

Chitina Dipnetters Association

Public Comments Concerning Submitted Proposals To The December 2024 PWS/Upper Copper and Upper Susitna Finfish and Shellfish BOF Meeting

Prop. 58 – support

Amend the Copper River king salmon management plan

The Copper River king salmon escapement goal is 21,000-31,000. Previously this escapement goal had no upper bound and no mechanism existed for the F&G commissioner to raise the king salmon bag limit for the Chitina Personal Use Dipnet Fishery (CPUDF). If in the future the Copper River king escapement is predicted to pass the 31,000 upper bound, this proposal could allow harvest of more than the one king permitted in the dipnetter bag limit. Something the Chitina Dipnetters Association (CDA) has been for years advocating.

Prop. 59 – support

Allow the commissioner to increase the CPUDF sockeye salmon bag limit if the Copper River sockeye salmon escapement goal will be exceeded.

Prop. 60 – oppose

Reduce the CPUDF household annual bag limit

The existing CPUDF annual bag limit is 25 salmon for the permit holder and 10 salmon for each additional household dependent. This annual bag limit was passed by the BOF during the 2014 PWS/Upper Copper finfish meeting for reasons it standardized the PU dipnet salmon bag limit between the Chitina PU fishery and the South Central Alaska PU dipnet fishery. It also made the bag limit more equitable for larger families. Since the CPUDF is managed by actual sonar counts the new bag limit was considered sustainable.

Prop. 61 – oppose

Reduce the CPUDF annual household bag limit and add supplemental periods.

See comments for proposal 60. Supplemental periods were done away with when the 2014 BOF passed the existing CPUDF bag limit.

Prop. 62 – oppose

Reduce the CPUDF maximum harvest level of 100,000 – 150,000 to 50,000 if the Copper River District commercial drift gillnet fishery is closed for 13 or more consecutive days.

This regulation was on the books until the BOF at their 2017 meeting repealed it at the request of a Chitina Dipnetters Assn. (CDA) proposal. The PU dipnet fishery opening and closing are based solely off of the sonar count passage numbers. When commercial fishermen are restricted because of low run numbers, those low numbers will show as low sonar counts, triggering closures in the dipnet fishery. To require that the PU dipnet fishery salmon allocation drop from 150,000 to 50,000 just because the commercial fleet has been restricted for 13 consecutive days, is asking the CPUDF fishery to bear two restrictions, first less fishing time due to low salmon sonar counts and second severe allocation reduction. This is unjustifiable. This allocation reduction would be for the remaining dip net season even though run numbers may rebound soon after.

The Copper River District drift gill net fishery is a mixed stock fishery. In recent years fishing times have been severely restricted in this fishery due to a poor king salmon run and the low survival rate of king salmon released from drift gill nets. This restriction due to low king number could trigger a 13 consecutive day closure and cause the reduction of the CPUDF salmon allocation to 50,000 salmon. Penalizing the CPUDF, where king salmon can be safely released from dipnets, would mean dipnetters would lose the opportunity to harvest sockeye salmon.

Prop. 63 – oppose

Change the opening date of the Chitina Personal Use Dipnet Fishery from June 7-15 to June 21.

The crux of this proposal is protection of the early upper Copper River salmon stock. The CPUDF management is abundance based using actual salmon sonar count numbers and passage of the upper Copper River stock is already taken into account when designating fishing time for the CPUDF. In the early 2000's the opening date for the CPUDF was changed from June 1 to June 7-15. This delay was to give the early upper Copper king salmon stock an extra 1-2 weeks to pass through that fishery unhindered. CPUDF users are allowed only 1 king salmon in their annual bag limit. According to F&G 2005-2009 radio telemetry data, by June 15, 60% of the upper Copper salmon stock has already passed through the CPUDF (**see attachment A**). During the week of June 7-15 there are 6 individual Copper River salmon stocks moving through the CPUDF, one of which is the upper Copper stock (**see attachment A**). From 2015-2023 the CPUDF averaged a 14% harvest of the total salmon sonar count attributed for that dipnetting fishing week (**see attachment B**). This 14% is spread over 6 different Copper salmon stocks. The number of upper Copper salmon saved by delaying the CPUDF opening date to June 21 would be insignificant.

In the last ten years, the number of Glennallen Subdistrict issued dipnet subsistence permits has greatly increased. As more restrictions are placed on the CPUDF, many of

these users have moved to the upriver subsistence fishery where fishing time is continuous, bag limits are much more liberal and they have priority over other users. Placing more restrictions on the CPUDF will only speed this movement.

Prop.64 - oppose

Prohibit a household from possessing permits for multiple personal use salmon fisheries.

