

**Comments received as of May 8, 2008  
regarding petition for expanding Egegik and Ugashik  
commercial fishing districts**

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1. Norman Van Vactor, Snopac Products
2. John Garner, Trident Seafoods, NorQuest Seafoods
3. Tom Whinihan, Peter Pan Seafoods
4. John Lowrance, Leader Creek Fisheries
5. Mark Palmer, Ocean Beauty Seafoods
6. Bristol Bay Driftnetters Association
7. Gordon Lindquist, Alaska General Seafoods
8. Nicholas Dowie
9. Mark Angasan
10. Pilot Point Traditional Council
11. Brad Angasan
12. King Salmon Tribe
13. Kenny Wilson
14. City of Egegik
15. Mike Friccero
16. Robin Samuelsen Jr.
17. Vicki Alto
18. Fred Ball
19. Fred Pike
20. Eddie Clark
21. Becky Savo
22. Trefon Angasan
23. Ralph Angasan Sr.
24. Kurt Kvernvik
25. Chris McDowell

# 1

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APR 28 2008  
BOARDS



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6118 - 12th Ave. S. ~ Seattle, Washington 98108-2768  
Phone 206.764.9230 ~ Fax 206.764.5540  
[www.snopac.net](http://www.snopac.net)

April 28, 2008

To: Mr. Mel Morris, Chairman / Alaska Board of Fisheries  
From: Norman Van Vactor  
Subject: Early Fishing

We are in receipt this morning of an Emergency Petition submitted by Robert Heyano and would like to offer our support for his efforts and the intent of the Petition.

We have strong concerns that the Plan proposed by the Department in early April for managing an early fishery will not be sufficient to address the concerns that have raised as it relates to the forecasted catch and processing capacity available to the industry.

We all know there is no single solution and this would be just one more tool that would be available to the Department to help manage for a more efficient and productive fishery.

Sincerely,

Norman Van Vactor  
Snopac Products

Cc: Greg Blakey  
Jenna Hall

# 2

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FR 28 2008

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From: John Garner [jgarner@TridentSeafoods.com]  
Sent: Monday, April 28, 2008 3:56 PM  
To: Marcotte, Jim R (DFG)  
Subject: Emergency Petition - Attention Mel Morris

Jim: please convey this message to Mel Morris, Chair, Alaska Board of Fisheries.

Thank you.

Dear Mel: On behalf of Trident Seafoods Corporation and NorQuest Seafoods Inc., I would like to express my support for the attached petition for emergency action by the Alaska Board of Fisheries to expand the fishing areas in Bristol Bay for a limited period of time in 2008.

As we all know, there is a general concern about the ability of the processing sector to purchase all surplus fish in Bristol Bay in 2008.

Any reasonable, early, fishing opportunities will help us towards our goal to harvest and process every available fish from the Bay. This petition appears to address the issue in a way that does not carry some of the negative consequences of the "general fishing district" concept that the Board previously rejected. We believe it will allow us the opportunity to catch and process earlier, for the benefit of all parties.

As the petitioner notes, early fish can have a higher value than the fish taken during the peak, since we are able to put a higher percentage into more valuable product forms. By processing earlier, we also have the chance to train our crews and tune our equipment, which should give us greater processing capacity during the peak. As always, the managers have the ability to keep the fishery closed if there are stock concerns during this early part of the season.

I would be happy to provide you or the Board with any information that might assist you making a decision on this petition.

Best regards,

John Garner  
Director, Salmon Division  
Trident Seafoods Corporation  
Vice President  
NorQuest Seafoods, Inc.  
206-297-5615 Office direct line  
206-281-7022 Office general line  
206-619-9546 Cell  
5245 Shilshole Ave NW  
Seattle, WA 98107

# 3

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APR 29 2008

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**Date:** April 29<sup>th</sup>  
**To:** Mr. Mel Morris, Chairman  
Alaska board of Fisheries  
**From:** Tom Whinihan / Peter Pan Seafoods, Dillingham

**This letter is in support of the proposed petition to seek emergency consideration by the Alaska Board of Fisheries to expand the Egegik and Ugashik commercial fishing districts from June 16<sup>th</sup>, through June 25<sup>th</sup>, 2008**

**From a processing company's viewpoint the following aspects would support this proposed "early fishing district expansion":**

- **Early fish into the processing facility allows us to "fine tune our systems", test our equipment and provide that time to train our crews before the peak volume of fish arrives which in turn helps us to increase our overall production.**
- **This early fishing time is also conducive for allowing the fishing vessels to test their equipment and train their crews.**
- **The early season fish can be processed into value added product forms such as fillets. There can be market advantages created by having product available to customers earlier than usual. Before the peak volume period, the fleet is able to take better care of their catch and consequently a higher standard of quality is being delivered.**
- **This proposed district expansion and three 48 hour fishing periods will have little or no measureable selective impact on any "specific" river system in Bristol Bay.**
- **The "Bottom Line" is that the proposed district expansion with early fishing can provide a considerable economic benefit to the industry and the local economy which will far outweigh any foreseeable negative consequences to the sockeye resource.**

