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From: Kandolls
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: Juliann.Curry@icicleseafoods.com
Subject: July 17th B.O.F.
Date: Tuesday, July 10, 2018 10:18:34 AM

To: B.O.F.

Chairman Jensen & Board members,

Thank you for extending the comment period. I live in Petersburg where I've been involved in the salmon industry for the last 38 years, the last 28 as a owner/operator of the F/V Providence with which we seine for salmon with a crew of 4. We count on on salmon for a part of our livelihood.

Please, do not take up or make changes from interest groups at a time of year when the people that it affects the most are out on the water trying to make a living.

In the past, although B.O.F. changes have not always gone the way I might like, I always felt that the process was public, open, & fair. These so-called emergency petitions would seem to me an attempt to thwart that process.

Sincerely, Brian Kandoll



Chairmen Jensen and the Board

I am writing as a fisherman in response to the Alaska Board of Fisheries decision to hold a hearing on the Emergency Petition filed May 16, 2018.

Alaska has an admirably open public process for amending fisheries regulations, but that process is being abused by a special interest group. This will be the fourth time this topic has been addressed by the Board of Fisheries or the Alaska Department of Fish and Game in less than 6 months. There is no new information to warrant holding a special meeting to discuss a petition that has been already been determined, by both the board and the Commissioner of Fish and Game, not to meet the emergency petition criteria.

I am very disappointed that the board has elected to hold a meeting in the middle of the summer fishing season when the participants most affected do not have the opportunity to participate. Alaska's hatcheries are vital to my business, and we are amid a busy fishing season which is our only opportunity to make an income and support our families.

The board has already established a committee, scheduled to meet in October, to address hatcheries. This is the appropriate time to address the topic, allowing the department, hatcheries, and salmon users to present information that will help the board make informed decisions.

I strongly encourage the board to once again find that this emergency petition does not meet the criteria and vote it down. I further encourage you to take no action at this meeting and follow the plans you've already set forth to convene a hatchery committee at the October Work Session.

Thank you,

Bruce J. Hayettine

7-5-18



Date: 7-5-18
Fisherman: Bruce J. Hazeltine
Fishing Vessel: Friesan Lady
Homeport: Cordova



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Bruce J. Hazeltine

Darren Platt

Kodiak, AK

Alaska Board of Fisheries

Boards Supports Section

Board Members,

I'm writing in response to the emergency petitions submitted to address the Chignik sockeye run failure as it relates to the Kodiak Management Area (KMA). The Chignik sockeye run is an important component of Kodiak's salmon seine fishery. Chignik bound sockeye harvested in the KMA are nearly exclusively harvested in Cape Igvak management area which has remained closed for the entire season and will likely remain closed until after the Chignik late run complete and management of that area switches to local pink and chum salmon. The closure of the Cape Igvak section is the direct result of the KMA salmon management plan which is responsibly implemented for sustainability. There is no reason to believe any Chignik bound sockeye are harvested in appreciable numbers in any other Kodiak districts, as demonstrated by the recent genetic survey of Kodiak sockeye harvests along with local knowledge of the Kodiak fishery. Any efforts to alter Kodiak's salmon management based on Chignik escapement will certainly be ineffective and will result in further undue harm caused to the Kodiak salmon fishery which is already suffering from near record low sockeye harvests and expected poor pink salmon returns. As a salmon seiner I consider the Cape Igvak section a critical component of my regular harvests and I support any conservation measures that will effectively sustain the Chignik sockeye run, however those measures must result in increased escapement in Chignik. Any emergency alterations of Kodiak's management plan will necessarily hinder our ability to harvest local salmon while producing no appreciable improvements to the Chignik sockeye escapements.

Thank you,

Darren Platt



From: Greg Deane
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Chignik fish and Kodiak
Date: Tuesday, July 10, 2018 4:56:02 PM

We aren't catching any chignik fish, on a normal run we could if Igvak were to open but we don't catch them any where else and the Kodiak fishermen I've talked to haven't seen any of those beautiful Big reds. We too are sorry that they're not showing up we would love to get our small share that I have enjoyed sense the mid 70'.

Thanks

Greg Deane
F/V Sheryl Ann

Submitted By
Harvey Goodell
Submitted On
7/12/2018 7:43:54 AM
Affiliation

To The Board of Fish, Thank you for this opportunity to comment on the emergency petitions before you. I feel the timing of addressing these petitions puts an undo burden on me an other commercial Kodiak fishers. As a salmon set net fisherman on the westside of Kodiak. Any changes made to the Kodiak salmon management plan should happen on its normal cycle. Salmon fishing is very slow this season, ocean conditions are most likely a key to the low returns. I am asking that you take no action at this time.

Thank you Harvey Goodell



July 9th, 2018

Chairman John Jensen
Alaska Board of Fisheries
dfg.bof.comments@alaska.gov

RE: Board of Fisheries Emergency Petitions, July 17th, 2018

Chairman Jensen and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in North America, with facilities throughout Alaska. We process salmon throughout the State including Southeast, Prince William Sound, Cook Inlet, Kodiak, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of our salmon resources. We appreciate the opportunity to comment on the emergency petitions submitted to the Alaska Board of Fisheries (BOF) for the July 17th emergency meeting.

As a processing company that is dependent on salmon, we oppose the petitions submitted by the Kenai River Sportfishing Association (KRSA), the Bristol Bay Native Association and the Chignik Advisory Committee. These proposals do not meet the emergency petition criteria and we request that you cancel the meeting, as we are in the heart of the busy summer salmon season. There is a reason that BOF meetings are never scheduled in the summer, and as far as our research can tell this meeting is unprecedented. Our fishermen, fleet and plant personnel, and tender operators are in the middle of their salmon season and do not have time to attend the meeting, and very few of them have the time or access to submit comments.

Icicle Seafoods agrees with the comments submitted by the Kodiak salmon processors and other members of the seafood processing sector. Under 5 AAC 96.625, the Joint Board Petition Policy, Boards of Fisheries and Game recognize that in rare instances circumstances may require regulatory changes outside the normal public process. In accordance with state policy (AS 44.62.270) emergencies are to be held to a minimum and they are rarely found to exist.

The regulations clearly outline the importance of a full public process in managing fish and game resources. *The public has come to rely on this regularly scheduled participatory process as the basis for changing fish and game regulations. Commercial fishermen, processors, guides, trappers, hunters, sport fishermen, subsistence fishermen, and others plan business and recreational ventures around the outcome of these public meetings.* In addition, *The Boards of Fisheries and Game recognize the importance of public participation in developing management regulations, and recognize that public reliance on the predictability of the normal board process is a critical element in regulatory changes. The boards find that petitions can detrimentally circumvent this process and that an adequate and more reasonable opportunity for public participation is provided by regularly scheduled meetings. Further..... it is the policy of the boards that a petition will be denied and not schedule for hearing unless the problem outlined in the petition justifies a finding of emergency.*

None of the Kenai River Sportfishing Association, Bristol Bay Native Association, or Chignik Advisory Committee petitions meet the criteria of emergency. The hatchery petition is scheduled to be addressed at the October Worksession and the two sockeye proposals could also be addressed in their next cycle which occurs in February of 2019. Low salmon returns do not constitute an unforeseen or unexpected event due to the highly variable nature of fisheries in Alaska including salmon. This emergency petition meeting is setting a dangerous precedent for seizing management of fisheries mid-season, forcing



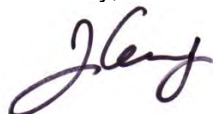
ADF&G staff to scramble to prepare for an emergency meeting at the height of the summer salmon season when time and resources should be devoted to managing fisheries.

Addressing the petition by the Kenai River Sportfishing Association (KRSA) against the egg take by the Valdez Fisheries Development Association (VFDA) specifically, we recommend the BOF concur with the Alaska Department of Fish and Game (ADF&G) findings for a lack of emergency with regards to this petition, and we request that the board take no action to reduce the permitted capacity of the Solomon Gulch Hatchery by 20 million pink salmon eggs in 2018. There has been plenty of opportunity to comment and participate in the permitting process. This issue does not constitute an emergency. We urge the BOF to follow through with the plan to convene a hatchery-specific meeting at the October Work Session in Anchorage. This is what the BOF noticed to the public, and it follows the plan you outlined and committed to enacting.

The egg take scheduled to occur this summer has already been approved through the proper rigorous permitting process. The Regional Plan Team (RPT) is a highly public and deliberative process, and is influenced by management experts at ADF&G. The increase of pink salmon egg take was approved in 2014 under the condition that it be done in two increments of 20 million eggs each. ADF&G requested that VFDA postpone the first increase to 2016 to accommodate the salmon hatchery study being conducted. Additionally, the 2018 increase was conditionally approved in 2014 pending completion of the hatchery infrastructure necessary to handle the increased egg capacity. In 2017, the RPT received an update on the progress of infrastructure for the conditional 20 million egg increase for 2018.

Thank you for the opportunity to comment. Please reach out if you have any questions.

Sincerely,



Julianne Curry
Public Affairs Manager
Icicle Seafoods
Julianne.Curry@icicleseafoods.com



Chairmen Jensen and the Board

I am writing as a fisherman in response to the Alaska Board of Fisheries decision to hold a hearing on the Emergency Petition filed May 16, 2018.

Alaska has an admirably open public process for amending fisheries regulations, but that process is being abused by a special interest group. This will be the fourth time this topic has been addressed by the Board of Fisheries or the Alaska Department of Fish and Game in less than 6 months. There is no new information to warrant holding a special meeting to discuss a petition that has been already been determined, by both the board and the Commissioner of Fish and Game, not to meet the emergency petition criteria.

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The board has already established a committee, scheduled to meet in October, to address hatcheries. This is the appropriate time to address the topic, allowing the department, hatcheries, and salmon users to present information that will help the board make informed decisions.

I strongly encourage the board to once again find that this emergency petition does not meet the criteria and vote it down. I further encourage you to take no action at this meeting and follow the plans you've already set forth to convene a hatchery committee at the October Work Session.

Thank you,

Joseph G Liaville



Date: 7/5/18
Fisherman: Joseph G Linnville
Fishing Vessel: FV Frisian Lady
Homeport: Driftwood bay AK



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Joseph G Linnville

Submitted By
Mike Kramer
Submitted On
7/11/2018 10:00:34 AM
Affiliation

RE: Situk petition,

There is no data to suggest that limited catch and release opportunities on the Situk will result in mortality. Mortality studies on catch and release are far from conclusive and depend on a host of variables, such as water temperature, bait and hook used, and hardening of the fish. Stopping all nearby commercial fisheries that are even suspected of intercepting a single Situk salmon should also be done if the board feels it necessary to take emergency action to save every Situk fish. While it appears the Situk may not meet escapement goals and drastic restrictions are necessary, prohibiting catch and release sport fishing should not become the new norm for management of poor returns, especially on an emergency petition basis. If local ADFG managers feel that catch and release in two selected areas of the river is biologically defensible, the board should not override that local management decision with an emergency order on 6 days public notice. It will set a bad precedent, not only for the board micromanaging single stream fisheries in season, but also send a message that poor returns should be met with bans on catch and release fishing. Anecdotal reports of fish being mishandled should not be the factual basis for the board passing any emergency restriction.

Submitted By
Raechel Allen
Submitted On
7/10/2018 4:06:16 PM
Affiliation

Phone
907-749-4069

Email
benandraechel@msn.com

Address
PO Box 84
Chignik, Alaska 99564

Mr. Chairman and Members of the Board, While I have already submitted an earlier comment, I have some other thoughts to add. It is of concern to me that for years, while chum caps were active in the Shumagins, Chignik didn't suffer low escapement, and sockeye returns provided ample surplus for a commercial harvest in the CMA. Since that time, run timing and escapement patterns have been in flux. The Department has been quick to identify changes and modify management within the CMA to fit the change in patterns. What concerns me is that the reason for the change in patterns was never identified nor addressed. I believe all the small changes inadvertently were accommodating the effects of interception. Presently about 10% of our escapement shows signs of gillnet marks. After inquiring locally if anyone was gillnetting for subsistence, it has become apparent that these fish are encountering the gillnets outside of the CMA. I'm sure it can be realized that seined fish are also caught leaving no physical evidence at all of harvesting CMA stocks. I am beginning to think that gillnet interception may be part of the reason behind high numbers of small sockeye present in our escapement. They are the ones getting through. At any rate, the amount being intercepted very likely would clear our second run escapement goals if allowed to reach the CMA, thus allowing for a second run fishery. I have now said farewell for the season to two permit holders leaving Chignik with their boats and crew to enter other salmon fisheries around the state. They told me of two others doing the same. Crew off other boats left with them. We have already lost crew. He has a family to feed. It's understandable. The City of Chignik will have no income if we don't fish, the Chignik Regional Aquaculture Association will have no income. Residents are going to be in a bind. If our second run is just short of meeting escapement, and we must abstain from fishing on our capes, pursuing chum, pink and coho, because of an interception fishery taking the few fish we needed, it will be an injustice. Lastly, I ask that you contemplate another option for Chignik. Perhaps Chignik could be managed as the Shumagins are. We could be open concurrently with them at least in the Lagoon, Western, and Perryville districts. It would afford us the same ability to pursue salmon as they have. We traditionally used to fish. There's no need to list the places at this time. Only that traditionally, we used to fish. Of course, this would be a known nightmare to manage for Chignik escapement but if it works so well in the Shumagins then why not here? I'm sure you know the answer to this but let me spell it out. The CMA escapement could not reasonably be managed. So why aren't the management tools extending to the same sockeye on the other side of an invisible, state appointed management area line? I don't believe the tool of Commissioner E.O. was adequate, effective, or enough this year, considering it afforded about 24hrs with zero gear in the water in the Area M June fishery. Please realize the effects on Chignik's sockeye runs and create regulation in interception fisheries that will address conservation ties to Chignik where there is none. Sincerely, Raechel Allen

Submitted By
Joe Connors
Submitted On
7/12/2018 10:23:40 AM
Affiliation
Greatland Lodge Owners Affiliation

Phone
907-398-1360
Email
krq12@gci.net
Address
38050 Greatland Street PO Box 1085
Sterling, Alaska 99672

Dear Board of Fisheries,

The Greatland Lodge Owners Affiliation is a group of five lodge owners located on Greatland Street in Sterling, Alaska, where the primary attraction is fishing on the Kenai River, Kasilof River, and the west side and marine waters of Cook Inlet. Collectively we host more than 1,000 individual clients per year, who in addition to lodging generate income for guides, restaurants, shop owners and other tourism related businesses. Sport fishing is the number one reason clients visit the Kenai Peninsula. Together, our lodges represent millions of dollars of investment in our businesses, and we generate significant sales tax revenues to the Kenai Peninsula Borough, and through angler licenses and fees support conservation.

