



03 February 2009

Boards Support Section
Alaska Department of Fish and Game
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RE: BOF COMMENTS

Dear Chairman Jensen, Board Members,

The Southeast Alaska Guides Organization, SEAGO, represents Southeast Alaska charter fishing and lodge operations in Alaska and their supporters. Our mission is to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our businesses and fish resources.

In preparing for the February Board of Fisheries meetings, SEAGO developed a committee process and involved a number of our members. The comments enclosed are based on many hours of conferencing and consideration of the proposals made to the Board of Fisheries. We've also had many long conversations with representatives of the Alaska Department of Fish and Game and put in a number of data requests. Our approach is founded on respect for the Board of Fisheries and its role in conserving and developing Alaska's fishery resources. Therefore we assure the Board we will not burden it with frivolous or unfounded proposals. Our comments will assess proposals on their merits and their impacts.

SEAGO considers conservation and sustainability of the resource the overriding concern in supporting or opposing any proposal. We are commenting on proposals that either directly affect our industry or the overall health of the resource. Since some proposals relate to fisheries or areas in which we have limited understanding and/or involvement, we've decided to withhold comment in those cases until we've heard public testimony and participated in your committee process.

Also in regard to our desire that fisheries management decisions be as well-informed as possible, we support ADF&G's efforts to collect meaningful and timely data for the proper regulation of all user groups, including charter. SEAGO stands ready to assist the ADF&G in collection of meaningful data and enforcement of regulations. We welcome the opportunity to increase communications between ADF&G and our industry.



As to the agenda at hand, SEAGO would like to express the deep concern of our members over the large number of proposals that seem to have a single goal – penalizing sport fishermen who choose to hire the services of a guide. In our highly competitive and challenging global market, more than a few proposals before the Alaska Board of Fisheries – all authored by commercial fishing interests – would have disastrous effects on our businesses.

Given that these proposals also share in common a lack of biological, enforcement, or data collecting purpose, we urge the Board of Fisheries to avoid setting policy on no more than unsubstantiated rumors, anecdotal information, and prejudice. We would sincerely appreciate your help in giving fair and balanced guidance to the ADF&G mission by making our fisheries available to the tens of thousands of sport and guided sport anglers who contribute billions of dollars to our economy and have traditionally been good stewards of the resource.

As the Board knows, we have endured a steady progression of decreased bag limits and/or annual limits to the species most important to our customers and prospective customers. We accept these regulatory changes when conservation is the rationale, as evidenced by the lack of outcry in the 2008 season over extremely challenging king salmon regulations. Some of the most egregious proposals before you now have no such basis, and in fact denigrate the Board process.

Finally, we would like to call attention to the new study prepared for ADF&G documenting the profound economic importance of sportfishing, including charter fishing. The study notes that fully half of the Alaska tourism industry is based on non-resident sportfishing. It also notes that here, in Southeast Alaska, some 3,000 jobs and nearly \$300 million in economic activity is derived from sport fishing.

Considering the dire state of the world's economy, great caution must be given to adopting any proposal that creates additional burdens or weakens any Alaskan industry. Rather, it is a time to carefully understand the economic values and the business models that distinguish each industry and to craft policies that optimize the value of Alaska's resources for the greater good. The Board of Fisheries has SEAGO's pledge to work constructively to that end.

Thank you for taking our comments into consideration.

Tom Ohaus

/s/

President
Southeast Alaska Guides Organization



SEAGO Summary Comments on BOF proposals February 2009

SEAGO offers the following summary comments below. We plan to provide additional information via public testimony and Recorded Comments during the BOF meeting. In addition, we may comment on additional proposals.

Proposal Recommendation

137 & 138 **OPPOSE.**

This is a sweeping regulation across many species, with no documentation or evidence of need for conservation measures such as bag and possession limits.

220 **OPPOSE.**

SEAGO is opposed to the implementation of king salmon overages and underages carrying forward from year to year. The sport fleet has successfully been managed to within their 20% allocation under the current King Salmon Management Plan (average is about 18% per year). There is no conservation or science based reason to approve this measure.

