
ALASKA BOARD OF FISHERIES

Work Session

Anchorage | October 12-13, 2023

Additional On-Time Public Comments

Adams, Virginia.....	PC42
Aspelund, Jennifer	PC43
Aspelund, Lindsey.....	PC44
Barrette, Al	PC45
Benedetti, Ben.....	PC46
Bergman, Bert.....	PC47
Billi, Keith.....	PC48
Boots, Justin.....	PC49
Bower, Dale	PC50
Brady-Power, Joel.....	PC51
Bristol Bay Regional Seafood Development Association.....	PC52
Bristol Bay Reserve	PC53
Buist, Emma Lee	PC54
Byron, Hunter	PC55
Campen, Benjamin (Comments also under PC11)	PC56
Christiansen, Susanne.....	PC57
Cyr, Woody	PC58
Daniels, Joe.....	PC59
Delzer, Damien	PC60
DeRuyter, Patricia.....	PC61
DiGennaro, Casey	PC62

Driver, Carrie.....	PC63
Dunn, Michael.....	PC64
Edwards, Jonathan	PC65
Emery, William.....	PC66
Evanoff, Cherissa	PC67
Ford, Shannon.....	PC68
Foss, Jacqueline	PC69
Fujioka, Tad.....	PC70
Gama, Willy.....	PC71
Genter, Keith	PC72
Hackett, Adam	PC73
Hackett, Lexi	PC74
Heyano, David.....	PC75
Hogue, John	PC76
Horn, Greta	PC77
Horval, Andrew.....	PC78
Hutto, Jonathan	PC79
Jahnke, Robert.....	PC80
Jorsan, Karl.....	PC81
Kelly, Ryan	PC82
Layland, Lindsay.....	PC83
Llanos, Thomas	PC84
Lopata, Stanley	PC85
Morrison, Graham	PC86
Murphy, Timothy.....	PC87

Murray, John.....	PC88
Myers, Kathleen.....	PC89
Myrick, Adelia.....	PC90
Nicol, David.....	PC91
Northwest Setnetters Association (NWSA).....	PC92
Owecke, Emma.....	PC93
Peters, Dale.....	PC94
Peters, Michael.....	PC95
Petrich, Jane.....	PC96
Powell, William.....	PC97
Preston, Lance.....	PC98
Prince William Sound Setnetters' Association.....	PC99
Reynolds, Earl.....	PC100
Rice, Debra.....	PC101
Richards, Mark.....	PC102
Ring, Craig.....	PC103
Rivera, Tracy.....	PC104
Savo, Scotty.....	PC105
Schmidt, Kevin.....	PC106
Schroeder, Tiera.....	PC107
Schwartz, Margie.....	PC108
Seafood Producers Cooperative.....	PC109
Smith, Candace.....	PC110
Smith, Todd.....	PC111
Smith, James.....	PC112

Stanley, Dale	PC113
Stanley, Dale	PC113
Stauner, William	PC114
Tanana Chiefs Conference (TCC)	PC115
Ten Kley, Rian	PC116
Thomas, Chris	PC117
Thomas, Jessica	PC118
Thorpe, Laurie.....	PC119
Turner, Alannah.....	PC120
Vey, Edward.....	PC121
West, Catigan.....	PC122
Wetter, Diane	PC123
White, Nia	PC124
White, Ani.....	PC125
Whitish, Andrew.....	PC126
Wilkinson, LaTisha	PC127
Williams, Mark.....	PC128
Wischer, Thomas	PC129



PC42

Submitted by: Virginia Adams

Community of Residence: Kodiak, Alaska

Comment: ACR #1: Oppose

I have fished my Westside Kodiak set net site for 43 years. This Statewide proposal in no way represents Westside Kodiak set net operations. This ACR1 should be rejected on that basis alone. Any set net regulation changes should reflect the actual workings of an area, as in Kodiak, Bristol Bay, Southeast etc.

I fish in Seldovia Tides, some of the greatest tidal fluctuations in the State. My main set net set is held by 9-300lb anchors and tremendous fathoms of line to hold that set when i put my net on it. There is no way I could conceivably remove and reset that frame work for openings. To remove that frame work for a 2 day closure and reset is completely unachievable, That is absurd.

There is and never has been in my many years of fishing my sites, any adverse events from set net frame work staying in water when the net not on it. This proposal is making issues where none exist.

To adopt this would essentially eliminate the West side Kodiak set net fishery. You, as Board of Fishery members, should not even have to deal with ACR requests such as this that waste your valuable time as well as my own. Let's all deal with realistic, productive ACR's that are area specific.

Reject ACR1 without hesitation.

Respectfully,

Virginia Adams

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC43

Submitted by: Jennifer Aspelund

Community of Residence: Seattle Wa

Comment: ACR 1) requiring the removal of setnet anchoring devices and buoys .

Please do not move this legislation forward.

Currently Set net fishers must mark there anchoring devises with buoys and a flashing light.

Drift boats are required by regulation to stay a certain distance away from setnet sites (anchoring devices”). If the drift fleet obeyed the current regulations they would not be getting “tangled” in setnet anchoring devices .

Further , the drift fleet can move about easily and setnet fishers cannot.

This legislation is not needed when existing regulations are followed .

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC44

Submitted by: Lindsey Aspelund

Community of Residence: Port Angeles, Washington

Comment: Hello,

My name is Lindsey Aspelund and I have been a setnet permit holder in the Naknek District of Bristol Bay since 1996. I also crewed on a drift gillnetter in Bristol Bay for nine seasons, so I have a unique perspective of being able to see fisheries issues from the sides of both gear types.

I am writing in stern opposition to Agenda Change Request (ACR) 1.

I do not believe ACR 1 meets the stated criteria of correcting an error in regulation, nor correcting an effect on a fishery that was unforeseen when a regulation was adopted. The regulations regarding set gillnet anchors and buoys have been the same since I began setnetting over 25 years ago.

As an owner-operator of two setnet sites with my family, I can honestly say there is no way our business could operate if we were required to remove our anchors and buoys when the site is not actively being fished. We are in a section where we cannot even access our outer screw anchor until the low tide hits a certain point. Further north of me, other family members can't access their outer anchors unless the tide falls below zero, which only happens once or twice during our very short season. Asking setnetters to remove their buoys and anchors while not actively fishing is incredibly impractical, and borderline impossible for hundreds of setnet fishermen.

It is clear to me that the author of this ACR has not setnetted and has not undergone the extreme physical labor required to set out screw anchors, buoys and running lines in knee-deep mud; or faced the challenges associated with screwing a 6 foot tall anchor into the mud and hitting rocks, etc.

Setnet gear regulations that have been in place for decades are effective in that we are required to have buoy lights and marker buoys attached to our anchors to clearly identify our sites. It's also regulation that drift fishing vessels stay a certain distance away from our buoys, which many setnetters will testify is not being adhered to. My buoys are clearly visible from my cabin a quarter mile away from my site, so most definitely are visible to a drift gillnet vessel that is 150 feet away. If drift vessels are actively adhering to the current regulations, there would not be the opportunity to get their drift gillnets tangled up in set gillnet sites.

Another point I'd like to be considered is that drift gillnet vessels have the ability to fish wherever they would like to in the district. Setnetters do not. We lease our sites from the Department of Natural

Resources and can fish on that site, and that site only. If drift gillnetters want the ability to fish on the beach, they have the option to buy a setnet permit.

Thank you for the opportunity to comment on this ACR. Us setnetters appreciate your time and consideration on this matter which could, if enacted, catastrophically impact our time management and ability to reach economic success in an already condensed season.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC45

Submitted by: Al Barrette

Community of Residence: fairbanks

Comment: Good day Madam Chair and members of the BOF

When the Board discusses meeting locations for the up coming PWS/Copper River fin fishery meeting. I would encourage the board to have that meeting in Anchorage. I have heard many times from all board members, "this is a public process and we would like to see more of the public to participate at meetings". Anchorage will provide much more benefit for Alaskan to participate at a meeting. Lastly, I also support ACR 2 and 8 to be accepted for a regularly scheduled meeting this cycle. I support your decisions and thank you for serving.



PC46

Submitted by: Ben Benedetti

Community of Residence: Gig Harbor, WA

Comment: I am writing to express my opposition to ACR 1.

Fixed anchors are essential to many setnet operations in Bristol Bay. The rapid currents experienced in the bay make conventional anchors ineffective.

For high tides when currents are strongest, a ban on semi-permanent anchors would render 4-5 hours of each high tide un-fishable in my case. That's over 2/3 of our prime fishing time in a day.

Setting and removing a screw anchor each time a net is set in these situations would be so difficult and time consuming, it would cripple our operation.

I have never witnessed or heard of any sea life getting entangled in a rope from a set buoy. Most set buoys are on the tide flats where drift boats aren't even operating any way.

This proposal is not feasible and would hurt a large portion of the setnet fleet while providing virtually no benefit to anyone else.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC47

Submitted by: Bert Bergman

Community of Residence: Sitka, Alaska

Comment: I support ACR 12 and 13 which seeks to restore to historical allocation between charter and commercial king fishermen in SE. This year the charter harvest plan(or lack of) ended up costing the troll fleet our second king opening. The second king opener is important to the troll fleet financially but it also helps reduce Chinook NonRetention Days (CNR days) for trollers compliance with the Pacific Salmon Treaty. The trollers second opening occurs in a time when the market conditions are better, the hatchery coho are higher percentages of the catch, and less permits are active leading to a longer season. It's unfair to trollers to loose this valuable opening to a belief that the charter fleet should not be managed in-season. If nothing is done the economic harm to trollers will continue.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC48

Submitted by: Keith Billi

Community of Residence: Petersburg, AK

Comment: I support the board taking up ACR 11, ACR 12, and ACR 13.

I support ADFG's strict adherence to the 80/20 split. I am a troller; losing 15,000 kings to the sport fishery this year was devastating. The Coho price was down significantly from last year, and the chum price was so low that it was an unprofitable fishery. Losing the opportunity to fish for kings was terrible for my business and my family.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC48

Submitted by: Keith Billi

Community of Residence: Petersburg, AK

Comment: I am commenting in support of ACR 12.

Please adopt RC 178, and the 80/20 split as written and agreed on by ATA, SEAGO, and Territorial sportsmen.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 12: Support



PC49

Submitted by: Justin Boots

Community of Residence: Fairbanks

Comment: Copper river personal use fishery meeting in Cordova. Who can afford to fly to Cordova to attend this meeting? Not many! Please move the meeting to anchorage.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to



PC50

Submitted by: Dale Bower

Community of Residence: Ester, Ak

Comment: I'm writing to encourage the BOF to consider changing the meeting location from Cordova to Anchorage. Many Copper River fishermen do not have the resources to attend the meeting in Cordova because of airfares and limited hotel availability. I would like to attend in person, and comment, but I cannot afford it. Please consider changing the venue. Thank you.

Dale Bower



Submitted by: Joel Brady-Power

Community of Residence: Bow, Washington

Comment: Joel Brady-Power

F/V Nerka

ATA Board Member

ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska all gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC 47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

Sports fisheries will argue that trollers benefited from getting to catch their underages in previous years. This is true, but trollers did not ask for these fish, nor did we harvest them at the expense of the charter sector. These underages were largely a result of the covid pandemic and the charter sector operating at a far reduced level. Had the trollers not been there to mop these fish up Alaska as a whole would have left king salmon on the table which hurts everyone, especially when it comes time to renegotiate the Pacific Salmon treaty and there is benefit to all gear groups in assuring that we catch the total all gear allocation. This is not the same thing as the charter sector going well over their allocation and these fish being taken from the trollers during the season resulting in lost fishing time and income for trollers.

This change occurred outside of the authority of the Board of Fish

The department made a change from the original text of RC 178. This is the language that the Board of Fish approved. All parties agreed to try this management plan until the next board of fish in 2025. We all know that we will have to deal with this issue again. Please, let this original agreement have a chance to operate as written.