With relation to the emergency petition from KRSA et al, we urge the board to first make a finding of emergency, as we feel this situation meets the requirements of an emergency. Next, we urge the board to take action to halt the additional 20 million egg take and rearing of hatchery pink salmon in Prince William Sound - Solomon Gulch Hatchery. At this time, when the issue of straying of hatchery pink salmon is unresolved, not just in Prince William Sound but also now Lower Cook Inlet, we feel that it would be irresponsible to not halt this action until we have a better understanding of the size and extent of straying hatchery fish.

In terms of inter-regional straying, ADFG has only sampled the streams of Lower Cook Inlet to check for straying hatchery pink salmon from PWS. While there is no data about whether or not straying into Cook Inlet is limited to the lower portion of the inlet, there is a realistic possibility that straying of PWS hatchery pink salmon is also extending up into Upper Cook Inlet. Cook Inlet has some of the highest tides in the world, and fish can be pushed into the upper reaches of the inlet easily.

Reading through the department reports on PWS hatchery management, the hatchery pinks are selected to be early returning pink salmon so as to lessen the impact of harvest rates on later returning salmon into PWS. We have seen anglers this year catch pink salmon already in the middle river of the Kenai River, far earlier than in past pink years (even years) on the Kenai. With no program to systematically sample pink salmon stocks in Upper Cook Inlet, there is no way to tell if the extent of straying into Cook Inlet is not already impacting wild pink salmon runs here.

The concept of testing Upper Cook Inlet pink salmon populations for contamination from PWS hatchery fish is not on the radar of the Cook Inlet or PWS Regional Planning Teams, and we doubt if ADFG has the money or resources to check this either. The Regional Planning Team process is not equipped to adequately deal with hatchery straying between major regions of the state. We do know that if a client of ours went on a fly-out trip to PWS, kept 12 wild or hatchery pink salmon, returned to Sterling with all of them in a live well, and released them into the Kenai River, ADFG and enforcement would have a major issue and that client (and most like us and the air transporter) would most likely face stiff fines and other penalties.

We do know that straying rates of hatchery pink salmon into streams for wild pink salmon in both PWS and LCI routinely exceed department policy of 2 percent. Adding more fish into that equation does not make sense.

Per the Alaska Sustainable Salmon Fisheries Policy, we strongly urge the BOF to take a precautionary approach, make a finding of emergency and then act to halt the decision to increase the egg take and rearing of hatchery pink salmon in PWS by an additional 20 million.

On behalf of the other lodge owners, do the right thing and assert the regulatory authority vested in the Board of Fisheries to provide a check and balance to hatchery production levels in terms of your power to regulate egg take, especially in instances like this where department standards for hatchery straying are being violated and there is no corrective action in place.

Respectfully,

Joe Connors, Greatland Lodge Owners Affiliation

Owner, Big Sky Charters

Submitted By
Matthew Siemion
Submitted On
7/12/2018 2:08:16 PM
Affiliation

Dear Board of Fisheries,

Every fish counts.

My name is Matt Siemion, and I'm a second generation Chignik Fisherman and an Alaska Native. I've been fishing in Chignik since 1975 when I started fishing with my father at 12 years of age. A lot has changed in the Chignik fishery since then.

The current (2018) first and second run escapement situation in Chignik is dire. Area M, our "naughty neighbor" to the west, needs further restrictions in the Shumagin Islands and Dolgoi Island fishing areas; these areas do not bear any conservation requirements, and they are habitually allowed to harvest fish regardless of the escapement numbers of the stocks they are targeting: Chignik, Kodiak, and Cook Inlet (per WASSIP). This season, Area M was restricted because the Chignik escapement was less than half the bottom escapement objective, but further restrictions are warranted. As Chignik fishermen continue to sit on the beach and are unable to harvest returning sockeye salmon, Area M continues to fish. This is unreasonable. Why? Because every fish counts for Chignik's escapement.

The last couple of seasons (2016 - 2017), and well before that, it has been noticeable that the first and second runs arrive to Chignik in irregular patterns in relation to what the historic norm has been. The fortunate fish that do arrive have gillnet marks and often lack size diversity, since they have been targeted by gillnets with a set mesh size. For example, one day the fishing in Chignik is good and uniform throughout the tide, and the next day it is poor, spotty, and unbalanced. Historic catch patterns are nonexistent. In short, what I've noticed is that as the South Peninsula and Kodiak get better at targeting Chignik bound sockeye, those lucky fish that do make it back to Chignik waters arrive in non-historic patterns: spotty catches, gillnet marked fish, and erratic size and weight.

I respectfully request that the Board of Fisheries severely restrict commercial fishing in the Shumanin Islands and the Dolgoi Island areas of the South Alaska Peninsula until the Chignik early and late sockeye salmon run minimum escapement numbers are achieved. The justification is strong. Such action is required for the conservation of Chignik bound early-run and late-run sockeye salmon which has remained well below minimum escapement since early June. It is common knowledge that the Shumagin Islands and Dolgoi Island areas are a well-established late-June and July migration corridor for Chignik sockeye per the Department's three-year WASSIP Investigation (2006-08). In that study for 2006 Chignik sockeye salmon comprised 67.0% of the July or post-June catch, in 2007 37.2%, and in 2008 47.3%.

Again, the Chignik Lake and Black Lake systems need their escapement numbers for this season and future seasons. Every fish counts.

Sincerely,

Matt Siemion



RE: PWS Hatchery Emergency Petition

To all whom may be concerned,



In response to hearing the news of an emergency injunction on the PWS salmon hatcheries, I wished to write this letter to serve as my sincere opposition.

I was born and raised on Kodiak, I am a career fisherman, and currently in my second season fishing PWS. The design of the hatcheries sustainable harvesting are solely responsible for providing my family's and crew's livelihood.

My single hope is any decisions will be made, again, on unbiased and accurately obtained data.

Thank you in advance for your consideration.

Steven Eggemejer
6/27/2018



6-27-18



PC612
1 of 1

I am writing this as a PWS salmon permit holder.

Three years ago I purchased my PWS permit because of and counting on the continued production of hatchery raised salmon.

Any loss of this production could prove detrimental to my business as well as my livelihood.

My permit investment would also be affected and could result in an extreme loss of permit value.

I am asking that any decisions that would affect PWSAC and VFDA production be solely based on PROFESSIONAL SCIENTIFIC DATA.

I own a home in Kodiak and rely on salmon fishing income solely for myself, my crew and my family.

Neil Bull

permit # 501E 60251E
F/U SECOND WIND



Date: 7/4/18
Fisherman: MASON GROVES
Fishing Vessel: WIGEON
Homeport: HOMER AK



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



I am writing as a fisherman in response to the Alaska Board of Fisheries decision to hold a hearing on the Emergency Petition filed May 16, 2018.

Alaska has an admirably open public process for amending fisheries regulations, but that process is being abused by a special interest group. This will be the fourth time this topic has been addressed by the Board of Fisheries or the Alaska Department of Fish and Game in less than 6 months. There is no new information to warrant holding a special meeting to discuss a petition that has been already been determined, by both the board and the Commissioner of Fish and Game, not to meet the emergency petition criteria.

I am very disappointed that the board has elected to hold a meeting in the middle of the summer fishing season when the participants most affected do not have the opportunity to participate. Alaska's hatcheries are vital to my business, and we are amid a busy fishing season which is our only opportunity to make an income and support our families.

The board has already established a committee, scheduled to meet in October, to address hatcheries. This is the appropriate time to address the topic, allowing the department, hatcheries, and salmon users to present information that will help the board make informed decisions.

I strongly encourage the board to once again find that this emergency petition does not meet the criteria and vote it down. I further encourage you to take no action at this meeting and follow the plans you've already set forth to convene a hatchery committee at the October Work Session.

Thank you,

MASON GROVES
F/V WIGEON





TO WHOM IT MAY CONCERN,
MY NAME IS MASON GROVES AND I AM A
PWS PERMIT HOLDER, I AM 27 YEARS OLD
AND HAVE BEEN FISHING MY ENTIRE WORKING
LIFE (11 YEARS). I AM NOT AN EDUCATED MAN
NOR AM I VERY INVOLVED IN POLITICS, ALL
I'VE EVER KNOWN WAS TO WORK HARD, BE
HONEST AND LET THE LORD PROVIDE THE REST.
IT HAS COME TO MY ATTENTION THAT
THERE IS A GROUP OF PEOPLE TRYING TO
TAKE A PORTION OR ALL OF EVERYTHING I
HAVE EVER WORKED FOR. I HAVE A SON
AND A PREGNANT WIFE AT HOME EAGERLY
AWAITING MY RETURN, BUT THIS IS THE LIFE
I HAVE CHOSEN, TO BE A FISHERMAN. IF
I CANT GO HOME TO SEE MY FAMILY, HOW
IS IT FAIR FOR SOME HEARTLESS GROUP OF
PEOPLE TO ATTACK MY INDUSTRY AT THE
ONLY TIME OF YEAR I CANNOT DEFEND
MYSELF? STOP THIS MEETING, ITS UNETHICAL,
UNLAWFUL AND COMPLETELY INAPPROPRIET. MY
FAMILIES LIVELYHOOD DEPENDS ON IT!

SINCERLY,

MASON GROVES
F/U WIGEON
208-440-6326

6-27-18

Matthew M.
F/V Secor



PC614
1 of 1

4 year crewman.

To whom this may concern,



I am writing this in regards to news about an emergency injunction on the PWS salmon hatcheries and wish this letter to serve as my opposition to the news. Thousands and thousands of hardworking men and woman alike rely on the fish these hatcheries provide and in more than one way feed the mouths of millions from all corners of the world. It provides tens of thousands of job openings and careers for families around the world, In my humble opinion SPORTS fishing should not come before livelihood fishing. I do hope any decisions will be made off unbiased data processing. Hopefully no hasty decisions are made towards one way or the other. I thank you in advance to whom this may concern.

Matthew M. Secor

RECEIVED
JUL 12 2018
BOARDS



PC615
1 of 1

18


To whom this may concern,
Every summer here in PWS and the Alaska region I work as a deckhand on commercial Fishing Boats. This is a part of my livelihood. The production on hatchery caught fish keeps stable runs for commercial operations in PWS and Alaska alike. Cutting back on hatchery is cutting back on the livelihood of Commercial Fisherman who feed this world.

I Rely on these hatcheries every year to pay my college tuition, and afford my living costs while in study. Many more rely on these hatcheries to feed their families.

It is important that if this proposition be backed by peer reviewed scientific evidence Alaska needs hatcheries, and so does the commercial Fish markets. There will be little salmon left for Commercial boats to harvest without hatcheries.

I hope to see scientific evidence done before any decision is made. This is a part of my livelihood!

Thank you!


E/v Second wind (PWS)
Deckhand

July 9, 2018

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

Attn: Alaska Board of Fisheries

John Jensen, Chairman	Reed Morisky
Orville Huntington	Alan Cain
Fritz Johnson	Robert Ruffner
Israel Payton	

To the Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide public comment on the emergency petitions submitted by the Bristol Bay Native Association (BBNA) and the Chignik Advisory Committee (Chignik AC). The Aleut Corporation strongly opposes the petition from the Chignik AC and the BBNA and the suggested regulation changes that further restrict fishing in the South Peninsula of Area M, Shumagin Islands Area, and South Unimak Area fisheries and we request that the Board of Fisheries deny these petitions.

