

**SOUTHEAST ALASKA REGIONAL DIVE FISHERIES ASSOCIATION
2012 BoF PROPOSAL COMMENTS**

Proposal 178 – 5 AAC 38.140 SE AK Sea Cucumber Management Plan

- SARDFA opposes this proposal as written. This proposal needs to include the effects of sea otters on sea cucumber populations in effected area.

Proposal 179 - 5 AAC 38.140 SE AK Sea Cucumber Management Plan

- This is a SARDFA generated proposal. This proposal asks the State to take into account the negative effects sea otters are having on sea cucumber populations.
- SARDFA will be asking the Board to look at a number of options to increase the harvest limits of sea cucumbers in areas that are being impacted by sea otter.
- Unfortunately the sustained yield principle does not work in areas where sea otters are present.

Proposal 180 - AAC 38.140 SE AK Sea Cucumber Management Plan

- SARDFA supports this proposal that changes the opening day during the week of thanksgiving.

Proposal 181 - AAC 38.140 SE AK Sea Cucumber Management Plan

- SARDFA supports this proposal that would allow for additional fishing time in NSE AK after November 1st.

Proposal 182 - AAC 38.140 SE AK Sea Cucumber Management Plan

- SARDFA supports this proposal which will clarify the existing regulation and make it more difficult to illegally harvest sea cucumbers.

Proposals 183, 184, 187, 188, and 189– 5 AAC 38.142 SE AK Geoduck Fishery Mngt Plan

- SARDFA is opposed to these proposals which attempt to establish equal share of the harvest, trip limits, and/or weekly harvest limits in the geoduck fishery.
- The ADF&G and AWT do not have the personnel and infrastructure available to implement these proposals.
- The vast majority of SARDFA geoduck fishermen want a competitive fishery.
- SARDFA has addressed some of the problems of large weekly harvests by only fishing a one day 6-hour fishing period;
- Currently 60 to 70 divers participate in the fishery. There are 104 CFEC permits. These proposals would increase the effort and decrease the individual ex-vessel value.
- This is a PSP driven fishery. No one can tell week in and week out where the fishery will be open. This makes it impossible to register in advance for any area. It's possible an area may pass PSP testing once or twice a season. Divers must be prepared to harvest as much as possible during those periods.
- These proposals may lead to high grading geoducks resulting in wasting the resource.
- The current system is working; the ex-vessel value of geoducks has raised from \$5/lb a couple of years ago to over \$20/lb during the 2011/12 season.
- If adopted this proposal would cost more money to implement and that would be SARDFA money.

Proposals 185 and 186 - 5 AAC 38.142 SE AK Geoduck Fishery Mngt Plan

- SARDFa opposes these proposals that would change the dates of the geoduck fishery.
- There is no need for these proposals. The department and SARDFa can change opening dates without a new regulation. The fishery opening dates are done in a cooperative fashion between ADFG and SARDFa.
- ADFG does not have enough personnel to manage this fishery in the spring and summer months.
 - this fishery has been set up as a fall and winter fishery, most of the processors would have difficulty doing salmon and geoducks at the same time;
-
- The current system is working; the ex-vessel value of geoducks has raised from \$5/lb a couple of years ago to over \$20/lb during the 2011/12 season.

Proposal 190 - 5 AAC 38.142 SE AK Geoduck Fishery Mngt Plan

- SARDFa opposes this proposal that would revise the harvest rotation in the geoduck fishery.
- SARDFa and ADFG already have this ability and it does not need Board authorization to do this.

Proposal 191 - AAC 38.142 SE AK Geoduck Fishery Mngt Plan

- SARDFa opposes this proposal to establish a maximum length limit of 300 feet for dive hoses.
- The majority of the Geoduck Committee did not agree with the basic premise of the proposal. Regardless of hose length there may be congestion in the fishing area.
- In certain circumstances a longer hose would be safer for divers as boats drag anchors in bad weather or divers can actually move further away from congested areas.
- There is no evidence this proposal would work.