The intent of this updated plan is fully contained in 5 AAC 47.055 (b) of RC 178. All parties signed the language and the Board Of Fish unanimously passed it. Verbal discussion about these agreements and what they meant by anyone does not change the legal authority of a written regulation. The Department made a critical mistake that needs correcting. I request the board take up this ACR to change this regulation back to the language contained in RC178.

How is the Board of Fish and The Department going to make this right? Correcting the language problem is the minimum. Restitution to the trollers may be necessary to meet the intent of "...an average of 20 percent of the annual harvest ceiling..." in 5 AAC 47.055 (b)(1).

I am a second generation Alaskan salmon troller and I have been trolling out of Sitka every summer of my life since I was 2 weeks old. I have been running my own boat with my wife for the past 19 years and I have been an ATA board member since 2016. I was at the table in March of 2022 at BOF as a board member of ATA when RC 178 was signed. We had a long detailed discussion before arriving at the language that ended up in RC 178 and all parties agreed to and signed the document. The department changing the language in a legal signed document completely changing the meaning of the agreement outside of the BOF process undermines the authority of the Board of Fish and the integrity of the entire Board of Fish process. The Board of Fish is a truly great and unique process that allows stakeholders over all sectors to work together to find solutions that work for all. Having a signed legal agreement between parties changed by the department without input or consent from the parties who signed it is a failure of this process and needs to be fixed. Please correct this mistake by taking up ACR 13.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



September 15, 2023

Alaska Board of Fisheries
Attn: Art Nelson
P.O. Box 115526
Juneau, AK 99811-5526

RE: Likely Causes for Declining Chinook Salmon Stocks

Dear Mr. Nelson,

As we all know, Chinook salmon abundance and average harvest size has been trending sharply downward across Alaska for quite a few years now. The Alaska Department of Fish & Game (ADF&G) has studied the issue intently as part of the [Chinook Salmon Research Initiative](#). Regarding the key question of “what is causing low runs of Chinook salmon in Alaska” the Initiative concludes the following:

Research has shown that during the recent period of poor production, marine survival has dipped below one percent. This decrease in marine survival, even in the face of some very good freshwater production in several systems, has been driving the downturn in overall adult production.

ADF&G has substantial experience and abilities involving research of salmon productivity in freshwater environments. However, ADF&G’s research strongly suggests the problem lies in marine-stage survival. In general, human harvest rates of Chinook salmon by commercial, sport, and subsistence fishermen has trended down over the past decade, yet Chinook abundance remains low.

The Initiative’s research understandably suggests that climate change may be at least partly to blame for declining Chinook abundance. Warmer water can alter food chains and increase metabolism, making it harder for species to survive or flourish. However, if climate change is the primary driver of poor Chinook abundance, doesn’t it stand to reason that we would see productivity trends generally improve the further north you go? That seems to be the case with Bristol Bay sockeye, where increased productivity generally coincided with warmer surface and ocean conditions. Conversely, for Chinook we see a broad decline in abundance and size across virtually all latitudes.

Fishermen and climate change aren’t the only challenges Chinook salmon face in their quest to survive and multiply. They are preferred prey for several marine mammal species. Given the existing research and trends witnessed over the past decade, we believe more

investigation and consideration ought to be given to marine mammal predation – and this approach is strongly supported by available research.

We would like to highlight some key findings of this published research:

- From 1975-2015, biomass of Chinook salmon consumed by pinnipeds and killer whales increased from 6,100 to 15,200 metric tons (from 5 to 31.5 million individual salmon). Meanwhile, the decrease in adult Chinook salmon harvest from 1975-2015 was 16,400 to 9,600 metric tons (Chasco et al¹).
- Though there is variation across the regions in our model, overall, killer whales consume the largest biomass of Chinook salmon, but harbor seals consume the largest number of individuals (Chasco et al¹).
- Estimated killer whale predation of adult Chinook salmon increased from 1.3 million to 2.6 million individuals from 1975-2015. Killer whale predation accounted for 10,900 metric tons of the estimated 15,200 metric tons of total marine mammal predation in 2015 (Chasco et al¹).
- Our results suggest that at least in recent years competition with other marine mammals is a more important factor limiting the growth of this endangered population than competition with human fisheries (Chasco et al¹).
- We find that widespread declines in the body size of Chinook salmon over the past 50 years can be explained by intensified predation by growing populations of resident killer whales that selectively feed on large Chinook salmon, thus revealing a potential conflict between salmon fisheries and marine mammal conservation objectives (Ohlberger et al²).

Regardless of potential implications involving climate change, it appears very likely based on marine mammal predation research that curtailing human harvests of Chinook salmon will *not* be sufficient to reverse the trends toward fewer, smaller Chinook salmon available for human user groups. In our discussions on this topic, we often conclude that “ok, yeah it makes sense that marine mammal predation is probably the biggest problem, but can anything be done about it?” It is true that reducing marine mammal predation would be extremely challenging, from both a political and logistical perspective, but it doesn’t change the cold hard math.

¹ Chasco, B.E., Kaplan, I.C., Thomas, A.C. et al. Competing tradeoffs between increasing marine mammal predation and fisheries harvest of Chinook salmon. *Sci Rep* 7, 15439 (2017). <https://doi.org/10.1038/s41598-017-14984-8>

² Ohlberger, J, Schindler, D.E. et al. Resurgence of an apex marine predator and the decline in prey body size. *PNAS* 116 (52) 26682-26689 (2019), 15439 (2017). <https://doi.org/10.1073/pnas.1910930116>



We strongly encourage Board of Fisheries members and fishery management leaders to read available scientific literature concerning the topic of salmon predation by marine mammals, particularly [Chasco et al](#) and [Ohlberger et al](#). We urge the Board of Fisheries to consider the ramifications of marine mammal predation research in its own deliberations, and to incorporate this information into broader discussions with the State of Alaska or other state/federal governing bodies.

Sincerely,

Andy Wink

Executive Director

Bristol Bay Regional Seafood Development Association

██████████ - ██████████

9.27.2023

Via electronic mail

Ms. Marit Carlson-Van Dort, Chair
ADF&G Board of Fisheries

Re: Bristol Bay Reserve support of ACR #5

Dear Ms. Carlson-Van Dort and BOF members,

I write on behalf of the Bristol Bay Reserve, a marine insurance and advocacy organization that represents over 350 Bristol Bay vessel owners. All of whom are confused and uncertain as to the enforcement of the 32 foot limit in Bristol Bay, as it is written and the 20 year migration of vessel improvements that has occurred, many of which have focused on safety and product quality.

It is no secret that the salmon industry is in chaos, with many stakeholders hoping for a break-even financial outcome at best. If we cannot bring some clarity to and amend portions of the 32 ft regulations, I can only imagine the chaos that will ensue.

As you ponder this request, may I ask that you reach out to Major Aaron Frenzel for guidance. He is a man of character and integrity, who also is seeking direction from you and your Board to update these regulations without undue disruption to the industry.

Thanks to you and your Board for your continued, intelligent service to the fishery resources in the State of Alaska!

Respectfully,

Warren "Buck" Gibbons
Bristol Bay Reserve, Director



PC54

Submitted by: Emma Lee Buist

Community of Residence: Fairbanks

Comment: September 7, 2023

Greetings,

Re: Setting locations for future BOF meetings

I support the Copper River Personal Use Fishery. Currently, most related BOF meetings are held in Cordova or Valdez. Please consider moving meetings to Anchorage as well so more participants may afford to attend, not just the commercial fishers and residents of these communities.

Anchorage, Fairbanks and Interior residents utilize this fishery. Most are financially unable to attend meetings in Cordova or Valdez. We deserve the right to attend the BOF meetings, and participate in person in the proceedings of the Copper River Fishery by the BOF. Please set some meetings in Anchorage so we may attend.

Regards,

Emma Lee Buist

Fairbanks



PC55

Submitted by: Hunter Byron

Community of Residence: Holbrook, az

Comment: I would like to write my support regarding the importance of ACR 11, 12, & 13. As a power troll permit holder having defined and agreed upon Chinook quota dispersement is important to all stakeholders. This year we saw a deduction mid season of our allocated Chinook which was given to the sport sector. This increased sport catch was due to an increase in the charter operation take. These operations should not be given preferential treatment over other commercial enterprises such as the power troll fishery. ACR 11, 12, & 13 helps to these issues.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



Dear Board of Fish members,

My name is Benjamin Campen and I am a lifelong resident of Sitka, AK. I've been commercially fishing king salmon since 2013 and they make up a large part of my annual income.

I'd like to strongly voice my support for **ACR 13**. An omission of language cost the commercial troll fleet dearly this past summer when king salmon were re-allocated to the sport sector and away from the commercial fleet.

It is especially concerning that a user group (guided charters and rental fleets) have no limit to the amount of boats on the water, no season limitations and no in season management.

A unbridled charter fleet, in coordination with the PST payback provisions that require a reduction in **all gear quota** (not the offending user groups quota), sets up a scenario where commercial trollers may be further punished by sport/charter over-harvest and bear the brunt of the subsequent reductions in harvest.

The full combination of the charter/sport sector having no accountability as far as season start/end dates, no regulations limiting amount of boats on the water, no in-season management and being able to pass off over-harvest onto the shoulders of commercial trollers will continue to result in a over harvest by the sport/charter sector if regulation is not amended.

I would also like to voice my support for **ACR 12** - to update regulations in light of the new tier system used by the Pacific Salmon Commission.

Thank you for your consideration.

Benjamin Campen



PC57

Submitted by: Susanne Christiansen

Community of Residence: Big lake

Comment: I'd like to attend the meeting but there's no way I could afford to go to Cordova Especially this time of year. Please consider moving it to Anchorage so many of us can attend. There are very many issues that are very important to us



PC58

Submitted by: Woody Cyr

Community of Residence: Sitka, AK

Comment: My name is Woody Cyr. I am a young commercial fisherman residing in Sitka who owns and operates FV Patience in the troll, gillnet, and halibut longline fisheries in SE AK. I have a degree in Aquatics and Fisheries Science from SUNY-ESF and sit in the trapping seat on the Sitka AC.

I support ACRs 11, 12, and especially 13 as these ACRs meet all requirements (A,B, and C) for changing the agenda.

ACRs 11 and 12 are basic good housekeeping to keep the state's management of king salmon in line with the PST. Enough said.

ACR 13 absolutely must be addressed immediately. The deletion of "sport fish" after the fact from a key location in RC 178 which was agreed upon by all stakeholders and was aproved unanimously by BoF is an egregious error at best... In an extremely difficult year of market crashes and crazy returns, fish that should have gone in myself and fleetmates' holds went primarily to the benifit of nonresident charter operations. Unjust harm has been inflicted upon us for benifit of another. This is just plain wrong. We had an agreed upon management plan, so let's use that. I implore you to reinstate the original wording of of RC 178 and retain the sport harvest ceiling so The Department will manage as the BoF intended. Inseason management is simply good and fair management. The disrespect to BoF in the deletion is unconscionable and gives a black eye to the process.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



Submitted by: Joe Daniels

Community of Residence: Sitka, AK

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

The reallocation to the charter fleet caused an undue financial hardship on my harvest season. At least a reduction of 10-15% of my GROSS income and the end result was a season where i was able to pay expenses but did not make a profit, this could have been the difference. As a southeast Alaska salmon troller, I am barely able to make ends meet as it is with current market conditions and quotas, this reduction in our Chinook quota (re-allocation to the charter fleet) has a devastating effect on the viability of my operation, the value of my permit and my ability to survive.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.



PC60

Submitted by: Damien Delzer

Community of Residence: Fairbanks

Comment: Please consider holding the Copper River 2024 Finfish meeting in Anchorage. It is very difficult for stakeholders to travel to Cordova in the middle of winter and very costly. Anchorage is far more accessible and will allow the voices of of the various stakeholders to be heard. Thank you.