- 1. DECREASE IN ABUNDANCE** – We are aware the Chignik sockeye salmon run is not returning as projected and the early run escapement has not been met but there is no evidence that this decrease in abundance is linked to the commercial fisheries operated in the South Peninsula of Area M. For decades the South Peninsula of Area M commercial fisheries have operated, and the Chignik run has remained healthy. This decrease in abundance is likely due to environmental factors.

Many salmon runs throughout the Gulf of Alaska have seen low returns this year. Due to the large-scale decline encompassing a large geographic area, it is likely this is attributed to a common shared environment such as oceanographic changes in the Gulf of Alaska. In recent years the ‘blob,’ exceptionally warm waters in the Gulf of Alaska, has been attributed to decreases in the survival of key commercially targeted fish species in the Gulf of Alaska, such as the large decrease in cod abundance in 2018.

- 2. SUBSISTENCE** - The Chignik AC makes the following statement, “*Subsistence fishing in Federal waters of the Chignik drainage is currently closed due to an unprecedented low early-run sockeye escapement*”.

The following is a statement from the BBNA, “*WHEREAS: Chignik River’s first run has failed to produce to the point where subsistence users from the area will not meet their basic subsistence sockeye salmon needs*”.

While we understand the importance of subsistence harvest to Alaskan residents, specifically in rural Alaska, and we empathize with the low abundance and stress it puts on subsistence users and commercial fisherman, we believe the statements made by the Chignik AC and the BBNA are incorrect regarding “no” opportunity for subsistence.

Residents from Chignik Bay, Chignik Lake, Chignik Lagoon, Perryville and Ivanof Bay may subsistence fish in Chignik Lagoon and the beach to harvest salmon, and there have been community hauls of salmon distributed throughout the community (Personal Communication Chignik Assistant Area Management Biologist). We understand some residents may choose to collect their subsistence fish through “home pack”, and that currently this method cannot be exercised; however, there are options to meet their subsistence needs.

In the Chignik Management Area, the primary salmon species targeted for subsistence purposes is sockeye salmon. Subsistence sockeye salmon harvest is reported through the ADF&G fish tickets and have an average estimated subsistence harvest of:

- a. 1996 - 2015: sockeye 8,535; coho 1,662; chum 225; pink 1,102; chinook 133
- b. 2006 - 2015: sockeye 7,864; coho 1,395; chum 198; pink 787; chinook 125
- c. 2011 - 2015: sockeye 7,649; coho 1,321; chum 225; pink 771; chinook 116

3. **WASSIP** – The Chignik AC and the BBNA used information obtained from the WASSIP study as a basis for the proposal. The WASSIP study examined commercial harvest from 2006-2009. The ratios found in the study are reflective of the commercial harvests at that time and the ratios are not reflective of all harvests through time.
4. **SOUTH PENINSULA OF AREA M COMMERCIAL FISHERIES** - The fisheries operated in the South Peninsula of Area M, Shumagin Islands Area, and South Unimak provide a vital source of income affording them the ability to live in their rural communities with their families. Adoption of this proposal would put an unwarranted negative economic burden on the Alaska Peninsula fisherman, their families, and the communities who fish these waters, without any significant savings of Chignik bound fisheries.

	Alaska Peninsula (Area M)				Total Area M
	S01M Purse Seine	S03M Gillnet	Drift Set Gillnet	S04M Set Gillnet	
Annual Permit	121	162	116	399	
Active Resident Permits	82	88	95	265	
Active Nonresident Permits	37	73	16	126	

5. We cannot stress enough that the request from the Chignik Advisory Committee and the Bristol Bay Native Association do not meet the purposes of 5AAC 96.625.
 - a. As of July 7th, 172,859 sockeye salmon have passed Chignik Weir and previous years have had healthy runs. Therefore, the long-term sustainability of the Chignik River sockeye salmon run is not at risk of being “unavailable for harvest in future years”.

- b. The request to modify regulations from the Chignik AC addresses an allocation issue and not a conservation issue as required in order 5AAC 96.625 to be considered. In February of 2019, the Alaska Department of Fish and Game Board of Fisheries, will be holding a regulatory meeting to address Finfish regulations for the Alaska Peninsula, Aleutian Islands, and Chignik Management Areas and this is where the issue should be discussed.
- c. Current regulations provide management and the Commissioner sufficient flexibility to manage this mixed stock fishery. Further, this year's management has exercised this authority and has closed fishing in the South Peninsula of Area M.
- d. Regulations offered by the Chignik AC are allocative in nature and they will place a significant burden on the fishermen in the South Peninsula of Area M.

5AAC 09.365 - South Unimak and Shumagin Islands June Salmon Management Plan

i. CHIGNIK AC RECOMMENDED MODIFICATIONS –

(a) CHIGNIK AC SUGGESTED LANGUAGE FOR 2ND SENTENCE TO READ:

The sockeye salmon are predominantly Bristol Bay and Chignik origin.

➤ **Our Response - This modification does not address a conservation concern but is more of a description of the origin of the harvest.**

(d) In the South Unimak and Shumagins islands fisheries, the commissioner may establish by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(B) **CHIGNIK AC SUGGESTED LANGUAGE:** notwithstanding (A) of this paragraph: Beginning June 15 and continuing through June 30 the commercial fishery in the Shumagin Islands Area and South Unimak excluding the Unimak District and terminal harvest areas, commercial fishing may be conducted provided Chignik's early run escapement goal is being met and the Department projects a harvest of at least 300,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.

(2) for seine and drift gillnet gear,

(B) **CHIGNIK AC SUGGESTED LANGUAGE:** notwithstanding (A) of this paragraph: Beginning June 15 and continuing through June 30 commercial fishing in the Shumagin Islands Area and South Unimak excluding the Unimak District and terminal harvest areas, commercial fishing may be conducted provided Chignik's early run escapement goal is being met and the Department projects a harvest of at least 300,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.

- *Our Response – The modifications in (1)(A) and (2)(B) do not address a conservation concern for this season as the time for implementation end June 30th. This is an allocative issue not conservation.*

5AAC 09.366 - Post-June Salmon Management Plan for the South Alaska Peninsula

i. CHIGNIK AC RECOMMENDED MODIFICATIONS –

(a) **CHIGNIK AC SUGGESTED LANGUAGE:** The purpose of this management plan is to provide management guidelines to the department for management of the post June salmon fisheries along the South Alaska Peninsula, to provide for the harvest of local stocks in terminal harvest areas, and in July manage fishing opportunity on Chignik-bound sockeye salmon in waters outside of terminal harvest areas.

- *Our Response - This modification does not address a conservation concern but is more of a description of the origin of the harvest.*

➤

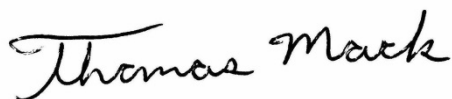
(d) **CHIGNIK AC SUGGESTED LANGUAGE:** (3): notwithstanding (b) and (c)(1), from July 1 through July 25 commercial fishing in the Shumagin Islands and South Unimak Areas, excluding the Unimak District and terminal harvest areas, may be conducted provided Chignik's escapement goals are being met and the Department projects a total harvest of at least 600,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.

- *Our Response – The current management plan is intended to be consistent with 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). Further, current regulations provide management and the Commissioner sufficient flexibility to manage this mixed stock fishery.*

- *Our Response - Further, this year's management has exercised this authority and has closed fishing in the South Peninsula of Area M.*

For these reasons, we ask that you deny the petition to modify regulations in the 5AAC 09.366 - Post-June Salmon Management Plan for the South Alaska Peninsula and 5AAC 09.365 - South Unimak and Shumagin Islands June Salmon Management Plan and any further changes to these fisheries.

Sincerely,



Thomas Mack
President/CEO
Aleut Corporation



Mister Chairman and board members my name is Alfredo Abou Eid and I am the vice president of the AC comity and have been a resident and fisherman in Chignik for 30+ years.

My concern is the 2018 Salmon run and as you know the 1st run is almost over and so far the escapement for the sockeye is 162,812 fish and it is half of the lower end escapement goals of 330,000-405,000 by the July 10. Area M intercepted over 900,000 or more fish and some of those fish were Chignik Bound, 8%-10% of these fish according to the WASSIP study were Chignik Bound Fish and that comes out to about 90,000 sockeye that could have helped boost our run but now are gone due to interception. We would like to thank the fishing game for there efforts is getting Area M fishing time reduced from 88 hours to 40 hours, But it wasn't enough to help due to the fact area M has 3 Different gear type based salmon fisheries that even if one is closed the other is going so they have for the better part of the month of June gear in the water that's intercepting Chignik Sockeye. I would like to mention that during Area M's salmon season the Shumagin Islands and Dolgoi Island. Now by the looks of the 2nd run it looks very weak at this time and we have asked fish and game to stop or put more restrictions on Area M especially in the Shumagin Islands and Dolgoi Island to help the escapement in Chignik but as of right now the Fish and Game hasn't done nothing to help at all to put a stop to Area M and help out our runs and the kept it like business as usual. We have been on the beach for the last 40+ days and we haven't even had a opener except for one limited area inner bay opening that turned out to be a flop and more of a money maker for the canneries for all the fuel they sold for the opening and out of the boats that went out for the opening about 90% didn't even make a set due to the lack of fish. And we feel that this opening was like throwing a bone to us and while Area M was fishing unrestricted while we couldn't even fish out on the capes in our area due to the fact our escapement goals haven't been archived but yet Area M harvested over 70,000 Sockeye and over 100,000 chum and according to the WASSIP



study in the Shumagin Island and Dolgoi Island the known interception numbers are about 44% to 23% of East bound chignik sockeye. What we need is a emergency plan put in place that the fishing game can use to help manage this fishery in times like this instead of saying we are looking at it day by day which isn't a plan at all **its guessing and guessing doesn't work**. Last year (2017) I asked the fishing game in chignik to come up with a emergency plan for Area M interception fishery in the event that the chignik sockeye escapement doesn't materialize and as of today we have yet to see a plan or idea and I feel that they never discussed it.

So as you can see or have herd from fishing game and fishing game data the 2nd run in chignik has been very weak and is on track to fail as the 1st run has already and Area M is open to fishing for 36 hours and closed for 60 hours in the month of July and so far they have had one opening on July 6th and being the first opening it was only for 33 hours and in that time they harvested 70,000 red salmon and 100,000 chum salmon and they have had another opening on the 9th for 36 hours and they are doing business as usual there in area M while we sit and watch them harvest fish that could be potentially coming to chignik. The escapement for the 2nd run as of the 10th of July is 15,108 sockeye and it is under the lower end escapement goals for the 10th of July which is 22,000 and the higher end is 42,000 fish.

Can you the member's of the board help to stop or restrict Area M which is not a terminal fishery, it is a interception fishery that is harvesting fish that is Chignik bound which is a terminal fishery that is under escaping and Area M is not being properly regulated or restricted.

Another point I would like to make according to Dr. Schindler form FRI the 2019 Chignik sockeye run is looking very weak to dismal for the number two ocean and one ocean sockeye return according to the Chignik Weir report is low and missing.

Once again I can not stress the importance of the fish board to do the right thing and close or regulate the interception of Chignik bound sockeye by Area M and to listen to advice from the Ac comity and the local knowledge/advice. The 5 villages in the



chignik management area depend on this one fishery due to the fact a majority of the people that just fish salmon. Our other resources in Chignik (crab,cod,halibut) are really low or aren't open. While Area M they have more opportunity to make a living by fishing (Sable Fish, halibut, crab) and they have a fleet of trawlers for catching cod and Pollock and other bottom fish. So far the 5 village economy has been hit very hard and we desperately need this salmon run to make a living, many boats have left and many crew members have left due to the fact fishing is closed due to the low escapment we aren't making any money.

In the past we sat on the beach to help the escapement and shut areas of the chignik management area to help boost the sockeye escapement and the feds even closed the subsistence fishing down in Chignik, ***And we will not sit by and watch a intercept fishery kill our run and not do anything about it so please do the right thing and do something to regulate or restrict Area M interception fishery to help keep Chigniks slamon run alive.***

We need a emergency plan in place for the future in case something like this happens again we cannot afford to lose any more fishing time. And as of right now we don't know how long we will sit on the beach or how strong our run will be next year or the year after, and we are unsure how long it will take to rebuild our run 5-10 years? **We need a plan and we need a plan now.**

**Thank You,
Alfrerdo Abou Eid
July 11, 2018**



Date: 7/11/2018
Fisherman: Andrew Otis
Fishing Vessel: Champion
Homeport: Valdez, AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Date: 7/11/2018
Fisherman: Chantrelle Cousins
Fishing Vessel: Champion
Homeport: Homer, AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

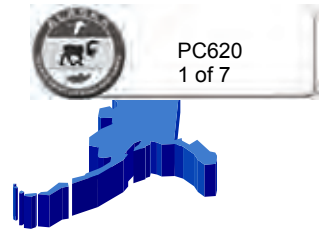
Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Chignik Regional Aquaculture Association
2731 Meridian Street, Suite B
Bellingham, WA 98225



July 13, 2018

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

Subject: ADF&G Staff Comments on Chignik Petition –Correct Oversight

Dear Chairman and Board Members:

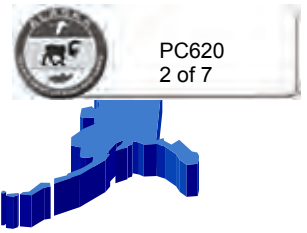
Under the criteria listed in the Joint Board Petition Policy used by the Board in determining whether or not an emergency exists, paragraph (f) of 5 AAC 96.625 reads:

..... an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.

