

FAIRBANKS FISH AND GAME ADVISORY (FAC)
NOVEMBER 13, 2024 6:00PM
FAC COMMENTS ON PROPOSALS FOR

Alaska Board of Fisheries Prince William Sound and Upper Copper/Upper Susitna Finfish and
Shellfish (except shrimp) Meeting Proposals

December 10-December 16, 2024 | Cordova, AK

PUBLIC COMMENTS DUE NOVEMBER 26TH TO ALASKA BOARD OF FISH

Note: Motion makers noted in meeting written notes

**All motions on proposals, including TNA, were supported unanimously by
15 FAC members (including one alternate) present at the November 13th
meeting**

Support highlighted in yellow, opposition highlighted in blue

ADF&G Staff comments not available as of 11/13/24

Proposal sections:

Groundfish (29 proposals)

Subsistence Groundfish (1 proposal) #1

Commercial Groundfish (23 proposals) #2 to #24

Personal Use Groundfish (2 proposals) #25 to #26

Sport Groundfish (3 proposals) #27 to #29

Shellfish (14 proposals) #30 to #43

Copper River Salmon (29 proposals) Proposals #44 to #-----

Subsistence (7 proposals) Proposals #44 to #50

Salmon Management Plans (5 proposals) #51 to #55

Commercial (2 proposals) #56 to #57

Personal Use (14 proposals) #58 to #71

Sport (1 proposal) #72

Commercial Fishing Permits, Allocation Plan and Hatchery Operations (9 proposals)

Commercial Fishing Permits (2 proposals) #73 to #75

Allocation Plan and Hatchery Operations (7 proposals) #76 to #81

Prince William Sound and Upper Copper and Upper Susitna Rivers Sport (13 proposals).....

Prince William Sound (7 proposals) #82 to #88

Upper Copper and Upper Susitna River (6 proposals) #89 to #94

Herring (9 proposals) #95 to #103

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<i>Note: Effective September 2019, when abstentions occur, the action or decision of a majority of the remaining members at a meeting at which a quorum is present is an act of the committee. For example, a vote tally of 7-6-2 means the motion carries. Members abstaining from voting must provide an explanation that is included in the committee record.</i>			
Ground Fish			
1	Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries		
TNA			
2	Reopen waters closed to the harvest of groundfish in Prince William Sound		
TNA			
3	Modify Prince William Sound groundfish pot specifications		
TNA			
4	Restrict gear in Prince William Sound relative to the rockfish guideline harvest level		
TNA			
5	Adopt a provision to close waters to specific groundfish gear types for rockfish conservation		
SUPPORT	15		
6	Allow for release of rockfish in mechanical jig and hand troll fisheries		
SUPPORT	15		
7	Establish gear specifications for directed lingcod fisheries in Prince William Sound		
TNA			
8	Modify the Prince William Sound pacific cod fishery guideline harvest level		
TNA			
9	Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed		
TNA			
10	Modify pot limit in the Prince William Sound Pacific cod fishery		
TNA			
11	Reduce the Prince William Sound Pacific cod jig/hand troll allocation and create a new, larger allocation for pot and longline gear		
TNA			
12	Increase Pacific cod allocation for jig and pot gear to 50%		
TNA			NEEDS REVIEW
13	Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery 17		
TNA			

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14	Close the Prince William Sound walleye pollock pelagic trawl fishery		
SUPPORT	15		The FAC fully supports the intent of this proposal to reduce the dramatic rise of Chinook bycatch.
15	Modify bycatch limits in the Prince William Sound pelagic trawl fishery		
SUPPORT	15		The FAC fully supports the intent of this proposal to reduce the dramatic rise of Chinook bycatch.
16	Close the Prince William Sound pelagic trawl fishery		
SUPPORT	15		The FAC supports the intent of reduction and controls on trawling, would like to see numbers and research supporting this effort
17	Establish observer requirements in the Prince William Sound pelagic trawl fishery		
TNA			The FAC supports the intent of seeking venues for requiring observers on any trawl fisheries
18	Extend the season dates in the Prince William Sound sablefish fishery		
TNA			
19	Modify the commercial fishing season for sablefish in Prince William Sound		
TNA			
20	Modify the commercial fishing season for sablefish in Prince William Sound		
TNA			
21	Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound		
TNA			
22	Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound		
TNA			
23	Prohibit the retention of sablefish from state waters		
TNA			
24	Lengthen the commercial fishing season for sablefish in Prince William Sound		
TNA			
25	Establish a personal use sablefish fishery in Prince William Sound		
TNA			
26	Establish a Prince William Sound groundfish personal use fishery		
TNA			
27	Modify rockfish bag and possession limits		
SUPPORT	15		