PC61

Submitted by: Patricia DeRuyter

Community of Residence: Fairbanks ,Alaska

Comment: Move the 2024 meeting to Anchorage so more people can attend. Cordova is a difficult place to access in winter therefore limiting participation in the 2024 meeting.



PC62

Submitted by: Casey DiGennaro

Community of Residence: Sitka, Alaska

Comment: Hello. My name is Casey DiGennaro. I am a full-time commercial power troller. I also have a mortgage on a home in Sitka where I raise my 4 year old son.

I support ACRs 11, 12, and especially 13 as these ACRs meet all requirements (A,B, and C) for changing the agenda.

ACRs 11 and 12 are basic good housekeeping to keep the state's management of king salmon in line with the PST.

ACR 13 absolutely must be addressed immediately. The deletion of "sport fish" after the fact from a key location in RC 178 which was agreed upon by all stakeholders and was approved unanimously by BoF is an egregious error at best... In an extremely difficult year of market crashes and crazy returns, fish that should have gone in myself and fleetmates' holds went primarily to the benefit of nonresident charter operations. Unjust harm has been inflicted upon us for benefit of another. This is just plain wrong. We had an agreed upon management plan, so let's use that. I implore you to reinstate the original wording of RC 178 and retain the sport harvest ceiling so The Department will manage as the BoF intended. Inseason management is simply good and fair management. The disrespect to BoF in the deletion is unconscionable and gives a black eye to the process.

Thank you.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC63

Submitted by: Carrie Driver

Community of Residence: Sitka, Alaska

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase "sport fishery." This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers' allocation.

Due to the allowed overfishing by the sport fisheries sector, I was forced to give up my job as a 10 year troll deckhand and seek work on land. The king troll fishery is a major source of income to those communities employed by the commercial troll industry. It is imperative that the 80/20 allocation be maintained and properly enforced in the future.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 9: Oppose ACR 12: Support ACR 13: Support



PC64

Submitted by: Michael Dunn

Community of Residence: Sitka

Comment: I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

Personally, during a season where kings were already in question and coho prices were predicted to be low. The quota allocation of kings to the sport fishery affected my financial ability to do necessary repairs to my boat to meet safety standards, and simply pay my moorage. I caught more fish this yr than any yr previous and ended with less finances than ever before. There has to be something reliable in this fishery for us to count on, the insecurity of the fishery as a whole is extremely unsettling and to take 15,000 king salmon away from trollers trying to feed their families and give it to “sport fishing” was a huge slap in the face in an already difficult year. Some of us don’t have boats we can winter fish due to the extremes in weather, and we sure never will if we keep getting our legs cut out from under us, so it’s imperative we do not get opportunity to earn taken away. I was away from my wife and daughter 60 days straight this season trying to make it work, destroying my hands cleaning small, low priced coho. Now that the season is done and I’m absolutely physically and mentally exhausted I will go back to work, as opposed to spending much needed time with my family.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to



PC65

Submitted by: Jonathan Edwards

Community of Residence: Chiniak, Alaska

Comment: ACR #1, I would like to voice my opposition to this ACR, if nothing else, because it is not area specific. Comparing different setnet operations around the state is like comparing apples and oranges, way different. Also, I have been a set netter for 43 years and have never had any wildlife harmed by my anchors, buoys, or set lines, nor have I ever heard of this happening.

Thank you,

Jonathan Edwards

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC66

Submitted by: William Emery

Community of Residence: North Pole, AK

Comment: I would like to see the Cordova BOF meetings to be moved to Anchorage due to inaccessibility issues of a meeting in Cordova and that I want a change of location for the 2024 Copper River fin-fish meeting to be moved to Anchorage, which will make it more accessible for more people to attend so they can be heard and not just the commercial fishermen that reside in Cordova. Thanks for listening.



PC67

Submitted by: Cherissa Evanoff

Community of Residence: Anchorage, alaska

Comment: #1. What about people who use screw anchors for their bouys? Or screw anchors for a pulley system to set and pull in their net?

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose

To the Alaska Board of Fisheries -

I am opposed to ACR 1 -

“ACR 1 Require set gillnet anchors and buoys to be removed from the water when not actively being fished (5 AAC 39.107). “

I oppose this ACR, and am disturbed by the trend of calling for setnet gear to be removed at various times during the fishing season. As a lifelong setnetter, we are continuing a tradition that has been handed down to what is now the 5th generation on this exact site. We pay an annual fee to the DNR for leasing our sites, and we don't fish anywhere else. It's our site. Set nets more than any other gear group are often comprised of families, with children and the elders still able to participate in the fishery. In fact, set net areas were originally created for this exact purpose.

We have put thousands of hours, and so, SO much labor into setting anchors and systems that we pray will hold. The mud is a terrible challenge, and we can only access outer areas during low tides. Temporary anchors do not hold and present their own hazards. Sinking something that will hopefully last for years is a BIG job. I know, because a drifter ran over our gear this summer and pulled up a screw anchor that had been there as long as I can remember, and it always held. Thanks to their actions (which were illegal since we had gear out and they ran over an actively fishing set net), we spent days and days at low tide, trying to get new anchors installed. Some of us use pulleys for a shore-based system to improve quality and safety. It's no joke to reset all this stuff! Screw anchors and duck bills are not re-installable. Their purpose is to go in and hold - to gradually burrow into the mud and sand bars until they are solidly holding whatever gear is attached.

A little history: drift fishers are supposed to comply with current laws requiring them to stay a specific distance away from all setnet gear. Again, this is gear located at a registered and paid for set net site. An increasing number of drift fishers violate this on a daily basis. I have filmed countless drifters running up to the river mouth with their jet drives, running the beach over every single set net. Many of us have been in our skiffs, actively under the lines, when drift boats run over our gear, sometimes pulling up anchors and swamping skiffs. It's beyond frustrating that we have current laws that are not being upheld, causing untold damage, threats, and stress to a gear group.

If drift fishermen were not running into a set net area, they would not have an issue with set net gear. Plain and simple. They have an entire bay in which to fish. We have a tiny sliver of gravel and mud, and that is where we stay. [ACR author] claims that “Buoys and gear left in the water at sites not actively fishing during the season create hazards to navigation, entanglement issues for vessel and wild life, negatively impacts other gear types operating in the area. “ The fact is that other gear types should NOT BE operating in that area. It's a set net area! As for wildlife, I've never heard of any non-human creature - neither aquatic nor terrestrial - becoming entangled in set net buoys or anchors.

[ARC author] also claims that this ACR meets both B and C in Criteria as stated, but does not clarify how as required in the ACR language:

b) to correct an error in regulation c) to correct an effect on a fishery that was unforeseen when a regulation was adopted

These regulations have been in place for many years, and certainly haven't caused anything "unforeseen when a regulation was adopted." I'm not sure that this ACR is justified for submission on any of the criteria listed, and the proposer hasn't given any reason why it should be.

The proposer also answered N/A to the question STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING. In fact, it was brought up at the most recent board cycle, and set net fishermen in significant numbers explained to the board that removing our gear is not an option, and attempting to do so would cause extreme hardship and endangerment.

I ask that the board reject this ACR and instead uphold the current regulations designed to protect our heritage fishery gear groups.

COMMENTS SUBMITTED BY SHANNON FORD, 9/27/2023

Submitted by Jacqueline Foss
[REDACTED]

Comments on ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. It purports to makes no other changes to the King Salmon Management plan.

I generally support changing regulations to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty but I do not support this ACR as written.

Under additional information, ACR 11 mentions “...continue to implement sport fish management actions based on the Alaska all-gear catch limit, and the resulting allocation to the sport fishery,...” There is no mention of the 20 percent sport harvest ceiling in this information. The Department removed wording that allows any sort of harvest ceiling to the sport harvest of king salmon.

I urge the board to take up this ACR to update the language to reflect changes necessary from the Pacific Salmon Treaty, but also take up ACR 13 to address the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan. The Department made a unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling..

By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska. Sport exceeding their king salmon allocation by more than 15,000 fish in the summer of 2023—largely driven by non-resident harvest. If the BOF does not remedy this language it is likely to occur in summer of 2024

Please see ACR 13 and my comments on it for further discussion and context.

Comments on ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

After the Board of Fish (BOF) meeting in March 2022 the Pacific Salmon Commission changed the way the all-gear harvest total was calculated and increased the tiers from 7 to 17. The King Salmon Management Plan should reflect these changes while keeping the objectives and language of RC 178 intact.



I support ACR 12. The intention of RC 178 and clearly spelled out in 5 AAC 47.055 (b) (1) is to manage the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

Comments on ACR 13

I urge the board to take ACR 13 and consider it in a future BOF meeting and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

ACR 13 meets 2 of the 3 criteria outlined in 5 AAC 39.999 (1)

This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting. This language was negotiated between Alaska Trollers Association (ATA), Southeast Alaska Guides Association (SEAGO), and Territorial Sportsmen. It was written by the ADF&G Staff (The Department), who were present through out the entire negotiation, and was moderated by BOF member McKenzie Mitchell. The Board of Fish approved it unanimously without edits.

ACR 13 identifies a small omission in 5A AC47.055, (b) (2) which removed the phrase "*sport fishery*." This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish—giving them more than 28% of the All Gear Catch limit after subtracting net gear. This represents a financial loss of at least \$750,000 to the 85% resident, mostly rural SEAK trollers. The BOF should take up this ACR to prevent this from happening again next summer.

This small change is a unilateral, allocative change of king salmon by The Department. Further, 5 AAC 47.055 b(1) states "*..manage the sport fishery to attain an average harvest of 20 percent of the annual harvest ceiling specified by the Pacific Salmon Commission, after the subtraction of the commercial net allocation specified in 5 AAC 29.060 from the harvest ceiling;*"

There is no further definition of average so it is admittedly tricky. This language was pushed by the non-resident sport sector. Trollers only want to stay within their 80% allocation—across all tiers. We as Trollers do not want sport fish or net underages. We prefer everyone catch their allocation.

Sport will argue that Trollers got some of their allocation of King Salmon in previous years. This is true for at least 2 years. However, when the department allocated these kings to Trollers, it did not shut down the charter sector or net sector in doing so. Everyone had a full season and the Trollers "mopped up" these king salmon in August and September because Trollers are the only gear type who can harvest these fish later in the season. This helps the State of Alaska mange King Salmon up



to their limit under the Pacific Salmon treaty. There is a benefit to the State of AK and all gear groups harvesting King Salmon under the Treaty to manage to the ceiling.

Trollers did not ask for these fish nor do we want them. We prefer everyone stay within their allocation. There is a big difference between harvesting underages from one sector at the end of the season and one sector grossly exceeding their allocation and harming another sector in the middle of the season.

Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20% over the entire season rather than a surprise 28% by early August.

This change occurred outside of the authority of the Board of Fish

The department made a change from the original text of RC 178. This is the language that the Board of Fish approved. All parties agreed to try this management plan until the next board of fish in 2025. We all know that we will have to deal with this issue again. Please, let this original agreement have a chance to operate as written.

The intent of this updated plan is fully contained in 5 AAC 47.055 (b) of RC 178. All parties signed the language and the Board Of Fish unanimously passed it. Verbal discussion about these agreements and what they meant by anyone does not change the legal authority of a written regulation. The Department made a critical mistake that needs correcting. I request the board take up this ACR to change this regulation back to the language contained in RC178.

How is the Board of Fish and The Department going to make this right? Correcting the language problem is the minimum. Restitution to the trollers may be necessary to meet the intent of “...an average of 20 percent of the annual harvest ceiling...” in 5 AAC 47.055 (b)(1).

This change negatively affected me, personally

My signature is right at the top of RC 178 as the ATA rep. I, personally, signed my name along side Russell Thomas from SEAGO and Ron Somerville from Territorial Sportsmen. We signed in good faith that this agreement would be codified into statute as written.

Guess who is getting blamed for “giving a bunch of [troller’s] fish to the charters.” Me. I have shouldered this responsibility and weathered the blame, because that is what accountability looks like. I stand by what I signed as the designated representative for ATA.

