



November 16, 2017

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

Members of the Board of Fisheries:

Please find below written comments from Cordova District Fishermen United regarding the upcoming Prince William Sound Finfish Board of Fisheries meeting proposals to be discussed in Valdez, Alaska on December 1-5, 2017. Please don't hesitate to contact CDFU with any questions whatsoever. Thank you for your consideration.

PROPOSAL 10 OPPOSE

The Copper River has seen strong and consistent returns of sockeye salmon using the current sustainable escapement goal (SEG). Therefore, there is no mandate or need to create a new optimal escapement goal (OEG). The lowest threshold of the proposed number would be higher than the current upper escapement goal. The Copper River is a mixed management watershed and is very different geographically from the Kenai. Fisheries and watersheds are not one size fits all. There is no data to support the development of an OEG for the Copper River that is not provided for the established SEG of sockeye. Additionally, there is no data to support the proposals statement that the current SEG set by ADF&G is artificially low and is used to exploit chinook harvests. ADF&G continues to monitor the watershed and makes management decisions based on the best available science. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. Furthermore, revising an escapement goal is the role of ADF&G and the department's analysis of best available science.



PROPOSAL 17 OPPOSE

If implemented, this proposal would more than double the size of the current Chitina subdistrict personal use fishery. Extending this harvest boundary would have great negative implications on the Native Village of Eyak mark-recapture study which helps to determine overall inriver abundance and contributes to estimates of run size and spawning escapement. This study has been conducted annually since 2003 and is integral to ADF&G and stakeholder knowledge of the Copper River fishery. This study increases the department's ability to make data driven management decisions to protect the health and sustainability of the run. Extending this harvest area would increase mortality which would impact the ability of scientists overseeing the mark-recapture study to accurately estimate chinook returns. This information is invaluable to all user groups for in season management as well as the long term health of Copper River chinook. If implemented, this expansion would also increase the burden on law enforcement in the Chitina subdistrict by increasing the area of enforcement by roughly 18 miles of river bank area that is difficult to navigate due to many overlapping shallow channels.

PROPOSAL 18 OPPOSE

If the commercial fishery is closed for more than thirteen days, there is clearly an abundance concern to which management must respond. In such an event, increasing harvest potential to any one gear group over another would be irresponsible and short sighted. Depending on the time of year and the strength of the season, one or all gear groups may be impacted, which is simply the natural result of managing a natural resource that fluctuates in its abundance from year to year. CDFU supports all user groups sharing in the burden of conservation.



**PROPOSAL 19
OPPOSE**

CDFU supports increased subsistence opportunity when sockeye and chinook run strength warrants it. CDFU maintains that in season management tools are an effective and sustainable method that outweigh the value of any mandatory regulatory decision. ADF&G management has the EO authority to expand subsistence openings and area in season and demonstrated that authority during the 2017 season. The department demonstrated this type of management during the 2017 season by leaving area open to subsistence users that was closed to the commercial fleet. CDFU supports the discretion of the department in regards to subsistence openings and subsistence access.

**PROPOSAL 21
OPPOSE**

CDFU opposes Proposal 21 due to the ambiguity of its language and intent. However, CDFU agrees that some restrictions and monitoring of subsistence herring is important and merits discussion.

**PROPOSAL 22
OPPOSE**

The health and abundance of herring stocks in Prince William Sound have been in question for decades and lower than the necessary threshold for regular harvest. There is no surplus of herring to justify opening a personal use fishery in Prince William Sound. State residents currently have access to the herring subsistence fishery.

**PROPOSAL 23
SUPPORT**

CDFU supports prohibiting catch and release in spawning habitat and the intent language of proposal twenty-three. If we truly wish to protect the longevity and health of salmon runs in this region, the salmon should not be harmed while spawning.



PROPOSAL 31 OPPOSE

The Copper River commercial fishery is a multi-stock fishery and is not limited to sockeye salmon. Reducing the depth of gillnets in the Copper River District would result in prohibitive and unreasonable cost burdens for the commercial fleet and lost financial opportunity for the State of Alaska. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. In years past as well as the Summer of 2017, CDFU has publicly opposed premature restrictions on subsistence users that are based on a forecast or related assumptions.

The 3,500 chinook harvest goal is not a commercial catch goal. It is simply a forecasted projection of a potential goal. ADF&G raises or lowers goals based on all available data and in season harvest indications. Additionally, reducing gear depth would limit sockeye harvest which could result in over escapement.

This proposal states that chinook salmon are a stock of concern. This is inaccurate. There are no species of salmon that are listed as a stock of concern in the Prince William Sound or Copper River District. Limiting the harvest area of the Copper River drift fleet to this extent is unreasonable and lacks scientific or data to support it.