221 **OPPOSE.**

As the current limit for non-resident anglers is already one Chinook per day, this proposal appears to be speaking to terminal harvest areas accessed in certain southeast regions by resident and non-resident anglers. The issue outlined as part of this proposal is false. There are no areas where non-resident anglers have more liberal limits than residents.

222 **OPPOSE.**

Implementation of this policy would signal a shift by the State of Alaska to manage its fisheries based on total mortality, something that both Alaska's commercial and sport fishermen have long opposed. The current King Salmon Management Plan has successfully managed the sport fishery within its Chinook allocation, in both years of high abundance and years of low abundance. Although trollers have provided anecdotal evidence to the Board of Fish regarding charter Chinook mortality, no sound scientific data demonstrates that the charter fleet is either targeting kings outside of its allocation or having a significant impact on the king salmon population in



years of low abundance. SEAGO supports education efforts targeted at reducing incidental mortality but opposes the closure of waters that are also fertile grounds for other salmon species without scientific data that supports the closure.

223 SUPPORT .

Sport fishermen have been harvesting less than their allocation in most years under the current management plan. SEAGO supports the addition of language allowing two rods to be used during the winter months. There is little guided charter business conducted in the winter. Winter anglers are primarily residents who take advantage of the winter king fishing. The Department has stated that no evidence exists to show that two rods significantly increases harvest. SEAGO supports resident access to the resource and sees a two-rod rule effective during the winter months as one way to give residents more opportunity to harvest Chinook salmon.

224 SUPPORT (with modifications).

SEAGO supports the concept of relaxing the non-resident Chinook limits during the Golden North King Salmon Derby. However, it appears that this proposal was written to accommodate a change in the derby dates. SEAGO supports the continued 10-day window for the Golden North Salmon Derby but does not support the requested 25 day change.

225 OPPOSE.

Comments to follow at BOF meeting

226 SUPPORT.

Comments to follow at BOF meeting

227 OPPOSE.

This proposal to allow commercial trolling 7 days per week in District 8 regardless of run strength is inappropriate. Trollers are currently allowed to fish up to 5 days per week when this fishery is open. The District 8 management plan when adopted 3 years ago specifically restricting gillnetting and trolling on the weekends to avoid conflict with sport fishermen.

228 OPPOSE.

Opening this portion of Frederick Sound would be in conflict with the



Crystal Lake Hatchery Management Plan and effectively reallocate fish away from an established sport and commercial hand troll fishery to the power troll fishery.

229 SUPPORT.

Adoption of this proposal would increase the District 8 annual limit for king salmon to a multiple of 4 daily bag limits. The agreement reached with Canada through the Pacific Salmon Commission process to allow this new directed king salmon fishery was supposed to benefit all user groups through increased harvest opportunity. The recreational fishers have seen little benefit and non-resident sportfishers even less. The current annual limit for District 8 is no more than is allowed for under region wide regulations in some years. The current District 8 annual limit is 5 with a daily bag limit of 2. The annual limit needs to be a multiple of the daily bag limit, example; 3 days fishing equals a 6 fish annual limit or 4 days fishing equals an 8 fish annual limit.

230 *Comments to follow at BOF meeting*

231 *Comments to follow at BOF meeting.*

259 SUPPORT.

Adoption of this proposal changing from a Sunday noon gillnet opening to a Monday morning gillnet opening during June, as amended and supported by the Petersburg Advisory committee, will benefit both gillnetters and sportfishers by reducing conflicts between the two user groups.

269 *Comments to follow at BOF meeting*

270 OPPOSE.

SEAGO is opposed to the closure of Herring Bay to sport fishermen and the changing of the release site to Settler's Cove. Problems regarding trash receptacles and parking are ones that should be addressed by the Ketchikan Gateway Borough, and not by the Board of Fish. Herring Cove is a popular recreation site, which provides sustenance to a bear population that subsists on Chinook salmon, and is home to a successful tour business that depends on both the Chinook and bear population.