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28	Modify the rockfish area, bag and possession limit		
TNA			
29	Create additional provisions for yelloweye rockfish management		
SUPPORT	15		
30	Increase subsistence Tanner crab pot limit in portions of Prince William Sound		
TNA			
31	Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries		
TNA			
32	Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound		
TNA			
33	Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area		
TNA			
34	Repeal the Registration Area E Tanner crab harvest strategy		
TNA			
35	Modify the harvest strategy for Prince William Sound Tanner crab		
TNA			
36	Increase the pot limit in the Prince William Sound Tanner crab fishery		
TNA			
37	Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery		
TNA			
38	Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab		
TNA			
39	Establish season dates for a commercial golden king crab fishery in Prince William Sound		
TNA			
40	Adopt a harvest strategy for golden king crab in Prince William Sound		
TNA			
41	Adopt new Prince William Sound king and Tanner crab harvest strategies		
TNA			

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42	Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound		
TNA			
43	Establish a directed octopus fishery in Prince Willilam Sound		
TNA			
44	Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery		
TNA			
45	Allow subsistence fishing for salmon in the Copper River inside closure area		
OPPOSE		15	
46	Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery		
TNA			Is this useful information?
47	Require inseason reporting in subsistence and personal use fisheries		
OPPOSE		15	
48	Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict 45		
SUPPORT	15		
49	Prohibit transport services in the Glennallen Subdistrict		
OPPOSE		15	Needs more information
50	Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts		
OPPOSE		15	Not enforceable
51	Reduce commercial salmon fishing opportunity in the Copper River District		
SUPPORT	15		<p style="text-align: center;">The FAC strongly supports this proposal, including consideration of FAC member recommendations:</p> <p>This proposal addresses the need to conserve king salmon early in the season until early run fish are in river and the run strength can be estimated. However, it only addresses one of several problems with the “plan” that needs change to actually protect the chinook escapement. We encourage the Board to consider other issues in the existing plan and direct changes to make it an operational management tool. Many plan features now may not actually protect king salmon escapement. The problems with the plan as it is currently written are: (1) Chinook salmon in salt water are “salmon” but when in fresh water they become “chinook salmon” and are regulated differently for all fresh water fishermen.</p>

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			<p>(2) The number of salmon caught in the earliest commercial openers is not indicative of their total run strength.</p> <p>(3) The present plan allows commercial fishery managers to open fishing periods for a month or more before the migrating salmon reach the sonar at Miles Lake (the first opportunity for actually counting fish and getting an estimate of the number of salmon for comparable dates and conditions.</p> <p>(4) The Miles Lake sonar has not been used to predict the number of chinook salmon in the daily counts (although it was intended to be able to do so). This failure causes a longer delay in estimating the chinook run strength compared to the escapement targets.</p> <p>(5) During this long period of not having even the total number of salmon, much less king salmon, the salt water fishermen take no conservation measures except restricted areas, resulting in a continued harvest of chinook before any run strength is estimated. (The term salt water fishermen includes commercial and subsistence).</p> <p>(6) These unknowns result in very restrictive, step down harvest regulations in the existing plan for all fresh water fishermen.</p> <p>(7) At present the present plan does not follow the priorities set by statute and policy for which fishermen bear the responsibility for conservation measures if the estimates are lower than needed to support all uses and spawning escapement.</p> <p>Changes to the management plan to fix these problems include:</p> <p>(1) Allow the managers to adjust the number of commercial fishing periods to insure fish passage as described in proposal 51.</p> <p>(2) Use the sonar to differentiate between the total number of salmon and the number of king salmon passing.</p> <p>(3) Recognize the differences in the harvest regime by river distance by looking at segments of the drainage and not assuming a similar situation from Miles Lake to the headwaters.</p> <p>(4) When conservation measures are needed include reporting to measure the effectiveness of those measures. As existing some measures look great on paper but managers have no way of knowing if they are effective. (The decades long data collected for Personal Use and Subsistence includes daily, species, and specific location information yet it is not used to estimate the effectiveness of conservation restrictions).</p> <p>(5) Use run timing related to number estimating rather than historical dates for implementing conservation measures.</p> <p>Why make changes?</p>