In the Department's July 10th letter to the Board, they stated that, "The current Chignik River early-run sockeye salmon escapement level does not threaten the long-term sustainability of this stock and the department does not believe the current Chignik River early-run sockeye salmon escapement level or the harvest of some Chignik-origin sockeye salmon in KMA and SAP areas represents an emergency. "

What the Department did not consider is the consequences of the Chignik early run not meeting minimum escapement. Per the attachment from the University of Washington staff, if it is assumed that the 2018 early run escapement will reach nearly 190,000 fish for the season (it is at 168k as of today), the expected return from such a low escapement is statistically estimated to be only 489,000 sockeye salmon or 39,000 above the upper end of the BEG (350-450k). Respectfully Board members, a 489,000 return would clearly be "significantly burdensome to the petitioners because the resource would be unavailable in the future." Chignik is already devastated by the 2018 failed early-run, and based on the likely return from the current escapement, even if it were to reach 190,000 fish, Chignik will again be significantly burdened. Chignik's economy is solely driven by its two sockeye salmon runs, and there is no fallback fishery. The late run is currently showing substantial weakness and may well remain below minimum escapement through the season. Being culturally and economically dependent on its local salmon fishery, it cannot be said that the current run failure being experience in

Chignik Regional Aquaculture Association
2731 Meridian Street, Suite B
Bellingham, WA 98225



Chignik is and will not continue to be 'significantly burdensome.' The simple reality is that Chignik will be affected. In recognition of such, the Board is asked to reduce the impact by curtailing the Shumagin and South Unimak fisheries through July 25 or until an escapement recovery occurs.

Thank you.

Sincerely,

Charles (Chuck) McCallum

Attachment (1)

Chignik Early-Run Sockeye Recruitment

Dr. Curry J. Cunningham
Dr. Daniel Schindler
Fisheries Research Institute,
University of Washington

Background

This report provides a *preliminary* estimate of recruitment for the Chignik early-run sockeye salmon population, based on an assumed 2018 spawning abundance of 186,310. Chignik Regional Aquaculture Associations (CRAA) provided the projected 2018 Chignik early-run spawning abundance, the first week of July 2018.

Methods

Recruitment from a projected 2018 Chignik early-run sockeye spawning abundance of 186,310 was estimated based with a Ricker approximation to the available stock-recruitment data for brood years 1922-2009:

$$(1) \quad \hat{R}_t = S_t e^{\alpha \left(1 - \frac{S_t}{\beta}\right)} e^{\epsilon_t}$$

where $\epsilon_t \sim N(0, \sigma)$.

The Ricker model was fit to available stock-recruitment data using Bayesian methods and assuming log-normally distributed errors (Figure 1). All prior probability distributions were uninformative. The estimate of mean recruitment from a 2018 escapement of 186,310 was generated with the appropriate log-normal correction. Convergence diagnostics were all acceptable (Figure 3).

Results

The expected mean recruitment for a Chignik early-run spawning abundance of 186,301 is 489,000 fish, with a 95% credible interval of 390,000 – 594,000 (Table 1, Figure 2). For reference, we also estimated the escapement (S_{msy}) that would produce maximum sustainable yield (MSY) which was determined to be 428,000 (95% CI: 347,000 – 553,000). At an escapement equal to S_{msy} , the expected mean recruitment (MSY) of sockeye salmon to the early-run is 942,000 (95% CI: 722,000 – 1,231,000) (Table 1).



Table 1. Mean, standard deviation, and 95% Bayesian credible interval for the mean recruitment from the projected 2018 spawning abundance of 186,301 sockeye salmon to the early-run of Chignik River, Alaska. For comparison, the second row provides the estimate of the escapement (S_{msy}) that would produce maximum sustainable yield. The expected average maximum sustainable yield (MSY) is given in third row. All values are given in thousands of fish.

	Mean	sd	2.50%	50%	97.50%
Expected recruitment (from 2018 escapement)	489	53	390	488	594
Escapement to produce MSY (S_{msy})	428	53	347	420	553
MSY	942	131	722	929	1231



Chignik Early-run

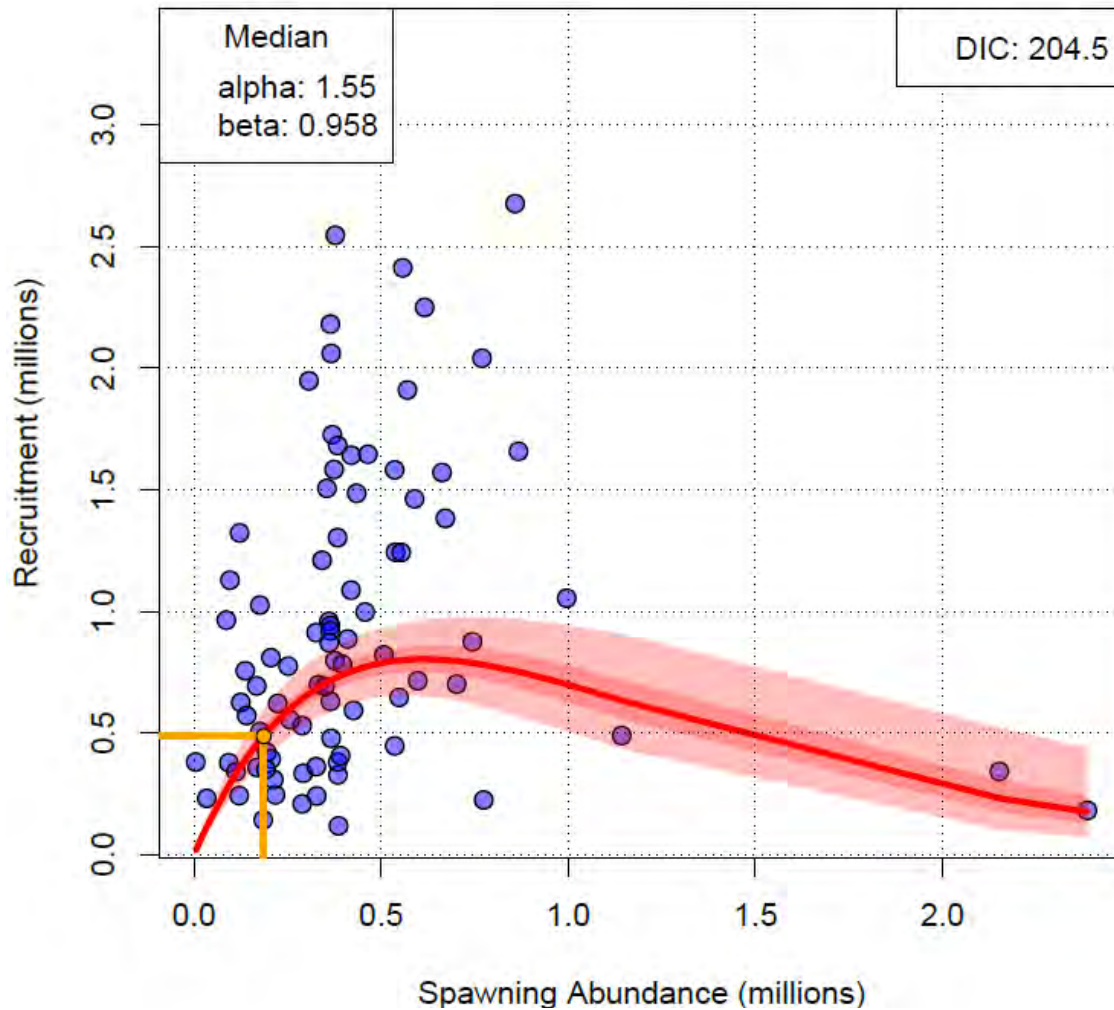


Figure 1. Stock-recruitment relationship for early-run of sockeye salmon to the Chignik River, Alaska. Data provided by the Alaska Department of Fish and Game. The heavy red line shows the best-fit of the Ricker function quantifying this relationship. Pink shading shows the 50% and 95% credible intervals around this relationship. Vertical orange line shows the projected 2018 sockeye salmon escapement, and the horizontal orange line shows the expected recruitment from the 2018 spawning population.

Expected Recruitment from $S=186,310$

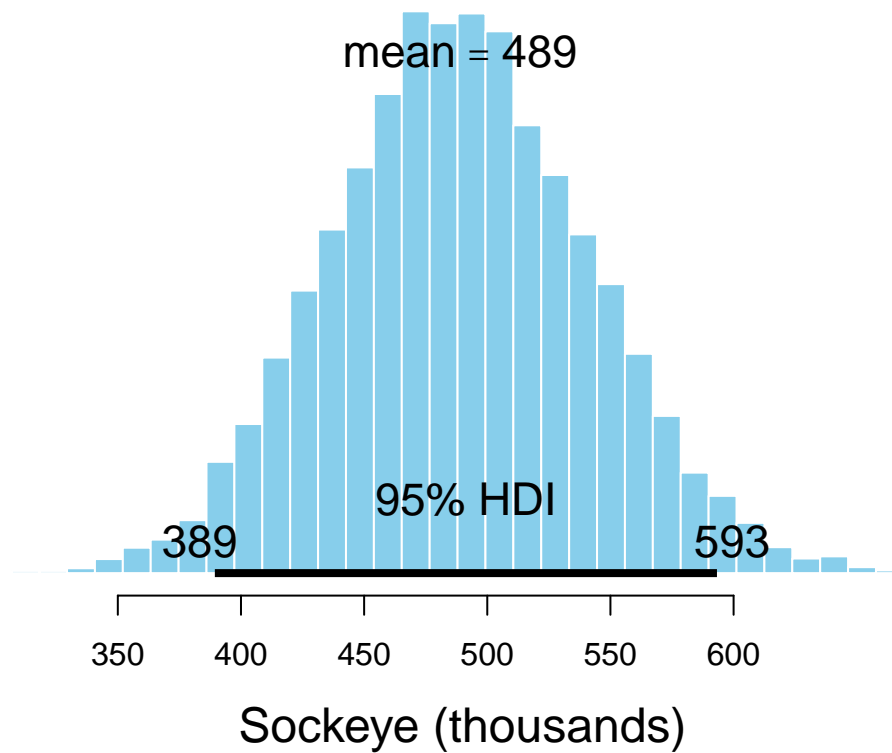


Figure 2. Posterior probability distribution for the estimated mean recruitment from a Chignik early-run spawning abundance of 186,310. The height of bars describes the relative probability of different recruitment levels, and the black line along the x-axis highlights the 95% highest probability density interval.

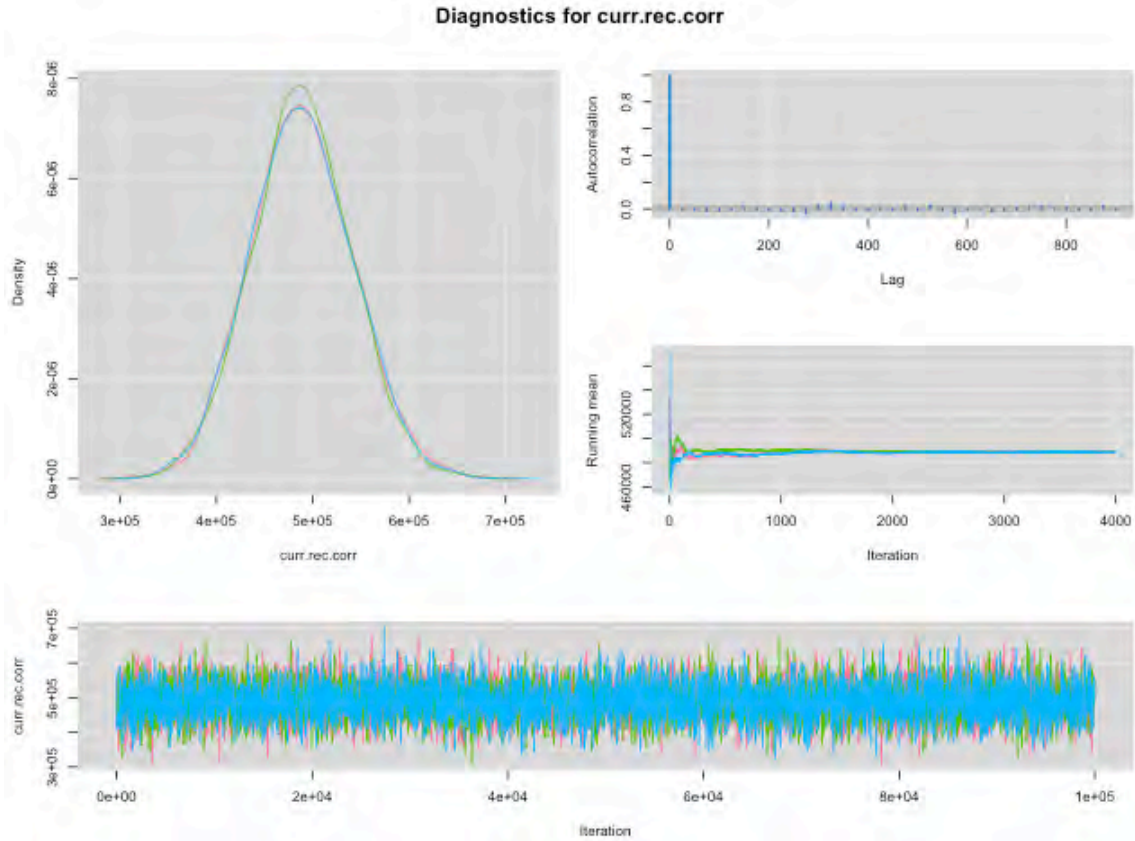


Figure 3. Convergence diagnostics for the expected mean recruitment parameter at $S=186,310$ from the Ricker model for Chignik early-run sockeye.



