

# On Time Public Comment List

## Alaska Peninsula/Aleutian Islands Finfish Regional Meeting

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# On Time Public Comment List

## Alaska Peninsula/Aleutian Islands Finfish Regional Meeting

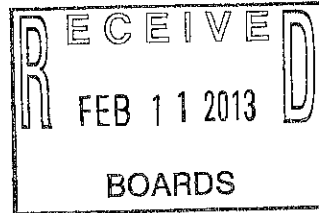
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February 8, 2013

Aaron Schrier  
1320 Holly Dr.  
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SN 60507



ADF&G  
Board Support Section  
Naknek/Kvichak Section

**RE: Proposal 250; Bristol Bay Permit Stacking**

Dear Alaska Board of Fisheries,

I have set netted in Bristol Bay for 14 years, my family has set gill netted in Alaska my entire life, and this letter is in response to Proposal 250 – 5 AAC 06.331. I support permit “stacking” in Bristol Bay, but for the entire bay, not just certain sections. A set net permit works in any of the districts and I don't like the idea of different districts having “special” permit regulations. I think all of the districts should be treated equally. I would be very concerned if some districts gained privileges and others did not – This could have unforeseeable consequences and generate future problems.

I do not support proposal 250. I do support stacking permits, but only for the entire Bristol Bay, not just Egegik and Ugashik. I could support proposal 250, if the other districts of the bay were written in as well.

Thank you for your time,

Aaron Schrier



I support proposal 260

I have setnetted on the Naknek River all my life. All rivers in Bristol Bay that want permit stacking for setnetters should be allowed to do so. Its good for the economy good for the fishermen even good for ADF&G. Please consider what the majority of the people and AC Committees are asking for. Proposal 17 which was adopted in 2009 performed and achieved everything we as setnetters wanted and you as board members expected. Allowing permit stacking where its wanted just makes sense, its good for Bristol Bay and the people who fish there.

Thank you

Ben Mack crew member

part owner permit 504T05617G



Bart M Meyer  
PO Box 1785  
Sitka, AK 99835

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(907)747-5517

February 9, 2013

ATTN: BOF COMMENTS  
Boards Support Section  
ADFG  
PO Box 115526  
Juneau, AK 99811-5526

Members of the Board:

I am an Alaska resident of 54 years and have set net fished the Kvichak Section since 1977. When the Kvichak Section was closed, I fished both the Alagnak River Special Harvest Area and Naknek River Special Harvest Area fisheries. I have participated in the BOF regulation process in the past.

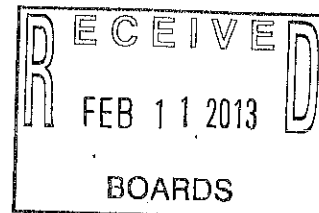
I am writing in regards to Proposal 250 which would amend 5 AAC 06.331 to allow a CFEC permit holder to operate up to four set gillnets in the Ugashik and Egegik Districts on permanent basis.

I am opposed to Proposal 250 as written.

However, I do support allowing a CFEC permit holder to operate up to four set gillnets in all districts of Bristol Bay (special consideration might be warranted in Togiak, given the special harvest considerations already in place for that fishery.) The reasons submitted by Alaska Board of Fisheries in support of Proposal 250 are the same reasons that were submitted by others during the December, 2012 Bristol Bay Finfish meeting.

I am particularly troubled that the Board would consider, and actually submit this proposal, out of cycle giving special consideration to Egegik and Ugashik District "dual permits". In order for the public to have adequate opportunity to provide input on this proposal, it should have been considered in December, 2012 (just three months ago) with all of the other Bristol Bay proposals, so that the reasons for treating Egegik and Ugashik different than the other districts could be understood.

As I long time set netter, I agree that holding two permits can allow for adequate fish opportunity in poor fish return years and in years when processor limits affect market. In my opinion, one CFEC permit holder operating two permits would not adversely affect fishery management, allocation, or displacement of local ownership.





I strongly encourage the Board to allow "dual set net permits" in all districts of Bristol Bay and not approve Proposal 250 as written. To deny this opportunity in the Naknek/Kvichak, Nushagak and Togiak Districts, while allowing it in Egegik and Ugashik Districts would be patently unfair for the other district set net permit holders.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bart M. Meyer".



To: Board of Fish - Support Section

FAX # 907-465-6094

Concerning set-net "permit stacking" proposal  
# 022-613 (Egegik/Ugashik districts)

My fishing history in ALASKA goes back to my Grandfather Joe Leman who had his privately owned fish trap (7-800' long) in Ninilchik.

My Dad (Nick) and brothers also fished their own traps until forced to go set-netting or drifting after "Statehood".

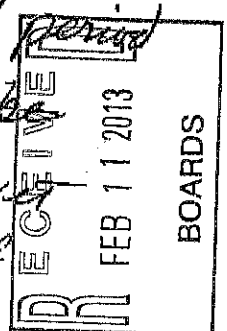
My family (immediate family), like many others run into problems keeping our salmon permits "in the family" as our kids sometimes must leave the fishery due to demands of a new career.

Sometimes this "leave of absence" is temporary, sometimes longer.

Now, I have a grandchild (Caleb) who will next year be old enough to join the family tradition next year.

Thankfully, due to the 3-year trial period in the NAKNEK (Kvichak district, I will be able to (permit stacking) our other set-net permit may be transferred to grandson, if necessary.

→ p. 2





P.2 - MARK LEMAN'S COMMENTS  
 ON Retaining dual permits (set-net)  
IN NAK / Kvi. districts

PC 24  
2 of 2

Local families set-netting in Cook Inlet,  
 B. Bay, Y-K, and elsewhere in ALASKA. have  
 been a "mainstay" to supporting local economies,  
 social support, traditional values, and other  
 values that were of concern when limited Entry  
~~was~~ first enacted here in ALASKA.

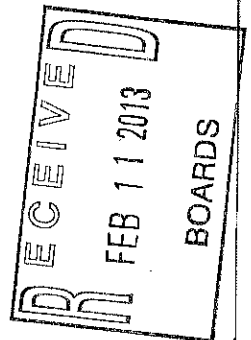
What could be more important than  
 keeping fishing permits in families / communities /  
 economically disadvantaged regions (of ALASKA) ???

I urge the Board to seriously  
 consider retaining this provision in  
 the NAK / Ruichak district

- MARK LEMAN  
 LOT 5 BIK 2  
 NAKNEK, ALASKA

- AND FAMILY SHELLE, ERIC, HAVI, CHIEL, JENNY,  
 JUSTIN

- AND BROTHERS LOREN, WAYNE LEMAN  
 AND their siblings w/ set-net permits  
 (Cook Inlet)



907-465-6024



PC 25  
1 of 1

Feb 11, 2013

TO: ALASKA Dept of Fish & Game  
BOARD of Fish.

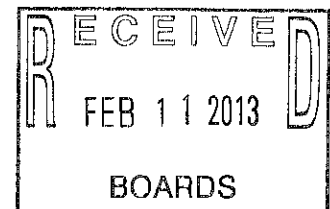
From: Aiyling SUN, KEN BOZINOFF

Re: set back PERMIT STACKING

THE ABILITY TO OWN AND OPERATE TWO PERMITS HAS ALLOWED US TO INCREASE OUR INCOME ENOUGH TO COVER THE COSTS OF REMAINING IN REBBIK YEAR ROUNDS AND HAS COVERED THE HIGH COSTS OF TRANSPORTATION, FUEL AND SUPPLIES TO OPERATE OUR SITES. IF YOU TAKE IT AWAY IT WILL COST US A SIGNIFICANT AMOUNT OF MONEY.

SINCE YOU ENCOURAGED US TO PURCHASE A SECOND PERMIT IN THE FIRST PLACE, I WONDER ABOUT THE LEGAL RAMIFICATIONS.

Aiyling Sun  
Ken Bozinoff





Kevin Schrier  
7030 NW Churchill Way  
Corvallis, OR 97330  
Permit #SN60602  
February 8, 2013

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

Comments on setnet permit stacking in Egegik and Ugashik (and beyond).

I am strongly in favor of permit stacking. I think it allows participants the opportunity to make a living wage. That said, I am strongly opposed to "cherry picking" particular districts in which to allow stacking. I think this is an "all or none" issue and should be treated as such -- it would be patently unfair to allow Egegik and Ugashik dual permits and not the other districts.

The fact that your Board would introduce a proposal to consider permit stacking anywhere is encouraging; I think this implies that at some level you think it's a good idea. That it would only introduce it for Egegik and Ugashik is troubling; I can't help but feel this implies some powerful lobbies have tied your hands in the other districts.

I encourage you to revisit the setnet stacking issue on a "global" level and give this option to ALL districts in Bristol Bay.

Sincerely,

A handwritten signature in black ink that reads "Kevin Schrier". The signature is written in a cursive style and is positioned above a horizontal dashed line.

Kevin Schrier

FEB 11 2013



I support proposal #250 just as I supported proposal #44 in 2012 and proposal #17 in 2009. My name is Jacob Mack I have fished the Naknek River all my life. In our area there has been a renewed interest in setnetting during the three years permit stacking has been allowed. It has given us a chance to make a living, we now hire two crew members from Bristol Bay. Permit stacking works in our area. Any river system in Bristol Bay that supports permit stacking should be allowed to do so. Please consider this proposal. Please consider including all eastside districts

Thank you

Jacob Mack

504 656493

504 656176



**Policy Implications of Recent  
Genetic Stock Identification (GSI)  
Studies to Area M Salmon Fisheries**

**Comments to the  
Alaska Board of Fisheries**

**Area M Seiners Association  
Aleutians East Borough**

**February 2013**



## Executive Summary

The Area M Seiners Association and the Aleutians East Borough (AEB) have thoroughly reviewed new genetic stock identification (GSI) information made available by the Western Alaska Salmon Stock Identification Program (WASSIP) studies. Stock composition estimates of some non-local sockeye and chum stocks are substantial, as expected in these historic fisheries. However, newly available estimates of harvest rate, which for the first time allow for a direct evaluation of mixed stock harvests against total run size of non-local stocks, indicates that the Area M fisheries pose no significant, or even measurable, threat to the sustainability of those non-local stocks.