I am deeply, personally offended that a hard-negotiated regulation was changed, unilaterally, outside of the public process at the 2022 Board of Fish Meeting. This erodes the authority of the board of fish and diminishes the process that trollers, charter industry, and resident sport fish went through.

My whole family attended this March 2022 Board of Fish meeting—a financial challenge since it was in Anchorage and not in a community in SEAK. This was the first Board of Fish meeting for my kids. I made them attend when they would rather



be playing at an indoor golf course. We are a fishing family living in remote, rural Alaska. It is vital that young people and kids get involved with the process and policy that shapes their future. It is never too early to become involved in decisions affect our livelihood and the long-term sustainability of Alaska's natural resources. I wanted them to see how policy is built, by all stakeholders involved, in front of a diverse board of decisionmakers. This is an excellent, public process that has stood the test of time and legal challenges. It should be continued.

This process failed us. We negotiated and signed in good faith to try something different, only to have The Department made a drastic change to the whole agreement. Please, correct this by taking up ACR 13.



Submitted by: Tad Fujioka

Community of Residence: Sitka

Comment: Board of Fisheries Chair Carlson-Van Dort:

ACRs 11, 12 & 13 all address the same regulation, namely 5 AAC 47.055 the SE Sport Chinook Management Plan. This regulation was the topic of considerable debate at the most recent SE BoF Finfish meeting. Under leadership from the Board of Fishery members, representatives from the Alaska Trollers Association, the SE Alaska Guides Organization and the Territorial Sportsmen all compromised, and signed off on a new version of the management plan which was submitted as RC 187.

As all three of these ACRs address the same recently-adopted regulation, and have structurally similar form, the BoF should either decide that all three meet the ACR criteria of 5 AAC 39.999, or that none of them do. The three ACRs are so similar that it is internally inconsistent to argue that one meets the criteria but that one or two others do not. As the sponsor of ACR 12, I believe that all three ACRs meet not just one, but two of the ACR criteria. Specifically:

These ACRs seek to correct an error in a regulation. The version of 5 AAC 47.055 that has been published materially differs from the version signed off on in RC187. Specifically, RC178 states that the non-resident sport harvest may be curtailed in order to keep the overall sport harvest within the specified sport fishery harvest limit, but under most of these circumstances, resident harvest would still be allowed to continue. In other words, resident sportfishermen would be granted priority over non-residents if the sport harvest was projected to exceed the sport allocation. However, this priority has been removed in the published version. Whether the error was by Department staff in misunderstanding the intent of the original written document or that all of the stakeholders misunderstood what they had signed (as the Department's RC2 claims was the case), clearly there has been an error somewhere in the process and the BoF should avail themselves of the opportunity to fix this problem by agreeing to give these ACRs further consideration so that the Board can hear from all stakeholders.

Additionally, these ACRs also meet the third criteria in that there has been a change in the manner that Alaska's all-gear Chinook harvest limit is determined by the Pacific Salmon Commission. Since the sport fishery harvest limit is computed directly as a function of the all-gear figure, 5 AAC 47.055 now refers to an obsolete process and thus directs that the sport fishery harvest limit continue to be based solely on the winter troll CPUE, even though this is no longer the only factor in determining the all-gear limit. This could make the sport allocation significantly higher or lower than the historic 20% of the combined sport + troll harvest. The BoF should be aware that this 20% was a hotly-debated figure, but all stakeholders that signed RC 178 in 2022 agreed to continue to set the sport fishery harvest limit this 20% level.

As I understand the process, the BoF's only decision regarding these ACRs this Worksession is to determine whether or not they meet at least one of the criteria of 5 AAC 47.055, and that the merits of each ACR will only become pertinent if and when the ACRs are advanced to the agenda of a later meeting. Thus, regardless of whether or not individual board members feel that these ACRs deserve to be adopted, I urge the board to at least agree to schedule ACRs 11-13 together for further consideration later this cycle.

Tad Fujioka (sponsor of ACR 12)

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC71

Submitted by: Willy Gama

Community of Residence: Anchorage

Comment: Lower Cook Inlet proposal 7. Disagree with the proposal.

There is such a low number of people spearfishing for king salmon in Soldovia, that's this will not significantly affect population numbers. The proposal also does not legitimately give a good reason for banning spearfishing besides the fact spearfisherman could be "hooked" by other fisherman. Anecdotally I have never felt in danger of getting "hooked" or "snagged."

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 7: Oppose



PC72

Submitted by: Keith Genter

Community of Residence: Wasilla,AK

Comment: I would like to see the BOF meetings moved to Anchorage permanently. Anchorage is much better suited to accommodate a large presence of fishermen participating. Thanks in advance, Keith



PC73

Submitted by: Adam Hackett

Community of Residence: Sitka, AK

Comment: ACR 13

It is imperative for all resource users to consume within their allocation. This is a basic principle of resource management and community:

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC 47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

Please correct this error in regulations by changing the language in 5 AAC 47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC74

Submitted by: Lexi Hackett

Community of Residence: Sitka AK

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC 47.055, (b) (2) which removed the phrase "sport fishery." This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers' allocation.

As trollers, our family income depends very much on king salmon. We'd like to see the allocation between sport and commercial to be fair, per treaty guidelines. We are year round residents in Sitka, not always the easiest place to live financially for a young family, and king salmon make up a significant portion of our income- both from our own catch, and from the direct marketing of fish we do for other trollers in our fleet. We appreciate efforts to correct this Chinook cap for sport allocation to what it should be.

Please correct this error in regulations by changing the language in 5 AAC 47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.



PC75

Submitted by: David Heyano

Community of Residence: Anchorage

Comment: I oppose ACR 1

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC76

Submitted by: John Hogue

Community of Residence: Anchorage, AK

Comment: I concur with the Chitina Dipnetters Association to move the Dec 16, 2024 BOF meeting to Anchorage. For the following reasons:

The Chitina Dipnetters Association (CDA) would like to see a location change for next year's meeting from Cordova to Anchorage for the following reasons:

- Holding the Copper River Finfish meeting in Cordova makes it easy for the Cordova commercial fishing fleet to attend, but disenfranchises the 7,000-10,000 Alaskan residents who annually purchase a Chitina Personal Use dipnet permit. Holding the meeting in Cordova makes it difficult for many to attend in person and make their voices heard.
- Cordova is off the road system and remote in the winter, when most Copper River meetings are held. There is only one flight per day in and out of the town. The flights are costly and often hindered by inclement coastal weather.
- The number of lodgings and restaurants open in the winter is very limited. Internet service is spotty and cell service is nill unless your carrier is GCI.
- The terrain and streets in Cordova are steep and icy, most attendees are on foot (Anchorage is flat)
- Valdez, although on the road system, does not provide many more winter time visitor amenities than Cordova provides.

John Hogue



PC77

Submitted by: Greta Horn

Community of Residence: Bandon, Oregon

Comment: Why would the board want to require more work in an already dangerous and exhausting profession for no reason...are they bored? Why?

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC78

Submitted by: Andrew Horval

Community of Residence: KETCHIKAN

Comment: ACRs 11, 12, & 13 are what I am concerned about as a SE Alaskan resident, charter guide, and commercial troller.

I fully support ACR 11 and 12 as it clarifies errors in regulation and adds mores tiers for flexibility in the numbers to ensure a fair 80/20 allocation of King Salmon.

ACR 13 Goes hand in hand with ACR 12 and I support it as it was quite unfortunate how many Kings were harvested by charter captains and cost commercial trollers so much financially. Charters and clients should be more than happy with 1 a day per person king salmon and get limits of other species of salmon.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC79

Submitted by: Jonathan Hutto

Community of Residence: Port Angeles, WA

Comment: Hi,

My name is Jonathan Hutto and I have been setnetting in Bristol Bay with my wife and her family since 2017. This past year I bought into the fishery and am now a setnet permit holder.

I am writing to oppose Agenda Change Request 1.

Where I've been fishing, the screw anchors have been in place for nearly a decade. Every once in awhile we have to replace an anchor and it's challenging. There's no way I could remove my anchors, lines, and buoys any time we were not actively fishing because I couldn't even get to my outside anchor unless the tidal conditions were right. There is usually a nice series of low tides two weeks before the season starts where we can walk out to set anchors or adjust lines as needed. It is no easy task carrying a heavy 6-foot-long screw anchor while walking over a thousand feet offshore in knee deep mud. The person proposing this ACR would probably think twice if they had ever experienced it.

From my understanding, the setnet site marking requirements have not changed in decades. I don't think this ACR meets the criteria it stated it did, because it is not creating an "unforeseen effect on the fishery" since the regulations have been consistent for a very long time. Please do not consider this agenda change request. Thank you for your time.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC80

Submitted by: Robert Jahnke

Community of Residence: Ward Cove

Comment: Support the change for the term sport to commercial sport and resident personal use sport. Those of us that live here year round subsist on King salmon and not money from outsiders.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC80

Submitted by: Robert Jahnke

Community of Residence: Ward Cove

Comment: I have held a AK. troll permit since '71/'72 and fed my family by personal use for all these years in the Ketchikan area. I was a member of the Ketchikan advisory committee back in the late '70s and I'm again a current member of the Ketchikan AC. I support ACR 12 & RC 178. We need to keep the 80-20 split between the troll fleet and sport, "BUT" we need to split the sport between any sport "COMMERCAL" entity that makes money off the fisheries . This includes resorts, lodges, those that have rental vessels for sport fishing, marina's and any cruise ship companies that get a % of that money. I also support ACR 13, but there again we need to split the sport from the commercial and from the resident personal use. My family has lost 2 1/2 months [April 1st- June 15th] for retaining King Salmon in my area , which feeds my family, while the commercial sport can hook and release ["hook and kill"] during this same time frame. The personal use residents need to have priority to feed their families without taking any kings away from the commercial Trollers. REMEMBER, ANY FISHERY THAT MAKES MONEY OFF THE FISHERIES IS DEFINED AS "COMMERCIAL".

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 12: Support ACR 13: Support



PC81

Submitted by: Karl Jorsan

Community of Residence: Sequim,wa

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements

under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase "sport fishery." This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish.

This cost my business thousands of dollars of lost fishing.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to



Submitted by: Ryan Kelly

Community of Residence: Wrangell, Alaska

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

This small omission that allowed for King Salmon to be allocated this way cost my fishing business thousands of dollars, on a year when we are being stretched finically , and basically trying to survive with the rising cost of doing business, along with poor dock prices this year. It really is disappointing to see ADFG work in a manner that is not honest, and it is not a fair way to manage a fishery, and our livelihoods as trollers .

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC83

Submitted by: Lindsay Layland

Community of Residence: Dillingham, AK

Comment: ACR 1:

This ACR is totally absurd - there's no way that it would be feasible or even reasonable to require setnetters to remove their anchors and buoys from the water when not actively fishing. It can take up to 2 hours, ONLY when the tide is at the lowest stage (between 0' and -2) of the lowest tides of the season to remove setnet anchors such as screw anchors, stakes, and buoys. If setnetters are only on a 4 hour closure, and have more than one setnet site with anchors/stakes, AND the tide isn't low enough, how can they be expected to remove those anchors? Ridiculous, silly, and quite frankly, not possible. Please do not support this ACR.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC85

Submitted by: Stanley Lopata

Community of Residence: Sitka, AK

Comment: My name is Stanley Lopata I have deck-handed longline, troll, and dive fisheries for a good 10 years. I have captained for 4 years and am a fairly new captain in the troll fleet. I have a biology degree with emphasis in fisheries and wildlife management from the university of Wyoming. I moved to Alaska after college and worked 7 years in Alaska hatcheries.

I support ACRs 11, 12, and especially 13 as these ACRs meet all requirements (A,B, and C) for changing the agenda.

ACRs 11 and 12 are basic good housekeeping to keep the state's management of king salmon in line with the PST.