The CPUDF and South Central Alaska P.U. dipnet fishery have identical annual bag limits. Each P.U. salmon dipnet fishery represents an individual river drainage and salmon stock. The author of this proposal infers that many P.U. dipnetters are obtaining multiple permits for these two fisheries in order to harvest a full family annual bag limit from each fishery. F&G data from the years 2015-2022 (**see attachment C**) shows that for dual permit holders for these two fisheries, if they fished both permits, had a combined harvest equal to one fishery annual bag limit for the size of their family. There is no justification for passing this proposal.

Prop. 65 – oppose

Require weekly harvest reporting in the CPUDF.

Similar proposals have been submitted in at least 4 of the last BOF PWS/Upper Copper Finfish meetings and were voted down in each. F&G staff comments, have consistently opposed these proposals on the premise that it would place undo burden on P.U. dipnetters and that weekly reporting is not needed and would not be used for management of the CPUDF. The fishery is managed by actual sonar count passage.

Prop. 66 – oppose

Manage the CPUDF to achieve the Gulkana Hatchery broodstock goal.

The CPUDF is a multi mixed salmon stock fishery. Reducing fishing time when supposedly Gulkana salmon are passing through the dipnet fishery will only reduce opportunity for Alaska state residents to harvest Copper River salmon to feed their families and due to the mix of salmon stocks, not guarantee more fish will make it to the hatchery.

Prop. 67- oppose

Prohibit removing king salmon from the water if it is to be released in the CPUDF. This proposal is not practical in many of the back eddies where shore based dipnetters are tied off short to prevent falling into the turbulent water of the Copper River in Woods Canyon. When releasing a king after already harvesting their 1 annual king or because king harvest is prohibited, most dipnetters will try release kings unharmed in the water. Due to precarious dipnetting sites or because the king has become entangled in the net mesh, this is not always possible. Public announcements could remind dipnetters to

release king salmon, not meaning to be retained, be done as gently as possible to ensure they make it to their spawning grounds.

Prop. 68 – oppose

Prohibit dipnetting from a boat in the CPUDF.

Productive shore based dipnetting spots within Woods Canyon can be in short supply especially during high water events. For this reason and because some dipnetters are physically not able to dipnet from the rocky outcrops in the canyon, they choose to use a boat. Dipnetting from a boat also gives the mobility to find a better fishing spot. Dipnetting from a boat is just another means for Alaska residents to harvest their set annual bag limit and once filled they are done for the year.

Prop. 69 – oppose

Place restrictions on dipnetting from a boat.

Chitina P.U. dipnetters have a set annual family bag limit and once filled they are done for the year. Boat dipnetting just affords users another means of filling their finite family bag limit and should not be burdened with unneeded restrictions.

Prop. 70 – support

Extend the lower boundary of the CPUDF

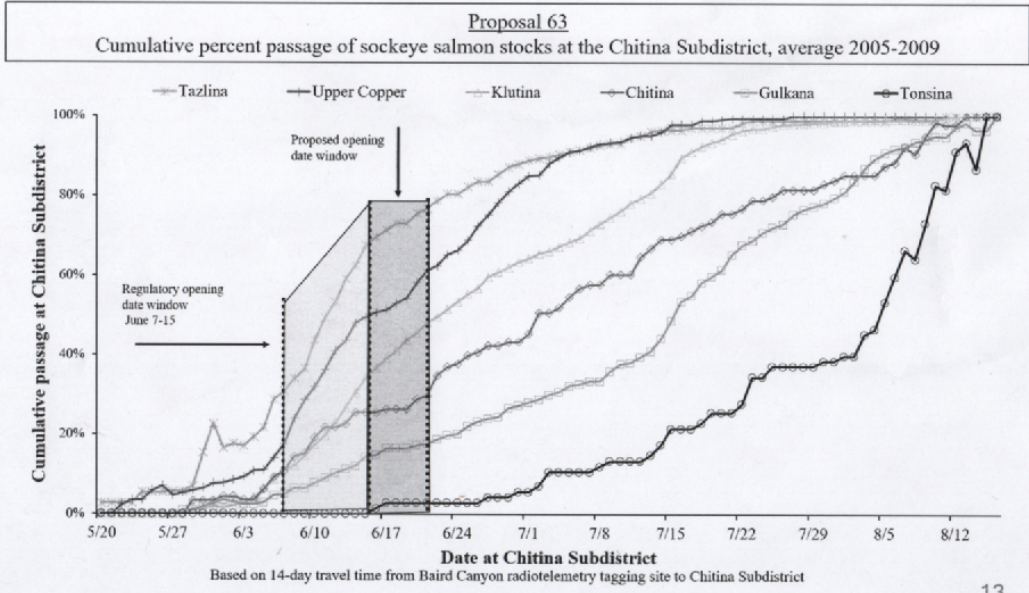
This is a CDA submitted proposal and the proposal language explains our stance. A map showing the existing and new boundary plus the existing short drift area is in **attachment D**.