Date: 7-11-18
Fisherman: Chris Clemetson
Fishing Vessel: Champion
Homeport: Anchorage, AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



CITY OF OUZINKIE

P.O. Box 109
Ouzinkie, AK 99644

Phone 907-680-2209
Fax 907-680-2223
cityofouzinkie@ouzinkie.org



PC622
1 of 1

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

RE: Chignik Emergency Petition and BBNA Resolution regarding Chignik salmon run.

Dear Chairman Jensen and Board Members:

The Alaska Board of Fisheries recently announced an unusual July meeting to address emergency petitions on two topics -- Hatchery Permitting and Chignik Sockeye Run Failure. KSWG opposes changes to Kodiak's salmon management plans based on the Bristol Bay Native Association's requests for emergency relief. The Kodiak area's Cape Igvak Management plan has a conservation burden written into it, as noted in the Chignik advisory committee petition, and there is no need for changing or altering the plan.

Chignik's sockeye run failure is unfortunate. So too are the sockeye run failures in Kodiak, Prince William Sound and, perhaps, Cook Inlet. It would appear that the unusually warm ocean water temperatures in 2015 and 2016 impacted the ocean survival of sockeye from all Gulf of Alaska sockeye systems, including Chignik. Chignik's emergency "run failure" is therefore not unique but symptomatic of larger oceanographic conditions common to Gulf of Alaska sockeye runs.

While the magnitude of the "failure" appears to be marginally more severe in Chignik, the overall lack of 2018 wild run sockeye in the Gulf of Alaska contextualizes the Chignik concerns. The Alaska Board of Fisheries should therefore address this as an area-wide issue rather than focus on the Chignik system --- one that has had rearing issues with the early run in Black Lake for several decades.

The key question, therefore, is how should the Alaska Board of Fisheries address the "emergency" sockeye run failures throughout the Gulf of Alaska? Kodiak Salmon Workgroup suggests that the best approach is recognition of the natural variability of wild stocks as well as the limitations of regulatory solutions for natural variability. In other words, humbly accept that there are things beyond our control and TAKE NO ACTION.

The City of Ouzinkie firmly stands behind Kodiak's salmon management plans as scientifically valid, historically verified and equitably implemented. Thank you for your consideration with this important matter.

Sincerely,

Daniel Rich
Mayor



My name is Dakota Anderson and I am 17 years old and just graduated from Mount Edgecumbe High School. I have taken over my father's fishing permit and I am the youngest captain in the fleet here in Chignik. Fishing is a huge part of my life, I grew up fishing currently I am the 4th generation fisherman that was raised here in Chignik Bay. Why is it taking the Department of Fish and Game/ Board of Fisheries so long to acknowledge the need to protect the sockeye salmon in the Chignik management Area. I hear the older generation of Fisherman stating that Kodiak and Area M has every intention of trying to kill the Chignik Sockeye Runs off.

I am anticipating being able to continue with my families' tradition of Commercial fishing and I encourage the Board of Fisheries to do their part in conservation of our runs and protect our fisheries here in Chignik.

It doesn't take a rocket scientist to know that the management needs to change. It is going to be a sad day when the last fish goes up the river. An end to generations of fishing families, traditions, cultural and subsistence survival.

Kill off Chignik Sockeye Run and then even area M won't have fish to intercept.

**Just do your job and be HONEST WITH YOUR
DEALINGS.**

Thank You,

Dakota Anderson

F/V Alaska Rose Skipper



From: Daniel Earle
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: B.O.F. Emergency Petitions
Date: Friday, July 13, 2018 10:03:33 AM

Dear B.O.F. Members:

I'm writing to express my concerns about the Board's decision to hold a closed and controversial meeting in the middle of a salmon season to discuss emergency petitions that may severely impact Kodiak fishermen.

My wife and I have setnetted in Uyak Bay since 1971. I've always believed that the Alaskan salmon fishery is one of the best managed fisheries in the world, enabling us to have the confidence to pursue our livelihood these many years with the knowledge that A.D.F.&G. takes care of conserving and protecting this amazing resource. I also strongly believe that the Board's history of open process, and conservative and measured adherence to established regulations, is being compromised by special interest groups using the emergency petition process when Kodiak fishermen, given very short warning, have had little or no time to present our case. Our processor, Icicle Sfds., has urged us to express our concerns about restoring the Board's open and transparent hearing process, and without the plea from them, we would have known nothing about the upcoming hearing.

Please add my voice to those of the Kodiak fishermen who are concerned and disturbed by the Board's sudden decision to hear this emergency petition.

Sincerely,

Daniel Earle SO4K 59415P

Sandra Earle SO4K 61139R



Kodiak Island Borough

Office of the Borough Mayor

710 Mill Bay Road

Kodiak, Alaska 99615

Phone (907) 486-9310 Fax (907) 486-9391

July 12, 2018

Alaska Board of Fisheries
John Jensen, Chair
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526

Sent via e-mail to: dfg.bof.comments@alaska.gov

Re: Opposition to Emergency Petitions on Chignik Sockeye Fishery

Chair Jensen and Board Members:

Thank you for the opportunity to comment on emergency petitions regarding sockeye salmon regulations for the Chignik, Kodiak and Alaska Peninsula management areas slated for action at the Alaska Board of Fish (Board) meeting on July 17, 2018. The petitions do not warrant a finding of an emergency and the Kodiak Island Borough asks the Board to deny the requests.

We recognize the hardships created by harvest reductions in commercial fisheries. Kodiak relies on commercial fishing and saw an 80% quota reduction for Pacific cod in federal waters for 2018, on top of a pink salmon fisheries disaster in 2016. However, we recognize that commercial fishing is inherently uncertain and not every low year will qualify as an emergency. Alaska Joint Boards of Fish and Game regulation and Alaska policy, codified at AS 44.62.270, state that, "emergencies will be held to a minimum and are rarely found to exist."

Kodiak has over 330 active salmon fishermen. Due to the short notice the majority of Kodiak's salmon harvesters are out fishing and will not be able to meaningfully participate in this public process. The Board has recognized the public's reliance on a regularly scheduled participatory process, and the importance of public participation in developing management regulations. We agree with the joint Board that petitions can detrimentally circumvent this process.



The current Kodiak area fisheries management plan already has provisions allowing limitations or closures in the Cape Igvak Section in order to protect the Chignik fishery. The petitions describe no conservation gains that could result from further restricting harvest by Kodiak fisherman in the Cape Igvak Section, and do not provide specifics on the expected timing of any action, or impacts relative to that timing. There is no rationale for further Board action beyond what is already provided for in the current management plans.

Kodiak is also experiencing a drastic reduction in sockeye production in 2018, which in combination with the 2018 reduction in Pacific cod, has had a detrimental impact on Kodiak fishermen, processing workers and municipal governments who rely on stable and healthy fisheries to support our community. The Borough strongly opposes any further restrictions placed on Kodiak's salmon management plan that are not thoroughly vetted through a full Board of Fish public and transparent process.

The petitions do not warrant a finding of an emergency and the Kodiak Island Borough asks the Board to deny the requests. Specifically, we ask that you take no action on these petitions at the July 17, 2018 meeting.

Respectfully,

A handwritten signature in black ink, appearing to read 'D.A. Rohrer'.

Daniel A. Rohrer
Kodiak Island Borough Mayor



Date: 7/11/18
Fisherman: Mike Babich
Fishing Vessel: Champion
Homeport: Big Harbor, WA

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

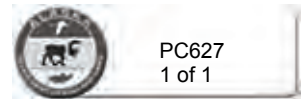
Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Ouzinkie NATIVE CORPORATION



July 11th 2018

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

RE: Emergency Petitions on Chignik Sockeye

Dear Chairman Jensen,

Ouzinkie Native Corporation (ONC) is an Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. The corporation which currently has over 500 shareholders, was founded within the Kodiak Archipelago in the Gulf of Alaska. Our community of Ouzinkie sits on Spruce Island, 14 miles north of the city of Kodiak. Our reliance on fisheries resources for both subsistence and commercial use goes beyond many within our generations. Ouzinkie has been on the front line many times working hard to establish a common ground in trying to find solutions while working diligently on issues affecting the viability and sustainability of our community. Fisheries has been a large portion of our efforts to stay very active among other coastal entities as we feel it still plays a vital role in the survival of our community.

It has come to our attention that the Board of Fisheries has received emergency petitions regarding the historically low 2018 Chignik Sockeye escapement. Ouzinkie Native Corporation opposes any request from other fishery management areas to stop or reduce salmon fisheries within the Kodiak salmon management area. While we recognize the unforgiving salmon season Chignik is having this year and can identify with its commercial fishermen and subsistence users, the board must recognize that restricting or shutting down Kodiak fisheries in 2018 will not change Chignik's issue. Chignik has stated in the past that the Cape Igvak section of the Kodiak management area when open has greatly affected the Chignik return. Two major rivers around the Kodiak area (Litnik and Buskin) widely used for subsistence harvest for residents of Kodiak, Ouzinkie, and Port Lions have also been closed to subsistence harvest due to low returns of sockeye. This has had a great effect on our local subsistence users as we get closer to the mid-point of the season and still feel the effects of the closures of these rivers.

This proposal will completely disrupt the Kodiak area fishery, and can cause substantial economic harm to its fishermen, processors and communities while not relieving Chignik's issue. Shutting down fisheries in the Kodiak fishery management area could cause another disaster in the Kodiak salmon management area, where we are still feeling the effects of the disastrous 2016 pink salmon season in Kodiak.

While an economic disaster declaration for Chignik may soon be upon them, we sympathize with them as we know it is not easy, however, Ouzinkie Native Corporation does not support restricting or closing the Kodiak salmon management area due to the poor sockeye returns to Chignik in 2018. Again, our hearts go out to the commercial and subsistence users in the Chignik area. We are hopeful that the representatives of the Board of Fish will identify solutions to assist them in their time of need. I ask humbly that any solution brought forward does not create harm to the Ouzinkie and the Kodiak region.

Sincerely,

Darren Muller, Chairman
Ouzinkie Native Corporation
P.O. Box 89
Ouzinkie, AK 99644
907.680.2208 office
907.2050158 cell
dmuller@ouzinkie.com



Date: 7/11/16

Fisherman: Trevor Mast

Fishing Vessel: Champion

Homeport: Gig Harbor

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Submitted By
Wally E Hinderer
Submitted On
7/12/2018 9:20:40 PM
Affiliation

Phone
9077494031
Email
lnight360@gmail.com
Address
William st lot #11
Chignik , Alaska 99564

Mr. Chairmen, and Members of the Board, Hi Im Wally E Hinderer. I inherited a permit no strings attached . But do to the bad circumstances of this year pretty much impossible to go forward, this year can't maintain new gear if something brakes. It's really hard to keep crew, it's a huge struggle. Even if I tried to change fisheries, I couldn't with no funds. This is one of the first years in 29 years of poor management with no return on salmon. I've fished here since 12, I'm 40 now and don't see a career here possibly in the worst case. Chignik is my career but it's really changing fast this season hopefully not for the worst next year. Who knows what it will bring the same. People won't come back on no predictions with the hope of a run like this. Five people already left the fleet and went elsewhere. I wouldn't have the funds to do that. If I had payments I wouldn't be able to pay them off. Not including my own lively hood bills in the winter months. THANK YOU SO MUCH FOR TAKING TIME TO READ THIS CONCERNING CHIGNIKS FISHER PEOPLE. PLEASE HELP US.
Sincerely, Wally E. Hinderer

Submitted By
Wesley ashby
Submitted On
7/12/2018 10:11:20 PM
Affiliation

Phone
907-749-4006

Email
Wesley_ashby15@yahoo.com

Address
P.o. box 56
123 main st. #56
Chignik , Alaska 99564

Dear, Chairmen and members of the Board,

My name is Wesley Ashby, I have been fishing since I was 9 yrs old. I'm now 26 yrs old, I depend on every Chignik salmon season to help me pay my bills during the winter months. This current season sure does tell me that something is terribly wrong with the way the entire Chignik area's fish is being managed. I have in the past and to this very day have seen that area M always cuts off the Chignik bound fish. As a result of that we are now seeing the full effects of our Chignik fishery being managed poorly and being intercepted by the other area. I'm very concerned about chigniks future and the future of this industry. How am I supposed to provide for my family, if the fish keep being managed poorly? I would hate the idea of having to leave Chignik in order to find a job that will cover my winter expenses. My leaving would also impact the Chignik community in different ways. If I where to leave the Chignik area it would impact the school during the month that it's important for all the kids to have adequate attendance for the school year. If there is less numbers of attendance being met then the school requires it would end up being closed down and that would really impact the education of the current students that attend school here in Chignik bay. I want to see change in management so the Chignik area will still have fish for the future to come..