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			<p>(1) Allowing the plan to add escapement time early, like proposal 51, would at very least insure the early salmon were in river as far as the sonar.</p> <p>(2) The present mark and recapture method used for estimating the number of kings has a terrible standard deviation. Timing, water conditions, fishwheel locations etc. restrict the estimates to a tiny portion of the return. Using the sonar to estimate king salmon run strength would give managers more than a week before the fish reach any upriver fishermen.</p> <p>(3) The existing plan assumes uniform river conditions from the sonar to the headwaters. In reality as salmon get further upstream fishermen do not have similar numbers of fish available or water conditions. As an example subsistence fishwheels working under nice sounding conservation measures like “closely attended” cannot release enough king salmon to affect the spawning escapement. Those operations are never required until very late June. If the managers wanted to examine the possible effectiveness of conservation measures they could look in 40 years of harvest data that record harvest by date and species. The data would show the possible effect of releasing wheel caught king salmon because wheels at Chitina, Copper Center, Gakona etc reported the kings for decades. That data would show, for example, only a few kings ever caught after July 1 above the Gakona River. At one Gakona location the 30 year average is 1.5 kings. During those periods there are good numbers of sockeye present. The survival rate for releasing kings from even a wet box fishwheel is very low. As low as 10% in some research. Why are we using “closely attended” if only one or two kings per wheel are “saved”? If those wheels were closed to operating for a 24-48 hour period every king salmon coming upstream then would survive. With a third of the wheels operating out of 80-100 total look at the potential and compare it with 800 extra kings caught in the commercial fishery. I’m not suggesting that’s bad, merely that if some harvest occurs under conservation conditions a much smaller harvest upriver can also be tolerated. The commercial fishery is under general measures, the upriver fishers have extremely detailed specific measures. Personal use fishermen have the best set of conditions for releasing kings. They catch fish basically individually, get a look and them and can release them without taking the out of the water. The sport fishermen are usually the first to be conditioned.</p> <p>First by number of annual harvest, then by methods and means (like no</p>

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			<p>bait).</p> <p>(4) Add to the plan a reporting requirement for fish released, at least in the subsistence and personal use portions of the river. A measure of the effect of the conservation measure is a basic need to show so managers the effectiveness. In 2024 the managers were in contact with most subsistence fishwheels still operating but never asked if any kings were being released. This type of information would not help with in season management but it would allow the managers and decision makers like the BOF to see if the plan elements were doing any good.</p> <p>(5) Run timing has changed slowly over time. While the early entry into the river begins before the sonar is placed, the first expected counts (fish present after the sonar is in water) are estimated for mid June. 2024 had the low estimate of kings cause the managers to require strict conservation measures by late June for all freshwater fishermen. Sport fishers not allowed to fish for kings, PU release of all kings and closely attended release for fishwheels. It was forecast the to be a terrible escapement year. By third week July the counting tower on the Gulkana showed the third best escapement of the last five years. The last two of those years the escapement significantly exceeded the goals. The final estimate showed the lower limit of the escapement goal was reached.</p> <p>(6) Having an early accurate estimate of king salmon abundance could have guided the extreme conservation measures with less arm waving and stress for everybody.</p>
52	Reduce commercial salmon fishing opportunity in the Copper River District		
SUPPORT	15		SEE PROP#51 –
53	Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met		
SUPPORT	15		SEE PROP #51 –
54	Restrict use of Copper River District inside closure area during statistical weeks 20 and 21		
OPPOSE		15	The FAC strongly opposes. This presumes that late run Chinook in the inside closure are not Copper River Chinook but are feeders.
55	Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted		

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OPPOSE		15	Nothing to do with each other. Would unnecessarily hurt personal use fishermen
56	Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders		
OPPOSE		15	Permit stacking without fleet reduction will only increase fishing pressure
57	Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery		
OPPOSE		15	This proposal needs further discussion. It purports to be a form of fleet reduction. Needs further assessment.
58	Amend the Copper River King Salmon Management Plan		
SUPPORT	15		This proposal provides additional opportunity for subsistence and personal use
59	Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan		
SUPPORT	15		This proposal provides additional opportunity for subsistence and personal use
60	Modify the annual limit for the Chitina Subdistrict		
OPPOSE		15	Opposed based on 10-year average
61	Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict		
OPPOSE		15	No benefit to the fishery
62	Allow inseason adjustment of the Copper River personal use maximum harvest level		
OPPOSE		15	Not necessary – incorrect assumptions
63	Amend the opening date of the Chitina Subdistrict personal use fishery		
OPPOSE		15	Proposition #51 would be a better venue for helping to reach objectives in this proposal. What really needs to happen is a comprehensive review of Copper River and PWS management plans. Note FAC member comments on Prop#51
64	Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year		
OPPOSE		15	Historical statistics do not support this.
65	Require a weekly permit and inseason reporting in the Chitina Subdistrict		
OPPOSE		15	Unnecessary – Dept will not use – talk with ADF&G
66	Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal		
OPPOSE		15	This will be followed up by an RC
67	Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict		
OPPOSE		15	NOT PRACTIBLE