Prop. 71 – oppose

Prohibit guiding in the CPUDF.

At the 2021 PWS/Upper Copper/Upper Susitna Finfish meeting, the BOF eliminated guiding in the Glennallen Subdistrict subsistence fishery. This decision was based on the 8 subsistence criteria and the clause of “pattern of noncommercial taking” was interpreted to relate to guiding within that fishery and therefore a vote to eliminate guides. This is a Personal Use fishery and the only qualifying criteria is the requirement that a P.U. user must be an Alaska resident and possess a valid state sport fishing licence. Many of these resident dipnetters choose to use a guide service to obtain their families salmon harvest and if guiding was eliminated in the CPUDF it would for various reasons (lack of their own equipment, disabilities or new to the fishery) disenfranchise many users.

ATTACH. A



ATTACH. B

Harvest of sockeye and king salmon in the Chitina Subdistrict personal use salmon dip net fishery from June 7-15 each year, compared to total salmon passing through the fishery during that period and percent overall harvest, 2015 - 2023

Year	Fishing hours	Actual harvest		Allowable harvest	
		Sockeye	King	Total salmon count at sonar (May 24-June 1)	Percent of sonar
2015	192	38,279	301	318,761	12%
2016	216	16,324	247	123,139	13%
2017	216	12,749	28	170,998	7%
2018	48	2,624	106	43,364	6%
2019	216	27,856	411	149,088	19%
2020	132	13,416	251	69,794	20%
2021	96	13,981	174	60,299	23%
2022	96	9,328	176	54,278	18%
2023	24	4,597	99	37,690	12%
Average	137	15,462	199	114,157	14%

Note: assumes two-week passage time from sonar to Chitina Subdistrict

ATTACH. C

DATA FROM F&G FOR HOUSEHOLDS ACQUIRING BOTH A UCI (SOUTHCENTRAL) AND CHITINA P.U. DIPNET PERMIT

Disclaimer: Since these numbers haven't gone through any biometric review, they don't represent the true harvest estimates we would report on. They are based on the corrected raw data from user reports. So, take it with a grain of salt that the actual numbers may be slightly different than what we see here for usage and harvest.

ATTACH. C

Permit Year	Household Permits	Households	UCI Fished	UCI Did Not Fish	UCI Did Not Report	UCI Average Household Size	UCI Average Harvest For Households That Fished	Chitina Fished	Chitina Did Not Fish	Chitina Did Not Report	Chitina Average Household Size	Chitina Average Harvest For Households That Fished	AVERAGE FAMILY SIZE FOR DUAL FISHERY BAG LIMIT FOR FAMILY SIZE	ACTUAL DUAL HARVEST PER AVE. FAMILY SIZE
2022	UCI Only	26552	19235	3856	3461	3.02	22.15							
2022	Chitina Only	5441						4369	709	363	2.95	27.44	3475	50
2022	UCI and Chitina	1745	1242	360	143	3.42	24.21	1271	359	115	3.53	27.59		
2021	UCI Only	24702	17288	3594	3820	3.04	22.72							
2021	Chitina Only	5536						4397	708	431	2.93	24.96	3325	49
2021	UCI and Chitina	1865	1217	455	193	3.34	24.02	1273	452	140	3.41	24.01		
2020	UCI Only	26331	16104	3643	6584	3.01	19.99							
2020	Chitina Only	4780						3205	1042	533	2.97	16.15	342	49
2020	UCI and Chitina	2235	1389	470	376	3.43	21.07	1391	601	243	3.40	15.73		38
2019	UCI Only	24542	15013	3115	6414	2.97	23.16							
2019	Chitina Only	6188						4317	770	1101	2.98	28.75	346	50
2019	UCI and Chitina	2051	1199	442	410	3.49	24.82	1275	419	357	3.44	25.46		50
2018	UCI Only	22557	13958	3589	5010	3.04	17.83							
2018	Chitina Only	3812						2356	712	744	3.10	22.92		
2018	UCI and Chitina	1250	727	322	201	3.65	19.62	732	313	205	3.61	21.04	363	51
Total	UCI Only	124684	81598	17797	25289	3.02	21.48							
Total	Chitina Only	25757						18644	3941	3172	3.00	24.40		
Total	UCI and Chitina	9146	5774	2049	1323	3.49	24.01	5942	2144	1060	3.47	22.18		41

ATTACH. D