# 4  
LEADER CREEK FISHERIES, L.L.C.

April 29, 2008

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Mel Morris/ Alaska Board of Fisheries

I have received a copy of the emergency petition submitted by Robert Heyano. I support the expansion of the Egegik and Ugashik districts as the best means to increase the harvest of sockeye this year and to maximize the seasonal capacity of the existing processing infrastructure in Bristol Bay.

Please vote in favor of Robert's petition.

John Lowrance

# 5



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April 29, 2008

Mr. Mel Morris  
Chairman  
Alaska Board of Fisheries

Dear Mr. Morris:

This letter is in support of the recent petition submitted to the Board by Robert Heyano in regard to expansion of the Egegik and Ugashik fishing districts in Bristol Bay during the early portion of the season.

Ocean Beauty generally supports any measure that has the potential for allowing the industry to get a "jump start" on the run during years when a large return is predicted. This not only allows some of the harvest to be taken earlier than normal (thus helping to flatten out the harvest curve) but also allows processors the opportunity to get their operations up to speed before the peak hits. Mr. Heyano's point in regard to delaying the usage of long haul tenders is well taken. A secondary benefit of early fishing not directly related to capacity issues at the peak is that it has the potential to allow additional production of fillets. This should help to increase the overall value of the fishery.

Thank you for this opportunity to comment and we urge you to strongly consider the petition's request.

Sincerely,

Mark Palmer  
President-CEO  
Ocean Beauty Seafoods

# 6

**Bristol Bay Driftnetters Association**

2408 Nob Hill Ave. N  
Seattle, WA 98109-2048  
Ph. (206) 285-1111, Fax (206) 284-1110  
JohnsonMarineSurveys@Gmail.com

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APR 30 2008

BOARDS



April 30, 2008

Mr. Chairman, Members of the Board,

**Bristol Bay Driftnetters Association fully endorses the emergency petition** before the Board of Fish. from Robert Heyano dated 4/23/08. We believe that a small increase in fishing time without expansion of the Egegik and Ugashik Districts will have negligible effect on total harvest and will not encourage a significant number of fishermen to launch their boats earlier than they normally do. We also believe that increasing the Districts areas will affect a substantial increase in early harvest effort and harvest size and will also address the concerns expressed by staff in the April 8<sup>th</sup> 2008 letter from Dan Grey to Denby Lloyd regarding Department Plans for Early fishing in Bristol Bay in 2008. During the 2004 General District fishery the best fishing occurred about 10 miles north of the Ugashik District and some fairly good fishing occurred in the deeper water outside of the Egegik shallow water. With the large expected run for 2008 and recent history of unusually large harvest limitations imposed by processors we believe this expanded area approach will have a real impact on early fishing.

Beyond decreasing over escapement, another advantage of more early fishing is that sockeye harvested in the non congested, slower paced fishery are of higher quality and of higher commercial value than sockeye harvested during the peak. The increased areas for early fishing is an approach that BBDA believes maximizes harvest with minimal undesirable side effects.

Sincerely,

Daniel F. Barr  
President BBDA

Warren B. Johnson  
Vice-President BBDA



## ALASKA GENERAL SEAFOODS

# 7

6425 NE 175th Street  
Kenmore, WA 98028-4808  
Tel: 425-485-7755  
Fax: 425-485-5172  
Internet: [www.akgen.com](http://www.akgen.com)

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APR 30 2008

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April 30, 2008

Attn: Mel Morris, Chairman – Alaska Board of Fisheries

Subject: Emergency Petition submitted by Robert Heyano

From: Gordon Lindquist, Alaska General Seafoods

On behalf of Alaska General Seafoods I would like you to know that I support the proposals made in the Robert's Emergency Petition to the Board regarding increased fishing area in Bristol Bay for a period of time.

I believe the single most effective means by which industry will be able to increase the opportunity to harvest and process as much Bristol Bay salmon as possible in a responsible manner is to maximize the number of days on which fish are available to us.

I urge to you consider this petition favorably

Thank You

Gordon Lindquist  
Vice President / General Manager  
Alaska General Seafoods  
425 485 7755  
[gordon@akgen.com](mailto:gordon@akgen.com)





# 8

Nicholas Dowie  
PO Box 2684  
Kodiak, AK 99615  
307-760-5848

May 5, 2008

Alaska Board of Fisheries  
Through Jim Marcotte, Executive Director

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MAY 5 2008

BOARDS

Subject: Emergency Petition to Expand Egegik and Ugashik District

Board of Fisheries,

I wanted to take this time to express my concern over the request for this Emergency Petition. As a lifelong setnetter in the Nushagak district of Bristol Bay, there are several red flags that become apparent to me when considering this petition. These considerations include management strategies and the allocation.