Sincerely,

Wesley Ashby

Submitted By
Alan Parks
Submitted On
7/16/2018 2:34:20 PM
Affiliation
commercial fishing

Phone
907-399-3069
Email
alan@homerphotofest.org
Address
1293 Beluga Court
Homer, Alaska 99603

The Solomon Gulch Hatchery should NOT be allowed to expand capacity. There are too many indicators showing stress in the ocean to add any further production. The very directives of the PWS Comprehensive Plan have not been followed and **four of the the five criteria** have not been evaluated.

The PWS "Phase III hatchery management plan" has **5 criteria** that are SUPPOSED to be evaluated before hatchery releases continue. However, decades after this management plan was written, it does not appear as if any of these criteria have been evaluated in a critical/objective manner, or evaluated to the extent that they are outlined within this plan.

In particular please consider these four:

1. "Experimental manipulation of hatchery releases is likely to provide the data needed to **detect density-dependent growth**."
2. Juvenile salmon should be released in large and small groups at different locations and times.
3. **Growth rates of juveniles in each group** can be estimated from recovery of tagged fish.
4. The **magnitude of density-dependent growth** could then be estimated from **bioenergetic and statistical** techniques that account for **variations in ocean temperature and zooplankton abundance**."

Well? This has not happened, and neither have any of the other studies they outlined.

These 4 criteria should be the starting point for evaluating the extent to which the RPT and ADF&G have been following their own rules. In other words, what good is a Comprehensive Management Plan if it is not adhered to?

It is easy to pick apart and be critical of the very expensive and time consuming University studies if they don't align with the hatchery ideology. However, there have now been hundreds of studies and dozens showing dietary overlap between adult and juvenile pink salmon and other salmon species (and herring). Most studies suggesting detrimental impacts to the productivity and/or growth of salmon. This removes money directly out of the pockets of the wild salmon fisheries. This is allocation.

More peer-reviewed publications are being released all the time and they will continue to show the same story: Ocean competition has been occurring and the detrimental impacts to high value salmon species will get worse if the abundance of pink salmon in the North Pacific is allowed to increase.

Please do not allow further expansion of this Solomon Gulch Hatchery. Alaskan priority is to protect wild fish for the wild Alaskan fisheries especially when we are seeing implications obviously affecting other fishing communities on wild fisheries.

Sincerely, Alan Parks



BRISTOL BAY NATIVE ASSOCIATION
P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257

Aleknagik
Chignik Bay
Chignik Lagoon
Chignik Lake
Clarks Point
Curyung
Egegik
Ekuk
Ekwok
Igiugig
Iliamna
Ivanof Bay
Kanatak
King Salmon
Kokhanok
Koliganek
Levelock
Manokotak
Naknek
New Stuyahok
Newhalen
Nondalton
Pedro Bay
Perryville
Pilot Point
Port Heiden
Portage Creek
South Naknek
Togiak
Twin Hills
Ugashik

July 16, 2018

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


RE: Emergency Petition on Chignik Sockeye – July 17, 2018

Dear Chairman Jensen:

This letter is regarding Bristol Bay Native Association's (BBNA) Emergency Petition on Chignik Sockeye. After reviewing the public comments, it is apparent that BBNA's intent, with regard to our resolution reference to Kodiak fisheries, calls for clarification. Kodiak restrictions were intended to be understood as a reference to the fishery at Cape Igvak. BBNA stresses that all fisheries have an inherent responsibility to share the burden of conservation as Igvak and SEDM currently do; however, the Shumagin Islands and Dolgoi fisheries do not.

Thank you for your consideration and commitment to ensuring sustainable fisheries management.

Sincerely,

for 
Ralph Andersen
President & Chief Executive Officer



Date: July 11, 2018
Fisherman: Bethany Morris
Fishing Vessel: Morning Light
Homeport: Homer, Alaska

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Submitted By
Brian HAWORTH
Submitted On
7/13/2018 4:22:46 PM
Affiliation
tenderman

Phone
951-813-8185
Email
bhaworth89@msn.com
Address
po box 2142
kodiak, Alaska 99615

My name is Brian Haworth,

I have been a commercial fisherman for over twenty years and have seen the ebb and flo of the industry over those years. During the summer I run the Alaskan Star, a tender, for Icicle Seafoods and am constantly moving fish for the commercial fisherman. Due to this I am not available to voice my opinion in person so I am taking time to voice my displeasure in writing. I do no approve of special interest groups using the emergency petition process in the middle of the busy summer salmon season a way to avoid the public process. This needs to stop and needs to go through the proper litigation.

Brian Haworth

Submitted By
Carrie Hoofnagle
Submitted On
7/16/2018 11:21:17 PM
Affiliation

Phone
907-359-2897
Email
carrieh@icicleseafoods.com
Address
PO Box 30
Larsen Bay, Alaska 99624

Thank you for the chance to comment on this emergency petition.

I am the Fleet Manager for Icicle Seafoods on Kodiak Island at Larsen Bay. I started working at this cannery in 1994.

Our small plant alone assists over 1000 people who rely on the harvest, care, and utilization of salmon in the Kodiak area between ADF&G, tenders, seiners, setnet, beach seine, subsistence, skippers, crew, cannery employees, their families, village, and community. All of these people are directly affected by the implications set forth in the Chignik petitions being considered, and all of these individuals should be offered the opportunity to weigh in on this topic in a properly sanctioned Board of Fish meeting. We are mid-season in this fishery and currently engaged in fishing. This group, along with all of the other processing communities directly involved in the Kodiak fishery should be allowed access to this meeting.

I oppose this use of emergency petition process to avoid the public process intended for responsible, inclusive fishery management. These petitions should be denied on the grounds that they do not meet the emergency criteria.

Thank you for your consideration,
Carrie Hoofnagle



Date: 7/11/2018
Fisherman: Cate Morris
Fishing Vessel: Morning Light
Homeport: Homer, Ak

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Date: July 11, 2018

Fisherman: Chad Morris

Fishing Vessel: Morning Light

Homeport: Homer, AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

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Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



City of Chignik

PO Box 110
Chignik, AK 99564

Phone (907) 749-2280
Fax (907) 749-2300

July 12, 2018

Board of Fish

The City of Chignik is very concerned about the Chignik Fishery right now, especially due to how much the City heavily relies on the landing and processing tax for its day to day operations throughout the year. The City of Chignik runs the utilities for the 85 people that live here in Chignik during the winter and for the huge influx of fisherman during the summer months, which raises the population to around 350. The City has several departments, which include: Water and Sewer, Harbor, Electric and Public Works. We also provide the fuel to keep the generators running for the Electric department and to provide to sell to the residents for heating fuel.

The lack of Fish Tax could mean a devastating gap in the budget. The processing and landing tax has averaged around \$55,000-\$100,000 per year and the raw fish tax has been around \$55,000. Because of lost revenue to fisherman we will also be missing out on this year's harbor and utility payments as well.

Although, we realize the Alaska Department of Fish & Game doesn't think this is an emergency situation as it clearly states in their response to BBNA's petition to the Board of Fish. If they think that the salmon escapement is sustainable then why is the low end of the escapement goal set at 350,000? That doesn't make a whole lot of sense, they are contradicting their own goals they set. So, are they saying their yearly escapement goals are for nothing if it doesn't really matter what the count is, no matter how low it is. I, the Mayor of the City of Chignik, along with the City Council, do believe this is an extremely emergent situation for the entire Chignik area as well as the entire Chignik Fishing Fleet.

Sincerely,


Richard J. Sharpe, Mayor
City of Chignik



PO BOX 37
KING COVE, AK 99612
P (907) 497-2340 F (907) 497-2594
hmackmayor@gmail.com

Office of the Mayor

July 16, 2018
Alaska Board of Fisheries
John Jensen, Chairman (via email to: dgf.bof.comments@alaska.gov)
RE: Emergency petitions on Chignik Sockeye Fishery

Dear Chairman Jensen & Board Members:

The City of King Cove is opposed to the emergency petitions before the Alaska Board of Fisheries (BOF) tomorrow (July 17). We respectfully request that the BOF deny them. Both petitions seek to address a very weak early run of sockeye to the Chignik River through emergency action to further regulate or restrict fisheries in the South Peninsula of Area M.

While we understand the concern for the recent low return of the early Chignik sockeye run, there is no evidence that this circumstance is tied to either the June or post-June South Peninsula fisheries. These fisheries, our fisheries, have operated for decades under detailed management plans developed through a rigorous public process and adopted by the BOF. Under these plans, with the exception of this year's early run, Chignik has never failed to achieve its targeted goal since 2008 (Munro and Volk, 2017, ADFG, FMS 17-05). We all understand that escapement is the essential component of salmon conservation.

Furthermore, we understand the frustrations and emotions of the Chignik area fisherman and residents. We are friends with many of these people. We sympathize with this situation. But through our own history and experiences, and our understanding of the best/governing science from the WASSIP study, we do not believe our AREA M salmon fishery is the culprit.

We believe the current and unprecedented ADFG Emergency Order has shown the department's intent to address this emergency situation. However, this action has subsequently reduced our June fisheries by 25% and is already having significant, negative impacts on our King Cove fishermen, residents, and city government tax base. While ADFG took this action as a conservation measure, harvest rate data from 2006-2008 WASSIP studies, show that very few early Chignik fish were likely conserved by this action in late June. We believe that these emergency actions should carefully weigh possible conservation benefits, as supported by available data, and compared to the socioeconomic benefits of King Cove fisherman and our community.



In the interest of time and avoiding the redundancy of information being provided, the City of King Cove has reviewed the letters sent to the BOF on this matter from the Aleutians East Borough, Pacific Seafood Processing Association, Concerned Area M Fishermen, Unga Tribal Council, and Aleutian Pribilof Islands Association. The City of King Cove fully supports the various fisheries management and science issues regulating our Area M salmon fisheries and the first-hand observation, perceptions, and attitudes that all of us in Area M communities bring to this critical issue.

In summary, Area M salmon fishery issues are already scheduled to be discussed during the BOF the regular cycle of meetings schedule, at the February 2019 Board meeting. We believe that any emergency action at this time by the Board would be an incursion on the important public process that the Board has supported over the years.

We are reasonable, conscientious, and hard-working people in King Cove. We continue to expect that the Area M salmon fisheries management processes and decisions that have such a significant impact on our individual and community livelihoods to be fair and based on the best available science.

In closing I want to express a sincere **Thank You** to each of you for your public service to the State of Alaska, and in particular to all our salmon fishermen, families, and coastal communities.

Sincerely,

A handwritten signature in blue ink that reads "Henry Mack".

Henry Mack

Mayor (and life-long Area M salmon fisherman)



City of Sand Point, Alaska

July 16, 2018

Alaska Board of Fisheries
John Jensen, Chair
via email dfg.bof.comments@alaska.gov

RE: Emergency Petitions on Chignik Sockeye Fishery

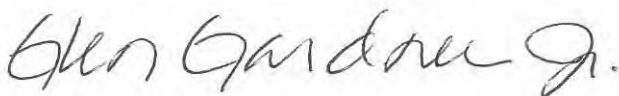
Chairman Jensen and Board Members:

The City of Sand Point opposes the emergency petition by the Bristol Bay Native Association and the Chignik Advisory Committee that ask for emergency action to halt or limit fishing in the South Peninsula area. The City understands the frustration of the Chignik fishermen this season but does not believe that the petition is the correct approach. Given the following facts, the City cannot support this petition.

- ADF&G already has the authority to issue Emergency Orders and chose to exercise that authority when slashing June fishing hours. Despite the need to take action to protect the first run in Chignik, the closures had no apparent influence on the run and only served to have a negative impact on Area M fishermen and communities.
- The June fishery has already concluded and there is no pressing emergency that should be addressed at this time; the petition strictly refers to the June fishery. The board cannot be expected to re-write history.
- Any discussion of Area M fishery issues are best addressed at the February 2019 Board of Fisheries meeting. Any action at this time would undermine the important public process that is the foundation of our fisheries.