Current regulatory fishery management plans for the South Peninsula June fishery, the Northern District fishery, the South Peninsula Post-June fishery, and the Southeastern District Mainland (SEDM) fishery have all been developed in compliance with the Sustainable Salmon Fisheries Policy, the Mixed Stock Salmon Fisheries Policy, and statutory Allocation Criteria. Information from WASSIP, and from a smaller genetics study in the SEDM, provides no evidence that the existing regulatory plans need to be changed.

The Area M Seiners Association and the Aleutians East Borough oppose Proposals 179-183 that seek to further restrict the South Peninsula June fishery. Area M Seiners and AEB also oppose Proposals 201-205 and 208 that seek to further restrict the Northern District fishery. Further, the groups oppose Proposals 209-210, and advise caution in evaluating any potential action under Proposal 211.

The WASSIP studies have provided new and important information about the harvest of sockeye and chum salmon throughout western Alaska. Results showing very low impacts on non-local stocks by the various Area M salmon fisheries are positive affirmation of the value and validity of current regulatory management plans.

## Overview

Commercial salmon fisheries have been pursued in the Alaska Peninsula and Aleutian Islands since the beginning of the previous century. Many of the harvests are known to be of migrating fish, on their way from ocean feeding grounds to spawning areas around the North Pacific. Of particular note are the harvests of sockeye and chum salmon in the South Alaska Peninsula June fishery, as well as portions of the harvests of sockeye salmon in the Northern District fishery of the North Peninsula and in the Southeastern District Mainland fishery.

These directed harvests on passing fish have been approved by the federal and territorial governments and by that of the State of Alaska for decades; they support the fishing economy of an entire corner of Alaska comprising the eastern Aleutian Islands and the Alaska Peninsula.

There continuously arise, however, persistent objections to these historic fisheries from participants in sockeye and chum salmon fisheries in other portions of the state, particularly in the Arctic-Yukon-Kuskokwim (AYK) region, the Bristol Bay region and, on occasion, the Chignik area. Oftentimes these objections have been couched in terms of dramatic conservation concerns; rarely has it been acknowledged that these are largely allocative rather than biological issues.



Various tagging studies, since the early twentieth century, have identified generally what stocks are harvested in these fisheries, but they could not reliably determine how many fish were being harvested from each stock.

In the mid-1990s, an allozyme-based genetic stock identification (GSI) study provided more specific information about the proportion of the harvests in the South Peninsula June and Post-June fisheries that were attributable to specific spawning stocks. But, these early GSI studies provided only stock composition information (i.e., stock-specific harvest divided by total fishery harvest). Without a comparison of these stock-specific harvests to the total stock size of the various spawning populations, there was no direct way to ascertain whether or not these mixed stock harvests had any biological or conservation effect, or even any noticeable effect at all.

Late in 2012, the Alaska Department of Fish and Game (ADF&G) provided the results of a massive and modern GSI study on sockeye and chum salmon harvests from all coastal fisheries in the Chignik area, the South Alaska Peninsula, the North Alaska Peninsula, the Bristol Bay area, and the AYK region. This Western Alaska Salmon Stock Identification Program (WASSIP) study is significantly superior to previous efforts for a number of reasons: 1) use of up-to-date genetic techniques, involving single nucleotide polymorphism (SNP) markers, 2) compilation of comprehensive sockeye and chum salmon spawning stock baselines, 3) conduct of massive sampling efforts in all pertinent fisheries, and 4) use of improved statistical techniques to determine reliable estimates, and potential error, of stock composition of the harvests.

But perhaps the most significant aspect of the WASSIP studies is the provision of estimates, and potential error, for total run, or stock, size of the various sockeye and chum salmon stocks involved. This is not a trivial addition; in fact, this is the first time that ADF&G has provided comprehensive estimates of total run size for most of these areas in western Alaska. And, it is these estimates of total run size that provide context for understanding the effects, if any, of the stock-specific harvests in the various mixed stock fisheries.

The resulting estimates of harvest rate (stock-specific harvest divided by total run size) give, for the first time, an indication of whether or not the mixed stock fisheries in Area M and elsewhere are having any potential biological effect on any particular stock.

In addition to the WASSIP studies, ADF&G has also published a smaller GSI project conducted in 2010-2012 on the Southeastern District Mainland (SEDM) fishery. This work provides only estimates of stock composition, rather than the more complete suite of run size estimates and harvest rates, but stock composition for the SEDM fishery can be used to assess the applicability of the existing regulatory allocation plan.

In this set of comments the implications of new insights into the stock composition and harvest rates of the major Area M fisheries will be explored with regard to existing fishery management plans. In particular, the various proposals for changes to management plans for the South Peninsula June fishery and the Northern District fishery, that have been submitted to the Alaska Board of Fisheries (BOF) from user groups outside of Area M, will be evaluated against the policies under which the BOF generally operates.



Fortunately, there have been no proposals submitted from constituents outside of Area M to restrict the Southeastern District Mainland and the South Peninsula Post-June fisheries. Therefore there is limited discussion of those fisheries here.

### **Brief Review of the Fisheries**

There are four major salmon fisheries in Area M, each of which is subject to a well-established, formal regulatory management plan: the South Peninsula (South Unimak and Shumagin Islands) June salmon management plan (5 AAC 09.365), the Northern District salmon fisheries management plan (5 AAC 09.369), the Post-June salmon management plan for the South Alaska Peninsula (5 AAC 09.366), and the Southeastern District Mainland salmon management plan (5 AAC 09.360).

All of these salmon fisheries focus primarily upon sockeye salmon, and much of the harvest is upon migrating stocks. Chum salmon are also an important component of the South Peninsula June and Post-June fisheries. In the June fishery these chum salmon are generally from migrating stocks and within recent decades, as a result of significant advocacy from constituents outside of Area M, fishermen have been required to, or have decided to voluntarily, restrict their harvests of chum salmon.

All of these fisheries are longstanding, and important to the region. Pertinent harvest numbers are listed in Table A, and illustrated by fishery in Figures 1-4.

#### South Peninsula June fishery

Harvest records for the South Peninsula June fishery go back to at least 1911. It has long been recognized that a large proportion of the sockeye salmon harvested are of Bristol Bay origin, but the fishery has been promoted and maintained in order to provide an economic base to the Alaska Peninsula region and to provide early, high quality fish to market.

The area available to Area M fishermen is only a portion of the Alaska Peninsula/Aleutian Islands management area, limited to waters east of Scotch Cap on Unimak Island, rather than extending along the hundreds of miles otherwise included in Area M out the Aleutian Chain. Also, there are various gear restrictions and, of course, limited entry that restrict the total amount of fishing effort that can be imposed. The result is a very low intensity fishery that is spread across a large number of stocks, many of which are traveling to spawning grounds hundreds of miles away.

In 1975, as a result of overall declines of the Bristol Bay sockeye run, the South Peninsula June fishery was further limited to an annual guideline harvest level (GHL) of 8.3% of the preseason, inshore forecast of harvests in the Bristol Bay area. Reportedly, this allocation was derived simply as a prorated share of the total Bristol Bay harvest, based upon relative participation levels between Area T and Area M.

The difficulty with basing an allocation on a preseason forecast of harvest is that such forecasts are routinely incorrect; worse yet, for many years the Bristol Bay preseason forecast was biased substantially low compared to the subsequent actual annual harvest. In effect, for a couple decades, the Area M fleet was not provided with full opportunity to harvest its share of the Bristol Bay sockeye run during June.

