



PC151

Submitted by: Zosima Serebrekoff

Community of Residence: Homer, Ak

Comment:

I'm commenting about proposal 54, on behalf of jiggers, it is unfair to let the pot fishermen take our quota away when we've basically just started fishing, pot boats can fish earlier when the fish is in deeper waters, our season begins in march when the fish starts schooling up in shallower grounds, the majority of the fish jiggers catch is caught in April, it makes no sense to cut the jiggers short in March before their season has began, please consider leaving our quota be

Proposal 54: Oppose



PC153

Submitted by: Devin Skonberg

Community of Residence: Kodiak, AK

Comment:

My name is Devin Skonberg and I'm originally from the village of Ouzinkie. My grandfather and I own the seiner Lorena Marie, which has been in my family since 2007. I am a 3rd generation seiner and one of the last salmon fishermen originally from Ouzinkie. Ouzinkie used to have many seiners, but now there are just two of us. I have spent pretty much all of my career fishing in the central section, so proposals 62 and 70 would leave me with very little area that I can fish. I am opposed to these proposals because they would basically put me out of business. This is how I feed my family and it's my only way to make a living.

I support proposal 60, which would give Kodiak seiners more fishing opportunity when there are plenty of pinks and dogs on the mainland.

Proposal 60: Support

Proposal 62: Oppose

Proposal 70: Oppose



SSRAA
Southern Southeast Regional Aquaculture Association, Inc.
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December 26, 2023

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: **PROPOSAL 59**

Chairman John Wood, Members of the Alaska Board of Fisheries,

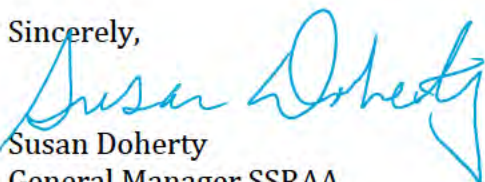
The Southern Southeast Regional Aquaculture Association (SSRAA) submits the following comments concerning the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration.

SSRAA **supports** the board's action due to the ambiguity of the proposal language, and subsequent edits to the original submission, which created even further confusion and added statewide implications.

SSRAA would welcome meeting with the chairman while in Kodiak to address how the operators and the BOF can provide a productive avenue to address concerns, provide factual information, and do our best due diligence to harvest wild and enhanced fishery resources, while protecting future returns. Emerging data surrounding the impacts of a warming ocean, and the environmental factors created, may cause long term negative impacts that the best of management and regulatory intervention cannot mitigate for. It is in Alaska's best interest to fully understand these interactions so we can address these changes rationally and not emotionally.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Susan Doherty".

Susan Doherty
General Manager SSRAA



Submitted by: Richard Starr

Community of Residence: Kodiak, Alaska

Comment:

Alaska Board of Fish and to whom it may concern:

My name is Richard Starr. I am submitting my letter in opposition to proposal 57. I have been involved in the food and bait herring fisheries since the early 1980s. I have participated in this fishery as a crewman, Captain, and a permit holder.

The food/bait herring fishery has successfully operated for many years as a co-op, due to its small quota. My recollection, prior to limited entry permits, is that there were management challenges (several boats were fishingsmall quota, a lot of different areas.)

With an increased Guideline Harvest Level (GHL) more currently permitted fishermen could participate and fill the quotas. There has been effort over the years to establish a larger market for food/bait herring, it has been a challenge.

This proposal is not justified to give, alter or devalue limited entry food/bait herring permits to people who have never participated in this fishery or sold their food/bait herring permits and want them restored without cost to them.

This proposal would be creating an A and B season allowing sac roe permit holders to fish in the food/bait herring fishery in Kodiak which is a limited entry fishery and should stay as such.

I strongly oppose this proposal.

Thank you,

Richard Starr

Proposal 57: Oppose



Submitted by: Tami Starr

Community of Residence: Kodiak, Alaska

Comment:

Alaska Board of Fish and whom it may concern:

My name is Tami Starr. I have lived in Kodiak Alaska with my husband Richard since 1987. We are a fishing family and have been since the late 70's. I strongly oppose proposition 57.

This particular proposal causes several questions to arise. Because we are a minority of permit holders is the requirement to devalue our asset just a majority of voices? Is it ethical that because of greed you can dilute and infringe on our livelihood and steamroll our earned equity in this fishery?

If that's the case there are several fisheries my family would appreciate being included in that are currently limited entry.