ACR 13 absolutely must be addressed immediately. The deletion of "sport fish" after the fact from a key location in RC 178 which was agreed upon by all stakeholders and was approved was a slap in the face to the troll fleet. Being a young captain I have seen the mental turmoil this year has caused on many of the elder captains and deckhands in the fleet. There was a level of disrespect I have never seen from a government entity before. As a veteran of the Middle East I thought the government was for the people by the people. What I have seen is an agency that followed the money and left the small town families as spawned out carcasses. If this was a covert attack on Alaskan communities it was a weak back boned and dishonorable way of doing it. I implore you to reinstate the original wording of of RC 178 and retain the sport harvest ceiling so The Department will manage as the BoF intended. Inseason management is simply good and fair management. The disrespect to BoF in the deletion is horrendous.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC86

Submitted by: Graham Morrison

Community of Residence: King salmon

Comment: ACR number 1, the removal of set net anchors has never been done and it shouldn't be considered. This proposal is like asking drift boats to fish 1 mile from the beach, absolutely ridiculous. Obviously the person writing this has no clue what goes into sinking screw anchors each and every season. I've set netted since the early 1990's and this has never been and issue and is not an issue today. I vote no on ACT 1.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



Submitted by: Timothy Murphy

Community of Residence: Anchorage, Alaska

Comment: To the State of Alaska Board of Fisheries;

I write in support of ACR 2;

1. This ACR meets the requirements for conservation of extremely depleted AYK Chum stocks. As certain AYK Chum stocks had been listed as stocks of yield

concern by ADFG for 8 years (EIGHT) prior to 2023.

Due to the lack of either managerial concern from both the State of Alaska and employees within ADFG, nor regulatory concern from the State of Alaska

Board of Fisheries to pass regulation that would provide adequate protection for conservation concerns or long standing subsistence needs this ACR meets

the requirements to require board action.

2. This ACR meets the requirements for regulatory correction, since the massive expansion of the South Alaska Peninsula salmon fishery in 2004, in which no

discussion nor concern for other fisheries that would be impacted by MORE THAN DOUBLING the fishing time for Area M interception fleets would create occurred when that

massive expansion was passed by the State Board of Fisheries in 2004.

Should the State of Alaska and it's employees be held to a standard to abide by whether it be the State of Alaska Constitution OR the Sustainable Salmon Policy, and

are not simply biased or corrupt this massive expansion should never have been allowed to pass.

The interception of AYK Chum and Chinook stocks alone should be valid reason enough to undo what was done in 2004. If not, perhaps the wanton waste of

the chums chucked overboard in a 100% retention salmon fishery that is Area M.

3. This ACR meets the requirements for the board to take action based on the negative impact the interception of Chignik bound sockeye occurring in the

South Alaska Peninsula, no discussion nor concern for the harm interception would have on the fishers and communities in the Chignik region exist in record or

attitude of State of Alaska employees nor previous fish board membership prior to the 2004 intercept fishery having been granted not only the harvestable

surplus of sockeye bound for Chignik but the escapement as well in recent years. Denying those who relied on the long standing historical sockeye

fishery in Chignik the ability to provide for themselves and their families.

What exists now is that the State HAS ALLOCATED the Chignik sockeye runs to Area M by regulation. What exists now is collusion between state managers at the

highest level with private industry to deny access to the historical Chignik sockeye fishery by letting it be harvested in Area M.

Regulatory Correction is necessary, permanent protections for the Chignik Sockeye stocks passing thru Area M is required.

Furthermore;

The commissioner of ADFG should refrain from comment on board proceedings unless otherwise prompted by members of the Board or other qualified participants-

to which the commissioner may lend some expertise other than his opinion. In the February 2023 meeting of this board, the commissioner acted as the 8th member of this

board and steered it to vote no on the ONLY legitimately meaningful regulatory change that would aid in recovery of AYK Chum stocks, as well

as aid in recovery of Chignik sockeye stocks, both heavily intercepted in Area M. Not only did [REDACTED] show his bias, but also his ignorance when instructed by

[REDACTED] - Alaska's foremost salmon fishery scientist that "CAPS DO NOT WORK". [REDACTED] offered his ignorant opinion "I disagree". [REDACTED] ([REDACTED])

showed that he is neither impartial, nor qualified to be in the position he is. ADFG is tasked with management and conservation of RESOURCES of the State of Alaska. To ensure ACCESS to those resources.

And is actively participating in denying long held historical access to salmon to both Chignik and AYK stakeholders while attempting to keep the Area M

intercept fishery "whole".

[REDACTED] is also on record touting how he had tried to "warn those guys" that they were catching too many chum. This collusion with private industry is not what the

commissioner of ADFG is unethical and could be found to be illegal.

The evidence of bias and impropriety by bad actors employed by the State of Alaska should set off warning bells.

https://www.cfec.state.ak.us/quartile/X_S01M.HTM?fbclid=IwAR0QsFzbQNKx3OlgIc1Dm7yDCXDuzTWopv0J0vbr-3QsULJhSh3pfFSX3_k

The link is to the CFEC website, it shows quartile reports for the "small boat fleet" in Area M.

How much does a chum pay per pound versus a sockeye?

Is there unlimited space in a boat's fish hold?

Would a crew member be willing to chuck chum for a better paycheck if their boss told them they had to?

█████ was witnessed in the private room reserved for the Area M fishermen- it became obvious WHY he would be opposed to a proposal that was and IS the only

guaranteed way of providing safe passage of AYK chum salmon, some of which had been listed as stocks of yield concern by ADFG for 8 years (EIGHT) leading up to 2023.

It has long been brought to ADFG and the State Board of Fisheries of the Chum Chucking that occurs in Area M salmon fisheries, also they had been managed under a

"CHUM POOL" to discourage targeting of Chum, which had a sunset date and ended, but is verification that problems have existed in regard to passage of badly

needed salmon bound for AYK spawning grounds, and just as importantly, the dinner tables and smokehouses in the AYK region.

And it was also obvious why █████ would be in support of a meaningless proposal but only if it included

"triggers", in the form of Chum Caps... You don't ever get shut down to allow chum to pass if they don't go on a fish ticket, but overboard dead.

When you think of chum chucking and the non-coincidental small amount of chum harvested in the South Alaska Peninsula in 2023, which was nowhere near the 10 year average

nor close to chum harvests of recent years, it is fitting that the Alaska State Troopers cited many Area M fishermen in 2023 for - chum chucking.

In personal testimony one Area M fisherman in 2023 before the State Senate offered "you're always looking over your shoulder for where the trooper drones are".

If you're not doing anything illegal why would you be looking over your shoulder for the troopers drones?

https://www.akleg.gov/basis/Meeting/Detail?Meeting=SRES%202023-05-01%2015:30:00#tab3_4e
3:59:52 in the meeting.

It is also no coincidence that Chignik finally had a solid sockeye salmon fishery in 2023, and that the South Alaska Peninsula Shumagin Islands section was

kept closed from July 1 to July 14 due to presence of immature salmon, thanks to a proposal that passed in that February 2023 meeting. In addition to small time periods when Area M was closed in June per recent regulatory action.

This is evidence, the ONLY EFFECTIVE REGULATORY TOOL to help fish pass thru the intercept fishery in Area M, is less fishing time in Area M.

In addition, this should be a reality check for those who falsely claim Chignik's spawning grounds are being less productive as the reason why Chignik's had

4 disaster declarations dating back to 2018. There had been a scientific term floated recently of a "bottleneck" being the WHY Chignik was having

sockeye salmon disasters, and it is false.

I implore the State of Alaska Board of Fisheries to adopt ACR 2 with language found in previous proposal 140 from the February 2023 Board of Fisheries meeting

that would revert the management plan in the South Alaska Peninsula to the pre 2004 management plan. The decreased fishing time will allow non local salmon to pass thru

the intercept fishery, and provide much needed relief to AYK Chum and Chinook, as well as Chignik sockeye and chinook, as well as all the other

NON LOCAL salmon passing thru those waters.

I also support ACR 3, reducing mesh depth on seines in Area M would no doubt reduce chum harvests. Conditions of chum stocks in the AYK region warrant action

on both ACRs.

Timothy Murphy

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 2: Support ACR 3: Support



PC88

Submitted by: John Murray

Organization Name:

Community of Residence: Sitka

Comment: I would like to comment on ACR 11, 12,13

While I look at 11 and 12 as more "housekeeping " I do support them.

My main concern is ACR 13 . This ACR is to the point and I strongly support this.ACR.

It all goes back to the BOF meeting in ANC March 20 2022 where an agreement was struck and the BOF pass RC178 which in turn became Regulation 5AAC 47.055 Southeast Alaska King Salmon Management Plan. The main hitch-up in that action was the change from RC178 to Regulation. A VERY IMPORTANT part of this was (b) the objectives of the management plan under this section are to(RC178).It was changed after BOF deliberations and vote . It was called an "administration " action?!?! This change radically changed what was voted and agreed on by Alaska Trollers, Territorial Sportsman and SEAGO. I will stress again AFTER THE FACT.

Why this needs to be addressed: 1) the sport allocation of 37 k chinook was over shot by around 20k a 55 % increase over the allotted allocation. This came out of trollers pockets.2) this "administrative" action sets a precedent ,where the BOF deliberations and vote was changed "after the fact".3) while the "intent" of RC178 was spoken of by ADFG just before BOF deliberations . That was not the intent of two of the parties ATA and Territorial Sportsman. I cannot speak for SEAGO. 4) if we let is action slide the troll

fleet could be facing another large overage by the Sports. I should point out this was mainly caused by the charter -non-resident part of the Sports.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC89

Submitted by: Kathleen Myers

Organization Name:

Community of Residence: King Salmon, Ak

Comment: ACR 1

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC90

Submitted by: Adelia Myrick

Organization Name:

Community of Residence: Kodiak, Alaska

Comment: Dear Board of Fish Members:

Re: ACR 1 opposition

As a lifelong commercial setnet salmon fisherman on Kodiak Island's west side, I am writing in opposition to ACR 1.

Requiring setnetters to remove anchors, lines, and buoys when not actively fishing would be extremely difficult and time consuming, not to mention adding additional danger to our fishery.

Fishing a semi-exposed site near the Shelikof Strait, with its large tides and strong currents, my set consists of 13 danforth anchors, 150 – 200 lbs in weight. Each anchor requires a minimum of 50 fathoms of ¾ inch sinking crab line – and most of them have more like 75-100 fathoms, line which is very heavy when wet. This is pretty typical for sites around me. As setnetters, we do not have hydraulics in our skiffs, and must pull the anchors using just our outboard power, with hand-operated come-alongs for additional strength.

Anchors can only be dealt with when weather allows – days which can be few and far between. Bashing around with 150-pound anchors in small aluminum skiffs is not safe in rough weather. Pulling and setting anchors is probably the most dangerous part of setnetting. In addition, we have to work around the tides and cannot unload or load anchors at low tides. Situated on the Kodiak National Wildlife Refuge, as most of the setnet sites near me are, we are not permitted to have any motorized transport on shore. That means all anchors and lines must be lifted out of the skiffs by hand and carried over very rocky shores – no tractors or 4-wheelers are present.

Taking the weather and tides into account, it can easily take days to fully remove a set from the water or, conversely, to re-deploy a set that has been pulled. The most common reasons for not fishing during the season are personal or family medical emergencies, crew problems, and for weather concerns – not wanting to have a net in the water during a storm. In none of these instances would it be possible to remove a set from the water in a timely manner, especially if someone is sick or injured or the weather is coming up.

In addition to these reasons for not taking up ACR 1, I am also concerned that it doesn't meet the criteria for an ACR in that it is not an emergency or a new situation. Setnetting with my family since 1980, I have never seen a regulation such as this in place.

Thank you for the opportunity to provide my comments, and for all the time and effort you put into your work with the Board.