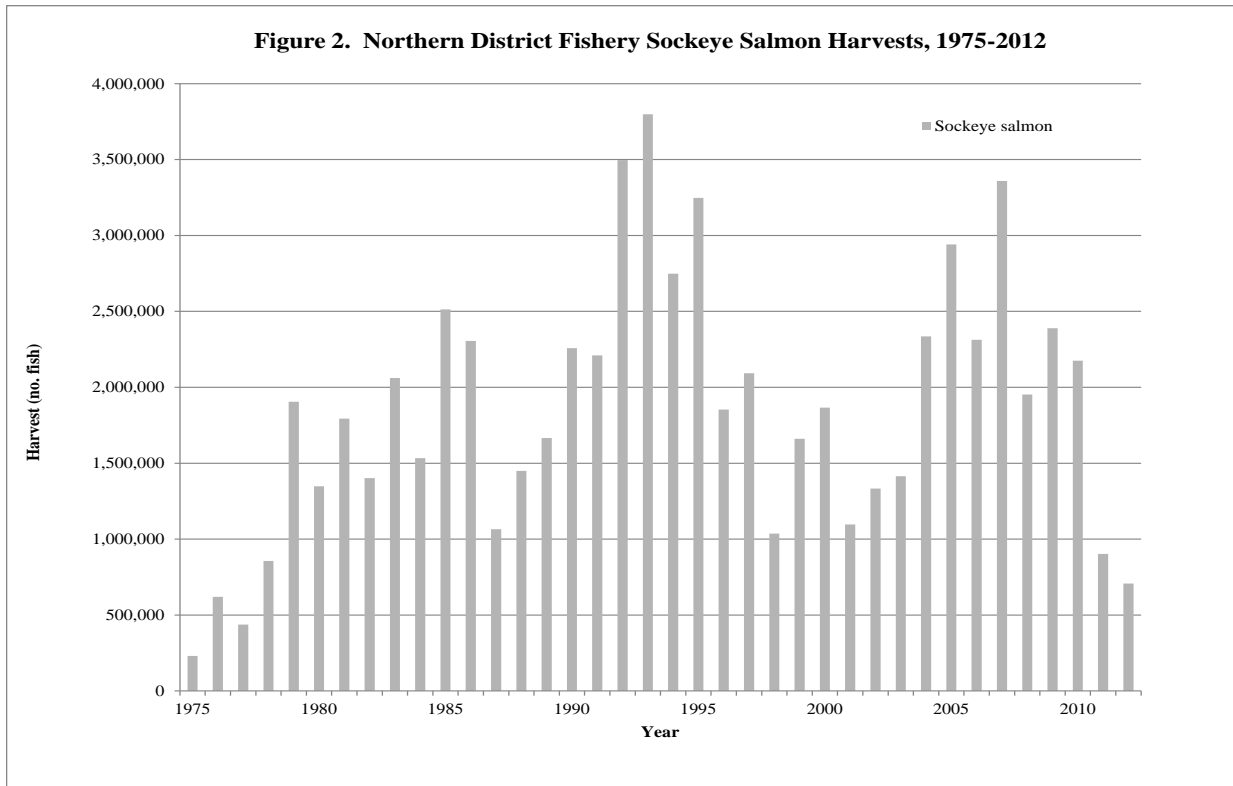
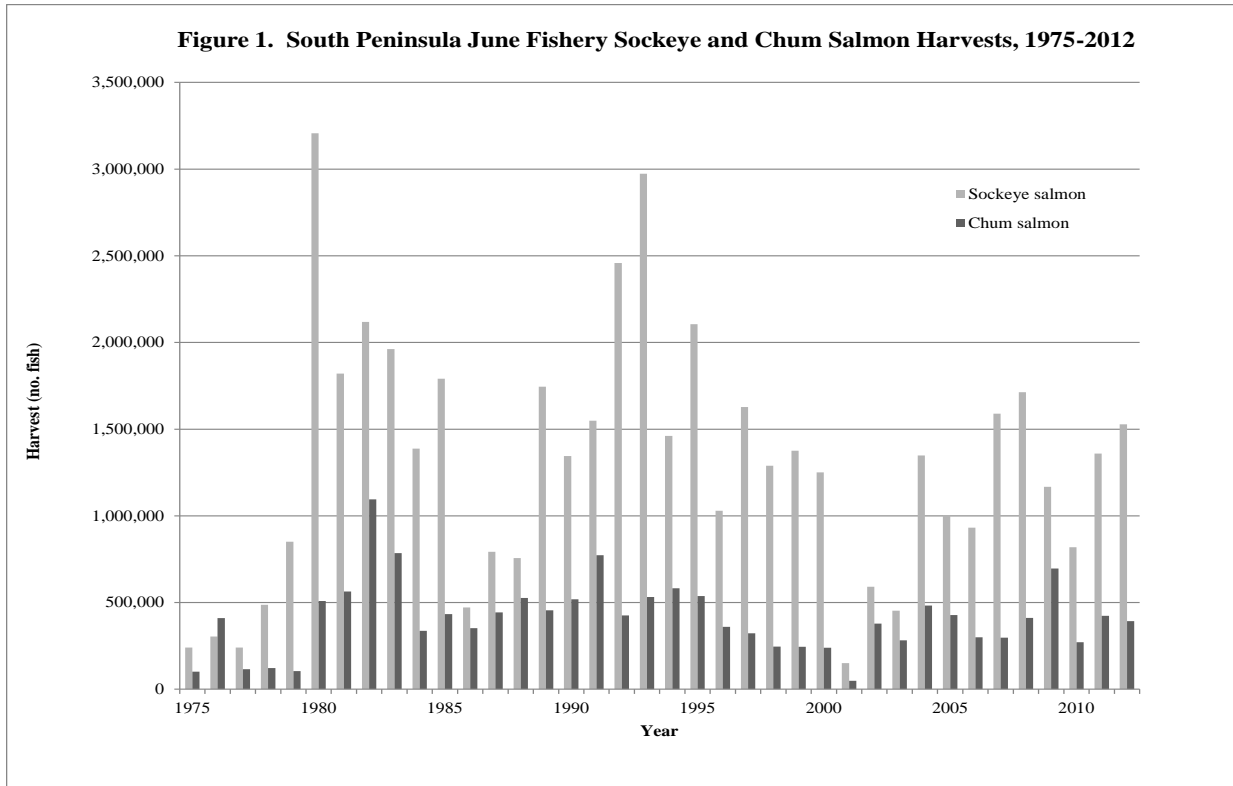
Beginning in 1986, after a couple years of unusually high chum salmon catches, the South Peninsula June fishery was also limited to an annual cap on chum harvests. This was out of consideration for potential

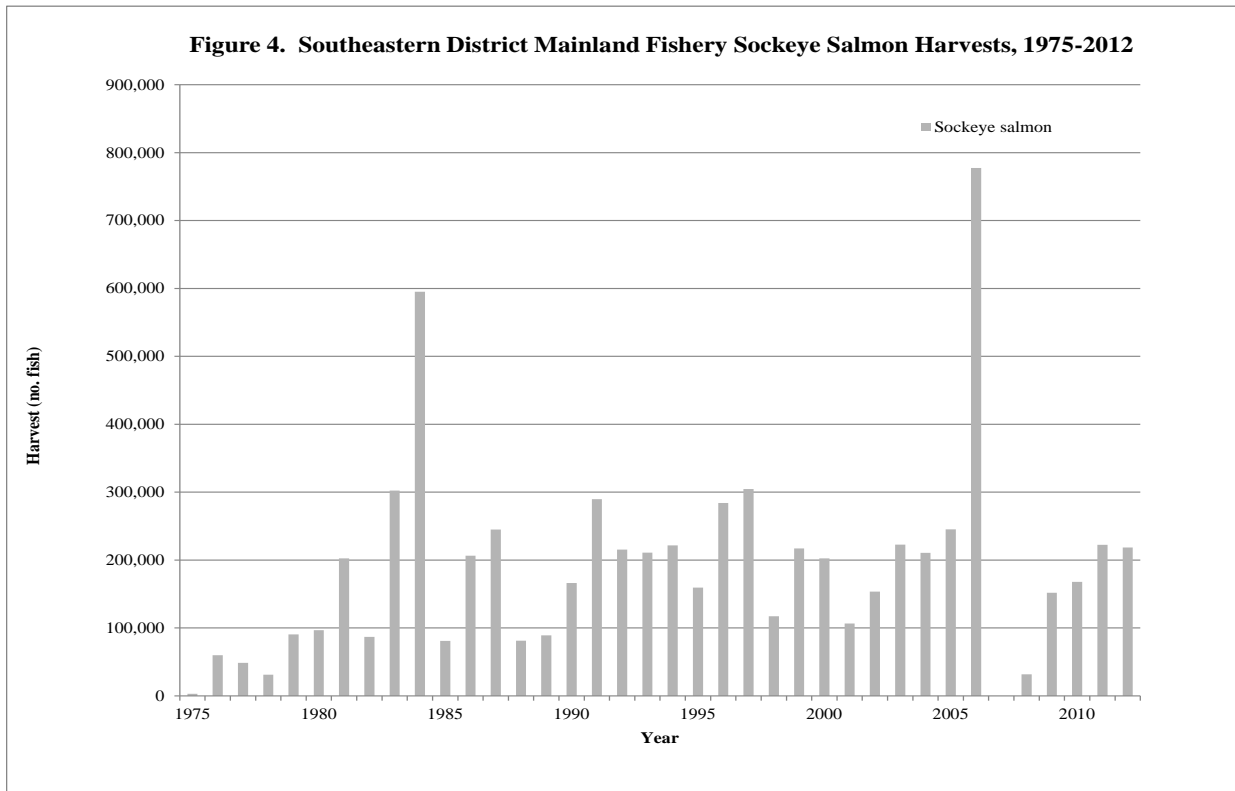
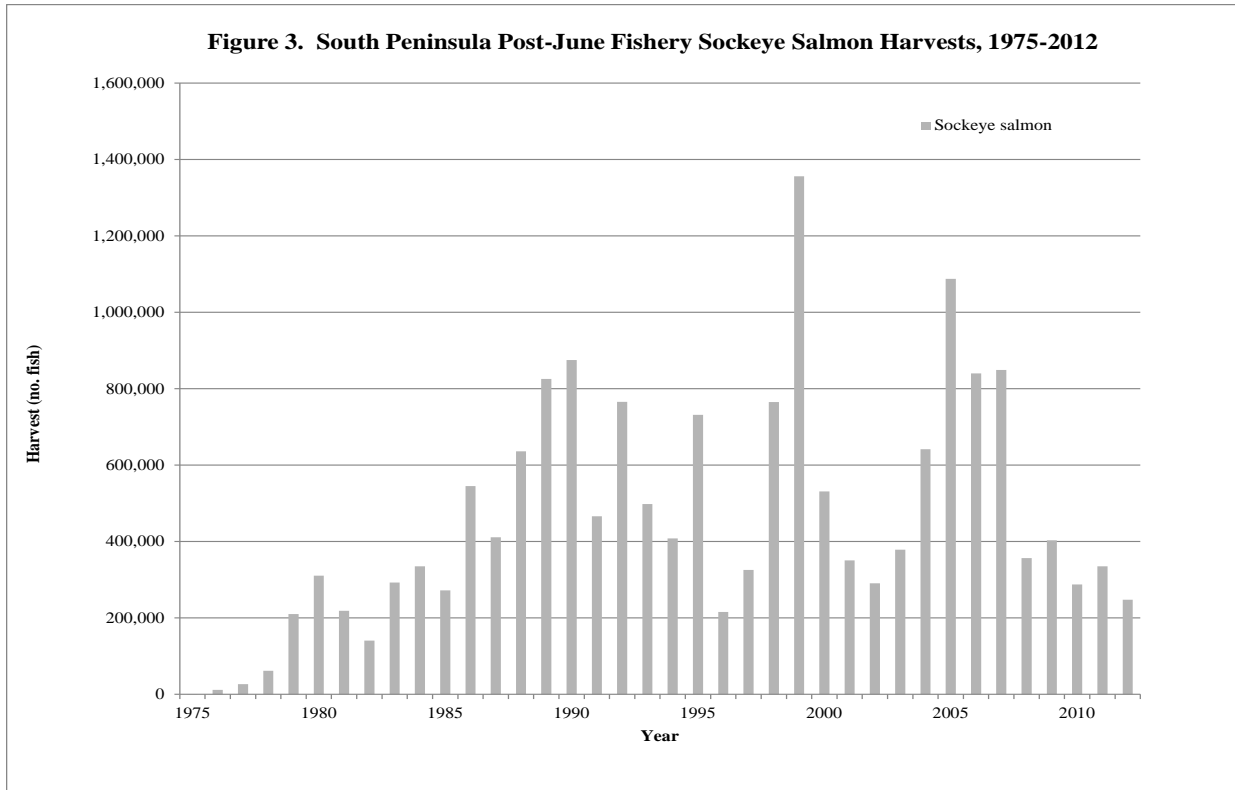


Table A. Salmon harvests (no. fish) for major Area M fisheries, 1975-2012.