I am aware that permits have already sold and the holders paid...and now one of them is leading this charge to return to this fishery after profiting from the sale of their own permit...How is that even legal? Are all limited entry permits up for grabs to the loudest voices? This is wrong!

Quite obviously I am in opposition to proposal 57.

Thank you for your consideration,

Tami Starr

Proposal 57: Oppose



Submitted by: Katie Story

Community of Residence: Uvalde, Texas

Comment:

Dear Board of Fish,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1977. I was born in Kodiak in 1968 and my family has been setnetting since I can remember. My father worked hard and built up his business from nothing because he loved it and still does. My brothers and all of our family at Rocky Beach Fish Site would like for our business to be a better source of income. We respect that there needs to be regulations that are fair to all.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The fear is that we will lose the opportunity to continue to be a family business. It is getting to the point where parts of the family are having to find ways to subsidize income which makes it so hard for the few left to run the

business on their own. Unfortunately there's the catch 22 which means finding ways to make money elsewhere while leaving the skeleton crew which can not be efficient to run the nets the way they should be fished. So work twice as hard and twice as long to get the few that we can.

I am also opposed to proposals 66, 72, 73,

and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely, Katie Story

December 23, 2023

Alaska Board of Fisheries c/o Boards Support
P.O. Box 115526
Juneau, AK. 99811

Chairman Wood and members of the Board,

We are writing today to oppose Proposal 63, permit stacking in the Kodiak salmon setnet fishery.

We own and operate a setnet operation on the Southend of the island, in the Alitak District. Though we are lifelong salmon fishermen with experience in multiple other management areas, we are new entrants to the Kodiak salmon fishery, and will be going into our 3rd season in 2024. The foundation of our opposition to this proposal is a desire to see a new generation of fishermen continue to invest in the Kodiak setnet fishery, and we are concerned that the consolidation that results from permit stacking does not serve that future.

The appeal of permit stacking for some individual operations is understandable, particularly in years of low returns. Perhaps an appropriate permit stacking option would be one deployed exclusively as a mechanism to sustain struggling small scale operations at times of low abundance. However, that is not how these regulations are designed to function, and is unlikely to be the primary motivation for stacking. We are concerned that the negative impacts are likely to substantially outweigh the benefits.

Permit stacking is almost certain to consolidate access, likely among the more established site owners. We can expect this to be followed by an increase in permit costs, which further decreases accessibility for new entrants and smaller operators. Owners focused on and financially able to build large and/or expanding operations are more likely to consolidate both permits *and* the critical infrastructure associated with them. So there is a potential for permit stacking to not only make permits less accessible, but all of the other assets associated with a successful setnet site as well, resulting in less opportunity for the next generation. There is also a direct link between consolidation, and the migration of permit ownership out of state, which has long-term consequences for coastal communities and for Alaska's future fishermen. We appreciate our setnet neighbors regardless of residency, but there is an overarching value in ensuring the opportunity for Alaskan participation in local fisheries remains strong.

Again, at times of particularly low returns, an individual holding and fishing a second permit could certainly increase harvest opportunity with potentially less overhead expense. But that opportunistic consolidation, while beneficial for an individual business in the moment, is detrimental to the fabric of the fishery in the long-term. It's also not the only way to address challenging times. While we are all feeling the squeeze of depressed runs and a poor market, it's important that our solutions to those challenges prioritize run rebuilding, market innovation and other stabilizing factors that

bolster the value of existing access mechanisms, without instigating access changes that create long-term negative consequences.

Setnetters already have the ability to address diminished returns through additional permits by increasing the permit holders fishing within their operation. Though understandably that's not always a viable option. Our hope for our small scale fisheries, however, is that we support opportunities where crew are motivated and empowered to buy their own permit - not just hold it for the operation owner - as a means to work their way into a fishery. Concentrating control of fishing access among fewer individuals isn't going to solve Alaska's market crisis, rebuild struggling runs, or improve availability of reliable crew. Making it harder for a new entrant to incrementally build their own equity investment toward an operation just creates additional challenge.

It seems there are two primary motivations for this measure, as addressed by the proposer. One, to consolidate access so that individual operations are more valuable -- good for some individuals but a disservice to the long-term future of the fishery. And two, to artificially increase the cost of permits so that harvesters wanting to exit the fishery can sell at a higher rate and recoup "stranded equity," regardless of what that fishery access is *actually* worth. The purpose of limited entry permits is to create an orderly fishery, and manage participation for resource conservation. It is not a guarantee of business viability or retirement equity, and was never intended to be. Making a major management change in order to provide that certainty to individual operators, as a direct cost to future operators who will be responsible for adapting fishing operations in an uncertain future, would be a mistake.