Sincerely,

Adelia Myrick

Kodiak Setnetter

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC91

Submitted by: David Nicol

Community of Residence: Bellingham, WA

Comment: This is an unenforceable attack on set net fishing. It's also going to be nearly impossible to comply with

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose ACR 2: Support ACR 3: Support ACR 4: Oppose ACR 5: Oppose ACR 6: Oppose ACR 7: Oppose ACR 8: Support ACR 9: Oppose ACR 10: Support ACR 11: Support ACR 12: Support ACR 13: Support



Submitted by: Mark Beardsley Northwest Setnetters Association (NWSA)

Community of Residence: Kodiak, Alaska

Comment: Northwest Setnetters Association (NWSA) opposes ACR 1 for the following reason.

1: ACR 1 is a Statewide-General Provision request and should be dealt with solely on a Region-by-Region basis. ACR 1 issues need to be heard by local Fish & Game Advisory Committees that can address region specific concerns. Fishing conditions for Westside Kodiak set gillnetters are completely different from Bristol Bay set gillnetters and other areas of the state. A statewide proposal on this issue is inappropriate.

2: Westside Kodiak set gillnetters work alongside the Shelikof Strait and deal with Seldovia District tides, some of the largest tide fluctuations in Alaska, at times greater than 25 feet. Westside Kodiak setnets require as many as 10-250 lb. anchors in depths up to 50 fathoms to hold their nets in this extreme tidal flow. Rarely do these operations have the advantage of hydraulics to set and pull anchors or adjust and remove that gear from the water. All gear holding set gillnets are typically manually set and hauled with assistance of outboard motors and many times require the assistance of a larger vessel's hydraulics such as a setnet tender.

3: Westside Kodiak set gillnetters fish a very long season, 3 ½ months, June 1 – Sept 15. If weather, injury, run timing or personal choice keeps an operation from actively fishing a setnet site for an opening or two during this long time period in Kodiak, there should be no requirement to remove all anchors, set lines and buoys.

4: Many Kodiak setnet operations pay the State of Alaska DNR for shore leases which give them exclusive rights to the locations where setnet gear is located.

5: Lastly, and importantly, most setnet sites on the Westside of Kodiak have been fished for decades in the same locations. This issue being raised by ACR 1 has never been a problem in this long traditional fishing time period. Many of these sets of fixed frame gear (anchors, lines and buoys) have been in the same location for multiple generations from June 1-Sept 15. To require this ACR 1 change to Kodiak operations would be nearly impossible for Kodiak setnetters to manage.

NWSA appreciates your time and consideration to this matter,

Mark Beardsley, President

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



Submitted by: Emma Owecke

Community of Residence: Homer, AK

Comment: I oppose ACR #1 which states:

Require set gillnet anchors and buoys to be removed from the water when not actively being fished (5 AAC 39.107).

My name is Emma Owecke and I am a setnetter in Prince William Sound. This proposal is absolutely and completely unrealistic. The work that is required to put in setnet anchors, lines, and buoys is no quick task. To start off the fishing season in Prince Willim Sound, every permit holder goes out to their respective fishing location with lines, anchors, and buoys, and we spend a day putting our sets in for the season. This is something that takes time and precision. Putting in just one set takes many hours. In Prince William Sound, each setnet permit holder is allowed to fish three 50 fathom sets. This means it can take the entire day to put in all of our anchors, lines, and buoys for the season. These sets are the framework for our nets which we connect to during our fishing openers. When the fishing period ends, we disconnect our net from this framework, until the next fishing opener, usually in a day or two. This is always how setnetting has worked in Prince William Sound.

Our most common fishing schedule is that we have 2 fishing periods a week. Both for 36 hours, beginning at 8 AM, and closing at 8 PM the next day.

If ACR #1 was implemented we would have to spend an entire day, two times a week, to put our anchors, lines, and buoys back into the water before we could fish again. Then, after fishing closures we would have to pull all of our sets immediately. If this was implemented, setnetters would have to pull their nets at 8 pm, deliver their fish, and then spend the next 6+ hours pulling all of their anchors, lines, and buoys out of the water. We wouldn't be done until the early hours of the morning. This is truly an absurd notion. We would then have to spend an entire day, two times a week, to put our anchors, lines, and buoys back into the water before we could fish again.

The only thing that can be said of ACR #1 is that the author has absolutely no idea how much time and energy it takes to put in anchors, lines, and buoys which make up the framework to a setnet.

Additionally, this ACR has been written broadly to encompass all setnetters. I can't speak to how setnetting works in other parts of the state, but I can say for certain that ACR 1 is absolutely and completely unrealistic in Prince William Sound.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC94

Submitted by: Dale Peters

Community of Residence: Naknek

Comment: I am OPPOSED to ACR#1! This ACR is ridiculous! This is an unreal ACR and is just not realistic! The person who proposed this has no clue as to how much work is involved in setting up most set net sites in Bristol Bay.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC95

Submitted by: Michael Peters

Community of Residence: Naknek, Alaska

Comment: ACR 1

I do not agree with this and if allowed can set net operators ask for ceases not actively being used to be pulled up so navigation can be done easier? Set net operations pay a lease and can only fish the lease spot, unlike a drift fisherman who can move around a district or transfer out to another if they so choose. Asking to remove fishing gear when not in use? It does not state if closed that the gear needs to be removed or what timeline a set net permit holder has to remove any gear. This is a very poorly written request and targeting set netters so they can move in closer to the beach.

My guess is this person who submitted this fishes illegal, and pulls his gear in between sites and has lost gear due to this.

As a set net operator, I was tempted to request a corridor to remain open along sites and drift vessels. I ultimately decided that was an over reach of what fishing is. Fishing is independent businesses fishing for the same product while preserving future stocks. Getting this petty between gear groups is very poor judgement and I hope this does not make it any further.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose

Jane Petrich CFEC permit S04K 57023, Kodiak Island
COMMENTS IN OPPOSITION TO AGENDA CHANGE REQUEST #1

ARC #1 is a statewide proposal and is unrealistic for the set gill net fishery on the west side of Kodiak Island. ARC #1 puts an unrealistic burden on the set net operator/CFEC permit holder to remove a set net frame from the water during a season if it not being fished at any time during the season. Due to the huge tidal flow on the west side of Kodiak Island a set is anchored by a minimum of 4 200# anchors and up to 10+ anchors, hundreds of fathoms of anchor line, and the 75-150 fathom set line. It takes multiple hours to set and multiple hours to pull a set net frame from an open set net skiff. Often pulling of the set requires the assistance of a larger vessel with hydraulics.

- There could be any number of reasons creating a situation in which gear is not fished for a short time during the season:
illness of crew and or permit holder, weather, mechanical problems-inability to get to gear due to mechanical failure, need to leave site for personal reasons (family wedding, school graduation....).
- Emergency transfer for CFEC permit paperwork takes 2 weeks to get through CFEC office and this proposal would require the permit holder to remove his/her gear while awaiting their paperwork to be processed.
- According to regulation if a set net fisher was required to pull his or her set frame during the season, another permit holder could set and fish on the site and is not required to relinquish the site to the original operator unless the site is leases.
- The issue being raised by ACR#1 has never been a problem in the history of this traditional fishery. Most setnet sites on the Westside of Kodiak have been fished for decades in the same locations. In my 45 years of fishing on Kodiak Island I have never encountered a situation in which my set net frames (anchors, lines, buoys) have caused an entanglement issue for wildlife. Is there any documentation to support this allegation of endangerment to wildlife?
- Set nets are operated close to shore and if anything, the buoys on a set net frame would warn vessels of their nearness to shallow water. In 45 years, I have never heard of a set net frame causing a hazard to navigation. Is there any documentation to support this allegation?
- Thank you for your thoughtful consideration of my comments.

Jane Petrich CFEC permit S04K 57023
Kodiak Island



PC97

Submitted by: William Powell

Community of Residence: Georgetown Texas

Comment: As a former resident of Fairbanks for 21 years I wish to express my disapproval changing the BOF finfish meeting to Cordova. My career in Alaska required me to travel extensively through the entire state of Alaska. I went to Cordova once and it took all day to get there

Meeting in Cordova will essentially eliminate any interested parties from attending except the Cordova commercial fisherman. That is not right.

We raised three children in Fairbanks and they ate a lot of Chitina salmon.

Please consider changing the meeting to an easily accessible Alaska location. It's the right thing to do.

Thank you

William Powell

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to



PC98

Submitted by: Lance Preston

Community of Residence: Sitka, AK

Comment: Ah to be saved from a disingenuous orca lawsuit only to have our quota significantly shaved by an exploitative management methodology sanctioned by ADF&G and the Treaty. I'm a commercial troller and yes, an irresponsible guided sport sector of course should not be allowed to exceed their quotas and help themselves to our livelihoods when they do. A more equitable system is needed.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



Submitted by: Forest Jenkins Prince William Sound Setnetters' Association

Community of Residence: Homer, AK

Comment: ACR 1:

We oppose ACR 1 that aims to require all setnetters across the state to remove all anchors, lines, and buoys from the water when that site is not actively being fished. This is a direct attack on the setnet gear group that would cause reduced setnet harvests across the state.

First off, the ACR does not meet any of the criteria for an ACR to be heard.

The regulation change requested by the author would create unnecessary and burdensome challenges for enforcement.

This ACR is extremely allocative and aims to limit the harvest of another gear group across the state. If we were required to deploy and remove all of our anchors and buoys every opener, our fishing time and harvests would be cut back drastically.

In general, this should not be taken up as a statewide issue. Every setnet district in the state is different. This issue should be brought up in the region the author currently fishes in.

Similar proposals have already been brought up at previous regional meetings across the state and have failed due to safety concerns, enforcement complications, and the allocative nature of the proposals.

The author has no understanding of the time and work it takes to put in or retrieve the gear for a setnet site. In order for us to set our anchors, we need time, good weather windows, and appropriate tides. Forcing us to remove our anchors and lines in addition to our nets is absolutely impractical and creates safety concerns for the setnet gear group across the state.

In addition, I would like to reference the Department's staff comments on ACR 1 (RC 2: Regional Information Report No. 5J23-05) for more clarification on how this ACR is unrealistic in the nature of the setnet fishery and how it should not be heard by the Board at the upcoming statewide meeting.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose ACR 8: Oppose



PC100

Submitted by: Earl Reynolds

Community of Residence: Walla Walla, Washington

Comment: ACR 1-I oppose removing anchors when the fishing period is closed as this is a time consuming and dangerous proposition.

ACR 10- I support this ACR

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC101

Submitted by: Debra Rice

Community of Residence: Girdwood,AK

Comment: I oppose ACR 1-I have Setnet in the Egegik district 36 years. The original regulation has been in place for decades, and does not create an unforeseen problem with the fishery. In most cases these anchors and associated gear are not easily moved and reset.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose ACR 4: Oppose ACR 5: Oppose ACR 6: Oppose



PC102

Submitted by: Mark Richards

Community of Residence: Fairbanks

Comment: Dear Chair Carlson-Van Dort and members of the board,

I am writing to request a change of location for the 2024 Copper River finfish meeting to Anchorage. The reason for this request is so those of us who dipnet on the Copper River have better access to the meeting so we can participate in person and comment on dipnetting issues.

Cordova has limited air access, which is expensive.. Valdez is on the road system but has limited lodging in winter. Anchorage is better suited to accomodate the board and public and provide access to the

thousands of Copper River dipnetters who would like to participate in the board process and weigh in on any changes that may happen with Copper River dipnetting.

Please consider at this Work Session meeting having the 2024 Copper River finfish meeting in Anchorage.

Thank you,

Mark Richards

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 2: Support



PC103

Submitted by: Craig Ring

Community of Residence: Ketchikan Alaska

Comment: ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase “sport fishery.” This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers’ allocation.

I see the commercial guide fleet in Ketchikan area start king fishing 2 month before they and keep any all catch and release. Just last week non resident non guided boats with kings under size because they thought they was kings. Again no law in enforcement or monitor of lodges in Ketchikan.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



Submitted by: Tracy Rivera

Community of Residence: Tenakee Springs, Alaska

Comment: ARC 11 support

I support changing the cited regulation to reflect the changes to the way the ALL Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the board takes up ARC 11, then they should also take up ARC 12 and ARC 13. ARC 12 aligns with the ALaska King salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ARC 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and active King Salmon Management Plan.