Year	South Peninsula June			Northern District	S. Pen. Post-June	SE District Mainland
	Sockeye	Chum	S:C ratio	Sockeye	Sockeye	Sockeye
1975	240,099	100,822	2.4	230,339	293	3,156
1976	303,584	410,270	0.7	620,390	11,674	59,844
1977	240,719	115,996	2.1	437,406	26,545	48,589
1978	486,811	121,892	4.0	856,551	61,379	31,197
1979	851,351	104,103	8.2	1,905,270	209,755	90,658
1980	3,206,275	508,865	6.3	1,347,748	310,278	96,665
1981	1,820,965	563,947	3.2	1,793,315	218,667	202,540
1982	2,118,701	1,095,044	1.9	1,401,537	140,487	86,793
1983	1,961,569	785,631	2.5	2,060,687	292,536	302,387
1984	1,388,203	337,120	4.1	1,533,112	334,781	595,044
1985	1,791,400	433,829	4.1	2,512,954	272,059	80,957
1986	471,397	351,769	1.3	2,305,445	545,160	206,532
1987	792,964	443,019	1.8	1,065,094	410,755	244,895
1988	756,687	526,711	1.4	1,449,656	635,804	81,160
1989	1,744,505	455,163	3.8	1,665,411	825,372	89,224
1990	1,344,529	518,545	2.6	2,258,027	875,237	166,322
1991	1,548,930	772,705	2.0	2,210,179	465,874	289,727
1992	2,457,856	426,203	5.8	3,496,458	765,575	215,444
1993	2,973,744	532,247	5.6	3,798,096	497,933	210,927
1994	1,461,263	582,165	2.5	2,748,282	408,089	221,657
1995	2,105,321	537,433	3.9	3,247,514	731,651	159,381
1996	1,028,970	359,820	2.9	1,853,017	215,721	284,076
1997	1,628,181	322,325	5.1	2,092,556	325,261	304,629
1998	1,288,725	245,619	5.2	1,036,237	764,947	117,131
1999	1,375,399	245,306	5.6	1,660,269	1,355,842	217,026
2000	1,251,228	239,357	5.2	1,866,436	530,913	202,435
2001	150,632	48,350	3.1	1,096,286	350,517	106,607
2002	591,106	378,817	1.6	1,333,030	290,657	153,469
2003	453,147	282,438	1.6	1,414,223	378,410	222,651
2004	1,348,073	482,309	2.8	2,335,359	641,326	210,545
2005	1,004,395	427,830	2.3	2,941,247	1,087,549	245,153
2006	932,291	299,827	3.1	2,312,642	840,225	777,513
2007	1,589,840	297,539	5.3	3,359,425	848,832	0
2008	1,713,575	410,932	4.2	1,952,460	356,456	31,669
2009	1,167,918	696,775	1.7	2,389,542	403,187	151,765
2010	818,865	271,700	3.0	2,175,173	287,491	167,756
2011	1,359,441	423,335	3.2	903,081	334,883	222,515
2012	1,528,018	392,305	3.9	707,015	247,246	218,601

Notes: South Peninsula June harvests, and sockeye:chum (S:C) ratios, are from ADF&G, FMR 12-42, Appendix B21.  
 Northern District harvests are from ADF&G, FMR 12-51, Table 4.  
 Southeastern District Mainland (SEDM) harvests are from ADF&G, FMR 12-42, Appendix C7.  
 South Peninsula Post-June harvests exclude SEDM, and are from ADF&G, FMR 12-42, Appendix D10.







effects on chum salmon fisheries in the AYK region. Interestingly, and unfortunately, the premise of this limitation was an incorrect assumption that the effects would be largely on the Yukon fall chum run, which had been weak in recent years. Subsequent GSI work, both in the mid-1990s and more recently in WASSIP, has shown that Yukon fall chum salmon are almost non-existent in the June fishery chum catches.

Management of the June fishery under the combined sockeye GH/L and chum cap proved challenging; it required hourly monitoring of catches in remote areas and comparison to multiple, sometimes conflicting objectives. Yet controversy continued, advocacy disputes between AYK/Bristol Bay interests and Area M fishermen escalated, and the department's performance in managing the sockeye GH/L/chum cap program was constantly criticized.

In 2001, the sockeye GH/L and chum cap were both eliminated, but the resulting windows and ratio management program even more drastically restricted the June fishery. As illustrated in Table A and in Figure 1, sockeye harvests plummeted immediately, even though there was no corresponding decline in the Bristol Bay run. Ironically, the ratio of sockeye salmon caught per chum salmon (S:C ratio, Table A) declined dramatically as well, indicating that this new management program was much less effective in limiting chum salmon harvests than it was in limiting sockeye catches.

In 2004, the June fishery management plan was revamped again, this time toward a simple, set fishing schedule of 88 hours beginning on June 7, interspersed with 32-hour closures, with a final fishing period of 64 hours. This management plan restored much of the sockeye harvest levels, but also maintained modest and consistent chum salmon harvests. For the past nine years, the June fishery has prospered under a simple, elegant management program that is now well-established, supported by the fleets, and meets the needs for limiting non-local sockeye and chum salmon harvests to reasonable and historic levels.

#### Northern District fishery

The commercial sockeye salmon fishery along the north coast of the Alaska Peninsula has also been prosecuted for about a hundred years. Today fishing effort is focused primarily within the several hundred mile reach from Izembek Lagoon to Port Heiden, with most deliveries being processed at the facility in Port Moller.

Management of the Northern District fishery is predicated upon assuring sufficient sockeye salmon escapement into local streams. Four of these systems have longstanding weir monitoring projects: Nelson, Bear, Sandy, and Ilnik. Other major systems, such as the Meshik and Cinder rivers, are surveyed aurally, sometimes several times per season.

While management of the fishery is directed at local stocks, it is understood and inevitable that substantial harvests are also derived from stocks of the much larger and nearby Bristol Bay run. Substantial contribution of Bristol Bay stocks to the composition of the Northern District harvest has been suspected from fishing patterns and the annual movement of fish and several tagging experiments; now it is confirmed by the WASSIP studies.

Due to the nature of the coastline in the Northern District, which does not include many embayments within which fishing can occur, the regulatory fishery management plan is based upon a practice of "dispersed management" rather than the more terminal fishery management practiced in Bristol Bay. The



benefits of dispersed management, which actually is practiced in most areas of the state, include keeping harvest pressure away from concentrations of fish as they gather near the mouths of their spawning streams. By varying the distance that the fishing fleet must maintain from the stream mouths, and by carefully allotting the amount of time available for commercial openings, managers have been very successful in meeting multiple sockeye salmon escapement goals in the area year after year.

The inevitable, and longstanding, harvest of migrating Bristol Bay stocks has engendered controversy and anxiety, similar to that for the South Peninsula June sockeye harvests. While this is unfortunate enough, the controversy has also hampered the fleet's and the department's ability to fully harvest available local stocks in the district. Only gradually have fishing areas and periods been added to the Northern District regulatory management plan in recent years, in order to directly access Ilnik River stocks, and then Meshik River stocks — but still there is not yet opportunity to access the relatively sizable Cinder River stock — all because of the ancillary harvest of fish from adjacent and substantially larger Bristol Bay stocks.

#### South Peninsula Post-June fishery

Most of the non-local stocks migrating to the west and north of Area M have passed through the South Peninsula area by July. As shown in previous tagging and GSI studies, and as confirmed by the WASSIP results, contributions of Bristol Bay sockeye and Coastal/Western Alaska chum salmon decline after the June fishery and decline further as the Post-June fishery progresses.

In the past there have been allegations that, since the June fishery does not appear to harvest many Yukon fall chum, then the Post-June fishery must be harvesting them. But, the previous allozyme GSI work and the current WASSIP studies indicate otherwise; Yukon fall chum harvests are negligible in the Post-June fishery as well.

There have been long-suspected contributions of Chignik-bound sockeye salmon to the harvest of the Post-June fishery, and the WASSIP studies confirm this established pattern. Also, in some years, there is an abundance of small, generally “immature” sockeye salmon present in the Shumagin Islands section (and the western sections of the Chignik area), which are likely to be Bristol Bay sockeye that will return to spawn in subsequent years.

The Post-June fishery management plan provides for the management of local stock escapements and for the restriction of fishing when immature salmon are abundant.

#### Southeastern District Mainland (SEDM) fishery

Sockeye salmon taken in the mainland portion of the Southeastern District of Area M have long been known to be of substantially Chignik River origin, but it has not been possible to determine very precisely what the stock composition of the harvest really is. A rudimentary tagging study in the early 1960s suggested that perhaps 80% of the harvest, at least through late July, was Chignik-bound, and this established the basis of the allocation plan within the SEDM regulations.

Thus, 80% of the SEDM harvests during the allocation period are deemed to be Chignik-bound sockeye, except those caught in the Northwest Stepovak section which contains the local Orzinski Bay run. Allowable fishing time in the SEDM is loosely tied to the annual forecast of the Chignik sockeye runs as well as to seasonal progress of Chignik area harvests. And the overall harvest of SEDM sockeye during



the allocation period is limited to an estimated 7.6% of the sockeye salmon harvest in the Chignik area. All of these components are embodied in the SEDM regulatory management plan.

### **Nature of the Proposals to the BOF**

A number of proposals have been submitted to the Board of Fisheries by constituents and groups from outside of Area M, particularly from areas in the AYK region and from Bristol Bay. These proposals aim to further restrict the harvest of chum salmon in the South Peninsula June fishery and to further restrict the harvest of sockeye salmon in the South Peninsula June and the Northern District fisheries.

Proposals 179 – 183 all look to limit fishing time, area or gear in the South Peninsula June fishery, based upon a rationale that further restriction of the fishery is needed to provide conservation of various sockeye, chum, and even stocks of other species of salmon in Bristol Bay and the AYK. The proposals are all framed, in large part, as dealing with conservation rather than allocation issues.

Proposals 201 – 205 and 208 all look to limit fishing time or area in the Northern District fishery, also based largely on assertions of the need for conservation of migrating stocks, mostly sockeye salmon moving into Bristol Bay.

These proposals for the South Peninsula June and the Northern District fisheries variously point to “stocks of concern”, “expanding mixed stock fisheries”, and other key phrases in order to invoke the Sustainable Salmon Fisheries Policy and the Salmon Mixed Stock Fisheries Policy.

No proposals have been submitted, during this cycle to the BOF, to restrict the South Peninsula Post-June or the SEDM fisheries.