We care deeply about the communities across Kodiak Island, and about all our neighbors on the southend. We want to see Kodiak's fishermen remain successful. In doing so, it's important that access rights and regulations be managed according to a long-term vision for community success, not for individual business plans. That community success needs to include viable access for next generation, diverse and local participants. Given that ultimate priority, we can't support any measures that further consolidate access, particularly in small boat fisheries that are such critical opportunities for new entrants and community-based fishermen. Thank you for your consideration.

Sincerely,

Hannah Heimbuch & Michelle Stratton
Twin Peaks Fisheries, Kodiak, Alaska

December 23, 2023

Alaska Board of Fisheries c/o Boards Support
P.O. Box 115526
Juneau, AK. 99811



Chairman Wood and members of the Board,

I am writing this comment letter on behalf of the Under Sixty Cod Harvesters (USCH). Our members are under 60-foot vessels that harvest Pacific cod with pots in state-water fisheries. Our vessels are primarily owned, operated, crewed and maintained by Alaskans, and based in Alaska ports. Several of our members are homeported in Kodiak.

USCH opposes Proposal 53, allowing longline slinky pots in the Pacific cod state water pot fishery. Our opposition is based on several concerns that this substantial change would introduce significant uncertainty for both management and the existing pot cod fleet.

Fundamental Change to the Fishery & Participants

This proposal would introduce a new gear type, and new fleet, into a fully allocated, very well managed and successful state-water fishery. While they are called pots, *slinky* pots are markedly different from any of the pot, longline or jig gear historically used to harvest Pacific cod in the Gulf of Alaska broadly, and Kodiak specifically. The Kodiak Pacific cod fishery is currently prosecuted with single pots and jig gear, under separate Guideline Harvest Levels (GHLs). Both sectors are well established and have significant participation and investment from Kodiak residents.

As noted in the Alaska Department of Fish and Game (ADFG) comments, Proposal 53 would likely result in the introduction of new participants to the Kodiak pot fishery, very likely from the under 50 hook-and-line fleet. We would like to emphasize that there are existing Pacific cod opportunities for this fleet, including the state waters fishery in Prince William Sound and the Gulf parallel federal fishery. Expanding the Gulf HAL fleet into the Kodiak state waters pot-cod sector would be a change in allocation that largely directs additional opportunity to a HAL fleet experimenting with gear modification, and decreases opportunity & efficacy for the actual Kodiak pot fleet. (*More below re: participation impacts.*)

While every fishery undergoes iterative review over time, the Kodiak Pacific cod fishery is already foundationally sound, and working well for participants, the local communities, and management. The fleet most likely to benefit from this substantial change is an established non-pot fleet with existing opportunity elsewhere. USCH does not see rationale for a fundamental change to the participant make-up of the Kodiak Pacific cod pot fishery.

Increased Management Uncertainty

We have seen significant fluctuations of the Gulf of Alaska Pacific cod stock in recent years, largely thought to be driven by episodes of particularly warm ocean temperatures in the North Pacific. This is a leading example of the ecosystem variability our fisheries face.

Management and harvest stability is critical to responding appropriately to biomass and ecosystem changes, and continuing to prosecute an effective and responsible fishery. Predictability of harvest rates and fleet capacity is an important part of that stability, one that we are concerned would be undermined by this proposal.

As noted in ADFG comments, the likelihood and unpredictable scale of increased participation, combined with the unknown CPUE of slinky pots in this fishery, will make managing within set limits more difficult, and increase the likelihood of “*GHLs being over or under harvested more frequently*.” (ADFG). While ADFG is neutral on this proposal given its allocative nature, we urge the Board to consider the multiple ways the Department noted increased uncertainty as a likely result of Proposal 53.

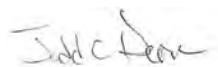
Impacts of Increased Uncertainty, Participation and Gear Conflicts

The impact of increased uncertainty on management and the fleet is illustrated by the already short nature of this fishery. In the past 10 years, the fishery has averaged 19 participants, and 21 days in length – shorter in recent years. In 2022, the fishery was officially open 15 days. In 2023 it was 10 days. Both years had 16 participants. Increased participation inevitably shortens fishery timing. Operating an orderly fishery within an even tighter window *and* with additional, less predictable participants, puts undue strain on managers and harvesters. Additionally there is an increased potential for costly gear conflicts, which harvesters currently experience in areas of longline/pot gear overlap, and in BSAI fisheries where longlined pots and single pot fisheries share grounds (i.e. sablefish and Pacific cod).