The state of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered ARC 11. ARC 12 adds additional language necessary to meet requirements under these new tiers. ARC 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling. Passing ARC 11, The Department appears to be formalizing an out-of-cycle, allocative change to king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ARC 12

ARC 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060(b)(5).

I support ACR 12. RC 178 and 5 AA 47.055(b)(1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AA 47.055(b)(2) back to the language of the Board Of Fish adopted in RC 178 at the March 2022 BOF meeting. I support ACR 13.

ACR 13 identifies a small omission in 5 AAC47.055,(b)(2) which removed the phrase "sport fishery". This small omission allowed the sport sector, which includes the charter and guided sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total of number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers allocation.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC105

Submitted by: Scotty Savo

Community of Residence: Bellingham, Washington

Comment: This comment is regarding ACR 1. Where I fish in south naknek we can only get to our setnet anchors on a minus tide. We show up early before the season starts to install them and we leave them in the ground until they fail. Installing and removing screw anchor is a very strenuous activity that takes three people and in most cases is 1000 feet off shore in the mud. I think if the drift gillnetters are having a problem with it they should keep their nets off the beach. During the main part of the season there are so many set nets that if a drifter is getting hung up on our gear they are simply too close.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC106

Submitted by: Kevin Schmidt

Community of Residence: Fergus Falls, MN

Comment: ACR 1

I oppose this request.

It is unrealistic and very labor some to set running gear and bouys and remove them once during the season. The tides alone would not allow for complete removal and replacement between fishing openings.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



Submitted by: Tiera Schroeder

Community of Residence: Dillingham, Alaska

Comment: I am in opposition of ACR 1 "Require set gill net anchors and buoys to be removed from the water when not actively being fished (5 AAC 39.107)." I am a fourth generation lifelong Ekuk beach fisherman and local Native (Yup'ik).

Many set gillnet outer anchors are designed to be semi-permanent. In other words, they are difficult to get out once put in (e.g., screw anchors, duck bills, pegs). On top of that initial difficulty, many set gillnet sites require a minus tide of -2.0 or lower to efficiently reach those anchors. In many cases even with a minus tide, wind and weather need to be optimal in order to safely spend time in the water. Even with optimal conditions, many sites such as my own are still not visible due to being under murky water, making the challenge of affixing or removing them even more difficult. Additionally, the seasonal window of opportunity in which we can safely enter the water is minuscule as it requires swimming and being exposed to oftentimes frigid waters. In sum, these challenges make it difficult enough to put the anchors out, and having a requirement to pull them from the water each season would not only be near impossible, but potentially dangerous for many set netters like myself and my family.

During the fishing season, we clearly mark our outer anchors with buoys as required by ADFG. While we are not fishing, we mark our outer anchors with a series of corks and tiny buoys to alert boaters of their location. This helps keep boaters safe, as well as keeping our outer anchors safe. Our upper anchors are rarely submerged in water except for exceptionally high tides. Luckily, the stationary nature of these anchors is common knowledge in the bay, and boaters (should) know to stay in the channel instead of meandering close to the shoreline. Additionally, they (should) know not to set their nets where there are known anchors. In sum, the anchors pose little risk to boaters due to their flagged, stationary, known locations.

Lastly, the anchors pose very little if any obstacle to local wildlife. They have been used for generations, and it is obvious to anyone that knows Bristol Bay and set netting that they do no harm as noted by our thriving ecosystem and salmon that return year after year.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC108

Submitted by: Margie Schwartz

Community of Residence: Salcha AK

Comment: I am a personal use dipnetter and a member of the Chitina Dipnetters Association.

Holding a meeting of this nature in Cordova, esp during the adverse weather months is nothing short of shortsighted in terms of the logistics in going to and staying in Cordova OR Valdez.

A good many dipnetters are from SouthCentral as well as the Interior Communities, and know full well the adversity of winter travel thru the AK Range and the expense of either flying into CDV or driving thru the Alaska Range.

The lack of consideration in terms of safety's sake for participants is abysmal at best, dangerous at worse. The commercial crowd in CDV can attend via Zoom at the Community Center, PWS campus, or the Science Center and not endure a similar peril for travel.

Consider Anchorage for these meetings to be held. Thank you.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Support ACR 2: Support ACR 3: Support ACR 4: Oppose ACR 5: Support ACR 6: Oppose ACR 7: Support ACR 8: Support ACR 9: Oppose ACR 10: Support ACR 11: Oppose ACR 12: Support ACR 13: Support

—



PC109

Submitted by: Seafood Producers Cooperative

Community of Residence: Sitka, Alaska

Comment: Dear Board of Fish Members,

As President of Seafood Producers Cooperative, with 206 members that participate in the Alaska troll industry to sustain their livelihoods and their member owned cooperative, I would like to express support for ACR 13. We strongly feel that in-season management has been and continues to be a fair and equitable procedure for both commercial and sport harvest. The 20% allocation for sport harvest set forth in 5 AAC 29.060(b)(1)-(5) must be upheld per the Southeast King Salmon Management Plan. As proven this year, by allowing the sport harvest to exceed their allocation by 20,000 fish, when the commercial harvest quota had already been reduced by 30% for conservation reasons, by not utilizing in-season management for sport charter, the equitable opportunity for the commercial troll fleet was grossly negatively impacted. SPC also supports ACR 12 with the intent of maintaining the 20-80 sport/charter split.

Thank You for your consideration.

Norman Pillen-President

Seafood Producers Cooperative



PC110

Submitted by: Candace Smith

Community of Residence: Salcha

Comment: I'm just hearing that the BOF meeting concerning Chitina Dipnetting in December 2024, is scheduled to be held in Cordova. With only one flight in and out of Cordova per day, how many mainland Dipnetters do you think you can fit on that plane? And how many Dipnetters can be accommodated on the island? Taking place just before Christmas, how many Dipnetters will not have the extra cash to finance a trip to Cordova? People live a subsistence lifestyle for a reason. Unfortunately, I don't know anyone there that I can stay with. I would be on foot, which, in Cordova in the winter, is like risking a broken shoulder or hip by falling on their icy streets. I would love an excuse to go to Valdez, but the fishing is non-existent in December and accommodations are just not there for the numbers of Dipnetters that would like to attend. Holding the meeting in Anchorage makes more sense than Cordova. It's an open, public meeting and you are essentially precluding the majority of Dipnetters from attending in person solely due to the location. I want to change of venue to Anchorage.



PC111

Submitted by: Todd Smith

Community of Residence: Gustavus,AK

Comment:

ACR 11

Alaska Department of Fish and Game (The Department) ACR 11 updates the Alaska King Salmon Management Plan to reflect changes made by the Pacific Salmon Treaty. This brings Alaska regulations in line with the way the Alaska All gear catch limit is calculated. ACR 11 states there are no other changes to the King Salmon Management Plan, but The Department already made a change to the King Salmon Management Plan outside of the Board of Fish Process.

I support changing the cited regulation to reflect the changes to the way the All Gear Harvest limit is calculated because it is based on the requirements of the Pacific Salmon Treaty.

If the Board of Fish chooses to take up ACR 11, then they should also take up ACR 12 and 13. ACR 12 aligns the Alaska King Salmon Management Plan with the new tiers under the Pacific Salmon Treaty. ACR 13 addresses the discrepancy between what was agreed to in RC 178 at the 2022 Board of Fish and the active King Salmon Management Plan.

The State of Alaska should fully comply with all of the Pacific Salmon Commission changes which go beyond what is covered in ACR 11. ACR 12 adds additional language necessary to meet requirements

under these new tiers. ACR 13 corrects The Department's unilateral, allocative change to the King Salmon Management Plan that favors sport fish and ignores the 80/20 split by managing sport to the all-gear harvest ceiling rather than the sport fishery harvest ceiling. By passing ACR 11, The Department appears to be formalizing an out-of-cycle, allocative change to the king salmon harvest in Southeast Alaska.

Please consider ACR 11, 12, and 13 to provide a full update to the King Salmon Management Plan.

ACR 12

ACR 12 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This ACR retains the 80/20 split between commercial and sport harvest, as agreed to in RC 178 and still referenced in 5 AAC 29.060 (b)(5).

I support ACR 12. RC 178 and 5 AAC 47.055 (b) (1) both include the language that manages the sport fishery to an average of 20%. This past summer the sport fishery harvested at least 28% of the All Gear Catch limit after nets. I urge the BOF to update the King Salmon Management Plan to reflect the agreement of RC 178 and the mandatory changes from the Pacific Salmon Commission.

ACR 13

I urge the board to take ACR 13 and change 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting.

I support ACR 13. This ACR meets 5 AAC 39.999 (1) (B) and 5 AAC 39.999 (1) (c) necessary for bringing up out of cycle regulations. It identifies a change to a regulation written and voted on in the March 2022 BOF Meeting.

ACR 13 identifies a small omission in 5 AAC47.055, (b) (2) which removed the phrase "sport fishery." This small omission allowed the sport sector, which includes the charter and guide sector, to exceed their allocation of King Salmon by more than 15,000 fish. Since there is a hard cap on the total number of King Salmon under the treaty, the sport fishery took those king salmon from the trollers' allocation.

The sport/guide is not regulated and by so reach into the commercial trollers pocket my pocket. And this is not the first time. 30,000 fish the first time now 15,000 fish, where and when does this end? The troll fleet should not suffer due to the lack of by regulation of the charter/guide fleet by ADF&G (by the way are mostly from the lower 48 states). The sport/guide fleet should be held to the same standards.

Please correct this error in regulations by changing the language in 5 AAC47.055, (b) (2) back to the language of RC 178. Retaining a sport harvest ceiling would allow The Department to manage the sport fishery to an average of 20%, as intended by the Board of Fish when they voted unanimously for RC 178 in March of 2022.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC112

Submitted by: James Smith

Community of Residence: Fairbanks

Comment: Sure would be nice if the December meeting was moved to Anchorage.



PC113

Submitted by: Dale Stanley

Community of Residence: Ketchikan AK.

Comment: I am in support of ARC 11,12 and 13 we need to keep our agreement that was signed by all parties in 2022.Thank you ,Dale Stanley

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 11: Support ACR 12: Support ACR 13: Support



PC113

Submitted by: Dale Stanley

Community of Residence: Ketchikan Ak.

Comment: Hi Board of Fish members, I am a power troller from Ketchikan AK. I would hope that you would adopt CR 178 that would hold ADFG to the agreed upon 80-20% split that was signed by all parties involved in the salmon treaty In 2022. I also support ACR 12. Thank You. Dale Stanley

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 12: Support



PC114

Submitted by: William Stauner

Community of Residence: Fairbanks

Comment: I am requesting that the Copper River fin fish meeting that is scheduled for December 10-16 in Cordova be relocated to Anchorage so that average person would have greater access to attend without breaking the bank. Having the meeting in Cordova limits our access due to the costs involved, as a personal use dipnetter I rely on this resource for my family's fish each year and when there are proposals that effect me I would like to have an equal opportunity to have my voice heard. Thank you so time.



September 25, 2023

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
C/O Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RE: Comments on ACR #2

Submitted electronically at <https://survey123.arcgis.com/share/f88ed3db47d8429fbb05ee3857fbde31>

Dear Ms. Carlson-Van Dort:

The Tanana Chiefs Conference (TCC) represents 42 communities within Interior Alaska, including 37 federally recognized Tribes. We are writing in support of ACR #2, requesting the Board of Fish (BOF) to revisit the Area M and Shumigan Islands June Salmon Management Plan that was adopted at the February 2023 Board Meeting, and to be reviewed at the upcoming BOF work session October 12-13, prior to the 2024 season.