### **Brief Review of New GSI Studies**

The WASSIP studies comprise the largest, most comprehensive genetic stock identification program on salmon conducted anywhere. It evaluated hundreds of thousands of samples taken from commercial and subsistence fisheries along thousands of miles of coastline for sockeye salmon (2006-2008) and chum salmon (2007-2009). As part of WASSIP, the department compared these mixed stock fishery harvests against baseline standards from hundreds of known spawning populations of sockeye and chum salmon throughout the region from Chignik, the South Peninsula, the North Peninsula, Bristol Bay, the Kuskokwim area, the Yukon River, Norton Sound, Kotzebue Sound, as well as spawning populations to the east and west of the “WASSIP area.”

Using sophisticated statistical techniques, the department was able to provide comprehensive estimates of the stock composition of the various mixed stock harvests. These estimates of stock composition provide direct information on the proportion of any fishery’s harvest that is derived from any particular stock (stock-specific harvest divided by total fishery harvest).

The resolution of the genetic techniques for sockeye salmon was highly specific, allowing for discrimination among stocks to detailed, local spawning areas (regional and subregional reporting groups). For chum salmon, the level of genetic discrimination was not quite so detailed, necessitating



geographic aggregation of some spawning populations into larger stock groupings (regional reporting groups).

Regardless of the ultimate resolution of these stock groupings, however, the information provided by WASSIP on the stock composition of the various fisheries along the coast from Chignik to Kotzebue is very useful. It generally confirms previous information on the dependence of the South Peninsula June fishery on Bristol Bay sockeye stocks, the coincident harvest of a broad range of chum salmon stocks in the June fishery, and the substantial proportion of Bristol Bay sockeye taken while pursuing local sockeye stocks in the Northern District fishery. In this regard, the WASSIP studies provide detailed but not surprising information on the stock composition of the Area M salmon harvests.

But, the real value of the WASSIP studies is the additional estimation of total stock size for the various spawning populations, and the subsequent derivation of harvest rates which describe the specific impact of Area M and other area harvests on particular sockeye and chum salmon stock groupings along the coast. While stock composition compares a fishery's stock-specific harvest to the total harvest in the fishery, harvest rates compare a fishery's stock-specific harvest to the total run size of each stock. It is only in this latter context, using harvest rates, that any information is available on potential biological effects of a fishery on any particular stock of interest.

#### Stock composition

Tables B – J provide a general summary of WASSIP results for sockeye and chum salmon harvested in the South Peninsula June fishery and for sockeye salmon harvested in the Northern District fishery. In a single view, these tables provide ADF&G's estimates for stock composition, stock-specific harvest, total run size, and resultant harvest rates of these major Area M fisheries on regional reporting groups (i.e., stock groupings) of sockeye and chum salmon in the North Pacific.

These results show no real surprises about the stock composition of these fisheries. Asia and Coastal/Western Alaska (CWAK) stocks of chum salmon constitute large proportions of the June fishery chum salmon catch (Tables B – D). Of course, the 50-60 percent stock composition of CWAK chums include fish from a wide range of spawning populations spanning a huge area from Bristol Bay, Kuskokwim Bay and Kuskokwim River, the Yukon River, and Norton Sound. And, the massive Bristol Bay stocks of sockeye salmon constitute a large proportion of the June fishery sockeye salmon catches (Tables E – G).

For the Northern District fishery, Bristol Bay sockeye stocks constitute a large proportion of the sockeye salmon harvests, although local North Peninsula stocks provide a large proportion of the harvest as well (Tables H – J).

#### Harvest rates

The truly important information provided by WASSIP are the estimates of total run size and the subsequent calculation of stock-specific harvest rates. These harvest rates, which are sometimes referred to as impact rates or exploitation rates, provide a view of harvests compared to total run size and thus provide the context for evaluating any biological effects.

Looking again at Tables B – D, the stock composition of the June fishery chum salmon harvests on CWAK chums ranges around 50-60 percent. But, because the estimated run size of CWAK chums ranges



Table B. June, South Alaska Peninsula fishery, 2007, chum salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Chum stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Asia	20.4	60,728	-	-
Kotzebue	0.4	1,265	812,275	0.1
CWAK	59.9	177,840	8,401,581	2.1
Upper Yukon	1.3	3,720	1,105,252	0.3
Northern District	0.2	718	724,126	0.1
Northwestern District	0.8	2,462	1,447,460	0.2
South Peninsula	1.1	3,281	3,200,468	0.1
Chignik/Kodiak	1.7	4,911	2,449,575	0.2
East of Kodiak	14.2	42,152	-	-
Total		297,077		

Table C. June, South Alaska Peninsula fishery, 2008, chum salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Chum stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Asia	28.6	117,105	-	-
Kotzebue	1.0	4,089	1,211,008	0.3
CWAK	52.3	214,428	6,001,760	3.6
Upper Yukon	1.7	6,861	895,238	0.8
Northern District	1.3	5,286	951,652	0.6
Northwestern District	3.3	13,715	1,333,844	1.0
South Peninsula	1.9	7,810	2,292,472	0.3
Chignik/Kodiak	3.2	13,242	1,946,912	0.7
East of Kodiak	6.7	27,574	-	-
Total		410,110		

Table D. June, South Alaska Peninsula fishery, 2009, chum salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Chum stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Asia	25.7	178,598	-	-
Kotzebue	0.4	2,471	744,622	0.3
CWAK	60.5	420,633	6,123,152	6.9
Upper Yukon	0.2	1,470	574,892	0.3
Northern District	0.8	5,509	810,528	0.7
Northwestern District	4.4	30,932	478,720	6.5
South Peninsula	1.1	7,635	2,701,080	0.3
Chignik/Kodiak	2.3	16,128	2,598,353	0.6
East of Kodiak	4.6	31,820	-	-
Total		695,196		

Notes: Stock composition data here are calculated as stock-specific harvests divided by total harvest.  
 Harvest rates are defined as stock-specific harvests divided by total run size.  
 Harvest and harvest rate data are from ADF&G SP 12-25, Tables 152-178 .  
 Total run (stock) size data are median values from ADF&G SP 12-25, Tables 4-6.  
 Total run (stock) sizes and harvest rates for Asia and East of Kodiak were not calculated in WASSIP.



Table E. June, South Alaska Peninsula fishery, 2006, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	4	76,043	0.0
Kuskokwim Bay	0.7	6,230	1,974,503	0.3
Bristol Bay	42.7	397,917	43,692,596	0.9
North Peninsula	2.1	19,526	3,155,675	0.6
South Peninsula	0.3	3,077	152,728	2.0
Chignik	32.8	305,407	2,300,159	13.3
East of WASSIP	21.5	200,130	-	-
Total		932,290		

Table F. June, South Alaska Peninsula fishery, 2007, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	97	65,371	0.1
Kuskokwim Bay	1.7	27,458	1,510,627	1.8
Bristol Bay	84.8	1,347,599	47,223,298	2.9
North Peninsula	1.5	24,556	3,609,080	0.7
South Peninsula	0.1	930	156,204	0.6
Chignik	3.6	56,518	1,644,480	3.4
East of WASSIP	8.3	132,682	-	-
Total		1,589,838		

Table G. June, South Alaska Peninsula fishery, 2008, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	0	28,527	0.0
Kuskokwim Bay	2.3	39,143	1,252,716	3.0
Bristol Bay	85.9	1,472,802	42,552,172	3.5
North Peninsula	3.2	55,491	2,870,068	1.9
South Peninsula	0.3	5,464	217,221	2.5
Chignik	3.3	57,193	1,562,232	3.7
East of WASSIP	4.9	83,482	-	-
Total		1,713,575		

Notes: Stock composition data here are calculated as stock-specific harvests divided by total harvest.  
 Harvest rates are defined as stock-specific harvests divided by total run size.  
 Harvest and harvest rate data are from ADF&G SP 12-24, Tables 87-89.  
 Total run (stock) size data are summed from median values in ADF&G SP 12-24, Tables 3-5.  
 Total run (stock) size and harvest rate for East of WASSIP were not calculated in WASSIP.

Table H. North Alaska Peninsula fishery, 2006, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	5	76,043	0.0
Kuskokwim Bay	0.8	16,477	1,974,503	0.8
Bristol Bay	40.6	831,012	43,692,596	1.9
North Peninsula	54.8	1,122,894	3,155,675	34.8
South Peninsula	0.0	44	152,728	0.0
Chignik	0.1	1,180	2,300,159	0.1
East of WASSIP	3.7	76,184	-	-
Total		2,047,796		

Table I. North Alaska Peninsula fishery, 2007, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	933	65,371	1.4
Kuskokwim Bay	0.7	22,330	1,510,627	1.4
Bristol Bay	40.8	1,230,495	47,223,298	2.6
North Peninsula	54.3	1,636,571	3,609,080	44.6
South Peninsula	0.1	1,528	156,204	0.9
Chignik	0.1	2,177	1,644,480	0.1
East of WASSIP	4.1	122,514	-	-
Total		3,016,549		

Table J. North Alaska Peninsula fishery, 2008, sockeye salmon stock composition, harvests, and harvest rates by stock (regional reporting group); total stock size for each reporting group also included.

Sockeye stock (Regional reporting group)	Stock composition (%)	Harvest (no. fish)	Total stock size (no. fish)	Harvest rate (%)
Norton Sound	0.0	0	28,527	0.0
Kuskokwim Bay	1.0	17,328	1,252,716	1.3
Bristol Bay	47.1	823,287	42,552,172	1.9
North Peninsula	51.7	903,634	2,870,068	30.5
South Peninsula	0.0	0	217,221	0.0
Chignik	0.0	3	1,562,232	0.0
East of WASSIP	0.2	3,716	-	-
Total		1,747,969		

Notes: Stock composition data here are calculated as stock-specific harvests divided by total harvest.  
 Harvest rates are defined as stock-specific harvests divided by total run size.  
 Harvest and harvest rate data are from ADF&G SP 12-24, Tables 93-95 ; does not include "terminal harvests" (e.g., Nelson Lagoon).  
 Total run (stock) size data are summed from median values in ADF&G SP 12-24, Tables 3-5.  
 Total run (stock) size and harvest rate for East of WASSIP were not calculated in WASSIP.



from 6 to over 8 million fish, the actual effect of the June fishery catch of CWAK chums is a harvest rate of only 2 to 7 percent. That is, the number of CWAK chums taken in the June fishery is equal to only 2 to 7 percent of the total number of chum returning to CWAK in any particular year.

Other details in the WASSIP reports, such as credibility intervals (CIs) and coefficients of variation (CVs), indicate that such low percentage harvest rates are smaller than the error involved in even estimating the CWAK stock size. Thus savings of these chums would not be measurable in the CWAK area even if none were harvested in the June fishery.