Proposal 191- AAC 38.142 SE AK Geoduck Fishery Mngt Plan

- SARDFa opposes this proposal that would establish a minimum 200 yard separation of geoduck fishing boats.
- This would be impossible to enforce as boats swing on the anchor as the tide and wind changes. Is it the anchor or the vessel? How can AWT measure distances, either vessel or anchors.
- Boats, during dive operations may have to move for the safety of the diver. The boat may have to move closer than 200 yards to another boat. Would this be illegal?
- Boats will be transiting the fishing zone during the opening, sometimes being closer than 20 yards but not interfering in the dive operation.

Proposal 193 – 5 AAC 38.054. Unlawful Use of Dive Fishing Gear

- SARDFa supports this proposal.
- This would help fight against illegal fishing and reduce the paper work for ADFG.

Proposal 194 – 5 AAC 38.146. Registration requirements for red sea urchins, sea cucumbers, and geoducks in Registration Area A

- SARDFa supports this proposal.
- This will help ADFG track divers closer and manage the fisheries better.

Southeast Alaska Regional Dive Fisheries Association

Phil Doherty – Executive Director

Sea Otter Questions for ADFG

- Does ADFG believe the sea otter population will continue to increase and expand in areas in Southeast Alaska based on the last 15 years of research?
- Does ADFG believe the major reason for the decline of sea cucumbers (*) in areas that have been closed or been reduced in GHL is sea otters in sea otter areas? If not, what is the major reason for declines in sea cucumber populations in sea otter areas?
- ADFG has closed 14 sub-areas to commercial harvest of sea cucumbers in recent years. Will sea cucumber populations rebuild in those areas even after ADFG have closed the areas to harvesters? Have shellfish populations ever rebuilt in areas of continued sea otter populations?
- If the major reason for the decline of most sea cucumber populations are sea otters how does sustain yield management work in those areas?
- Do sea otters leave a viable sea cucumber population once otters re-colonize a sea cucumber area? What are sea cucumber populations in closed areas as opposed to the population before sea otters re-colonized the area? How many surveys have been done in an area once it is closed?

(*) geoduck clams, red sea urchins or Dungeness crab can be substituted

1/15/2012

Propose the Board of Fish amend Proposal 164 -5AAC 32.150 by adding Closed Waters in Registration Area 106-42. Close commercial Dungeness crab fishing in the Petersburg vicinity as follows:

In Area 106-42, the following waters are closed to taking of Dungeness crab: **(17) waters of Wrangell Narrows west of a line from 56 degrees 44' 30" N lat., 133 degrees 56' W long to Mountain Point., north to Bayou Pt. 56 degrees 47' 45" N lat., 133 degrees 58' 45" W. long.**

ISSUE: Depletion of Dungeness crabs in District 6, Area 106-42. Commercial crabbers fishing in the summer and fall are having a significant impact on the community residents to harvest personal use of Dungeness crab. Areas surrounding the community of Petersburg are heavily fished by commercial crabbers making it difficult to obtain crab.

WHAT WILL HAPPEN IF NOTHING IS DONE? Personal use for Dungeness crab will continue to decline. The general public is not well served by the intense crab fishing that presently is permitted in the waters surrounding the community. The crab population is part of the diet of sea otter and as they continue to expand their population will intensify the use of this resource.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? By setting aside this area the answer is yes.

WHO IS LIKEY TO BENEFIT? The residents and visitors that live or visit the area of Petersburg will benefit greatly.

WHOSE IS LIKELY TO SUFFER? Commercial Dungeness fisherman would have to fish areas away from the closed area. The fisherman using this area are few in number as the area of the proposed closure is a small area confined to the upper end of the Wrangell Narrows.

OTHER SOLUTIONS CONSIDERED? Close the proposed area on the first part of the fishery or the second part of the season should there be one.