I realize that management of these fisheries is of the utmost importance in ensuring the continuance of salmon harvests as a sustainable and renewable resource. This is why harvesting salmon in different districts is fundamental in determining the return stocks of different river systems. Without a multi-faceted genetic study it is unclear what percentage of fish will be intercepted from other districts. This is of primary concern, especially with the large expansion of the Egegik and Ugashik districts, which have been considered as milling areas for mixed salmon stocks. This will result in skewing early statistics that aid the Alaska Department of Fish and Game in management.

Although the Kvichak escapement goals are of primary concern, it could also have implications in other districts. These other districts will remain closed until initial escapement levels have been reached (Tim Sands personal communication). The requested expansion could result in delaying openings in other districts. Early openings have been a good way for setnetters to bolster their numbers before the peak of the season and it provides Fish and Game with current information. Throughout this time period returning fish generally increase up until the time of the run. If the fishing districts remain closed in its entirety then

(1)

an early surge of fish may be able to escape into the river systems. If this happens it may force management to forgo the allocation in favor of escapement goals. Because of the relative size of the drift fleet, they can adversely affect the success of the fisheries to many resident setnetters, who have come to rely on the allocation as a means of confidence to reinvest money into their operations, such as improving overall quality.

In these ways, the petition may in fact act antagonistically to its stated goals. Therefore, I urge the Board to consider the various impacts that this petition could impose upon other districts in regards to both long-term management and the fisherman. Thank you for your time.

Sincerely,

Nicholas Dowie

2

# 9

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MAY 05 2008

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Alaska Board of Fish

Chairman Morris,

I am opposed to the petition to expand the Egegik and Ugashik salmon fishing districts for the following reasons.

- 1) The petition seeks to expand the Egegik and Ugashik fishing districts into areas that are considered to be mixed stock milling areas. By allowing fishermen to harvest fish in these areas will have an adverse impact on the returns of salmon to all the fishing districts in the Bay because there is no way of telling which fishing districts fish stocks are being harvested in these areas. The Kvichak River has had lower than expected returns of salmon over these past many years and has been classified as a stock of concern. To allow fishing in these milling area's will only compound the problems of low returns of salmon to the Kvichak River system .
- 2) Management and allocation plans are already in place for the Naknek/Kvichak,Egegik,Ugashik,Nushagak and the Togiak district's that the Board of Fish adopted .
- 3) If the intent of the petition is to harvest fish earlier it is my recommendation that fishermen be placed in the established fishing districts so that management and allocation plans can be followed.

Thank you for your time and consideration.

Sincerely ,

Mark E Angasan  
Drift fishermen



## Pilot Point Traditional Council

2200 Main Street \* P O Box 449 \* Pilot Point, Alaska 99649

Telephone (907) 797-2208 \* Fax (907) 797-2258 \* Internet [PIPCouncil@aol.com](mailto:PIPCouncil@aol.com)

# # 10

May 6, 2008

State of Alaska  
Department of Fish & Game  
Board of Fisheries  
Attn: Mel Morris, Chair

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MAY 07 2008  
BOARDS

RE: Petition to Expand the Egegik and Ugashik Districts

Dear Chairman:

The Pilot Point Tribal Council and the Lower Bristol Bay Advisory Committee would like to take this opportunity and comment on Robert Heyano's Emergency Petition to the Board regarding the expansion of the Egegik and Ugashik fishing districts. Our position as a Council and Advisory Committee has been formulated after careful review of the Department of Fish & Game's comments concerning the proposed boundary changes. First and foremost we would like to lend our support for Mr. Heyano's petition for the following reasons:

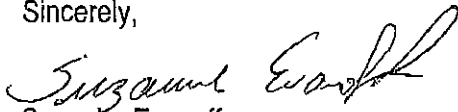
- The Board adopted regulation changes in 2007 that allows Area M drift permit fishers to fish 20 miles south of Cape Mersikof (Ugashik District) and seaward to the three mile territorial boundary on mixed salmon stocks. These boundaries are ditto to what Mr. Heyano has proposed for the Ugashik and Egegik districts.
- The Board still allows False Pass/Shumagins to fish on mixed salmon stocks predominately headed for Bristol Bay. In doing so, there does not seem to be any concern by the Board or the Department for Kvichak stocks in the North Peninsula, False Pass and Shumagin sockeye salmon intercept fisheries.
- The Department states that managing on predominate mix stock fisheries lends to conservation concerns for certain river drainages within Bristol Bay but turns around and does exactly that for the rest of the Alaska Peninsula. For instance, on the North Peninsula the area biologist does not even need Departmental supervisory approval for his emergency order openings. Hence, the result is continuous fishing on mixed salmon stocks on the North Peninsula.
- The need to expand the quality and processing capacity of an anticipated large run is essential for the economic viability of our sockeye fishery.
- Over-escapement concerns, especially, in the Ugashik district, are very serious considering that over-escapement of sockeye salmon has occurred the last two year. This over-escapement is not the fault of the Department managers but rather run timing and

processing capacity. We face a dire situation with the threat of three consecutive years of larger than desired escapement into our river system.