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68	Prohibit dipnetting from a boat in the Chitina Subdistrict		
OPPOSE	15		This needs a strong statement
69	Establish restrictions when dipnetting from a boat in the Chitina Subdistrict		
OPPOSE	15		Additional language/ (See CDA)
70	Extend the lower boundary of the Chitina Subdistrict		
SUPPORT	15		This is a safety issue
71	Prohibit guiding in the Chitina Subdistrict		
OPPOSE	15		Would not provide any advantage to fish
72	Close sport fishing for salmon based on water temperature in the Gulkana River		
OPPOSE	15		Technical management issue
73	Allow permit stacking by Prince William Sound commercial salmon purse seine permit holders		
TNA			Insufficient information without ADF&G assessment
74	Allow permit stacking in the Prince William Sound commercial salmon purse seine fishery		
TNA			Insufficient information without ADF&G assessment
75	Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan		
TNA			Insufficient information without ADF&G assessment
76	Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to increase access to the Port Chalmers Subdistrict by drift gillnet permit holders		
TNA			Insufficient information without ADF&G assessment
77	Include salmon produced by Valdez Fishery Development Association in the Prince William Sound Management and Salmon Enhancement Allocation Pla15		
TNA			Insufficient information without ADF&G assessment
78	Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%		
SUPPORT	15		Long standing FAC effort to reduce hatchery egg takes and releases. RCs will be submitted at the Board meeting
79	Close Main Bay to all fishing during hatchery cost recovery operations		
OPPOSE	15		
80	Manage the Main Bay sport fishery based on the hatchery corporate escapement goal		
TNA			Insufficient information without ADF&G assessment
81	Modify the area open to sport fishing near the Main Bay Hatchery		
TNA			
82	Modify the Prince William Sound management area marine waters into two units 76		
TNA			
83	Allow a resident sport angler to use two rods when fishing for salmon		

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SUPPORT	15		
84			Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel
TNA			
85			Modify the bag and possession limit for coho salmon
SUPPORT	15		
86			Modify the sport fishing area and season dates in Ibeck Creek
TNA			Needs numbers
87			Modify the sport fishing area and season in a Copper River Delta system
TNA			ADF&G opposes
88			Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed
TNA			Needs further information on numbers
89			Increase the bag and possession limit for burbot in Lake Louise
SUPPORT	15		
90			Modify bag and possession limits of burbot in Crosswind Lake
TNA			ADF&G opposes
91			Modify seasons, bag, possession, and size limits for Arctic grayling in Mendeltna Creek, Moose Lake, and Our Creek
SUPPORT	15		No conservation issue
92			Modify the seasonal bait closure in Paxson and Summit Lakes
SUPPORT	15		
93			Modify area closed to sport fishing in Hungry Hollow Creek
SUPPORT	15		
94			Repeal definition of "bow and arrow" in area regulations
SUPPORT	15		Housekeeping issue
95			Make numerous changes to management of commercial herring fisheries in Prince William Sound
TNA			Does this affect salmon forage?
96			Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation
TNA			
97			Reduce the minimum herring spawning biomass threshold
TNA			
98			Align Prince William Sound herring and salmon management area descriptions
TNA			
99			Define commercial herring fishery districts in Prince William Sound

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TNA			
100			Adopt a Kayak Island District herring management plan
TNA			
101			Adopt a new exploratory fishery for herring in the eastern portion of the Prince William Sound Management Area
TNA			Does this affect salmon forage?
102			Allow commercial fishery permit holders to harvest herring for the own use as bait
TNA			
103			Allow dual permit commercial herring purse seine operations in Prince William Sound
TNA			

Adjournment: 9:00pm

Recorded By: Gale K. Vick, Fisheries Subcommittee Chair & Austin Smith, Secretary

Approved By: Jeff Lucas, Chair

Date: 11/26/2024