PROPOSAL 32 OPPOSE

Mandated regulations should not be implemented based on a forecast. According to ADF&G, the forecast range has an 80% confidence level for the total run forecast. The earliest chinook count data regarding inriver abundance estimates used by ADF&G is from 1999; therefore, there is not enough data to create a 20-year average. ADF&G also states that Chinook total salmon run forecasts between 1998-2007 were not generated as the inriver abundance and spawning escapement estimates were inadequate. In the January 20th forecast summary for Chinook ADF&G states that if the 2017 forecast was realized it would tie with the 2016 total run forecast as the smallest run since 1980. This forecast was not realized for the year of 2017. There is a pattern of these forecasts being misleading and resulting in frustration, for all user groups, when mandated regulations are placed prior to in season monitoring, based off information that is just an estimate of total run sizes for the year.



This proposal states that chinook salmon are a stock of concern. This is inaccurate. There are no species of salmon that are listed as a stock of concern in the Prince William Sound or Copper River District. Limiting the harvest area of the Copper River drift fleet to this extent is unreasonable and lacks scientific or data to support it.

CDFU defers to the department and its scientists to manage based on a combination of past data and in season abundance. CDFU supports the department's conclusion that in season abundance is the least biased and most accurate mechanism.

PROPOSAL 33 OPPOSE

The Copper River commercial fishery is a multi-stock fishery and is not limited to sockeye salmon. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. In years past as well as the Summer of 2017, CDFU has publicly opposed premature restrictions on subsistence users that are based on a forecast or related assumptions. The commercial fleet experiences significant restrictions on area and reduced fishing time in order to conserve chinook salmon when abundance is low.

PROPOSAL 34 OPPOSE

CDFU defers to the fisheries biologists who understand the timing of salmon runs up river, but it is imperative to recognize that many factors contribute to the rate and pace at which fish pass the sonars up river. ADF&G and other stakeholders are working to provide additional tools to monitor in river data and the movement of salmon up river in the near future. Consequently, we should avoid locking ADF&G's management options up in this proposed regulation.

For example, the 2013 salmon season presents a strong contradiction to this proposal. The first commercial opener was a strong harvest but no fish had passed the sonar. As a result, fishing was closed. Then a massive number of fish passed the sonar and the season was consequently over escaped. The rate at which salmon move up river varies from season to season and depends upon low or high water levels, weather, temperature, and the pace at which the river ice melts.



CDFU maintains that in season management tools are an effective and sustainable management tool that outweigh the value of any mandatory regulatory decision. ADF&G management has the EO authority to expand subsistence openings in season. CDFU supports the discretion of the department in regards to subsistence openings and subsistence access.

**PROPOSAL 37
SUPPORT**

Kayak Island is traditional and historical area for the Copper River gillnet fleet. CDFU would like to see the Board of Fisheries and Department of Fish and Game explore the intent of this proposal based on best available science.

**PROPOSAL 40
OPPOSE**

CDFU opposes this due to the fact that it would be impossible to enforce and would burden fishermen to validate the 4 fathoms rule. For example, a set that is made legally could then become illegal due to tide fluctuation. Regulation is already in place that makes it illegal for a gillnet to be anchored.

**PROPOSAL 41
SUPPORT**

CDFU supports increasing access to the drift gillnet fleet where there are viable waters to fish or where it is feasible to legally set a gillnet.



Sincerely,

Jerry McCune
President of the Board, CDFU
Gillnet Fisherman, F/V Wudahad
jmccune59@hotmail.com
Mobile: 907.200.0240

Rachel Kallander
Executive Director, CDFU
Rachel@CDFU.org
Mobile: 206.334.4618

CC: John Renner, Vice President & Herring Division Representative
Seine, Herring & Gillnet Fisherman
F/V Shadow Dawn & F/V Never Enough

Curt Herschleb, Director
Gillnet & Groundfish Fisherman
F/V Chilkat

Gus Linville, Groundfish Division Representative
Seine, Tender & Groundfish Fisherman
F/V Frisian Lady

Robert Eckley, Groundfish Division Representative
Seine, Gillnet, Herring & Groundfish Fisherman
F/V Ariel, F/V Coghill, F/V Alaganik & F/V Cape Fear

Trae Lohse, Gillnet Division Representative
Gillnet & Groundfish Fisherman
F/V Catalyst

Red Culbertson, Seine Division Representative
Shrimp & Seine Fisherman
F/V Ninkasi

Vic Jones, Herring Division Representative
Seine, Gillnet & Herring Fisherman
F/V Valkyrie & F/V Chelsea Dawn



Mike Mickelson, Director
Gillnet & Seine Fisherman
F/V Amy & F/V Mariah

Ezekiel Brown, Director
Gillnet & Seine Fisherman
F/V Viking Maid & F/V Meshed Up

Galen Meyer, Seine Division Representative
Seine Fisherman
F/V Tina

James Honkola, Gillnet Division Representative
Gillnet Fisherman
F/V Sportsman

Kal Kuzmin, Director
Gillnet Fisherman
F/V Sea Glider