Looking at Tables E – G, the stock composition of the June fishery sockeye salmon harvests on Bristol Bay sockeyes ranges around 40-85 percent. But, again, because the huge run size of Bristol Bay sockeyes ranges in the tens of millions of fish, the actual effect of the June fishery catch is a harvest rate of 3.5 percent or less. The June fishery harvest of Bristol Bay-bound sockeye is much smaller than the error inherent in estimating the Bristol Bay run size; it is actually smaller than some of the annual excess escapements that occur in the massive Bristol Bay systems.

Similarly, looking at Tables H – J, the stock composition of Northern District sockeye salmon harvests on Bristol Bay stocks ranges around 40-50 percent. But this level of harvest on Bristol Bay-bound stocks equates to a harvest rate of only 2 or 3 percent, well below any level of detection among the tens of millions of sockeye that annually return to fisheries and spawning grounds in Bristol Bay.

Interestingly, here in the Northern District there is also substantial contribution from local, North Peninsula stocks, resulting in stock composition estimates of 47-55 percent. These stock composition estimates for local stocks are slightly larger than those for Bristol Bay stocks but, tellingly, the harvest rates of the Northern District fishery on local North Peninsula stocks are much higher, at 30-45 percent, than the single digit harvest rates on Bristol Bay stocks. This indicates that the Northern District fishery is focusing upon local stocks, but is coincidentally overwhelmed by the massive Bristol Bay sockeye migration to adjacent areas.

### **Application of Major Policies**

The Alaska Board of Fisheries (BOF) has, over the years, developed a process with which to evaluate proposals and potential modifications to the state's salmon fisheries. This process includes consideration of any proposed action against provisions of the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) and the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220). Consideration of any allocative proposal is made against provisions referred to as the Allocation Criteria, found in state statute (AS 16.05.251(e)) and repeated in regulation.

The Sustainable Salmon Fisheries Policy comprises many pages of regulatory text. The BOF has condensed the operative portions of that policy into a couple-page "checklist" organized under nine topic headings. The Mixed Stock Fishery Policy asserts two main tenets: 1) the board's preference in assigning conservation burden and allocation of harvest opportunity is through the application of specific fishery management plans, and that 2) in the absence of a regulatory management plan, the burden of conservation should be shared among pertinent fisheries in close proportion to their respective harvests of particular stocks.



### Consideration of the South Peninsula June fishery

Proposals 179-183 all seek to limit the South Peninsula June fishery, out of various stated concerns for the conservation of Bristol Bay sockeye salmon stocks and AYK chum salmon stocks. Given the very low harvest rates of the June fishery on Bristol Bay sockeye and CWAK chums, there is no apparent or likely effect on the conservation of these stocks. In fact, the small stock-specific harvests from the June fishery are below any reasonable level of detection compared to the large total run sizes of Bristol Bay sockeye or CWAK chums.

These same conclusions are applicable to specific sockeye salmon stocks within the Bristol Bay drainage as well. This is illustrated in the very detailed, and extensive, harvest rate information provided for subregional reporting groups within the WASSIP reports (e.g., ADF&G, SP 12-24). There are no harvest rates attributable to the South Peninsula June fishery that pose a risk to the conservation of any specific stock of Bristol Bay sockeye.

These same conclusions are likely also applicable to specific spawning stocks of chum salmon in the AYK region. Even though the harvest rate calculations from the WASSIP studies apply to the large CWAK chum stock grouping, there is no information nor reason to believe that any one stock within the CWAK group is inordinately vulnerable to the June fishery compared to any other. In fact, previous tagging studies indicate that, aside from the distinct Yukon River fall chum run, all of the various summer chum runs to Bristol Bay and the AYK have overlapping presence in the Alaska Peninsula/eastern Aleutian Islands area, thus none should be uniquely vulnerable to higher harvest pressure in the June fishery.

The South Peninsula June fishery is constrained to only a small portion of the total area available in Area M, and it is subject to a longstanding regulatory fishery management plan, most recently amended in 2004. For the past nine years the June fishery has operated under a stable, effective management regime. During that same time, there has been marked improvement in the one sockeye stock of concern in Bristol Bay (Kvichak River), and there has been continuing improvement in the status of various AYK chum salmon stocks, including Norton Sound.

In 1996 the BOF declared in published findings (96-164-FB) that various management restrictions on the June fishery have "...resulted in substantial burdens of conservation being imposed on the Area M fishery..."

In 2001, the management plan for the June fishery was substantially altered, placing much more severe restrictions on fishing time and flexibility, and resulting in substantial reductions in the sockeye harvest but, ironically, no real reduction in relative chum salmon harvests.

In 2004, the BOF corrected problems with the 2001 plan, and declared in published findings (2004-229-FB) that: 1) "...the proportion of Bristol Bay sockeye in the June fishery sockeye catch (i.e., stock composition) is quite high, but the impact of these catches on the total Bristol Bay sockeye run (i.e., harvest rate) is very low", and 2) "...the impact of the June fishery on specific stocks of AYK chum salmon is negligible and that reducing the chum harvest in the fishery would not produce detectable results or measurable benefits to AYK chum runs."



The 2004 BOF findings go further to state that, “The 2004 June Fishery Management Plan is consistent with sustained yield principles, the subsistence statute (AS 16.05.258), the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) and the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220).” And, the findings state that in developing the 2004 plan, the board considered the precautionary principle and the allocation criteria.

Results from the recent and comprehensive WASSIP studies validate the 2004 conclusions of the board and provide further support for the current regulatory management plan. The June fishery management plan imposes a substantial burden of conservation on the fishery (through time, area, and gear restrictions) and fairly allocates respective harvest opportunity on the various sockeye and chum salmon stocks among various user groups. If anything, the June fishery management plan unduly restricts Area M fishermen’s opportunities to enjoy high harvests at times when stock abundances are plentiful, while fishermen in Bristol Bay and the AYK will have ample opportunity to intensively harvest highly abundant returns.

#### Consideration of the Northern District fishery

Proposals 201 - 205 and 208 all seek to limit the Northern District sockeye fishery, out of various stated concerns for the conservation of Bristol Bay sockeye salmon stocks. Given the very low harvest rates of the Northern District fishery on Bristol Bay sockeye, there is no apparent or likely effect on the conservation of these stocks. In fact, the relatively small harvests of Bristol Bay sockeye in the Northern District fishery are below any reasonable level of detection compared to the large total run sizes to Bristol Bay.

These same general conclusions for the Northern District are applicable to specific sockeye salmon stocks within the Bristol Bay drainage as well. The very detailed, and extensive, harvest rate information provided for subregional reporting groups within the WASSIP reports (e.g., ADF&G, SP 12-24) illustrates that there are no harvest rates attributable to the Northern District fishery that pose a risk to the conservation of any specific stock of sockeye salmon within Bristol Bay.

In 1996, the BOF declared in published findings (96-165-FB) that, “Like past boards that have rejected proposals to restructure the North Peninsula fisheries, the board found no reason to reduce fishing districts, seasons, or harvests in the Northern District.” The current WASSIP results corroborate the board’s findings from 1996, which evaluated the dispersed management strategy and acknowledged the interception of migrating stocks.

Since that time, there have been some improvements made to the Northern District management plan, largely in order to directly access Ilnik River and Meshik River sockeye near the northern boundary of Area M. WASSIP results indicate that catches, for example in the Outer Port Heiden section, exert higher harvest rates on these local stocks than on passing Bristol Bay stocks. While catches in this section have a fairly high stock composition of non-local Bristol Bay fish, the harvest rates on local stocks indicate an appropriate targeting of the fishery by these more recent additions to the management plan.

#### General comments on Area M fisheries with regard to pertinent policies

The current regulatory management plans for the South Peninsula June fishery and the Northern District fishery satisfy pertinent factors in the Sustainable Salmon Fisheries Policy. These plans have, especially now with the advent of WASSIP, dealt with data uncertainty and they account for existing harvest patterns. Given the very small harvest rates, there is no measurable impact of these fisheries on spawning



stock escapement. Very effective management systems have been established and applied to regulate human activities. A precautionary approach has been applied, whereby the fisheries are constrained from imposing any significant pressure upon any particular non-local stock. The best information is being applied, as are principles and criteria for sustainable salmon fisheries.

The current regulatory plans for the June fishery and the Northern District fishery also satisfy conditions of the Mixed Salmon Fisheries Policy. These management plans, which greatly restrict the potential of these fisheries, have provided for appropriate sharing of the burden of conservation. Recent additions in the June fishery, such as access to fishing area around Dolgoi Island (2004), and in the Northern District, such as better access to the Meshik River sockeye run in the Outer Port Heiden section (2007), were provided with very specific purpose; they were appropriately added to the management plans in full consideration of the Mixed Stock Policy.

Any new restrictions to either the South Peninsula June fishery or to the Northern District fishery would presumably be based upon allocative grounds. As such, they would need to be justified against the various Allocation Criteria. The reimposition of a sockeye GHL, reestablishment of a chum salmon cap, and various reductions in fishing time and area that have been proposed would substantially complicate the management of both these fisheries and could potentially jeopardize the effective escapement-based management program in the Northern District. Such restrictions could also substantially damage the economic and social livelihood of the hundreds of fishermen in Area M, with no discernible benefit accruing among the thousands of users in Bristol Bay and the AYK.

The WASSIP studies have shown large non-local stock compositions, but low harvest rates on non-local stocks, for sockeye and chum salmon in the South Peninsula June and for sockeye salmon in the Northern District fisheries. The existing management plans fairly and appropriately allocate the burden of conservation, and satisfy parameters of the Sustainable Salmon and the Mixed Stock Salmon policies. Any significant changes to these management plans may not fairly satisfy statutory Allocation Criteria. A delicate balance has been designed, between users in Area M and those in Bristol Bay and the AYK.

Similar arguments can be applied to the South Peninsula Post-June fishery and the Southeastern District Mainland (SEDM) fishery. Stock composition estimates from WASSIP, as well as the department's recent SEDM genetics study, indicate expected stock contributions from Chignik sockeye stocks. If anything, the SEDM studies show a surprisingly close correspondence to presumptions of Chignik-based stock contributions to that fishery, deemed at 80% (except for the NWSS), that were derived from a rudimentary tagging study in the early 1960s.