PROPOSED BY: Don Koenigs, 37 year resident of Petersburg

HARVEST IN POUNDS 2010-2011 Ketchikan In-Season Geoduck Clam Commercial Harvest ALASKA DEPARTMENT OF FISH AND GAME - January 16-2012 preliminary data sw

SUB DIST	Foggy Bay	Cat & Dog Island	Lower Cordova Bay (11/21)	East San Fernando	Uljika Bay	Bianquiza Islands	Palisades Islands	St. Nicholas N. Lulu	Port Alice	Cone Is. North	Cone Is. S. Paloma	Warren Island	Port Santa Cruz	NW Dall Island	TOTAL
GHL	101-23-001	101-005	102-10, 103- (11/21)	103-60-001	103-70-001	103-70-005	103-70-006	103-70-007	103-90-002	103-50-005	(103-50)004-351-006	(103-90)105-41,43,50-005	104-30-002	104-20(30)-003	
October 7	39,400	42,700	22,600	33,200	10,200	46,400	138,100	147,700	14,900	106,900	134,000	27,700	50,000	20,300	834,100
October 14	7,946	3,620	0	3,934	0	0	24,593	0	0	0	18,661	0	0	0	58,754
October 21	5,228	0	0	8,066	0	0	32,257	0	0	0	10,899	0	0	0	57,857
October 28	0	0	0	15,851	0	0	41,891	0	0	0	18,825	0	0	0	76,567
November 4	0	0	0	Closed	0	0	42,223	16,175	0	0	23,269	0	0	0	84,487
November 11	0	0	0	0	0	0	Closed	21,792	0	0	20,751	0	0	0	44,336
November 18	2,520	2,163	0	9,867	0	22,057	0	28,167	0	6,070	14,197	0	0	0	59,130
November 25	0	0	0	0	0	0	0	0	0	0	Closed	0	0	0	55,858
December 1-2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
December 8-9	0	7,877	0	8,066	0	21,196	0	63,281	0	2,614	Closed	0	7,091	0	100,192
December 15-16	9,546	12,424	0	0	0	Closed	0	Closed	0	31,627	0	0	18,896	23,850	83,482
December 22-23	Closed	Closed	0	0	0	0	0	0	0	0	0	0	0	Closed	43,203
December 29-30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
January 5-6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
January 12-13	0	0	0	0	2,838	0	0	0	0	0	0	0	0	0	0
January 20-21	0	0	18,524	0	0	0	0	0	0	0	0	17,570	0	0	20,408
January 26-27	0	0	0	0	0	0	2,080	0	0	0	0	0	0	0	20,604
February 2-3	0	0	0	0	0	0	0	0	0	47,113	0	0	0	0	47,113
February 9-10	0	5,087	0	0	0	0	0	0	0	21,007	0	0	0	0	29,454
February 16-17	0	Closed	0	0	9,228	0	0	0	0	Closed	0	0	0	0	9,228
February 23-24	0	0	0	0	Closed	0	0	0	6,316	0	0	4,995	0	0	11,311
March 9-10	0	0	0	0	0	0	0	0	10,647	0	0	0	0	0	10,647
March 15- 17	0	0	0	0	0	0	0	0	Closed	0	0	5,387	0	0	5,387
GHL TAKEN	37,569	36,436	23,611	27,851	13,758	47,473	140,964	139,282	20,546	107,040	125,775	37,767	46,748	23,850	828,670
% LEFT	1,831	6,264	(1,011)	5,349	(3,558)	(1,073)	(2,864)	8,418	(5,646)	(140)	8,225	(10,067)	3,262	(3,550)	5,430
	5%	17%	-4%	19%	-26%	-2%	-2%	6%	-27%	0%	7%	-27%	7%	-15%	1%

* Did not pass PSP testing
 ** water quality sampling not done
 *** PSP samples not taken
 Does not include Catches outside of the Ketchikan management area

2022

Attention BOF COMMENTS
 Boards Support Section
 Alaska Dept. of Fish and Game
 PO Box 115526
 Juneau, Alaska 99811-5526

RE: Proposal #166-Fishing Seasons for Registration Area A—OPPOSE

I DENNIS POLLOCK a resident of Kasaan, Alaska, do oppose proposal #166. I oppose it as it will further affect the low levels of Dungeness crab in district #2.

Since the summer commercial Dungeness crab fishery in district #2 I find it impossible to get my customary and traditional levels of crab. With the already low levels of Dungeness crab in district #2, specifically Kasaan Bay, Skowl Arm, Polk Inlet and Twelve Mile Arm and with the high cost of fuels I cannot get my much needed crab. You must let this fishery "Sunset" and not reopen it. Should you open this district to summer Dungeness fishery it will not only be bad for subsistence users but also for the commercial industry in general.