Again, the City of Sand Point requests the Alaska Board of Fisheries take no action on the BBNA or the Chignik AC emergency petitions. There is no emergency to be addressed at this time and the Department of Fish and Game already the discretion to issue an Emergency Order should the need arise. Issues raised by this petition should be properly addressed at the regularly scheduled Board meeting in February 2019.

Sincerely,



Mayor Glen Gardner, Jr.



Date: 7/11/18
Fisherman: Claire McElroy
Fishing Vessel: Marina Lynn
Homeport: Kasilof, AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

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Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Copper River/Prince William Sound Fish and Game Advisory Committee
July 12, 2018 @ 6:30 PM (AST)
Prince William Sound Aquaculture Corporation Conference Room
Cordova, Alaska

- I. Call to Order at 6:35 PM by Tom Carpenter, Chair of Game.
- II. Roll Call:

Members Present (10): Tom Carpenter; Mike Collins; John Greenwood; Andy Hanson; Kevin Kimber; Mark King; John Renner; Tommy Sheridan; Amanda Wiese; Dennis Zadra

Members Absent (7): Torie Baker; Kory Blake; Teal Lohse; David O'Brien; Brad Sapp; Troy Tirrell; John Wiese.

Number Needed for Quorum on AC: 8.

List of User Groups Present: Alaska Department of Fish and Game (ADF&G); Copper River/Prince William Sound Marketing Association (CR/PWSMA); Native Village of Eyak (NVE); Prince William Sound Aquaculture Corporation (PWSAC); Prince William Sound Science Center (PWSSC).
- III. Approval of Agenda: Motion by M. Collins, seconded by M. King. Approved unanimously.
- IV. Approval of Previous Meeting Minutes: N/A.
- V. Fish and Game Staff Present: Jeremy Botz, Copper River/Prince William Sound gillnet fishery Area Management Biologist; Charles Russell, Prince William Sound purse seine fishery Area Management Biologist; Stacy Vega, Copper River/Prince William Sound Assistant Area Biologist.
- VI. Guests Present: Forrest Bowers (telephone), Deputy Director for ADF&G's Division of Commercial Fisheries; Thea Thomas, CR/PWSMA, PWSAC and PWSSC board member; John Whissel, NVE Director of Environmental and Natural Resources.
- VII. Old Business: none.
- VIII. Reports
 - a. Chairman's report:

Chairman Carpenter gave the floor to AC member Tommy Sheridan to provide some background on the Kenai River Sportfishing Association (KRSA) et al. emergency petition currently before the Alaska Board of Fisheries (BOF) and scheduled for board deliberation on July 17. Sheridan provided a history on recent related petitions received and reviewed by the BOF, including Hillstrand's emergency petition regarding Alaskan hatcheries at the January 2018 SEAK BOF meeting in Sitka: Hillstrand was given a three-minute opportunity to present her case to the board, and not action was taken on the issue. A more thorough review of Hillstrand's petition was heard by the board at their March 6-9 meeting in Anchorage; no



emergency was found to exist, and the petition was denied. However, the BOF established a committee (of the whole) review of Alaska's hatchery program to take place at their October Work Session as an opportunity to begin informational review of hatchery program. Sheridan described how KRSA had submitted a petition that was very similar to the one currently before the board, and which was heard during a May 14 teleconference. As a part of that meeting, ADF&G determined that an emergency did not exist, and the board itself denied the petition emergency status. KRSA et al. then resubmitted another very similar petition to the board for a finding of emergency and a request to deny a previously approved 20 million increase in the number of pink salmon eggs taken at Valdez Fisheries Development Association's (VFDA) Solomon Gulch Hatchery in 2018. ADF&G has again determined that no emergency exists, although the BOF wishes to deliberate on this petition in Anchorage on July 17.

According to Sheridan, there is significant opposition to this petition and its second hearing, and a common sentiment among many is that a summertime BOF meeting with such far reaching ramifications for stakeholders whose participation is so severely limited represents a flawed process. Sheridan acknowledges that concerns regarding Alaska's hatchery program have been recognized by stakeholders, and points to the Alaska Hatchery Research Project (AHRP) as a \$16 million investment in science, and collaboration amongst many stakeholders, including: Alaska Department of Fish and Game; the state's hatchery operators and the many thousands of fishermen that they represent; and, the state's processing community. Sheridan further pointed out recent certifications of the PWS salmon fishery by the Marine Stewardship Council (MSC) and the Alaska Responsible Fisheries Management (RFM) programs, and suggested that both certification programs were impressed by the scope and design of the AHRP during their recent assessments. Further, the Global Sustainable Seafood Initiative (GSSI) has determined that the MSC and RFM programs are dependable indicators of sustainably managed fisheries. GSSI is a multi-stakeholder process including prominent international environmental nongovernmental organizations such as Monterey Bay Aquarium.

Sheridan further stated that the Alaskan commercial fishing industry supported an October 2018 Board of Fisheries review of Alaska's hatchery program as an opportunity for much needed board and public education on the program. This has been scheduled to take place at the board's October Work Session. Sheridan argued that there is a general perception that hatchery critics have failed to appreciate the economic value of the Alaskan hatchery program to harvesters, processors, communities, and the state, and hopes that the state will do a better job of articulating their policies regarding hatcheries, and better describing the value and benefits of the state's hatchery program.

Sheridan then introduced Forrest Bowers to the group, and thanked Forrest for agreeing to speak to the group regarding this process.

b. ADF&G:

Deputy Director Bowers introduced the BOF's policy on emergency petition process. Throughout its history, emergencies have rarely been found to exist by the BOF, and there is an expectation that emergencies will be held to a minimum. Prior to 2015, Board of Fisheries and Board of Game evaluation of emergency petitions took place internally, with information provided by ADF&G in response to petitions. In 2015, the board delegated its authority for determination of an existence of emergency to ADF&G's Commissioner, so as to avoid the expense and inconvenience of holding a special board meeting every time a petition alleging



an emergency is received outside the regular meeting schedule. Following a review by ADF&G, Commissioner Cotten did not find evidence of an emergency, and denied the KRSA et al. May 16 petition. However, in this case, two board members disagreed with this finding, and called a meeting to deliberate on the KRSA et al. petition. Therefore, at the July 17 meeting the board will convene to make an independent determination as to whether an emergency exists, and what, if any, regulatory action may be desired. And, as of this (Thursday, July 12) evening, the board had received a total of six petitions, with the possibility of receiving more before the meeting, according to Bowers.

Deputy Director Bowers also provided some clarification on expectations for the review of Alaska's hatchery program currently scheduled to take place at the BOF Work Session via a committee of the whole process. Bowers stated that this meeting will entail a series of presentations by the department featuring (1) a review of the state's regulatory and permitting structure as it pertains to hatcheries, (2) a history of the state's salmon fishery enhancement program, and (3) a science component, including a summary of the statewide hatchery-wild interactions study (AHRP) and a review of relevant literature.

IX. Public comment:

Thea Thomas strongly questioned the board's authority to take action on this issue, and recommended a review of the AHRP at the BOF October Work Session.

John Whissel recommended that the CR/PWS AC unanimously oppose the KRSA et al. emergency petition, and relayed Native Village of Eyak's strong opposition to the petition.

X. New Business:

After some discussion of the KRSA et al. petition, including broad agreement on the group's opposition to the petition, and shared concerns regarding such a meeting taking place when most commercial fishery stakeholders were participating in their respective fisheries, a motion was made by member Greenwood and seconded by member Zadra to make the following recommendation to the BOF:

"The Copper River/Prince William Sound Fish and Game Advisory Committee strongly recommends that the Alaska Board of Fisheries confirms Alaska Department of Fish and Game's (ADF&G) findings for a lack of emergency with regards to the KRSA et al. emergency petition, and requests that the board take no action on this petition. The committee is concerned by any process which stands to affect local, regional, and statewide stakeholders at a time when public participation is severely limited. Further, the committee questions the board's authority to take action on this petition regarding VFDA's permitted egg capacity and directs the board to note ADF&G's June 14 memo to Chairman Jensen and their interpretation of the board's regulatory authority as specified in AS 16.10.440(b). Finally, the committee does not believe that this situation constitutes an emergency."

This motion passed unanimously with 10 in favor, and none opposed.

Member Renner then made a motion to make the following recommendation to the BOF, which was seconded by member Wiese:



“The Copper River/Prince William Sound Fish and Game Advisory Committee recommends that the Alaska Board of Fisheries adheres to its March 9, 2018 decision to convene a hatchery committee during the board’s work session being held on October 15 and 16, 2018 in Anchorage. The committee understands that hatchery production levels and salmon fishery enhancement permitting processes and regulatory structures will receive a thorough review by the board during this meeting, at a time when this issue can be vetted in an open public forum. Only then would this issue benefit from necessary public participation.”

This motion passed unanimously with 10 in favor, and none opposed.

- XI. Tommy Sheridan was selected to represent the committee at the July 17 BOF meeting in Anchorage.
- XII. The next meeting of the Copper River/Prince William Sound Fish and Game Advisory Committee will take place in Fall 2018.
- XIII. The meeting was adjourned at 8:12 PM.



Alaska Board of Fisheries Emergency Petitions July 17, 2018				
	Position	# Support	# Oppose	AC Comments, Discussion, Amendments, Voting Notes
1	Recommended motion for comment to the Alaska Board of Fisheries regarding the KRSA et al. emergency petition.			
	Support	10	0	“The Copper River/Prince William Sound Fish and Game Advisory Committee strongly recommends that the Alaska Board of Fisheries confirms Alaska Department of Fish and Game’s (ADF&G) findings for a lack of emergency with regards to the KRSA et al. emergency petition, and requests that the board take no action on this petition. The committee is concerned by any process which stands to affect local, regional, and statewide stakeholders at a time when public participation is severely limited. Further, the committee questions the board’s authority to take action on this petition regarding VFDA’s permitted egg capacity and directs the board to note ADF&G’s June 14 memo to Chairman Jensen and their interpretation of the board’s regulatory authority as specified in AS 16.10.440(b). Finally, the committee does not believe that this situation constitutes an emergency.”
2	Recommended motion for comment to the Alaska Board of Fisheries regarding the KRSA et al. emergency petition.			
	Support	10	0	“The Copper River/Prince William Sound Fish and Game Advisory Committee recommends that the Alaska Board of Fisheries adheres to its March 9, 2018 decision to convene a hatchery committee during the board’s work session being held on October 15 and 16, 2018 in Anchorage. The committee understands that hatchery production levels and salmon fishery enhancement permitting processes and regulatory structures will receive a thorough review by the board during this meeting, at a time when this issue can be vetted in an open public forum. Only then would this issue benefit from necessary public participation.”

Minutes Recorded By: Tommy Sheridan
 Minutes Approved By: Tom Carpenter
 Date: July 15, 2018

July 15, 2018

ATTN: State of Alaska Board of Fish

RE: Emergency Meeting scheduled 17 July 2018

It has come to my attention that certain parties are appealing to the Board of Fish to rescind **VFDA's pending increase of pink salmon production.**

As a commercial fisherman in PWS for close to 40 years, a PWSAC board member for 20+ years, RPT member and Alaskan resident since before the Earthquake I feel I have a vested interest in decisions affecting fisheries economics.

I oppose any reduction or limitation to fisheries production.

VFDA's increase in production has gone through "due processes" by ADF&G and RPT. At this time there is no science showing a down side. Fisheries production equates to more available fish for predators, sports fishermen, commercial fishermen and subsistence users.

Also, the timing of this BOF meeting is scheduled to interfere with participation by commercial fishermen from PWS or anywhere in the state due to it's being the height of fishing season.

David B. Clemens

3735 Dora Ave

Anchorage, AK 99516

(918) 916-1845

dclemens@alaska.net



Date: 7/11/18
Fisherman: Dillon Bosick
Fishing Vessel: Marina Lynn
Homeport: Homer AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Board of Fish

I have been involved in the salmon industry for 50 years now. 46 of those years have been in Chignik. As I read comments from other areas, it seems that most people don't really think that there is a problem. This salmon run here in Chignik literally is in my front yard. In all the years I have lived here I have never seen what I have this year. The second run is not on track. We here in Chignik have been telling the board for years that the areas on both side of us should be sharing the conservation as well as Chignik bound fish that they intercept. This wait an see attitude is not working. The one thing that is for sure is in 4 or 5 years when this 2018 run returns it will be weaker and if the wind is blowing right, it could intercepted before it reaches Chignik. If these areas, on both side of us, are calling Chignik bound sockeye are common resource then they should be worried about the future of it. This job in front of you is a big one and hope you can make the right choice for all concerned.

Thank You Don Bumpus



Date: 7-10-18
Fisherman: Efreim Efimoff
Fishing Vessel: Voyager
Homeport: Cordova, AK.