Both the Post-June and the SEDM fisheries are also managed under longstanding regulatory management plans, and they are understood to fairly allocate burdens of conservation and harvest opportunity; they are understood to comply with provisions of the Sustainable Salmon Fisheries Policy, the Mixed Stock Fisheries Policy, and the Allocation Criteria. There are no proposals by constituents from outside the region to further restrict the Post-June or the SEDM fisheries, and no indication from the WASSIP (or SEDM) studies that any changes are warranted.

## Summary

The WASSIP reports provide an astounding amount of new and detailed information on the stock composition and, now, potential impacts of mixed stock sockeye and chum salmon harvests in western





Alaska. In large part, the stock composition estimates contain no really surprising information, but they do corroborate stock composition information provided from earlier genetics studies.

The harvest rate information, however, is new. WASSIP provides a holistic picture of the mixed stock harvest of sockeye and chum salmon stocks from across western Alaska. In particular reference to the salmon fisheries in Area M, this new and comprehensive information on harvest rates clearly shows that the stock-specific harvests pose no significant, in fact not likely even measurable, risk to sockeye salmon stocks in Bristol Bay or to chum salmon stocks in the AYK.

Some advocates have lamented that WASSIP did not serve its purpose, because the application of even these modern genetics techniques has not been able to distinguish subregional reporting groups within the large Coastal/Western Alaska (CWAK) chum salmon reporting group. While this lack of discrimination is regrettable, it is also understandable, given the likely common evolutionary history of chum salmon within the area. But, there is no compelling reason to believe that any one particular subregional reporting group of chum salmon within the CWAK reporting group is more at risk in Area M fisheries than the others. And the harvest rate on CWAK chum salmon in the South Peninsula June fishery is vanishingly low.

Rather than being a source of disappointment, the WASSIP results are a very positive development. The evidence of low harvest rates on non-local stocks within the mixed stock Area M salmon fisheries is positive affirmation that the existing regulatory management plans for Area M fisheries are prudent, precautionary, and protective of Bristol Bay sockeye and AYK chum salmon stocks.

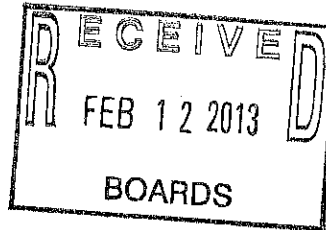
None of the changes recommended in proposals submitted by constituents from outside Area M are warranted. No alteration of the current management plans are needed to provide for the sustainability of these stocks. Therefore, the Area M Seiners Association and the Aleutians East Borough oppose Proposals 179-183 that would further restrict the South Peninsula June fishery and Proposals 201-205 and 208 that would further restrict the Northern District fishery.

In addition, Area M Seiners and the AEB oppose Proposals 209-210, even though they are labeled as “placeholder proposals”, due to their inappropriate presumption that the WASSIP genetics data would compel further restriction to the Area M fisheries. We advise caution as well for any use of Proposal 211, especially if a specific proposed action might be outside the scope of the proposals that have been appropriately submitted prior to the BOF’s proposal deadline last April.

We believe that an understanding of the WASSIP (and SEDM) results, and a positive affirmation of the current regulatory management plans by the Board of Fisheries, can greatly help quell the ongoing debate among western Alaska user groups. In the future, financial resources and department staff can be better used to more fully monitor stock-specific escapements, reduce the errors in estimating total run size, gain a better understanding of parameters that actually affect the productivity of these stocks, and design creative harvest opportunities in the AYK.



Gus Grossi  
1647 Willow Pass Rd. Ste.# 160  
Concord CA 94520



Boards Support Section  
AK Dept of Fish and Game  
Juneau AK 99811-5526

Proposal 250 set net permit stacking

My family has been operating four set net permits on four sites in the Naknek/Kivchak district since 1968. My mother brother and myself still operate the permits we were issued by CFEC in 1976. My son has inherited the permit my father was issued by CFEC in 1976. My mother is not able to fish any more and we have small children coming up who are interested. Set net permit stacking has been useful to us because we were able to hold and control the permits in the family, retain possession of our sites which must be leased to a permit, and use all permits during good and bad season.

We ask that you include the Naknek/Kivchak district in your proposal and that you pass this proposal into regulation.

Thank you for your consideration

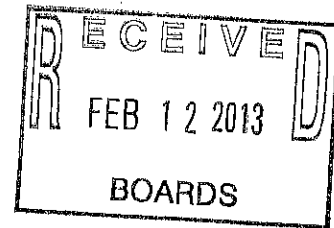
Dixie Grossi  
Enrico Grossi  
Gus Grossi  
Domenico Grossi

[gusf456@yahoo.com](mailto:gusf456@yahoo.com)  
(925) 382-4850





**Alaska Peninsula/Aleutian Islands Finfish  
February 26 - March 3, 2013**



**Comments on Proposal 175-5AAC 09.360 - Establish a  
schedule in Southeast District Mainland Area**

My name is Jack Foster Jr., forty-five years experience in all three salmon fisheries in the area; my comments are on Proposal 175 and other proposals to reinstate fishing time to the South Peninsula Mainland Fishery for the set net fleet. The mainland fishery for June and July should be given back to the set netters as the 2 previous record runs to Chignik basically prove that we don't have a big impact on their fishery.

The N. W. Stepovak Area should be managed from outside the bay to prevent overstocking; this also gives an idea of run strength in season, while allowing a more measured escapement on the front of the run.

The set net fleet should not be held accountable for pink escapements, because the fleet has little impact on the escapement caught by us versus the seine fleet. Pink escapement should be met before the bays are open to seining to minimize "here today and gone tomorrow" fish.

The August mainland fishery for set netters should be less restrictive, as the fleet is a very slow paced easily managed and in reality we just don't catch that many pinks unless there are large runs of large fish, because most of us use 5 1/4 " mesh and the smaller fish swim through the web and are not caught in the set net.



The September and October fishery needs to be reestablished as before because local fish are in the area and after 100 years of commercial set net fishing and the low effort of fishermen at the end of the cycle. Because of the foul fall weather, it takes a certain type of individual to want to get into a small skiff and harvest salmon in 30 to 50 m.p.h. winds on the open ocean, besides the fish still seem to be running, and I don't see the harm of 10 or 20 set net fishermen are going to impact the salmon fishery this late in the run.

In conclusion, despite historic runs to the chignik area, the S.E.D.M. set net fleet has been able to fish, and despite fishing time that more closely resembles the original management plan, except for the closures in August, September, and October, in the last two years the chignik run appears to be quit healthy, and while there may be a percentage of chignik fish in the area history proves that the actual percentage of the chignik run is very small. There fore the severe economic binders the board has placed on Southeast District Mainland, should be removed. Management needs to quit reinventing the wheel, on the mainland and quit changing the plan every cycle, because in the end this is a business, the salmon are a state recourse that the fishermen in this area have as much right as anybody, to harvest. Considering the fact that I pay the state for fishing privileges thru my registered sites, which have been in place as long as the fishery has been executed. I don't think it is to much to ask for what we all have invested millions in to be treated as a business, as it stands the actions of the board and staff have depressed and cut the value of my permit by 30,000 thousand dollars with no actual proof of benefitting anybody only hurting and depressing our economic income. The board process should be brought to this area when our cycle comes up so you quit diluting our time with the board with parties of



non participants diluting our time, who have nothing to lose by interjecting their opinions, rather than the experience the local fishermen can bring to the table from a lifetime of participation in the fisheries.

For the Southeast District Mainland Salmon Management Plan area I support proposals 175-5AAC 09.360, 177-5AAC 09.3XX, 174 -5AAC 09.360, 173 -5AAC 09.360, 178-5AAC 09.360. Other salmon proposals I support are 187 5AAC 09.365, 190 5AAC 09.366 and 194 5AAC 09.335.

I oppose proposals 179 -5AAC 09.365, 180 -5AAC 09.365 (x), 181 -5AAC 09.365, 182-5AAC 09.365; 5AAC 09.369 and 183 - 5AAC 09.310.

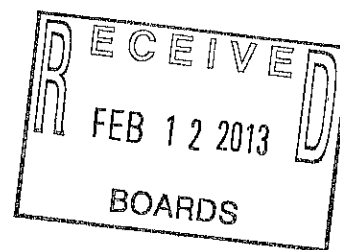
Jack Foster Jr.  
Amy M Foster



Shelbi Bishop  
PO Box 1047  
Homer, AK. 99603

907-399-1007

permit #SO4T61442



February 12, 2013

Dear members of The State of Alaska Board of Fisheries

Thank you for addressing the Bristol Bay set-net permit stacking proposals during the upcoming area M meetings.

I am in favor of one person holding and fishing two Bristol Bay set-net permits.

Sincerely, Shelbi Bishop

*Shelbi Bishop*



Stephen Bishop  
PO Box 1047  
Homer, AK. 99603

907-299-0260

permit #SO4T59936



February 12, 2013

Dear members of The State of Alaska Board of Fisheries

Thank you for addressing the Bristol Bay set-net permit stacking proposals during the upcoming area M meetings.

I am in favor of one person holding and fishing two Bristol Bay set-net permits.

Sincerely, Stephen Bishop

A handwritten signature in cursive script that reads "Stephen Bishop".



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



February 12, 2013

**Subject: Setnet Permit Stacking In Egegik, Ugashik, and Naknek/Kvichak**

Members of the Board:

I was born and raised in Bristol Bay, and have been setnetting there for most of my life. I am currently the president of the Kvichak Setnetters Association (KSA) representing 44 permit holders and fishermen. I would like to comment on proposal 250 which would amend 5 AAC 06.331 to allow a CFEC permit holder to operate up to four set gillnets in the Ugashik and Egegik Districts on permanent basis.

The majority of the KSA strongly support permit stacking. Allowing a permit holder to operate more than one net increases the financial return and makes fishing a more viable career choice. With prices down (on an inflation adjusted basis) a single set net permit does not provide sufficient annual income.

However, we are opposed to the proposal 250 as written, because it limits permit stacking to only certain districts in Bristol Bay when we believe it should be allowed in all districts of Bristol Bay.

Please amend proposal 250 to include this opportunity for all Bristol Bay set gillnet fishermen.

Sincerely,

A handwritten signature in black ink, appearing to read "Eike M. Ten Kley".