Harvesters are already operating within the limitations of short seasons, difficult weather, and a depressed statewide seafood market that has significantly impacted Pacific cod dock prices. Given depressed prices, the potential for increased losses from gear conflicts, the variability of winter fishing weather, an increase in competition for lower-than-average catch limits, and the overall combined risks of gearing and crewing up for a season that could be less than a week, it is possible that existing Kodiak pot cod vessels could be precluded from participating in the Kodiak pot cod fishery with the introduction of additional uncertainty.

USCH members independently, and our organization overall, have long been supportive of managing fisheries to support small-boat opportunities. Kodiak currently has a diversified fleet of small, medium and large boats able to prosecute the statewater cod fishery. This includes an established resident fleet of jig operators using small vessels, and an established resident fleet of pot vessels. While slinky pots have been successful in some fisheries, they are not right for every fishery. Recognizing that this proposal would fundamentally change participation, and increase management and harvest uncertainty, we urge the board not to support Proposal 53.

Sincerely,



Todd Hoppe, *Board President*. Under Sixty Cod Harvesters



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December 23, 2023

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Alaska Board of Fisheries
PO Box 115526
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Chairman John Wood, Members of the Alaska Board of Fisheries:

The Valdez Fisheries Development Association Inc, (VFDA) submits these comments in support of the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration in Kodiak. This action by the board was correct and reasonable, given the vagueness of the proposal and its statewide implications to Alaska's fisheries and hatchery programs.

VFDA has submitted significant public comment and in person testimony over the years opposing this proposal in all of its many forms. Proposal 59 and others like it, have sought unsuccessfully to find justification for adoption siting; improper hatchery regulation and management plans, unsubstantiated conservation concerns, opinions on the Board's authority to regulate hatchery permits and undocumented agreements purportedly made by hatchery operators. None of which has been found to be plausible by the Board.

Respectfully, we would ask that Proposal 59 remain removed from any future board deliberations. We would also suggest that strong guidance be provided to the public, that future hatchery proposals which have significant and far-reaching statewide implications, be submitted in a way that permits maximum stakeholder engagement and be supported by fact and scientific data.

Thank you.

Sincerely,

Mike H. Wells
Executive Director



PC161

Submitted by: Corina Watt

Community of Residence: Rochester, WA

Comment:

Proposal 63, we support permit stacking. We are family operated and owned business. I have been a permit holder and participant in this fishery for 3 decades. My husband and I and our three boys own and operate our fishing business. Strongly support permit stacking for the following reasons:

- 1) Sustaining the set-net fishery permit holder participation has been in steady decline in the Alitak District over the last three decades.
- 2) Economical, we hold 4 permits and need to fish all four continuously throughout the season. We are in a constant struggle to survive rising costs and unpredictable prices we like most are subsidizing our business just to sustain participation.

Proposal 63: Support



PC162

Submitted by: Jason Watt

Community of Residence: Rochester, Washington

Comment:

Proposal #63

As a set net fisherman owner on the south end of Kodiak Island I am in favor of permit stacking for set net fisherman. In the past people have argued against it claiming that it puts people trying to get into the fisheries at a disadvantage. Times change and it is all but impossible to make it in this fishery without multiple permits. Our fishery and the canneries have been in steep decline and in order to survive this the few remaining sights have been forced to cut back like no time in our history. This fisheries is on the verge of total collapse and we need any help we can get.

Proposal 63: Support



PC163

Submitted by: Ross Weller

Community of Residence: Kodiak

Comment:

I don't support proposal 49 as written. I'm open to a possible change but this is too restrictive.

Proposal 49: Oppose



Submitted by: Anitra Winkler

Community of Residence: Kodiak, AK

Comment:

Dear Board of Fish Members

My Name is Anitra Winkler. I am 30 years old and a lifelong Alaskan. I grew up in Cantwell went to college in Juneau and I have also been in the westside Kodiak salmon setnet fishery since 2010 and a site owner since 2017. I am writing you to encourage support for proposals 62, 64, & 71 as well as opposition for proposals 72, 73, & 74.