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed, 



Date: July 2 2018
Fisherman: Fred I Reutor
Fishing Vessel: Frontier
Homeport: Cordova AK

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed, 



Date: 7/14/18
Fisherman: Gregg Basick
Fishing Vessel: Miss Molly
Homeport: Kasilof



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Date: 7-11-18
Fisherman: Gregory Bosick
Fishing Vessel: Marina Iyaa / Revelation
Homeport: Homer

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Submitted By
James Hamik
Submitted On
7/15/2018 6:16:44 PM
Affiliation
Brother

I'm the brother of one of the fisherman that would be told to pack up and go home if the South Alaska Peninsula salmon fisheries were closed. Seems unfair that the area would then be fished by fisherman from an area that was mismanaged. Where's the fairness in that? A lot of money and time is invested in getting a boat and crew out there every season in the hopes of making a profit. Please be fair to the men and women who's livelihood and families livelihood would be negatively affected by a ruling to close the South Alaska Peninsula salmon fisheries. Thank you.

Submitted By
Jeff Thalman
Submitted On
7/16/2018 3:33:30 PM
Affiliation

Phone
907-235-6218
Email
fish@alaska.net
Address
39295 Greg court
Anchor Point, Alaska 99556

RE: Please do not allow further PWS Production coming from Solomon Guch Hatchery.

Unless it is their own invention, hatchery advocates scoff at science, scoff at wild fish, scoff at wild fisherman, scoff at ADFG authority and now they are scoffing at the Board of Fisheries.

When is enough, enough? 250 million is already too much. The PWS's close to 1,000,000,000 billion extra low valued hatchery pink salmon mouths to feed in the Gulf of Alaska waters is **way too much**.

It is said that Yakutat is the balony between the hatchery sandwich because Yakutats wild fish are doomed as prey to hatchery fish on both sides, PWS and SE, especially on years of mis-match of prey species and abundance.

It looks like Chignik is the mustard on top of the hatchery sandwich!

Both Yakutat and Chignik as well as many Gulf of Alaska Rivers were inundated with pinks. ADFG did not and does not monitor any of these streams. It was a fluke, unforeseen and unexpected that Lower Cook Inlet found the 93% of PWS hatchery fish straying during sampling.

At the time in the newspaper LCI managers blamed the Kitoi Hatchery fish near Kodiak as the culprits of all the straying because Kitoi DOES NOT THERMAL MARK THEIR HATCHERY FISH so ADFG has no idea the extent or damage being caused by the narrow band of genetics from hatchery fish into the diverse genetics of wild stocks. This is outrageous! This is against the law.

All hatchery expansion must cease until all science, all reports, all information is put together into a comprehensive picture of the dynamics of this complex puzzle. Using narrow hatchery designed PWS genetics study, as an excuse to continue increasing production, has no merit. This study is only a tiny part and not the answer to this puzzle.

This out of control industry must stop expanding and scoffing and admit they are blocking the process to let the biological pieces be put together to protect wild fish.

This is the BOF responsibility and the State of Alaskas Public Trust.

Hatchery fish are not the priority in the state of Alaska.

Hatchery fish are less than 5% of the x vessel value in Alaska.

Hatcheries do not warrant taking any chances to damage wild fish.

If ever there was a time to institute the Precautionary principle it is now.

5 AAC 39.322(c)(1)(a)(iii), (D) reads in part:

(5) in the face of uncertainty, salmon stocks, fisheries, artificial propagation, and essential habitats shall be managed conservatively as follows:

(A) a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and habitat management, the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge, should be applied to the regulation and control of harvest and other human-induced sources of salmon mortality; a precautionary approach requires

(i) consideration of the needs of future generations and avoidance of potentially irreversible changes;

(ii) prior identification of undesirable outcomes and of measures that will avoid undesirable outcomes or correct them promptly;

(iii) initiation of any necessary corrective measure without delay and prompt achievement of the measure's purpose, on a time scale not exceeding five years, which is approximately the generation time of most salmon species;

(iv) that where the impact of resource use is uncertain, but likely presents a measurable risk to sustained yield, priority should be given to conserving the productive capacity of the resource

Thank-you for listening

Jeff Thalman



PC651
2 of 2

Submitted By
Joe short
Submitted On
7/15/2018 9:05:01 AM
Affiliation

Phone
907-518-0467

Email
Jshort@gci.net

Address
907-785-3585
Petersburg , Alaska 99833

Dear board

I object to this proposal in a time when we are at such low levels of salmon returns. And I strongly object to this proposal being brought to the board of fish right in the middle of our commercial salmon season when all of our commercial guys are trying to earn there livelihood..

I am a 3rd generation commercial fisherman I have 2 boats that I tender salmon with in SE Alaska with. I have fished salmon or tendered salmon over the last 43 years. I cannot stress that the timing of this proposal is very poor for all user groups to be fairly represented.

Thank you, Joe short F/V Kayleigh Ann, T/V Carole B

7/15/2018

Chairman Jensen and members of the board,

I have been a fleet and plant manager in Alaskan salmon fisheries for some thirty years. For the past three years, I have been working for Icicle Seafoods as an assistant fleet manager in Bristol Bay. I can tell you that holding an emergency meeting on salmon proposals at the height of the salmon season is not good public policy. Our fishermen need regulatory stability, and our managers need to be able to manage. Please don't let political pressure force a meeting where an emergency doesn't exist.

Alaska has the best fisheries management in the world. Our fishermen, tenders, and plant managers want to see salmon sustained for generations. That will be hard to accomplish with managers being threatened with emergency petitions mid-season. This approach effectively halts in-season management activities for fisheries managers, forcing them to focus on preparing for an emergency meeting rather than managing ongoing fisheries at hand. Nature, including salmon, is cyclical, and runs will face ups and downs, thus it does not constitute an emergency meeting mid-season! Hatchery egg takes undergo a public process and approval by ADF&G prior to implementation. There is nothing about the hatchery proposal that signifies an emergency.

Please strongly reconsider holding a salmon meeting in July in Anchorage. I look forward to participating in the hatchery work session in the fall.

Sincerely,

John Baird

Submitted By
Kristen smith
Submitted On
7/15/2018 9:50:33 PM
Affiliation

Phone
541-760-8102

Email
Kristen_s3@hotmail.com

Address
Po box 2260
Valdez, Alaska 99686

I am a seine permit holder in Prince William Sound. This fishery is the primary source of income for myself and for each of my 4 crew members who have all been active participants in this fishery for years. We are all avid sport fishermen and love to enjoy what the sound has to offer. This seine fishery is a fishery we are all proud to participate in. We Love making our living this way and believe that the hatcheries are a necessary part of that process. We need to see the hatcheries continue to produce fish. Also I find it frustrating that an emergency meeting was called in the middle of our season, the one we all rely on for our primary income. This is an exceptionally important topic and I would like to be able to be there to be able to express my views and those of my crew.

Submitted By
Kyle Foster
Submitted On
7/16/2018 1:47:09 PM
Affiliation
Aleutia

To Whom it May Concern:

The Board should deny these emergency petitions to restrict South Peninsula salmon fishing at this time because:

Chignik and Area M proposals are already scheduled to be discussed during this Board of Fisheries meeting cycle at the February 2019 meeting.

- ADFG already has emergency order authority to make adjustments as needed to the South Peninsula fishery, and have already exercised that authority this June when they reduced the Area M June fishing time by 25%
- In July fishing is closed nearly twice as much as it is open, in the current management plan.
- An all-out closure of the South Peninsula fishery will not significantly help improve the Chignik run, but it will do lasting damage to South Peninsula fishermen, processors, communities and this historic salmon fishery.
- The unfortunate low salmon runs are occurring throughout the Gulf of Alaska this year, and are likely caused by environmental conditions, not South Peninsula fishermen.

Sincerely,

Kyle Foster
Executive Director
Aleutia



Date: 7-14-18
Fisherman: Marina Bosick
Fishing Vessel: Miss Molly
Homeport: Kasilof AK



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Marina Bosick



Date: 7/11/2018
Fisherman: Melanie Morris
Fishing Vessel: Morning Light
Homeport: Homer, Alaska

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,

Melanie Morris



Date: 7/12/18
Fisherman: Molly Heim
Fishing Vessel: Miss Molly
Homeport: Kasilof AK



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



July 12, 2018

Board of Fish,

As a Commercial Fisherman and Permit owner in Chignik, AK I would like to express my deep concern over the low escapement this season and how even with the studies done such as the WASSIP study that clearly shows that Chignik fish are intercepted and caught in very high numbers in other areas and those areas are still kept open without regard to the record low escapement in Chignik and that there is no concern on the Alaska Department of Fish & Game's side which is clearly stated in its response to BBNA's petition to the Board of Fish. It is basically a slap in the face to all Chignik area people and fisherman. This goes to show how mismanaged the Chignik area is by the Alaska Department of Fish & Game and adds to the distrust, especially when they are controlled by the Kodiak area and not by a Lake & Peninsula office or Regional office. I believe as well as many others in Chignik believe, we should have our own area management and if ADF&G continues to disregard and favor other areas, maybe the Federal government should take over.

As I see it, the way it is managed right now, ADF&G will not only will ruin our chances for a future fishery but they will also will ruin our chances on what sustains our lives during the winter months which is our Subsistence lifestyle and Sockeye salmon is one of the biggest resources of our Subsistence food source. This is not only our main source of income, this is what sustains our economy in the region and most importantly this is what keeps us alive, our Subsistence lifestyle, our food on the table, which will be gone if this is what continues to be mismanaged.

Sincerely,

Peter Anderson
F/V Patti Ann



Date: 16 July 2008
Fisherman: Robert Beede
Fishing Vessel: CEDAR BAY
Homeport: CORDOVA

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

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Signed,

Submitted By
Roberta Copeland – McKinney

Submitted On
7/15/2018 12:30:23 PM

Affiliation

Phone
1-907-299-0294

Email
Paulinos@xyz.net

Address
972 Lakeside Dr.
Homer , Alaska 99603

Many people depend on this fishery for their livelihood. Please do not shut it down.



Dear Sir or Ma'am,

My name is Rosanna McArthur and I'm a Community Health Aide in training at the clinic here in Chignik Bay. Since being recently hired, I am under contract for a number of years. My husband is a teacher at the village's school, where I was formerly a preschool and physical education aide. Not only is the fishing industry vital to the survival of the community, but the school and student education are the essential tools to thriving.

Living within such a small village, it can be easy at times to be overlooked. Due to the significant absence of fish this season, it is imperative that immediate action take place. We are pressed to request for emergency relief in order to pull through this coming winter. The substantial loss of tax revenue attributed to the scarcity of fish will have a considerate impact on the education of the students, especially in Chignik Bay.

Thank you for not overlooking our pleas!

With utmost sincerity and a hopeful heart,
Rosanna McArthur



Date: 8/1/18
Fisherman: Sam McElroy
Fishing Vessel: Marina Lynn / Revelation
Homeport: Homer

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,



Date: 7-13-18
Fisherman: SHAWN WILLIAMS
Fishing Vessel: TERYN
Homeport: SEWARD

To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

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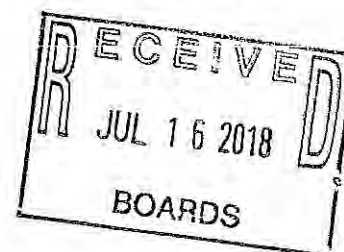
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PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed, 



Date: 07-09-18
Fisherman: Stefan Heim.
Fishing Vessel: Miss Holly
Homeport: Kasilof AK



To: Alaska Board of Fisheries

RE: Comments on KRSA et al. Hatchery Emergency Petition

Dear Chairman Jensen and Board of Fisheries Members:

I am a commercial fisherman in Prince William Sound and depend on the area's commercial salmon fishery for my family's livelihood. 1,500 active salmon permit holders and their crew would not be able to make a living in PWS without hatchery production. Studies have shown that VFDA salmon account for 30% of PWS seiners' annual average gross earnings, while PWS seiners and gillnetters derive 64% of their gross earnings from harvesting PWSAC salmon. On many years in PWS, there would not be much fish at all if it weren't for the hatcheries.

Hatchery programs are economic drivers for Alaskan communities. Studies have shown that 74% of VFDA's commercial salmon harvest value goes to Alaskan residents, with 37% going to residents of Cordova and Valdez, 23% to the Kenai Peninsula, 9% to residents of Anchorage, and 4% combined to residents from Kodiak, Mat-Su, Sitka, and Wrangell-Petersburg. It should be noted that these hatchery fish are not just benefiting commercial fisherman. According to the McDowell Group, almost 700,000 PWSAC sockeye salmon were harvested in subsistence and personal use fisheries between 1999 and 2011, with 73% of these fish going to residents of Anchorage, Fairbanks North Star Borough, and the Matanuska-Susitna Borough. Further, VFDA hatchery production accounts for 75% of all coho and 90% of all pink salmon caught by sport fish anglers in the Valdez area, and the total sport fish economic output for VFDA is estimated at \$6.6 million annually.

Finally, I wish to voice a concern about process. Convening an emergency meeting on this issue during the middle of our commercial salmon fishing is unreasonable and poor process, especially when the same petition has already been denied due to not meeting emergency criteria. The board has scheduled a discussion on hatchery production at the October 2018 work session. By holding this meeting in Anchorage on July 17, you have denied me and my fellow PWS fishermen an opportunity for meaningful participation.

PLEASE DENY THIS EMERGENCY PETITION REQUEST.

Signed,