The relocation of the release site would be unnecessarily costly. Additionally, over-escapement could be problematic as a stream that currently supports one species would now be supporting three.



286 &
287

OPPOSE.

ATA's proposal to change the definition of possession is long on innuendo and short on facts. ATA would like the Board of Fisheries to believe that the preservation of a guided client's fish is something that has seen a rapid increase recently, necessitating this change. Guides, lodges, and sport processing plants have always processed their customers' fish for transport back to their home. This is not a new phenomenon, nor has it caused a recent increase in coho harvest by non-resident anglers.

Possession limits were implemented as a way to prevent wanton waste. The current definition of possession ensures that fish are preserved in a timely fashion and accomplishes the purpose behind the law. ATA has argued that with the current definition of possession Alaska's possession laws are completely meaningless. To the contrary, the possession laws ensure that anglers will make necessary arrangement for the care and preservation of their catch and prevents Alaska's valuable resource from being wasted.

ATA's proposal states that the current regulations allow "large numbers of sport-caught fish to be transported out of the region." What they fail to mention is that sport fishermen in Southeast Alaska catch only 11% of the total coho harvest. The commercial fleet, on the other hand, catches 89% of the total coho harvest. Would they have us believe that their 89% aren't being transported out of the region as well?

ATA's proposal also states that sport fish data is not collected, tabulated, or reported in season in the same manner as commercial fisheries data. Although ADF&G may not tabulate the information provided them, guides are required to fill out a verifiable log book entry for each day fished, which accurately represents their catch, the number of anglers on their boat, and the areas in which they fished and the name and license number of each client. Log books are due every two weeks, similar to the weekly requirement for fish ticket reporting on the commercial side.

SEAGO shares ATA's concern over coho harvest in years of low abundance. However, years of low abundance bring a reduction in the number of coho available and consequently, a reduction in the sport catch using the department's available tools. In addition, a non-resident's opportunity is finite. Unlike the commercial fishermen that continue to fish until their quota is met, a sport fishermen will go home at the end of their fishing trip, regardless of whether or not they caught their daily bag limit each day they fished.

ATA also makes a categorically false statement when they claim that self-



guided anglers don't process their fish during their trip and that current regulations give priority access to guided anglers. With the occasional exception of an angler's last day's catch, all self-guided fishermen process their catch, whether they do it themselves or hire a processing company to provide the service for them.

ATA lists three groups of people that will benefit by the implementation of this proposal.

- First, they state that ADF&G and enforcement will have a more straightforward way of counting fish in possession. How will this be accomplished? Right now all an enforcement officer would need to do is check to see whether or not a person's catch was preserved. A change in the possession definition would now require an enforcement officer to count each fish inside a box and determine whether or not a person had gone over their possession. Enforcement of a new possession definition would cause significant trouble for enforcement officers and for clients.
- Second, ATA cites that harvesters that abide by the limit will benefit. What benefit is accrued to the harvester that was previously able to catch up to his daily bag limit, have his catch processed, and bring it home for his friends and family? Under this definition change, this angler would only able to take twelve fish.
- Third, ATA states that the resource will be protected by an increased ability to monitor harvest amounts being transported. How would this be accomplished? A change in the possession limit definition would do nothing to provide additional information on the number of coho being either harvested or transported out of the state. It would categorically reduce the number of coho being harvested by sport anglers but ATA has failed identify a scientifically-sound conservation argument.

Since the proposal to change the definition of possession accomplished almost none of the issues outlined as part of this proposal, SEAGO sees proposals 286 & 287 as attempts by the troll fleet to move coho from the sport guided recreational fishery into the commercial fishery. Current ADF&G coho management practices manage the fishery for escapement. Since coho stocks in Southeast are currently strong and meeting escapement, a reduction in the sport guided recreational fleet would likely result in more harvest opportunity for the commercial fleet. There is no basis or biological justification for the approval of this proposal and its implementation would be punitive to the sport guided recreational fleet and its customers.



288 &
289

OPPOSE.