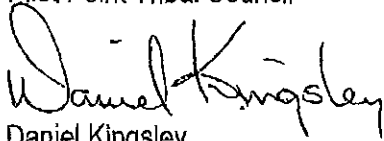
- Mr. Heyano put a cap on the amount of early harvest that can occur in the expanded districts that we feel is very biological conservative considering the amount of Bristol Bay sockeye that will just be harvested in the June False Pass fishery.

The Pilot Point Tribal Council and the Lower Bristol Bay Advisory Committee strongly feel that the fishermen of Bristol Bay are really not getting the opportunity to participate and/or contribute to the management of our fishery through the Board process. We feel it is time for the Board to step-up and lend some foresight management practices to the reality of the biological and economical problems that watershed fishermen of Bristol Bay are currently encountering.

Sincerely,



Suzanne Evanoff  
Pilot Point Tribal Council



Daniel Kingsley  
Chair, Lower Bristol Bay Advisory Committee

# 11

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MAY 07 2008

BOARDS

5/07/08

Dear Chairman Morris:

I'm writing to oppose a petition to create an emergency order extending the district fishing boundaries of the Egegik and Ugashik districts. The proposal has been made by Robert Heyano of Dillingham, AK, and will be addressed by the Alaska Board of Fisheries on Friday, May 9<sup>th</sup>, at 2:00PM, as I'm told by your staffer.

The extension of these districts and resultant increased fishing areas will cause significant damage to Kvichak River bound stocks that are designated "stocks of concern" by the State of Alaska. The creation of this emergency order would be reckless abandon from the many years sacrifice managers and fisherman of the Naknek/Kvichak District have endured and made to ensure effective recovery of the Kvichak River stock return.

The run would unfairly reallocate mix stock fish in the milling areas to fishermen who ply their trade in the lower outside district from those who cannot or choose to fish in the upper districts who ply their trade near the natal streams. In a nutshell it is an allocation, and allocation issues should be taken up during a full session of the board where the public would be given an opportunity to voice their opinions.

Sincerely,

Brad T Angasan  
S03T-58874, F/V Homeward-65505



# King Salmon Tribe

#12

People of the Volcano

P.O. BOX 68 KING SALMON, AK 99613  
TEL: 907-246-3553 FAX: 907-246-3449  
E-MAIL: kstvc@starband.net

May 7, 2008

Chairman Mel Morris  
917 Mill Bay Road  
Kodiak, Alaska 99615

Via E-Mail: [jim.marcotte@alaska.gov](mailto:jim.marcotte@alaska.gov)

Dear Chairman Morris:

The Village of King Salmon is opposed to the petition to expand the Egegik and Ugashik salmon fishing districts for the following reasons.

1. The petition seeks to expand the Egegik and Ugashik fishing districts into areas that are considered to be mixed stock milling areas. By allowing fishermen to harvest fish in these areas will have an adverse impact on the returns of salmon to all the fishing districts in the Bay because there is no way of telling which fishing districts fish stocks are being harvested in these areas. The Kvichak River has had lower than expected returns of salmon over these past many years and has been classified as a stock of concern. To allow fishing in these milling areas will only compound the problems of low returns of salmon to the Kvichak River system.
2. Management and allocation plans are already in place for the Naknek/Kvichak, Egegik, Ugashik, Nushagak and the Togiak district's that the Board of Fish adopted.
3. If the intent of the petition is to harvest fish earlier then it is my recommendation that fishermen be placed in the established fishing districts so that management and allocation plans can be followed.

Sincerely,

Ralph Angasan Jr.  
Tribal Administrator

# 13

To: Board Support  
Joseph Chythlock  
Board of Fish

From: Kenny Wilson

I am against this Emergency Petition to expand outer Districts for Egegik and Ugashik.

We are still in the rebuilding stage for the Kvichak River.

In the past when we had expanded areas the Igushik section of the Nushagak had very little fishing time. I was their poorest season in years.

The village of Manokotak which is mostly Igushik setnetters had very little money to buy food and oil for the winter.