It is apparent to me that without some sort of change set netting in Kodiak may not survive as a viable commercial fishery. It is becoming increasingly difficult to find and retain crew (because it's hard to pay them enough) and I know of a couple of young people who crewed in the fishery and were interested in buying sites themselves but the finances made it not reasonable. It's important to point out that all of this has nothing to do with the price crash we are dealing with now. This has been an on going problem for years where we had good prices.

Setnets have less opportunities. Kodiak is one of the only places in Alaska where two different gear types fish without any time or area separation. We are not allowed to fish on most of the island. We can only be in the central section of the NW district or on the south end. We cannot fish in terminal areas including we are not allowed to fish the Telrod SHA and we can't fish at Kitoi the hatchery. Long story short the mobile gear type can try to catch the fish before they get to us, in the same area as us, and then again when they are past us. Further we never benefit from a "mop up" opening. These kind of inner bay clean up openings actually come partially at our expense because we will be closed to achieve the buildup but then we can't participate when the fishery is in catch up mode.

Gillnets are a slow and inefficient gear type - we need time to catch fish. That said the single biggest way to help us is to give us more fishing time, particularly fishing time where we are not competing with the other gear type. Proposal 62 best addresses this.

Proposal 64 bigger hooks would be a small increase in production and would make our hooks more convenient to pick. The way it is now I have hook panels that I can barely fit my skiff in. Hooks are key to gillnetting in Kodiak as we are targeting pinks as well as reds and our water is generally very clear as opposed to the silty/murky water of Bristol Bay ect.

Proposal 71 is mostly a housekeeping proposal. It gives the department another option and would help us achieve escapement a little faster, allowing more fishing opportunity in the central section.

Proposal 63 permit stacking I am not particularly opinionated about but a lot of people are. I am one of the youngest non-family operation permit holders in the fishery and I personally have no issue with it. I don't believe its going to make buying in significantly harder and from a crew persons perspective if you are crewing for a multi permit operation you are going to make more money. I do know that this would make life easier for family operations with multiple permits and kids in school ect.

Proposals 72 and 73 I oppose as they would increase targeting of fish before they reach the central section as well as slow down reaching escapement goals which would negatively impact fishing time in the central section.

I would also like to voice my strong opposition to proposal 74. Proposal 74 as it is written would be death sentence for set netters. A site could hire a crew get ready to fish and then spend most of the summer on the beach. This could even happen on a season that may have had a strong forecast but that particular bay was weak. From a business standpoint this is unsustainable, it is just not a reasonable way to run a business. This puts the burden of conservation unequally on set netters, who ironically can't even benefit from fishing in the inner bays that this proposal is hoping to beef up.

Thank you for your time and consideration

Anitra Winkler

Proposal 62: Oppose
Proposal 69: Oppose
Proposal 74: Support

Proposal 63: Oppose
Proposal 71: Oppose

Proposal 64: Oppose
Proposal 72: Support

Proposal 66: Oppose
Proposal 73: Support



PC165

Submitted by: Thomas Wischer

Community of Residence: Kodiak, Alaska

Comment:

Proposals 62, 69-support

The Kodiak gill net fishery annual harvest has declined drastically for many years. We are a stationary/fixed gear fishery and are restricted to the central section of the Northwest Kodiak District. If we are to remain a viable fishery, we need time in the water without the competition of the seine fleet.

Proposal 63-support

Permit stacking would allow a family owned gill net site to fish all of their permits for the duration of the season. It should be amended to prohibit a stacked permit holder from fishing salmon in another region of the state.

Proposal 64-support

Having the option of using a longer hook or pot on a gill net may increase the individual permit holder's harvest and assist in getting closer to the historical set net harvest.

Proposal 66-Oppose

Increasing the length of a seine by 50 fathoms will increase the seine harvest to the detriment of gill net fishermen. Seine nets are already 50 fathoms longer than the regulation length of gill nets.

Proposal 70- support

Allocation attempts to achieve the historical harvest of Kodiak's gill net fleet.

Proposals 72,73 Oppose

These proposals would provide additional fishing opportunity for the seine fleet on the north and south adjacent sections to the only section where gill net fishing is permitted, resulting in only fewer fish available for harvest by an already diminished gill net fishery.

Proposal 74- Oppose

Dividing the Central Section into three sections that can be open or closed would concentrate the seine fleet in the open section(s) while the gill net fishermen in the closed section(s) would be denied fishing time further decreasing their harvest.