SEAGO opposes the implementation of harvest records for coho salmon. Harvest records have traditionally been used to log the catch of a species that is either facing conservation concerns or is managed under an international treaty, such as Chinook and the Pacific Salmon Treaty. The current version of the Pacific Salmon Treaty does not contain a coho annex. Additionally, there is no biological basis for a harvest record. Significant numbers of non-resident anglers use the services of guides that are required to log and report their catch in their log books. The implementation of a harvest record would be one extra layer of red tape placed on the non-resident angler with no justification. If conservation issues are scientifically-supported basis for coho harvest records, SEAGO believes that all sport anglers, including local residents, should be required to use them.

Sport Coho Take is 11 Percent - Commercial fishermen have a vested interest in how much fish recreational anglers take home. Over the past five years they have caught on average more than 2,500,000 Coho annually representing 89 percent of the total catch (see chart below). Non-resident sport fishermen take fewer than 6% of the total Coho catch.

	Number of Salmon Caught In Southeast Region							
	Sport			Commercial			Percent Comm	
	Coho ¹	King ¹	Total	Coho ²	King ²	Total	Coho	King
2000	192,951	63,173	256,124	1,974,427	232,536	2,206,963	91%	79%
2001	321,106	72,291	393,397	3,300,932	243,225	3,544,157	91%	77%
2002	277,150	69,537	346,687	3,242,516	386,384	3,628,900	92%	85%
2003	322,882	69,370	392,252	2,498,375	416,684	2,915,059	89%	86%
2004	330,651	80,572	411,223	3,084,663	483,330	3,567,993	90%	86%
2005	409,303	86,575	495,878	3,002,784	441,363	3,444,147	88%	84%
2006	209,577	85,794	295,371	2,091,875	366,862	2,458,737	91%	81%
2007	261,445	82,848	344,293	2,062,603	353,997	2,416,600	89%	81%
1 - Data Provided by ADFG, Robert Chadwick								
2 - Fishery Management Report No. 08-34, ADFG, June 08								

Enforcement - Reporting of catch in the guided recreational fishing sector is already accounted for in verifiable log books, creel surveys, and the statewide harvest survey. There is no evidence to support the claim that law enforcement is unable to enforce charter/non-resident daily bag limits and possession limits. A change in the definition of possession limit will not accomplish increased data for management.

There is no gain for enforcement given that officers can already board boats, check boats at the dock, and, in the case of guided anglers, check the observed catch against the catch reported in the logbooks. This regulation would place an addition burden on ADFG in creating, distributing, and



collecting harvest records from anglers.

Economic Impact - This proposal would have a negative impact on the Alaska economy by reducing the number of tourists visiting our State and add further stress the charter industry which is already struggling under the weight of the current economic recession and other bag limit reductions in halibut, Ling cod, rock fish and King salmon. Enactment of this proposal could be devastating for many sport fishing-related businesses in Southeast Alaska because it represents one more deterrent to booking a trip for prospective customers and one that NO ONE can justify on the grounds of sound, sustainable management of the resource.

290 SUPPORT.

SEAGO supports the release of all steelhead unharmed regardless of how they are caught (commercial or sport). Steelhead mitigation equipment must be installed and used in all gill net boats to maximize survivability of caught fish. Gillnet operators should be required to count and to keep a log of number of all steelhead caught and number of those fish killed. Sale of steelhead should be prohibited. The steelhead population decline is affected more by gill net fishery than the sport fishery. Sport fishermen took the hit last time while gillnet caught steelhead are still available in stores

292 SUPPORT.

We support this proposal because it contributes to the general health of the Dolly Varden fishery

293 SUPPORT.

Dog fish have been inadvertently included in harvest limitations for other less abundant shark species. Dogfish are abundant to the point of nuisance in many marine waters in Southeast Alaska. Keeping the current bag limits will deprive anglers who want to retain dogfish while allowing the dogfish population to continue increasing reducing the abundance of more desirable species.