*Kenny Wilson*

*Dillingham, Alaska*

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# 14

City of Egegik  
P.O. Box 189  
Egegik, AK 99579  
Phone (907) 233-2400  
Fax (907) 233-2231

May 7, 2008

Mr. Mel Morris, Chair  
Alaska Board of Fisheries

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MAY 11 2008

BOARDS

Dear Mr. Morris:

The City of Egegik is opposed to the Emergency Petition to Expand the Egegik and Ugashik commercial fishing districts. We are in complete agreement with the Alaska Department of Fish and Game's response to the petition, on the biological issues as well as the belief that this petition fails to meet the criteria for a finding of emergency.

We believe that the Alaska Department of Fish and Game has done an admirable job of managing the Bristol Bay salmon fishery for sustainability and harvest over the years despite already having their hands tied in a number of ways. The department has a primary objective of meeting its escapement goals while trying to spread out the escapement over the length of the run. This is already a difficult task without taking into account the setnet/driftnet allocations, ebb tide issues, etc. We believe that creating three 48 hour unmanaged driftnet fishing periods in expanded fishing areas where nobody knows what fish might be caught would make this job even more difficult. In addition, the petition would mandate that the department's hands be further tied by having two 48 hour periods where only setnet fishing would be allowed. We believe that one of the main reasons that Alaska will have the only open salmon fishery on the west coast this year is because the fishery has been managed for sustainability and not for maximum harvest. We also believe that the fishery is managed most effectively when openings and closings are being managed on a tide by tide basis with current information, not with predetermined openings, closings and gear types set six weeks in advance.

In addition to the fishery issues, this petition also creates potentially harmful financial issues for the City of Egegik, City of Pilot Point and the Bristol Bay Borough. The proposed expanded fishing districts are outside of the taxing jurisdictions of all three municipalities. Depending on where these fish were headed, a harvest of 3.5 million fish would result in lost tax revenues of up to \$400,000. We find it ironic that the petition states that "Naknek-Kvichak districts are not expanded out of concern for the affected municipalities' ability to track landings for tax purposes". Apparently the petitioner has no such concern for Egegik and Pilot Point, municipalities that would be affected. We also find it ironic that the petitioner makes no reference to expanding the Nushagak and Togiak districts on the west side of Bristol Bay, where the petitioner resides.

While it is true that escapement has exceeded the department's objectives the past couple of years, it is also true that we have had years in the past decade where economic disasters were declared because the run didn't meet expectations. We strongly urge the Board of Fish to reject this petition.

Sincerely,

*Richard E. Deigh*

Richard E. Deigh, Mayor

*Myra J. Olsen*

Myra J. Olsen, Vice-Mayor



# 15

**Mike and Gina**

---

**From:** "Mike and Gina" <rainydawn@ak.net>  
**To:** "mike" <mike.clarion@ak.net>  
**Sent:** Thursday, May 08, 2008 12:35 AM  
**Subject:** Fw: Emergency petition BOF - early fishing time

----- Original Message -----

**From:** Mike and Gina  
**To:** mike  
**Sent:** Thursday, May 08, 2008 12:13 AM  
**Subject:** Emergency petition BOF - early fishing time

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MAY 08 2008  
BOARDS

**Mr Mel Morris, Chairman  
Alaska Board of Fisheries**

I am a long time (26 yrs) veteran of the Bristol Bay Drift fishery and an Alaska Resident for 36 years. Salmon fishing in Bristol Bay has been the primary source of income for my family for all of those years. We now own and operate multiple refrigerated vessels with multiple permits and are seriously invested in the Bristol Bay Fishery. My wife Gina fished before me and our sons and daughters (Adopted and Fostered Alaska Native) now participate and are permit holders in this robust and historical fishery. We have a thirty-two year catch history and plan on harvesting sockeye in Bristol Bay for perpetuity.

It is very difficult to formulate a successful business plan in this fishery when there are so many fish left unharvested (while the fleet is on limits). During these periods (while the harvest limits are placed on the fishers) there is very little profit to be made for the harvester who has significant investment levels in the vessels, permits, gear and refrigeration equipment.

All indications for the 2008 season lead us to expect that more fish will arrive than last season, when a significant financial loss was experienced by a vast majority of the harvesters, both drift and setnet(due to processing capacity shortfalls, run size and timing) There is little evidence that the existing processing capacity will adequately handle this 2008 return in such a manner as to maximize the earning potential for the stakeholders.

In the AIFMA March 208 newsletter, David Harsila's letter to Gov Palin clearly states their belief that "processor capacity survey does not...adequately address limits or the welfare of the (BB) fleet.....We anticipate continued overescapement and even more restrictive delivery limits during the '08 season, if the status quo is given a nod of approval"

Also please note the number of processors who have weighed in on this issue and supported the premise of Heyanos petition.