Proposal 62: Support	Proposal 63: Support With Amendments	Proposal 64: Support
Proposal 66: Oppose	Proposal 69: Support	Proposal 70: Support
Proposal 72: Oppose	Proposal 73: Oppose	Proposal 71: Support
		Proposal 74: Oppose



PC166

Submitted by: Garrett Wood

Community of Residence: Kodiak, AK

Comment:

My name is Garrett Wood and I own a seiner and tender boat in Kodiak. I also own a welding and fabricating business. I rely on healthy fisheries for all of my businesses. Before I even became a fisherman I worked as welder and earned all of my income from the fishing fleet. I care about this town and this community, and don't want to see changes to our fisheries management that would result in less fish being caught which means less money flowing to the businesses in town. Some of the proposals that intend to shut down the seine fleet in the central section would mean less fish across the docks and less income for all of the residents of Kodiak. Most of the fish that seiners would give up still will not be caught by setnetters, so basically no one would get to harvest those fish and less income will be available for our community. As a tender, I have seen how important this area is to the seine fleet and I know how bad it would be if the central section were arbitrarily closed to seining. Now that I also have a seiner, these proposals would harm me in three ways - less money available for my welding business, fewer days available for my tender vessel, and less fishing opportunity for my seine boat. I was able to start my welding business from scratch 12 years ago and I appreciate the opportunity that the fisheries in Kodiak provide for all of our residents and I hope the Board of Fisheries understands that this town runs on fish, so please don't take that away.

I support proposals 60 and 72 which would provide more fishing opportunity for seiners to access local stocks. I also support proposal 66, which would simplify net building for seiners.

I am very opposed to proposals 62 and 70. These proposals would harm all of my businesses and hurt the community of Kodiak.

I am opposed to proposal 65. As a tender, I have seen how flyers are used to spread out the fleet which benefits everyone.

I am also very opposed to proposal 68 which would mean that Karluk would drastically over-escape sockeye and waste fishing opportunity. I think the Alaska Department of Fish and Game should determine escapement goals and manage for those goals, not one individual with no scientific basis for the escapement numbers.

I support proposal 73. Of course we should include Sturgeon escapement goals in the management of the Sturgeon section,

Proposal 60: Support	Proposal 62: Oppose	Proposal 65: Oppose	Proposal 66: Support
Proposal 67: Oppose	Proposal 68: Oppose	Proposal 70: Oppose	Proposal 72: Support
Proposal 73: Support			



Submitted by: Stig Yngve

Community of Residence: Kodiak,AK

Comment:

See attached

Proposal 44: Support Proposal 45: Support With Amendments
Proposal 46: Support With Amendments Proposal 61: Support
Proposal 67: Support With Amendments Proposal 68: Support

I support proposal 51 with an amendment. I am the proposer. There are very few crab to catch for sport and subsistence harvest, king, tanner or Dungeness around Kodiak. I want to amend this proposal to read such that it would ban sportfishing for shellfish in Kodiak waters by any commercial sportfishing or transporting vessel outright.

I want to amend my proposal to only ban bait in freshwaters of the Kodiak remote zone. I support this proposal if it were to only include the Kodiak remote zone.

Proposal 44 is what I am talking about. I am the proposer and support it in full. This was also supported in an 11 to 3 vote by the Kodiak Advisory committee. It is sensible and needs to happen.

I am the proposer of this proposal 46 and support it with an amendment. When sockeye runs are at mid or upper end of escapement, legalized snagging of sockeye in freshwater should be allowed as a means of harvest.

I am the proposer of this proposal, Proposal . 67 I support it in its basic intent. I believe that the Coho specific number goals can be adjusted and are highly variable. I would like to see an RC, a register of change if possible on this one.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

My biggest concern here is the lack of concern for all anadromous fish species in Southwest Kodiak and Olga Bay, especially Coho, that ARE NOT high dollar commercial caught Sockeye or high volume, commercial dollar caught Pink salmon.

Alaska Department of Fish and Game Kodiak Island Commercial Salmon Management, under the reign of [REDACTED] and [REDACTED] has traditionally been quite vocal and blatant about their motives and intentions with salmon here. All that matters is Sockeye and Pinks. Their Westside salmon management plans and Alitak/Olga bay salmon management plans have consistently reflected that. Sportfish Management is almost completely absent from Coho in that part of the island. Sportfish has no funding or firepower to do much of anything. No weirs except Karluk operate past mid August.

My question is how can ADF&G manage anadromous fish stocks, Sockeye, Chinook, Pink, Chum, Dolly Varden, Coho, and Steelhead, commercially or otherwise, WITH FULL ACCOUNTABILITY, when there is no concrete quantitative data and fish counts to support management decisions after a weir is gone?