294 OPPOSE.

SEAGO opposes this proposal as being selectively punitive towards anglers that choose to use the services of a guide. Sport anglers would be restricted from accessing non-hatchery stock in that area as well as the hatchery stocks raised by regional aquiculture associations. The concept that each entity that funds a hatchery can create an exclusive zone around that hatchery flies in the



face of public access to marine waters.

For the five year period ending in 2007, sport fishermen have paid more than \$84 Million in license and salmon tag fees. By comparison, commercial fishermen have paid only \$9.7 Million in license fees. Furthermore, sportfishing interests support multiple hatcheries throughout Southeast as follows: Sport Fish Division currently funds the production of king salmon by SSRAA at Whitman Lake Hatchery (75%), Neets Bay Hatchery (41.2%), and Crystal Lake Hatchery and Anita Bay (67% each). In 2008, 100% funding is also provided to NSRAA for a remote king salmon release in Lutak Inlet near Haines.

Either sport fishing should be allowed in the regional aquiculture association's terminal harvest areas or it shouldn't. There should be no distinction between anglers who choose to use the services of a guide and those that do not. Although not used by all anglers, some residents and guides do take advantage of fishing in the association's terminal harvest area. In addition, terminal harvest areas generally extend beyond the immediate hatchery area and include components of other fisheries.

We feel a better approach would be to work cooperatively with regional aquiculture associations to better enhance fishing opportunities for our common benefit. We would like to see more cooperation between these sport and commercial funding mechanizes and hatcheries to benefit all users. This proposal works to alienate user groups when cooperation is so much more beneficial to all.

295

OPPOSE (as written).

While release techniques could potentially be improved in the charter industry, this problem is not unique to the sport fleet. Commercial trollers also have mortality associated with the release of juvenile fish. As mentioned in the proposal, many charter operators already practice sound techniques, (e.g. barbless hooks, circle hooks, fish handling techniques, right sized fishing gear, etc.) to reduce fish mortality as their sport fishing clients demand ethical treatment principles.

We support sound fishing practices and recommend that fish mortality be addressed as an education issue rather than as a regulation. Advocacy will have more success than regulation here because it is almost impossible to enforce specific regulations.

If incidental mortality can be reduced by better educated fishermen, both the sport and the commercial troll fleet should participate in any program designed to make us all better stewards of the resource. Regulating a small



group of sportfishermen in the name of conservation while allowing the largest group of harvesters a pass on participation in that same regulation would be nothing short of self-defeating.

296 **OPPOSE.**

There is no biological or sustainability issue solved by this proposal. Denying use of electric reels would discriminate against fishermen with physical handicaps and may be illegal. Restricting use of electrically powered downriggers is an abusive attempt by the commercial sponsors of this proposal to harm charter and sport fishermen when they use more heavy duty equipment routinely in their own businesses. Bag limits are already in place to serve as conservation tools.

297& **SUPPORT.**

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Place electric reels into law. The elderly and the physically challenged need this gear to fish deep water. If there is an issue with the harvest of deep water species, deal with it directly via bag limits rather than adding more layers of regulation and red tape.

299 **SUPPORT.**

Allow herring capture for charter boats. This would allow an efficient and cost saving means of obtaining bait rather than purchasing from costly out of state resources.

301 **OPPOSE.**

This regulation would require enforcement personnel to determine the intent of an angler or the possible outcome of a day's fishing prior to the fact. Again there is no resource issue involved here as sport fishing is only a small fraction of the harvest. Far more fish mortality occurs from commercial release simply on the basis that they catch and release nearly nine times more fish. If damage to the resource is occurring from releasing fish it would then be logical that to ban barbs in commercial fishing where release is possible and would be nine times more successful in decreasing mortality. Release is always a consideration when fishing in Southeast. An undersized king Salmon may bite anywhere, anytime even while targeting bottom fish. This proposal would require barbless hooks at all times.



