay and continue their southern migration. However, in the case of Deadman Bay, the sockeye, in general, turn the corner at High Rock and go into the Moser-Olga Bay systems. Some heavily used bay areas "hot spots" are the NW side of Uganik Island, SW side of Uyak Bay and the SW side of Alitak/ Deadman Bay.

.....

**Proposal 56. 5AAC 18.361 (b-c). Alitak District Salmon Management Plan. Change opening and closure times for Alitak District.**

On general principle, all set gillnet fishermen in the Alitak Bay District (Olga, Moser and Alitak Bays) should start fishing and quit fishing at the same time because they are the same fishery. One bay should not be given an advantage over another for the common property resource. Consequently, I was never in favor of the staggered openings. However, I must admit that fishing under the staggered opening has made delivering salmon much easier because the cannery dock is not plugged near closure time.

To provide for a more orderly fishery and a constant closing time through out the season, I would recommend the following:

1. Open at 9:00 a.m. instead of noon.

RECEIVED  
DEC 28 2007  
BOARDS

2. Close at 6:00 p.m. instead of 9:00 p.m.  
This would give fishermen adequate time to deliver salmon on closures before darkness through out the season. It would also eliminate changing the closing time form 9:00 p.m. to 6:00 p.m. in August.

.....

**Proposal 57. 5AAC 18.361 (a-d). Alitak District Salmon Management Plan.  
Change allocation to Olga Bay.**

A book could be written about the pros and cons of this proposal. It does have some merit. However, a similar allocative plan, The Chignik Co-op, passed by the BOF was declared unconstitutional. This proposal most likely will not meet requirements of the State constitution.

.....

**Proposal 58. 5AAC 18.331. Gillnet specs., and 5AAC 39.280. Identification of stationary fishing gear. Allow fishing of two set gillnet permits...**

This proposal has merit because it allows family owned and operated setnet camps to continue fishing their family permits in their traditional fishing areas. Historically and currently there have been few if any "stand alone" set gillnet permits for sale on the open market. Most permits are held with in a family. If this proposal were passed it would help most Kodiak Island set net camps to stay financially viable in the fishery.

.....

**Proposal 59. 5AAC 18.330. Gear. Establish a Kodiak Area troll fishery to meet market demand as follow:**

**This proposal should be rejected because:**

1. Kodiak has enough commercial salmon gear to harvest any given salmon resource in the Kodiak Management Area.
  2. A new gear type would take salmon away from established fisheries.
  3. The troll fishery would be catching mixed stock salmon from California, Canada, Oregon, Washington and Alaska.
  4. A new mixed stock salmon fishery would compound the complex management problem for managers from California to Alaska.
- .....

Thank you for considering my comments.

*John B. Murray*

John B. Murray  
Alitak Bay Setnet fisherman  
P.O. Box 5073  
Akhiok, Alaska 99615

COMMENT# 19 3/3