I cannot get my level of crab since the Summer Dungeness crab fishery was opened in District #2 using the same pots, same type of bait and setting in the same areas. I can only get about 20 % of what I use too get!

A Summer Dungeness fishery in District #2 will further damage the already low levels of Dungeness crab. Both the laws and the state constitution say that "all resources will be managed in a sustainable yield" and this fishery Proposal #166 does not do that.

Respectfully,



Signature

DENNIS POLLOCK

Name

P.O. Box KXA KASAAN

Address

907 738 3066

Phone # (optional)

E-mail (optional)

	183	184	185	187	188	189
Equal share set	X	X				
SARDFA sets season start	X	X - SARDFA also sets ending date		X		
Core/non core fishing regime	X					
Preseason weekly poundage set	X	X	X - Weekly poundage set to last entire year	X	X	X
Preseason registration	X	X				
Weekly registration	X - Weekly choose poundage and area with ADF&G pro-rating	X - Weekly choose poundage and area with ADF&G pro-rating		X - Weekly choose sub area to fish - ADF&G sets trip limit	X - divers choose single harvest day	
When divers can fish	harvesters can fish any DEC approved days	harvesters can fish any DEC approved days		harvesters can fish any DEC approved days	harvesters can fish one of the DEC approved days	

**Board of Fisheries Southeast/Yakutat Shellfish Meeting
January 15-21, 2012 - Petersburg, Alaska
Public Testimony Sign Up List**

Number	Name/Organization	Representing	Subject
1	Greg Fisk	Self	Proposal 169, 171 and 177
2	Steve Thynes	Self	Proposal 154
3	Gerry Merrigan	Self	Proposal 154
4	Brennon Eagle	Self	Proposal 168 – 175, Proposal 146
5	Don Koenigs	Self	RC 14
6	John Hoag	Self	Designate a personal use area for harvesting shellfish
7	Ronald Leighton	Organized Village of Kasaan	Proposal 166
8	Julianne Curry	PVOA	PC 10 – shellfish proposals
9	Jeffrey Bell	Organized Village of Kasaan	Proposal 166, PC12
10	Kathy Hansen	SEAFA	PC 25, RC 12, RC 13, Dungee Crab, K&T crab and shrimp comments
11	Phil Doherty	SARDFA	Miscellaneous Shellfish proposals, RC19
12	Kirk Thomas	Experience AK Tours	Proposal 147
13	Joe Willis	Self	Dungeness
14	Stan Malcom	SEAGO	Speaking to proposal 154
15	William Farmer	Self	Speaking to shrimp issues
16	Casey Mapes	Yakutat AC	RC10 – comments to the board from the AC
17	Max Worhatch	Self	Proposals 161-166, 146
18	Wane Regelin	Territorial Sportsmen, Inc.	P/U king crab fishing
19	Arnold Enge	Self	Proposal 154

Board of Fisheries Southeast/Yakutat Shellfish Meeting
 January 15-21, 2012 - Petersburg, Alaska
 Public Testimony Sign Up List

Number	Name/Organization	Representing	Subject
20	Yancey Nilsen	Self	Proposal 155
21	Otto Florschutz	Self	Proposals 174, 168, 170, 171, 146, 161-163, 145
22	Alan Reeves	Self	Pot Shrimp Task Force
23	Ladd Norheim	Self	Proposals 148, 152, 153, 155
24	Jeremy Jensen	Self	Proposal 154
25	Mike Bangs	Petersburg AC	AC6
26	William Farmer	Craig AC	AC2
27	Clay Bezenek	Self	Crab proposal
28	Clay Bezenek	Ketchikan AC	AC7
29	Brennon Eagle	Wrangell AC	AC4
30	Mike Peterson	Juneau/Douglas AC	AC9
31	Peter Roddy	Sitka AC	AC 1

Charge for Southeast Alaska Pot Shrimp Task Force

Purpose: An advisory industry group to provide direction and assistance to ADF&G on commercial pot shrimp management issues including:

1. Long-term management goals and plans
2. Research plans
3. Stock Assessment and data collection
4. Management issues such as fleet capacity

The intent of this Task Force is to address commercial pot shrimp fishery management issues and is not to be a forum for allocation.