302 OPPOSE.

The US/Canada Treaty counts only landed mortality in both the sport and commercial fishery. Adding a projected hooking mortality number to the treaty will likely lower harvestable numbers of salmon to both sectors. Sport fishers land only a small percentage of the salmon harvest – less than 20% of the kings and roughly 11% of the coho. If the State of Alaska grows concerned about release mortality, a study of the impacts of release mortality in both the commercial and sport fisheries would be step one. Management needs to be science based.

303 SUPPORT.

We support unguided anglers use of herring jigs and consistency in regulations for the guided and unguided angler.

307 & OPPOSE.

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Proposal 307 disallowing use of a charter vessel for personal use fishing for a period of time before and after the charter season seems to be nothing more than a punitive action directed at everyone owning a charter boat. Proposal 308 restricting personal use or subsistence fishing by charter operator or lodge owners when clients are present is already addressed by current regulations. It is also currently illegal to furnish subsistence or personal use products to clients. This proposal seems to be nothing more than a punitive action directed at everyone owning a charter boat.

309 OPPOSE.

Coho are managed on a sustained yield basis without in-season management to any gear group. There is no preseason forecast or target harvest number for the commercial or sport harvesters. The sport fishery currently catches about 10% of the overall harvest. There are no resource concerns with overharvest or under escapement of coho in Southeast Alaska other than specific jeopardized stocks that are protected by specific management measures, not an overall reduction in harvest.

SEAGO opposes the implementation of a coho allocation for the guided sportfishing sector. The premise that the guided fleet has caused lost opportunity for resident anglers, subsistence fishermen, and the commercial fleet is unsubstantiated. There is no biological basis for this proposal, making it appear punitive to guides and their customers. In addition, ADF&G manages Alaska's sport fishery salmon catch with no distinction



between the guided fleet and non-guided fleet.

310 **OPPOSE.**

This proposal would add a costly, cumbersome, and redundant layer of bureaucracy for ADF&G with no benefit to the resource.

Proposals seeking to establish an allocation and harvest ticket for the guided sector on Coho is not based on any biological or resource concerns. We already have the tools in place to track and regulate the charter industry. No benefit would be realized by adding more paperwork and reporting requirements. This would just increase bureaucracy and administrative costs. Money would be better spent on streamlining or modernizing the data entry system of log books for more timely information.

311 **OPPOSE** as written.

312 Enforcement currently has the authority to board and check vessels and gear
313 engaged in charter fishing. We agree that enforcement or creel census
 personnel should have access to vessels and landing facilities where sport
 caught fish are being harvested or offloaded. The portions of these proposals
 that grant authority to inspect freezers, homes, hotels or B&Bs associated
 with charter fishermen seems to be extreme and would facilitate little if any
 enforcement concerns while infringing on personal rights. Reporting of catch
 in the guided recreational fishing sector is already accounted for in verifiable
 log books, creel surveys, and the statewide harvest survey.

315 *Comments to follow at BOF meeting*

319 *Comments to follow at BOF meeting*

322 **OPPOSE.**

This proposal seeks to reopen waters closed to commercial trolling October through March. These waters have been closed for over 30 years. In the years this area has been closed, a significant sport fishery has developed within its' boundary. A boat ramp has been constructed in this area with sportfish funding to provide access. This is a popular fall and spring fishery for local residents with small boats who would be displaced by the intense effort of the troll fishery that has developed over the past 7 or 8 years due to extremely high prices paid for winter fish.



333 SUPPORT.

Evidence on the fishing grounds points to an over-abundance of lingcod. SEAGO is concerned that the current GHL on lingcod in the SEO is leading to excessive numbers of lingcod, which may have negative impacts on other bottom feeding fish. Raising the GHL would benefit all user groups and possibly other groundfish competing for food.

334 SUPPORT.

In the CSEO and SSEO subdistricts between 2004 and 2007, the directed and longline bycatch allocations of lingcod have been consistently under-utilized. These unharvested lingcod would represent a huge benefit to the guided sport fishery, which currently operates under onerous restrictions (1 lingcod per year limit with a 30-35" slot limit, completely closed June 16-August 15 for CSEO and NSEO sections).