At the expense of Coho, commercial Sockeye and Pinks takes precedence. Coho are a huge part of fall sport fishing on Kodiak Island. Folks come from all over the state of Alaska to come to our Island to sport fish, also from all over the United States and from many different countries around the world as well. These rivers, Karluk ,Ayakulik, Sturgeon and Olga Bay Drainages are a tremendously valuable resource economically for approximately 20 fishing lodges from Uganik Bay to Olga Bay. This generates roughly the same income as a Salmon Seiner over the span of a season and it can't be done without COHO.

The monetary value is overshadowed on a much higher level by the natural demand for Coho. The whole ecosystem of the Karluk River, Sturgeon River, Ayakulik River, Akalura Creek, Upper Station Lakes, Dog Salmon River, Silver Salmon Lagoon and Horse Marine all depend on silvers heavily to feed Bears and foxes and provide nutrients for future salmon generations. Therefore, Coho are a natural phenomenon and to a lesser degree, economic phenomenon that needs to be addressed NOW.

The mouth of the Ayakulik River is narrow, less than 75 feet. Fish can stack up quite heavily at the outh of this river and like Karluk and Dog Salmon, the amount of Coho in this drainage is very small in comparison to Pinks(700,000-1,000,000 on a good year) and Sockeye(300,000-400,000) on a good year. ADF&G runs a weir on this river from late May to mid August most years. The weir has stayed in ONCE to count later running Coho in the last 25 years. It was 2009 and I was there counting them. There is no hard base line number for a minimum Coho escapement goal here. Generally the weir gets flooded out in August and that is it for the year. Commercial Salmon Seiners are left to fish wide open after the fact. Because the river mouth is so narrow. It literally takes 1 boat here blocking the river mouth or making repeated sets in its near vicinity to mop up everything .

There are 5 sportfishing operations on this river that make a partial or VAST MAJORITY of their income from Fall Fishing, of which Coho is the major part. I am one of them. That is a lot more than just 1 Salmon Seiner mopping up all the fish. Do it yourself unguided recreational fisherman come to fish this river from all over the world as well. Being that the Ayakulik is the longest drainage on the whole of Kodiak Island, its Coho are a crucial element for fueling the whole ecosystem from August to December. To recklessly and knowingly take away the lifeblood of a whole ecosystem for the better part of the fall is utterly foolish and caters selfishly to Salmon Seiners. Negligence and a dollar driven fishery rules here, NOT CONSERVATION AND SOUND ESCAPEMENT MANAGEMENT POLICY. In the past when a weir was gone, sonar was utilized to count fish with some degree of effectiveness, so it is possible to enumerate fish without a weir, but difficult to speciate properly. Bottom line, wide open commercial fishing without inriver enumeration is poor management and this needs to be remedied.

Regarding proposal 61 I support it in full.

I am the proposer of this proposal.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

My biggest concern here is the lack of concern for all anadromous fish species in Southwest Kodiak and Olga Bay, especially Coho, that ARE NOT high dollar commercial caught Sockeye or high volume, commercial dollar caught Pink salmon.

Alaska Department of Fish and Game Kodiak Island Commercial Salmon Management, under the reign of [REDACTED] and [REDACTED] has traditionally been quite vocal and blatant about their motives and intentions with salmon here. All that matters is Sockeye and Pinks. Their Westside salmon management plans and Alitak/Olga bay salmon management plans have consistently reflected that. Sportfish Management is almost completely absent from Coho in that part of the island. Sportfish has no funding or firepower to do much of anything. No weirs except Karluk operate past mid August.

My question is how can ADF&G manage anadromous fish stocks, Sockeye, Chinook, Pink, Chum, Dolly Varden, Coho, and Steelhead, commercially or otherwise, WITH FULL ACCOUNTABILITY, when there is no concrete quantitative data and fish counts to support management decisions after a weir is gone?

At the expense of Coho, commercial Sockeye and Pinks takes precedence. Coho are a huge part of fall sport fishing on Kodiak Island. Folks come from all over the state of Alaska to come to our Island to sport fish, also from all over the United States and from many different countries around the world as well. These rivers, Karluk, Ayakulik, Sturgeon and Olga Bay Drainages are a tremendously valuable resource economically for approximately 20 fishing lodges from Uganik Bay to Olga Bay. This generates roughly the same income as a Salmon Seiner over the span of a season and it can't be done without COHO.