Please consider carefully the emergency petition, it is clearly written and states the need for "many partial responses". The early fishing in the expanded areas

5/8/2008

provides several areas of relief from these problems, which are clearly stated in the petition. One beneficial aspect of this early fishing opportunity (with the expanded areas) is that the processors will get more of the fish as early as possible. This works in our favor for all gear types due to many factors, one of which is the ability for the plants to achieve their capacity sooner, thereby increasing the number of days and volume of fish they can process, as well as other benefits such as training crews.

Another important aspect that should be considered is the colder weather this spring will most likely result in colder water temperatures and could keep fish from moving in to the (traditional boundaries) systems early and create a lack of fish and processing opportunity early in the season, thereby compressing the run timing which this year could dramatically increase the overescapement problem (and foregone harvest) that we have experienced in recent years.

I support The petition as submitted by Mr Heyano, please give us the means to resolve the above issues for the 2008 season. Thank You

Respectfully submitted  
Mike Friccero and Family  
F/V Miss Gina  
F/V Rainy Dawn

Michael J Friccero

5/8/2008

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PRINT TIME MAY. 8. 8:15AM

# 16

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MAY 08 2008

BOARDS

May 7, 2008

Mel Morris, Chairman  
Alaska Board of Fisheries

Dear Chairman Morris and Board of Fish Members,

I am writing to oppose the Emergency Petition to expand the Egegik and Ugashik Districts. I do not believe that the petition meets the criteria laid out in 5AAC 96.625 (f) because the Board of Fish for the past three years rejected such proposals dealing with the "General District". The new petition is nothing more than a modified "General District" proposal but, the implications to the Naknek and Kvichak River sockeye salmon stocks still remain. The reasons why the "General District" was rejected by the BOF are all the same under this proposal. First and foremost is the potential impact and interception of the Kvichak River sockeye stocks, a "stock of concern" as listed by the Board of Fish, proposals such as these were rejected by all Fish and Game Advisory Committee's as well as the majority of the fishermen who reside in the Bristol Bay Region, as well as communities and boroughs who collect fish taxes. As a sitting member of the Nushagak Advisory Committee, I believe this proposal is an end run around the advisory committee's and the public process that we all hold up to the world on how to manage fish stocks. This proposal circumvents the public process, it was put to the Board, the last minute, no comments from advisory committee's and most of the Bristol Bay public and fishermen do not even know about. The Bristol Bay forecast has been out since November, why now?

Further more we have allocation plans between drift and setnet fishermen for each of the East side fishing districts. I know this is not a concern of the Bristol Bay processors, it is a major concern for fishermen, especially setnet fishermen who are not mobile. This proposal will greatly benefit one user group over the other, drift fishermen over setnet fishermen.

Please consider the economics of the "Regions Residents" most of these folks are hanging on by a few nails trying to remain in the fishery. Most of these fishermen do not fish in Egegik and Ugashik and if they do they are master fishermen in-river and not in the outside districts. I know because I have watched these fishermen when I used to fish Egegik. Many of our local drift fishermen only fish home town districts.

In every study since 1922, right up to the 1987 Bev Cross, ADF&G study, the middle bluff area between the Kvichak-Naknek and Egegik fishing districts are classified as a milling area of sockeye salmon bound for all districts in Bristol Bay, especially those of the east side fishing districts. Past Boards of Fish have also recognized this milling area and reduced fishing districts to minimize the interception of sockeye within Bristol Bay.

I realize that we are facing a large sockeye run to Bristol Bay this season. I believe the ADF&G, April 8 announcement to fishermen and processors on how, they the department, are going to manage the east side fishing districts did not allow enough

RECEIVED TIME MAY. 8. 9:44AM

fishing time within the east side fishing districts to take advantage of this large sockeye forecast. I would support that between June 1 and June 25 the department will be very aggressive in harvesting sockeye in all east side fishing districts. This would attain the goals of the petition and more by:

1. "Effectively flattens the daily harvest curve and help create an efficient flow of fish for processors and fishermen".
2. Greater efficiency and lower operating costs, will burn less fuel, less distance to run.
3. Early fishing will allow fishermen and crew to work the bugs out as well as allowing processors to train workers.
4. Early fishing will delay use of long haul tenders who are needed in the peak of the season.
5. Allow processors to develop a "fresh" program for Bristol Bay sockeye.
6. Keep in-region sockeye interception to a minimum.
7. Keep allocations between drift and setnet fishermen to historical levels.
8. May add 7-14 million pounds of sockeye to the fishermen and processors bottom line.
9. No in-region fighting over taxes to respective entities.
10. Under 5 AAC 06.355(b) It is the intent of the Board of Fisheries (board) that Bristol Bay sockeye salmon be harvested in the traditional harvest locations and that historical sockeye salmon catches be allocated between drift and set gillnet fisheries by district.