Eike M. Ten Kley





Kenneth R. Johnson

Page 2

<del>Kenneth R. Johnson</del>		SA 4M64457Q
Richard Eastlick	Richard Eastlick	404M
Jim R. Smith	Joe R. Smith	504M
Keith Lee Wilson	Keith Lee Wilson	641556

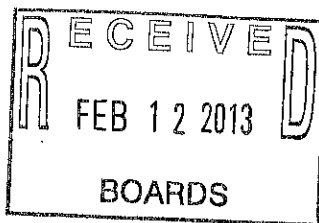




February 11, 2013

Board of Fisheries Personal Comment Book

Sent Via Fax: 907.465.6094



REF: SETNET PERMIT STACKING – UGASHIK

Permit stacking is very beneficial to our family operation for the following reason:

My husband and I started setnet fishing in Ugashik Bay in 1984. This will be our 29<sup>th</sup> season. When we started this, it was planned to be our future retirement income, but without the stacking this will not be possible. My husband is 73 and cannot be in the boats due to chronic dizziness and I am 68 and have a very unstable back that the doctors have said I am not to be in the boats either. I still go over every year and help out at the cabin with mending and hanging nets, cooking for the crew, etc. My husband is unable to make it anymore. We are fortunate to have 2 grown sons who are involved in the operation and have been since they were young. Each now has their own permit and would stack each of ours on theirs so we could continue to have some income.

Also the other advantage of stacking is being able to have additional income. Today one permit barely covers your expenses, with the high cost of plane fares, fuel, crew share, food and fishing gear. When we first started fishing we could live all year on the income, but not in today's world. There is no advantage for young people to buy into the fishery. A good example is last season we did a temporary transfer on my husband's permit with the possibility of selling it to the young man. As it turned out we were short a million + fish in the bay and had lots of drift boats thanks to Fish & Game in King Salmon telling the drifters to go to Ugashik for lots of fishing time. Our shortage of the million plus fish was intercepted by the area M fisherman (80% of their catch was Ugashik stock). So the share of the pie for setnetters was very small and he didn't feel there was enough income ratios to expenses and labor to warrant buying a single permit and he is right. So having the ability to stack an additional permit makes all the effort and expenses worthwhile. It helps with retirement, kid's college tuition, mortgages, and the economy in general.

Another advantage of stacking is in our case; my husband's and my permits would be transferred to our sons and upon our death there would not be the problems of having to get them transferred or forcing them to sell. They could stay in the family and eventually go on down to our young grandchildren. What greater legacy for us.

So really in a nutshell we have Fish & Game, Area M and now the Board of Fisheries all working against us. We work hard for our money, but it seems like we are always having to fight for just a small piece of the pie and at my age I'm getting tired of all the uphill battles.

Can anyone tell me what does stacking hurt? Stacking benefits the present fisherman and the future generations to come so I hope you all will approve setnet permit stacking.

If you have any questions please give me a call at 509.464.3608.

Sincerely,

*Karen Freeman*  
*Douglas Freeman*

Karen Freeman  
Permit No. 62334B

Douglas Freeman  
Permit No. 60430Z

*Brad LaRock*

Brad LaRock  
Permit No. 60005B

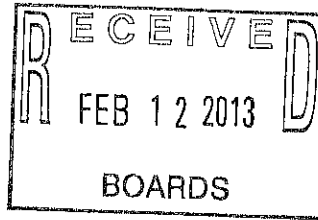
*Ernest Pierce*

Ernest Pierce  
Permit No. 60781A



George (Will) Bishop  
PO Box 1047  
Homer, AK. 99603

907-299-3377



February 12, 2013

Dear members of The State of Alaska Board of Fisheries

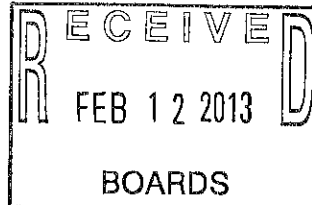
Thank you for addressing the Bristol Bay set-net permit stacking proposals during the upcoming area M meetings.

I am in favor of one person holding and fishing two Bristol Bay set-net permits. As a current dual permit holder I feel it is necessary to continued to be able to hold two permits in order to make this a financially viable fishery for myself and many other fishers.

Our overhead has continued to rise exponentially (airfare, gear, food, fuel and freight) while fish prices have topped out. Additionally families such as my own whose children hold permits but are now in collage and required to apply themselves in internships during the summer months will have to suffer the financial loss or trust those permits in crewmembers names. Either way a lose-lose situation. Thank you for your consideration.

Sincerely, George (Will) Bishop

A handwritten signature in cursive script, appearing to read "George Bishop".

PC 37  
1 of 1

February 11, 2013

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

THE TENTH FLOOR  
2200 SIXTH AVENUE  
SEATTLE, WA 98121-1820  
206.728.6000  
OPERATION FAX 206.441.9090  
SALES FAX 206.728.1855

Re: June Chum Pool- South Unimak / Shumagins

Dear Alaska Board of Fish Members:

After reading the proposals for the upcoming Board of Fish meeting I noticed that proposals 179 – 181 involved reinstating some level of Chum Cap in the June salmon fishery at South Unimak and the Shumagins. As a long term (since 1988) Office Manager at Peter Pan Seafoods Port Moller location I wish to make known to you our long standing policy of a mandatory "Chum Pool" as this information may help your decision making.

The purpose of the Chum Pool is to make sure that there will be no monetary benefit for any fisher to target Chum Salmon in the June South Unimak and Shumagins fisheries.

Participation in the Chum Pool is mandatory for anyone delivering salmon to Peter Pan Seafoods in those fisheries and the process is as follows:

- Each gear type within each management area has its own Chum Pool. Example – Fish caught by a setnet permit in the Shumagins will be pooled with other setnet catches in the Shumagins. Setnet catches in South Unimak are pooled separately.
- By examining the fish tickets the determination is made of how many days were fished by each fisherman in each gear type. This is done after the completion of the June fishery.
- Within each management area the total pounds of chum salmon caught by each gear type are divided by the total number of days fished by that gear type. This daily catch average is multiplied by the number of days fished to determine each fisherman's chum value.

In summary, we have a long standing policy of a mandatory Chum Pool governing our purchase of Chum Salmon in the June South Unimak and Shumagins fisheries. The purpose of this is to make sure there is no monetary benefit to target Chum in those areas at that time.

Respectfully Submitted,

Lee Anne McDermott  
Office Manager – Port Moller  
(206) 727-7242



IN REPLY REFER TO:

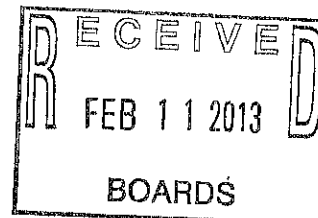
## United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199

FWS/OSM13012.GP

FEB 08 2013



Mr. Karl Johnstone, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811

Dear Chair Johnstone:

The Alaska Board of Fisheries will deliberate 2012/2013 regulatory proposals that address Alaska Peninsula and Aleutian Islands commercial, sport, and subsistence finfish fisheries beginning February 26, 2013. We understand that the Board will be considering approximately 61 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed these proposals and does not believe that adoption of any of these proposals will have an impact on Federal subsistence users and fisheries in this area. We may wish to comment on these proposals if issues arise during the meeting that 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,



Kathleen M. O'Reilly-Doyle  
Acting Assistant Regional Director, OSM

cc: Cora Campbell, ADF&G  
Tim Towarak, Chair FSB  
Jeff Regnart, ADF&G, Anchorage  
Hazel Nelson, ADF&G, Anchorage  
Charles Swanton, ADF&G, Juneau  
Monica Wellard, ADF&G, Juneau

Jennifer Yuhas, ADF&G, Anchorage  
Drew Crawford, ADF&G Anchorage  
Interagency Staff Committee  
Administrative Record

TAKE PRIDE  
IN AMERICA 



February 12, 2013

TO: FAX 907 465 6094

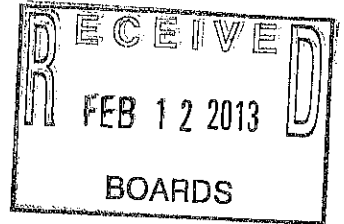
To Alaska Department of Fish and Game, Boards Support Section

From Sam Bain

Re: Proposal 250 concerning permit stacking in the Bristol Bay setnet fishery.

Position: I am against permit stacking.

Greetings Board members,

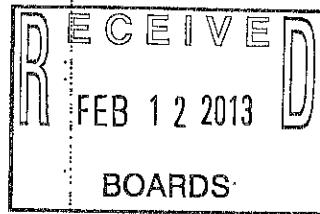


The decision the Board made in Naknek this December was the right one. Permit stacking is against the spirit of the Bristol Bay fishery. With quality improving, runs strong thanks to great management and cooperation from the fleet, and prices back up, this is no time to stack permits. This is the time to share the incredible natural wealth with the hard working, small-scale fisherman or woman. Permit stacking hoards the resource to the greediest in a manner out of proportion with setnetting's relative simplicity. It is not capital intensive- you don't need hundreds of thousands of dollars worth of the latest equipment to setnet. Alaska has maintained the natural resource, and now needs to maintain its human resource. As any fisheries economist can tell you, consolidation in the industry means fewer jobs and more benefits to fewer people. For bering sea fisheries like pollock dragging, some consolidation may make sense, but not for setnetting out of skiffs for a month or so a year.

I've been setnetting in Bristol Bay for ten years but unfortunately, due to permit stacking, I have not been able to afford to buy a permit myself. I am a year round commercial fisherman, dedicated to working only sustainable fisheries, but I'm scared of being priced out of the Bristol Bay market. My family depends on the income I make setnetting. I want to be able to bring my kids with me some day, but that wont happen if I can never afford a permit because the privileged few are hoarding the resource. Please, don't shut the door on yet another fishery that a young person of moderate means hopes to get into.

Thank you,

Sam Bain  
Port Townsend, WA



Mariano Floresta  
BBEDC Liaison  
P.O. Box 90  
Clarks Point Ak.  
99569

Board of Fisheries

Feb. 12, 2013

I oppose proposal 250. I believe that no one person should own (2) two setnet permits. When setnetting was first introduced, one person owned one permit, and for years that worked just fine. Now, with one person owning two permits, we see a lot more setnet sites in our area where we have never seen them before. If a setnet permit holder purchases another permit, they then need to find, or purchase another setnet site. We do not need anymore added setnet sites, their are enough as it is.

Mariano Floresta