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Dog Salmon Flats is very shallow, 1-4 feet deep and salmon stack up there and surge into the river with the incoming tide. The purpose of commercial salmon fishing the flats here in mid August is generally to mop up Pink Salmon and late Sockeye. Coho have virtually the same run timing here, as the 2nd half of the Pink Run, mid August



to mid September. By mid August the Sockeye run here is winding down as evidenced by ADF&G weir counts for the past 50 years or so. Thus the major money incentive salmon is almost non-present at all for the catching. Having restricted fishing here would have a minimal negative impact on the high dollar value Sockeye because the run is almost dried up at that time of year.

It only takes 1 set gill net here to utterly stop fish movement into the Dog Salmon River. There is no discriminating, everything gets caught. Simultaneous to the pink salmon run and end of Sockeye run is the Coho run. There are so few Coho, less than 3,000 on any given year, and upwards of 200,000 Pinks and 150,000 Sockeye, very very little money value generated by Coho from a commercial fishing perspective. This flats fishing literally benefits 1, **ONE** commercial salmon fishing enterprise, not a whole fleet of them. Thus there is no lost opportunity for a whole group of fisherman.

The weir on the Dog salmon is gone by mid August every year, so nothing gets counted. The ADF&G [REDACTED] Era Salmon management attitude is, "Well its over, so let 'em run wild (commercial fisherman that is) . I DON'T ABIDE BY THAT AT ALL in the name of Conservation. This river is a sport fishing gem as well as the lifeblood for close to 100 bears late in the Fall, with the Coho as a crucial food source. And it is completely overlooked. Fish and Game has a lack of management tools here to justify commercial fishing in the aforementioned manner after the weir is gone. IT NEEDS TO STOP.

I am the proposer of this proposal, Proposal 68. I support it in full

Stig comment please read out loud

Regarding proposal 68. I support this proposal in full.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

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Regarding Karluk River and its Sockeye, especially the Wild Stock late run, it is the largest commercial salmon fishery on Kodiak during August and September on years with a high volume of Sockeye and Pinks. Again, like the other systems, Karluk has SOCKEYE ESCAPEMENT and Sockeye DOLLAR driven motives managing and influencing it. It also has strong Pink runs as well. Normally Sockeye runs don't overlap much with Coho, but in this system, the late Sockeye Run coincides with the entirety of the Coho run. The Karluk is also a world renowned sport fishing river not only for Coho, but also for Sockeye, Steelhead and once upon a time, KINGS. It is one of the most studied rivers in the world in the last 200 years.

All species stage quite heavily in the Karluk Lagoon which is 4 miles long, and in the vicinity of the river mouth in the near shore waters of the Inner Karluk Section EVERY YEAR from early August to Late OCTOBER. Because everything lumps up in one big mass, untold thousands of steelhead, and 10s of thousands of Coho are caught every year by commercial Seine and gillnet while mainly targeting Sockeye and Pinks. Though the Coho carry small commercial monetary value, it is the Sockeye especially that draws commercial fisherman here late.

This drainage is also a salmoncentric ecosystem, very dependent on Coho and late Sockeye and Pink to fuel it with nutrients for all organisms. A single gray boat or a handful of seiners can singlehandedly control fish flow here too. It is even more vulnerable to overharvest of target and non target species than either Dog Salmon or Ayakulik because of the lagoon,/rivermouth area which at times can hold upwards of half a million salmon with the same amount or more in front of the lagoon in the ocean. Often times in September, the bulk of the whole Coho run is mixed in with those late Sockeye and Pinks.

In essence the whole Coho population can get scooped up swiftly in commercial nets in a matter of a day. This cannot happen. It is biologically blind and completely lacking in sensible management. Karluk is the one weir that is in operation latest, so species enumeration is realistically possible because of the weir being in operation to count late Sockeye. For far too long has Kodiak Salmon Management turned a blind eye to all species not named Sockeye and Pink. I demand accountability and I demand positive action.



PC168

Submitted by: Barbara Zimmerman

Community of Residence: Kodiak, AK

Comment:

I support the existing Kodiak Food and Bait Herring Fishery and do not support creating a new one.

Proposal 57: Oppose



PC169

Submitted by: David Zimmerman

Community of Residence: Kodiak, AK

Comment:

To whom it may concern,

I don't see the purpose of this proposal as we already have a food and bait herring fishery. Thank you.

Proposal 57: Oppose