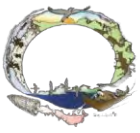
This letter of support for ACR #2, is based on the unforeseen consequences of the action on RC190 amendment to Proposal #136; which established time-sensitive triggers for fishing closures in the event of that the Area M fleet reached a certain number of chum bycatch. This may have resulted in illegal fishing practices. Unforeseen consequences is one of the criteria for an ACR, and this past season for the first time in recent history, the Alaska Wildlife Troopers cited numerous fisherman for “chum chucking” or throwing chum overboard so they would not be counted against the trigger quota¹. The nine citations of “chum chucking” during the time period indicate an effort to off-load chum, to not reach the triggers that might close the fishery.

Some other items to consider in a meeting for the South Unimak/Shumigan Island are:

- A full discussion on “wanton waste” in relation to chum chucking.
- The need for more law enforcement coverage.
- A request for more increased in-season genetic stock testing, as well as an objective test fishery.
- A need for observer coverage to be placed at processing plants, as well as on fleets.
- A request to change management authority away from fleet “adaptive management plan”, to more of an in-season management plan.

This current management plan is in place until re-visited at an Alaska Peninsula Board meeting, which is not until 2026, unless it is changed by a special South Unimak/Shumigan Island meeting prior to that

¹ <https://dps.alaska.gov/AST/PIO/PressReleases/Wildlife-Troopers-Deploy-Significant-Resources-for>



time. The unforeseen consequences resulting from the Board's actions on Proposal #136, as amended by RC190 must be addressed as soon as possible to ensure sustainable priority subsistence fisheries and ACR #2 meets the formal criteria to address during the 2023-2024 regulatory cycle.



PC115

We cannot afford to wait for the next Area M BOF cycle in 2026 to make a change. We need our wild stock chum to be protected now for the betterment of our residents. Please adopt ACR #2 and schedule for a special South Unimak Island and Shumagin Islands meeting or add it to the Upper Cook Inlet regularly scheduled meeting in Anchorage before the 2024 season. TCC is requesting the South Unimak Island and Shumagin Islands to be held in Anchorage to ensure ease of access for affected fishermen in the TCC region.

Sincerely,

TANANA CHIEFS CONFERENCE

A handwritten signature in blue ink, appearing to read 'BR'.

Brian Ridley
Chief/Chairman



PC116

Submitted by: Rian Ten Kley

Community of Residence: Camas, WA

Comment: This comment is in opposition of ACR 1. Setting up a setnet site takes hours of work. It involves trudging through the mud and accurately laying out running lines, anchors and buoys when the tide is out. Asking fishermen to repeat this process on a daily basis is short sighted and not a sustainable solution or strategy for any setnetter. We're already restricted in so many ways, please do not pass ACR 1.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC117

Submitted by: Chris Thomas

Community of Residence: Anchorage

Comment: Christopher, Thomas

ACR 1

I oppose ACR 1

ACR 1 would put an undue burden on setnetter's ability to realistically fish.

It takes no less than half a day of work to get anchors, Louise, running lines, etc. in the water for a single set. Many fisheries allow for multiple nets/sites

Furthermore, it usually requires days, fishing periods, and several tide cycles to adjust, modify or configure each set so that it is correctly placed given the tide, geography, etc

Most fishermen identify their gear with brightly colored buoys that are readily visible and easy to navigate around or away from.

It should be the responsibility of the captain, pilot, or skipper to know whether or not an area they are transversing supports an active commercial fishery, and if so, gear might be present, whether it is drift or setnet gear.

Unlike drifting hazards, such as branches stumps, trash, debris, logs, etc., Setnet gear is fixed in place and is designed to be visible seen and noticed by other operators in the area.

Lastly, the presence of Setnet gear in the water reduces conflict at the beginning of an opener between gear types Drift Gillnetter's know where setnetters are likely to fish, and therefore can plan accordingly to avoid any conflict.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC118

Submitted by: Jessica Thomas

Community of Residence: Dillingham, Ak

Comment: ACR 1: This is very comical request from someone whom I'm assuming has never participated in set netting. We pay land leases for a reason. You want to fish on the beach, buy a set net permit. I'm obviously strongly opposed to this request.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



Submitted by: Laurie Thorpe

Community of Residence: Wasilla

Comment:

I apologize, I don't know the ACR number for my comment.

Holding the Copper River Finfish meeting in Cordova makes it easy for the Cordova commercial fishing fleet to attend, but disenfranchises the 7,000-10,000 Alaskan residents who annually purchase a Chitina Personal Use dipnet permit. Holding the meeting in Cordova makes it difficult for many to attend in person and make their voices heard.

Cordova is off the road system and remote in the winter, when most Copper River meetings are held. There is only one flight per day in and out of the town. The flights are costly and often hindered by inclement coastal weather.

The number of lodgings and restaurants open in the winter is very limited. Internet service is spotty and cell service is nill unless your carrier is GCI.

The terrain and streets in Cordova are steep and icy, most attendees are on foot (Anchorage is flat)

Valdez, although on the road system, does not provide many more winter time visitor amenities than Cordova provides.

Anchorage is well capable of hosting everyone wishing to attend a Board of Fish meeting any time of year. Holding the Copper River finfish BOF meeting in Anchorage affords an opportunity to the many personal use Copper River dipnetters, as well as upriver subsistence users, the ability to testify in person and meet BOF members without breaking the bank to do so.

Please hold the meeting in Anchorage where the majority of stakeholders can get access and participate in a fair and equitable manner.



PC120

Submitted by: Alannah Turner

Community of Residence: Girdwood, AK

Comment: Commenting on ACR 1.

I am opposed to ACR 1, suggesting that setnetters remove anchors and buoys when not actively fishing. I'm opposed to this for several reasons.

We pay shore fishery leases, our anchors are within the lease area.

We fish in areas that have extremely strong current, anchors are massive and not removed, even through the winter.

Most importantly, the language in the ACR is vague and could be suggesting that anchors and buoys should be removed during a drift only opening, when setnetters aren't allowed to fish. Sometimes drift only openings are as short as 4 hours. This would be impossible, not only because of large anchors, but this is essentially suggesting we dismantle our whole operation so that it doesn't inconvenience the other gear type.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose ACR 4: Oppose ACR 5: Oppose ACR 6: Support



PC121

Submitted by: Edward Vey

Community of Residence: Palmer

Comment: TOPIC: CHANGE the 2024 PWS/Copper River finfish meeting location from Cordova to Anchorage

SUPPORTING REASONS:

While holding the Copper River Finfish meeting in Cordova may allow easier meeting access for local members of the Copper River commercial fishing fleet to attend, it disenfranchises everybody else outside the town of Cordova, including the 7,000-10,000 Alaskan residents who annually purchase a Chitina Personal Use dipnet permit. Holding the meeting in Cordova makes it more difficult for many to attend in person and make their voices heard compared to Anchorage, a more centralized location with better access and lodging amenities.

Cordova is off the road system and remote in the winter, when most Copper River meetings are held. There is only one flight per day in and out of the town. The flights are costly and often hindered by inclement coastal weather.

The number of lodgings and restaurants open in the winter is very limited. Internet service is spotty and cell service is not available UNLESS your carrier is GCI.

Valdez, aside from being accessible on the state highway system, does not provide many more visitor amenities than Cordova provides.

Anchorage is capable of accommodating everyone wishing to attend a Board of Fish meeting any time of year. Holding the Copper River finfish BOF meeting in Anchorage affords an opportunity to the many personal use Copper River dipnetters, as well as upriver subsistence users, the ability to testify in person and meet BOF members without breaking the bank to do so.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 8: Support



PC122

Submitted by: Catigan West

Community of Residence: Anchorage, AK

Comment: ACR 1: As a Bristol Bay setnet fisherman I strongly oppose this proposal. Setnet fisherman pay the Alaska Department of Natural resources yearly to lease our tiny portion of the bay while the drift fleet has access to all districts. This proposal is absurd, if the drift boats would abide by the regulations already in place they would have no issues with setnet gear causing damage. I'm also interested to know what kind of "entanglements" a screw anchor, 15' of line and a buoy are going to cause for wildlife? If you want to fish the beach, sell your drift boat and buy a setnet permit!

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose ACR 2: Support ACR 3: Support ACR 4: Oppose ACR 5: Oppose ACR 6: Oppose ACR 7: Support ACR 8: Support ACR 9: Oppose ACR 10: Support ACR 11: Support ACR 12: Support ACR 13: Support



PC123

Submitted by: Diane Wetter

Community of Residence: Dillingham Alaska

Comment: I oppose ACR.

This proposal would greatly hinder my ability to operate my fishing site.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC124

Submitted by: Nia White

Community of Residence: Dillingham, Alaska

Comment: Requiring set gillnetters to remove anchors and buoys when not actively being fished would be almost impossible for my site. Our site on Ekuk beach is on the point and most of the time the buoy is out in 20 feet of water at least. This would require us to use a skiff, which not required for our fishing as we have a cannery on the beach and use iced trucks to deliver fish. This amendment is implausible and fail to even see the benefit of such as act. The buoys also show where our running lines are. Without this indication, boats could run over our lines and cut them, requiring a lot of work (and swimming in cold bay water) to thread a new running line through the pulley. Drifters have the whole bay, they manage to keep their nets from tangling in our buoys. Please reject this new amendment.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC125

Submitted by: Ani White

Community of Residence: Dillingham, AK

Comment: ACR1- makes absolutely no sense for set netters. As a set netter off of Ekuk beach we are able to set our screw anchors and buoys only when there is a severe minus tide. This usually happens once before fishing and maybe a few times during the fishing season. The drift fleet have much more room to operate in the bay as set netters we have one site where we can operate. To say that it is hazardous to navigation is total crap. The drift fleet shouldn't be so close to the beach anyways. If this passes it will be detrimental to the Ekuk set netting fleet.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC126

Submitted by: Andrew Whitish

Community of Residence: North Pole

Comment: Please schedule the next meeting in a location that can accommodate people in Anchorage or Fairbanks. Somewhere that can accommodate all the people that would like to participate.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Support ACR 2: Oppose ACR 3: Oppose ACR 4: Oppose ACR 5: Oppose ACR 6: Oppose ACR 7: Oppose ACR 8: Support ACR 9: Oppose ACR 10: Support ACR 11: Support ACR 12: Support ACR 13: Support



PC127

Submitted by: LaTisha Wilkinson

Community of Residence: Anchorage, Alaska

Comment: I am not in support of ACR1. Putting in and taking out gillnet anchors every summer in the mud is very taxing. The anchors are screwed down so low in the mud it does not cause any harm for anyone's equipment and environmental harm. The cost of new anchors every year is very costly.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose



PC128

Submitted by: Mark Williams

Community of Residence: Anchorage, AK

Comment: I am writing to voice my opinion in favor of changing the location of the Board of Fisheries meeting scheduled for December 10-16, 2024 from Cordova to Anchorage. This meeting will address Copper River dipnetting issues and proposals. Holding the meeting in Cordova confers upon the commercial fishing fleet a distinct advantage in making their voices heard compared to the thousands of Chitina Personal Use dipnet participants, who largely live and work on the road system.

I would welcome the opportunity to attend any BOF meeting which addresses Personal Use fisheries. Financial and time constraints would preclude my attending a meeting in Cordova.



PC129

Submitted by: Thomas Wischer

Community of Residence: Kodiak, Alaska

Comment: I oppose ACR 1. This request seeks to change gear requirements for set gill netters state wide. This request is simply unworkable in most regions where set gillnets are allowed. I am a set netter in Kodiak. This proposal makes no sense for Kodiak. The issues cited in the request do not happen in Kodiak. All fishermen and even charter operators know where a gill net site is located during the salmon season. There is a detailed map of all westside gill net site locations. Kodiak set netters use 6-12 anchors per set that weigh at least 200lbs. Anchors are in deep water and we do not leave buoy's in the water after the season. It would be impossible to pull a complete set out of the water during a closure and get it back in the water in time for the next opening given the sea conditions we experience in Kodiak. This request does not take into consideration the variety of methods and conditions in other regions in the state.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to

ACR 1: Oppose