(c)(2) Management of Bristol Bay Area salmon districts as terminal fisheries, recognizing that interception between districts within Bristol Bay is unavoidable; utilization of management plans and practices to ensure designated salmon harvest in districts of origin.

(d)(5) Reduce harvest of stocks bound for other districts, subdistricts, or sections in accordance with specific regulatory management plans.

These are the your own Board of Fish guiding principles put into regulation, the proposed petition does not meet these standards in any way shape or form.

In closing, all the reasons why the petition was submitted could and should be attained within the existing east side fishing districts of Bristol Bay, no expanded districts are needed. The department needs to allow more fishing time within these districts to maximize the harvest of surplus sockeye. Let's not throw the baby out with the bath water by adopting this petition, the department has the tools it needs to maximize the harvest.

Thank You

  
H. Robin Samuelson Jr.  
Drift fishermen Bristol Bay  
Box 412  
Dillingham, Alaska 99576

*Emailed comments received as of May 8, 2008 regarding petition for expanding Egegik and Ugashik commercial fishing*

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# 17

5/7/08

I would like to voice my opinion about this extention.

I have fished in the Bristol Bay area for more than 40 years and I have seen the Mighty Kvichak River go from the mighty to the meek all due to intercept fisheries and past poor management. Please let the fish go to where they are from before this Mighty Kvichak Run becomes nothing.

We have seen some increase in the runs with little or no intercept fishing please lets continue to help save this system Kvichak River.

You have the chance to make a difference in turning this River System Kvichak back to what it used to be, it has been getting better with better choices made by those IN CHARGE of our livelihoods and our environment our lifestyles, please please do not kill the Mighty Kvichak River System by voting against this petition. Please

My Mother wrote a poem called THEY'RE KILLING THE MIGHTY KVICHAK RIVER I'll scan it and send it to you when I find it. It will almost make you cry.

Vicki P Alto

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# 18

5/7/08

I believe that intercepting the fish prior to them getting into their particular river systems would only profit the fisherman doing the intercepting. The fish should be allowed to reach their respective river systems and to the fisherman fishing those districts. When an over escapement is going to take place, the ADF&G should have the latitude and authority to allow In-River fishing at the same time as the traditional fishing district. The outside district should not be affected. It should have no affect on the allocation system in place in the district. It seems ridiculous that there are regulations stating that if the Egegik River District moves inside that the Naknek fisherman have to move into the river. It is also ridiculous to close the Nushagak general district and force all the fisherman inside the Wood River where only a small percentage of fisherman will be able to fish. The In-River fisheries should be a separate fisheries for emergency escapement purposes only. The size of the river such as the Wood River and the Naknek River will regulate themselves to the number of drifters or set netters that wish to participate in the In-River fisheries.

I object to the Petition to Expand the Egegik and Ugashik intercept fisheries. They are already doing a pretty good job of intercepting the fish to other districts. The Kvichak river is a prime example.

Thank you for your consideration.

Sincerely

Fred Ball

Bristol Bay Drift fisherman

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5/7/08

# 19

Chairman Mel Morris and BOF members:

The Naknek/Kvichak AC is opposed to the emergency proposal submitted by Robert Heyano. We do not believe this request meets the requirements of an emergency petition. This issue has been brought up previously as a "general district" area and all AC's from Bristol Bay have been opposed. The Naknek/Kvichak AC is opposed to any expanded commercial fishing areas because of the concern for the Kvichak River salmon and expanding the harvest of mixed stock fishing. It is detrimental to ADFG management and compromises the set net allocation and set net harvest as a whole. Other issues of concern are increased interception of north bound salmon stocks, the early triggering of special harvest area plans and lost revenue in the form of raw fish tax to the Bristol Bay Borough.

I most recently spoke of our concerns at the Salmon Restructuring Committee meeting held in Anchorage this spring. Processors have stated that they have ample capacity to handle a run of 36 million fish.

This issue can be taken up in cycle at the 2009 BOF meeting dealing with proposals for Bristol Bay.

Thank you,  
Fred Pike, Secretary Nak/Kvi AC

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5/7/08

# 20

As a life long setnetter in the Egegik Dist---I am OPPOSING this-- We have enough Allocation problems now--as a setnetter I sit out may a tides -some times the run is gone--as a setnetter in the Egegik Dist.-we have had 2 marginal years. The Kvichak River is just starting to show some hope---all of us on the East side of the bay as paid attention to it--when ever any thing to help the Kvichak comes up--we vote to support it. Also--the Boroughs would lose out on needed revenue.

