



Southeast Alaska Fishermen's Alliance

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January 15, 2019

Alaska Board of Fisheries

Reed Morisky, Chair

PO Box 115526

Juneau, AK 99801

RE: Group 5: Miscellaneous Sport and Commercial Proposals

Dear Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species fishing organization representing our 330+ members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. The majority of our members also participate in sport, personal use, and subsistence fisheries as part of their lifestyle. We would like to comment on the three proposal that were added during the work-session that will affect Southeast fisheries.

PROPOSAL #175: SUPPORT - Align regulations for sport fishing services and sport fishing guide services in fresh and salt waters and update guide registration and reporting regulations.

SEAFA supports reimplementing the registration system and reporting requirements for sport fishing guide services and guides. The timely reporting by the sport fishing guides has become very important to the management of the resources particularly king salmon and halibut, as accounting for removals is a cornerstone of sustainable fisheries management

PROPOSAL #176: COMMENT – SE KING SALMON MANAGEMENT PLAN

While we support in the long term adjusting the king salmon management plan to align with the salmon treaty provisions this must be done with extreme caution and understanding of the new provisions, how the new CPUE model will work for the Chinook fisheries, maintain the protection for resident sport food fishery built into the king salmon management plan, and put into context of all the restrictions that were implemented last year in the King salmon action plans to protect local stocks. Between the proposal as written and the actions taken last year the inside fisheries are taking the brunt of the management restrictions. The proposal provided by the Dept for consideration is not simple

housekeeping but has many allocation implications and effects particularly between the resident and non-resident sport fisherman as well as between inside and outside waters. On page 21 of the Chinook annex¹ the CPUE model will be re-evaluated in 2022 and 2025 and the Commission may determine to revert back to the AI model after either evaluation. This is a proposal that needs the ability for SE Alaska affected users to be able to have more time to evaluate, come up with alternatives such as suggested by Territorial Sportsmen or other public comments received and have an opportunity to discuss together.

PROPOSAL #177: SUPPORT - Add purse seine and drift gillnet as allowed gear types in the Crawfish Inlet Terminal Harvest Area

SEAFAs supports the addition of seine and gillnet to the Crawfish Inlet Terminal Harvest Area (THA) as we thought that was what was being discussed and agreed to between the gear groups in their consensus agreement. We believe the glitch that occurred was because of a misunderstanding between terminal harvest area and special harvest area definitions. While supporting the inclusion of gillnet into the THA we acknowledge that the gillnet fleet is above their allocation range and the seiners and trollers are below. In addition, the NSRAA Board has made the Crawfish THA as a priority area for the troll fleet.

HATCHERY COMMITTEE AGENDA

We understand the board is soliciting information about suggested topics for the hatchery committee meeting in March. You have received some good suggestions in public comments from the hatchery operators and processors. We would caution about trying to put too many items on the agenda and having to hurry through and superficially touch on the topics. This first meeting could easily spend a day on Regional Planning Team, permitting processes and Comprehensive Salmon Plans. SEAFAs has been helping Yakutat develop a hatchery program starting in 2011. Unfortunately, Yakutat still hasn't been able to put any fish in the water but have spent the time in developing a regional aquaculture association, revising the comprehensive salmon plan for Yakutat, and doing water quality and quantity tests to find a suitable site, some sampling of chum salmon stocks for genetics etc. This is not a process that can be rushed and has a lot of public hearings that are required as well as the regional planning team meetings being public. Understanding the steps necessary to develop a hatchery and the permitting process might reassure the public about the process.

Sincerely,



¹ http://www.adfg.alaska.gov/static/home/news/hottopics/pdfs/2019_pst_chp_3_chinook_salmon.pdf

Kathy Hansen
Executive Director