335 SUPPORT.

For reasons stated under proposal 334.

336 OPPOSE.

This proposal may encourage targeting lingcod and topping off in the halibut fishery. The longline bycatch allocation has been consistently underharvested in the past 4 years, so the bycatch allowance appears to be more than sufficient.

337 OPPOSE.

SEAGO believes that the lingcod which are consistently underutilized by the directed dinglebar fishery should be allocated where the greatest economic benefit can accrue to Southeast communities: the sport fishery. Guided sport anglers consider lingcod a highly prized game fish, and allowing a reasonable harvest opportunity (ie: 1 lingcod per year, open all season) will help guided sport operators market their trips.

338 OPPOSE.

Same rationale as for 337.

339 SUPPORT.

Allowing guided anglers to have a chance to take a state record lingcod would



provide a benefit for guided sport operators in marketing their trips, and would result in a negligible increase in harvest.

340 SUPPORT.

Greater sport harvest should be allowed where there is a harvestable surplus. It should be noted that Elfin Cove fishery is more similar to that in 3A than it is to the fishery in Sitka.

341 SUPPORT.

Inadequate sport DSR allocation will likely result in time and area closures for halibut and/or all sport fishing in coming years. The sport DSR limits have already been ratcheted down as much as possible (1 Yellow Eye per day, 2 per year for guided anglers). Since most released DSR won't survive, the only tool left for managers will likely be closures. This is unnecessary in light of the fact that the halibut fishery has not needed anywhere near the 84% commercial allocation in the past 8 years. Two high-value fisheries need enough DSR bycatch to operate normally: these are the halibut longline fishery and the halibut sport fishery. Fortunately this can be accomplished by adjusting the allocation so both fisheries will have an adequate DSR allocation. No directed DSR fishery should be allowed until the bycatch needs of the halibut longline and halibut sport fisheries are met.

343 OPPOSE.

344 As stated in our response to 341, DSR need to be utilized as bycatch for the commercial longline halibut fishery and the sport halibut fishery before contemplating any directed DSR fishing.

345 OPPOSE.

346 These proposals would encourage "topping off" with DSR after halibut fishing and could result in a de-facto directed DSR fishery. Again, SEAGO believes that DSR should be utilized first and foremost as necessary bycatch in the halibut longline and sport fisheries. This proposal would encourage targeting DSR instead of taking them incidentally.

349 SUPPORT.

350 Even though many DSR released at depth will likely not survive long-term,
352 and ADF&G will still assign a mortality rate of 100% to released DSR, SEAGO still believes this is a good idea. Some DSR released at depth likely



will survive, and that alone warrants our support.

351 SUPPORT.

If requiring release of DSR at depth in the sport fisheries makes sense, then it also makes sense to practice this in all other fisheries as well. All fishermen should share in this innovative conservation practice, especially those where the volumes involved, and therefore the potential benefits, would be greatest.

353 SUPPORT.

Quilback and other small DSR caught in shallow water should be allowed to be released if they are not injured. This would reflect the intent of the current regulations.

368 OPPOSE.

This proposal seeks to reduce the possession limit on all species to one daily bag limit for non-residents. The possession limit on species of concern is currently one daily bag limit for non-residents and two daily bag limits for other species. There are no biological or resource concerns to justify this proposal. There is no verification of the charges of widespread abuse of current possession limits or of non-residents taking home large amounts of fish just to “eventually be thrown out”. Alaska does not give away large amounts of fishery resources to non-residents. Non-residents pay dearly to come to Alaska and harvest relatively small amounts of fish for their personal consumption. The state and local economies benefit greatly from this harvest opportunity provided to non-residents.

This proposal would effectively bankrupt all lodge and charter operators that cater to multi-day clients without any biological justification. It would have a crippling effect on the economies towns and villages across Southeast Alaska and cost countless jobs in diverse industries including hotel, restaurant, retail, air travel, and fish processing to name just a few. This would be done despite providing no gain to the resource or law enforcement. This type of proposal only furthers acrimony and distrust between user groups.