Task Force Structure: A committee of twelve commercial pot shrimp permit holders from the following communities.

- Petersburg – one
- Craig – one
- Sitka – two
- Wrangell – two
- Ketchikan – two
- Northern Southeast At Large* - two
- Southern Southeast At Large+ - one
- Out of Southeast Alaska# - one

Task Force Membership: Membership will be filled by interested permit holders chosen at a community meeting of permit holders from that community. The At-Large seats will be done by a letter sent to the permit holders in the communities for each at large seat. After interested members sign up by date specified in letter a ballot will be sent to the permit holders for that at large seats for the original election & seating of task force members. The task force will develop at an organizational meeting length of term for task force members, whether alternates will be used for the committee, election of officers, how & why a member of the task force may be replaced and how member will be appointed in the future.

Meeting Schedule: Post season meeting in person and a pre-season teleconference. Meetings will be held on a rotational schedule among centrally-located communities to be chosen by Task Force members. Other meetings and teleconference could be scheduled as needed. Task Force members are responsible for their own expenses to attend the meetings.

The Task Force will maintain contact to the Board of Fisheries by reports to Board of Fisheries member _____.

Dated: January _____ 2003
Sitka, Alaska

Ed Dersham, Chairman

January 16, 2012

Gerry Merrigan, Box 1065, Petersburg

Re: IPHC estimates of halibut bycatch in SE crab pot fisheries

The IPHC has not changed the estimate for halibut bycatch in crab pot fisheries in Area 2C since 1987 (303,000 net lbs/yr). During public testimony, the question arose as to how the IPHC calculated that bycatch estimate. The IPHC staff would be the most qualified to answer that question. However they are not present at the BOF meeting. It appears that the bycatch estimate is based on previous research (1981) that indicated that side-loading pots (squares) caught 1.43 halibut per pot lift with an average weight of 16.1 pounds/halibut and top-loading pots caught 0.04 halibut per pot lift with an average weight of 6.0 pounds/halibut. So the bycatch estimate by gear type would be:

(Number of pot lifts) X (Number of halibut/pot lift) X (avg. weight halibut) = bycatch estimate

The average number of pot lifts in the late 1980s in the GKC fishery was 17,500 per year (Table 3.12 GKC management report). If the gear composition was 75% squares and 25% cones, then:

Squares: 13,125 pot lifts X 1.43 halibut/pot lift X 16.1 pounds =	302,177 pounds bycatch
<u>Cones: 1210 pot lifts X 0.04 halibut/pot lift X 6 pounds =</u>	<u>290 pounds bycatch</u>
Total:	302,467 pounds bycatch

However in recent years (2007-11), the average number of pot lifts is just under 11,000/year. With a gear composition of 89% cones and 11% squares, and using the same methodology:

Squares: 1210 pot lifts X 1.43 halibut/pot lift X 16.1 pounds =	27,858 pounds bycatch
<u>Cones: 9790 pot lifts X 0.04 halibut/pot lift X 6 pounds =</u>	<u>2350 pounds bycatch</u>
Total	30,208 pounds bycatch

If this is the methodology used by the IPHC then the bycatch estimate used by the IPHC (303,000 net lbs) may be overestimating current bycatch in this fishery by a factor of ten (based on this method). This is due to the change in number of pot lifts and the change in gear composition. It is also not clear why the IPHC does not adjust bycatch estimates for changes in relative halibut biomass.

Substitute Language for Proposal 139

Submitted by Alaska Department of Fish and Game at the request of Chair Johnstone.
January 16, 2012

Chapter 02. Subsistence Shellfish Fishery;

Chapter 47. Southeast Alaska Area.

Chapter 77. Personal Use Shellfish Fishery.

The following sections are amended to read:

5 AAC 02.199. Subsistence bag and possession limits.; 5 AAC 47.036(d). Prohibitions.; 5 AAC 77.630. Prohibitions.; and 5 AAC 77.699(d). Prohibitions. The bag and possession limits for shellfish in the subsistence, personal use, and sport fishing are not cumulative. For the purposes of this subsection, this means that a person who has harvested a bag limit or a portion of a bag limit of a particular species under a subsistence, sport, or personal use season, may not, after that, harvest any additional shellfish of that species on the same day.