Thank You-- Eddie Clark  
POBox 167  
Naknek,Alaska 99633  
907 246 3383

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5/7/08

# 21

Myself and my two sons are opposed to the petition submitted by Mr. Robert Heyano concerning the Ugashik District. We feel it will harm the Naknek Kvichak District which has just begun to recover. Thank you Becky Savo  
Scotty Savo and Alex Savo, Commercial Fishing Family of Alaska

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# 22

5/8/08  
Mel Morris, Chair

My name is Trefon Angasan . I am a lifelong commercial fisherman and have held a gear license to set net and drift since 1959. I have served two terms on the Board of Fish. I would like to comment on the petition to expand the window of opportunity to harvest salmon from June 16- June 25.

It has been my experience serving on the board that petitions have generally been discouraged because it circumvents the public participation process. The public perception about this petition is tantamount to submitting ear marks in the Congressional budget process. It is done without public debate except through written comments and emails.

The Department's management strategies have always erred on the side of conservation. Expanding the districts in the petition would permit the harvest of discreet stocks before they reach their districts. The risk of opening up a new fishery is that it can have a negative effect on an area that has already been classified as a River of Concern. That river has a chronic inability to obtain its minimum escapement for maximum sustainability.

I believe that the Department's harvesting strategy is a good one. That management plan allows for emergency order opening and closure of each district based on the strength of the run to that district.

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# 23

5/8/08

I am writing in opposition to Robert Heyano's letter to expand the Egegik and Ugashik fishing districts.

My name is Ralph Angasan Sr., I am a Bristol Bay drift permit holder. I have been fishing Bristol Bay for 55years now. In fact me and my brothers use to get our fishing license from the US Dept of Interior Bureau of Fisheries in King Salmon, before State hood.

I am the past co-chair of the Nak-Kvi advisory committee. We opposed tthe general district in the past and the entire Bristol Bay advisory committees did also. Because of the Kvichak run which is a stock of consern, If you would look at the past history of escapment into the Kvichak, it has not meet its goal for the past 23 years maybe 3years out of 23, because of interseption which happens else where in the Bay.

Remember Bev Cross's taging study? Way back in the 22's middle bluff was considered a milling area for stocks of all the river systems, and I think that Her Efferts of tagging salmon proved it. Also November was when the Dept. came out with the forcast for Bristol Bay, and the letter is sent at the 11th Hr.? Where has this guy been. Right now we have an allacation between the set-net and drift fisherman. It would harm the set-netter the most if this is passes. Just the outside fisherman, drift fleet, would benifit, Most of us local drift fisherman stay at our local fishing districts. With the cost of fuel now it's hardly worth traveling from district to district. It's bad enough that we have such low fish prices, we can hardly make ends meet, I suspect a lot more local Alaskans will get out of the fishery that has sustained they lives for many years. Thank you

Ralph Angasan Sr. --Bristol Bay resident and fisherman

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5/8/08  
To the Board of Fish

# 24

I support early fishing in Bristol Bay, as well as expanded districts, I will list a few of the reasons.

1. A large run is predicted once again. We can reduce over- escapement into the rivers by more effectively harvesting some early fish.
2. More early fishing will help the processors train their crews before the main run hits, perhaps letting them come into the ballpark of processing the amount of fish that they claim to be able to handle.
3. I was told by a few processors that the last General District openings produced over 90% number 1 grade fish, I would assume that both the fisherman and the processors benefited from not mangling the salmon, as is customary, during condensed fishing periods.
4. The longer our season lasts, from start to finish, the more time we will have to develop our markets for our Salmon.

Sincerely, Kurt Kvernvik  
FV RED ALERT  
NAKNEK

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Alaska Board of Fisheries  
Attn. Chairman Mel Morris

# 25

Mr. Morris:

I am writing in support of the emergency petition before the board regarding temporary expansion of the Egegik and Ugashik districts of Bristol Bay.

The petition provides an opportunity for industry to better use the harvestable surplus of Bristol Bay sockeye. The petition also provides the board an opportunity to respond to new information, namely the consistent under-forecast of Bristol Bay sockeye returns in recent years.

The Department's response to this petition revolves around concerns with the Kvichak River stock and reflects a lack of confidence in the Kvichak projection.

In the last three seasons (2005 - 2007) sockeye returns have been sufficient to exceed the Kvichak spawning goal of 2 million fish each year, AND to provide several million sockeye for commercial harvest

within the Kvichak section of the Naknek-Kvichak district. Kvichak sockeye escapement was 5.5 million in 2004.

Considering the early timing of the proposed openings and the recent history of under-forecast, this petition poses little if any risk of excessive Kvichak interception. The Department's ability to enact Kvichak stock conservation measures as the bulk of the run enters Bristol Bay (after June 25) will be unchanged.

I urge the board to approve this common-sense petition as an effective and low-risk means of reducing the foregone sockeye harvest in Bristol Bay.

--

Chris McDowell  
Bristol Bay driftnet permit holder  
Juneau, AK

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