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BREENA APGAR-KURTZ

BOF COMMENTS

ATTENTION: BOF COMMENTS

BOARDS SUPPORT SECTION

ADF&G

PO BOX 115526

JUNEAU, AK 99811-5526



Proposal 35: Vessel specifications and operations

I oppose Proposal 35 that would increase vessel length over 32 feet. This would create an unfair advantage to people who could afford to buy a bigger boat. This regulatory change would benefit non-local fishermen the most because they have the money to spend on a bigger boat whereas the local guys would not be able to compete with these guys.

Proposal 36: Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay

I oppose Proposal 36 because it would concentrate power into fewer hands of this fishery. The people who will buying the extra permit to fish more gear are most likely non-local residents. Non-local residents already have enough power over the fishery.

Proposal 41, Proposal 42 and Proposal 43: Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay

I oppose Proposal 41, Proposal 42 and Proposal 43 based on my findings from my Master's Thesis, Factors Affecting Local Permit Ownership in Bristol Bay and an Evaluation of the BBEDC Permit Loan Program: An Analysis of Based on Interviews with Local Residents. In interviews with Bristol Bay watershed residents last summer, I asked people whether they thought dual permits on one boat was helping or hurting local residents. Here are their thoughts on this issue. Here is an excerpt:

12. Fishing drift dual permits helps/hurts locals?

A total of 70 people responded to this question.

This is a relatively new regulation allowing two permit holders to fish on one boat with 150 fathoms of gear. One permit holder is allowed 100 fathoms of net so fishing dual permits is not twice the amount of gear. This regulation was passed to help local permit holders get back into the fishery if they do not have a boat. It is supposed to lower the barriers to entry to buying a permit because it is removing the other main expense to entering the fishery, buying a boat. I asked this question to local participants in the drift fishery to understand whether they thought this regulation was helping them.

The interview results suggest that people have mixed feelings about this regulation. 48.6% of respondents said two permits on one boat helps locals, but 35.7% of respondents thought it hurts locals.

Fishing drift dual helps/hurts locals?

Table 12.1

	Number of responses	Percentage of responses
	Drift Respondents	Drift Respondents
TOTAL	70	100.0%
Helps locals	34	48.6%
Hurts locals	25	35.7%
I do not know	9	12.9%
It helps everyone	2	2.9%
Number of people asked	72	

This regulation was designed to help permit holders who do not have a boat remain in the fishery. This target group is more likely to live in a rural village instead of Dillingham because they have fewer resources to buy or maintain a boat. I wanted to understand if respondents in these villages thought this regulation was helping them. 52.2% of people in Dillingham thought this regulation was hurting them but most people in Manokotak, New Stuyahok and Togiak thought this regulation was helping them.

Fishing drift dual helps/hurts locals?

Table 12.2

	Number of responses				Percentage of responses			
	Dillingham	Manok-otak	New Stuy-ahok	Togiak	Dillingham	Manok-otak	New Stuy-ahok	Togiak
TOTAL	23	1	16	17	100.0%	100.0%	100.0%	100.0%
Helps locals	7	1	10	8	30.4%	100.0%	62.5%	47.1%
Hurts locals	12	0	5	5	52.2%	0.0%	31.3%	29.4%
I do not know	2	0	1	4	8.7%	0.0%	6.3%	23.5%
It helps everyone	2	0	0	0	8.7%	0.0%	0.0%	0.0%
Number of people asked	23	1	18	17				

The people who are supposed to be benefiting from this regulation believe it is helping them. Although many people think it has helped non-local fishermen too, people are more likely to think this regulation is helpful if they have benefited from it. There are few people in Togiak who fish two permits on one boat so they are the least likely to be familiar with this regulation. 23.5% of respondents in Togiak did not know if the regulation helped or hurt them and some of these people did not know the regulation existed.

Although this regulation has helped to get more local permit holders back into the fishery, most permit holders who fish as dual permit holders on one boat live outside of Bristol Bay. To take advantage of this regulation of allowing more gear on board, most boats that have two permits holders aboard are some of the larger boats. All boats are restricted to 32 feet in length but the biggest boats are much wider and taller. On average, local permit holders have smaller boats and may not be able to accommodate the extra gear and crewmembers.

The rationale for allowing two permit holders to fish on one boat with more gear is to allow villagers who have permits but no boats to get them back into fishing. A person who has bought a permit faces lower costs because they only pay for the permit and can fish with another person, usually a family member, until they get enough money to buy their own boat. Permit Holder Drift Dillingham BBEDC 2 does not have a boat and thinks this regulation has helped him get into the fishery because he could not afford a boat and a permit. Permit Holder Drift Dillingham BBEDC 1 and his partner bought a permit. They shared a boat and permit until Permit Holder Drift Dillingham BBEDC 1 bought a permit and this year, bought a boat, splitting their partnership. He does not think that fishing dual made enough money

to justify the expense of extra gear and crewmembers.

"During those lean years it was supposed to help people get back into the water. It helped anyone. That still exists. I think that as fish prices continue to increase, dual permits are going to split fishing partners because we could get a second boat fairly economically." BBEDC 2/ Permit Holder Drift Dillingham 4

"It hurts local people because they cannot afford another permit. 90% of dual boats are from outside, very few locals. There are a few that fish together locally but not many. They cannot afford to set aside money for another permit. They have to eat, live. The cost of living out here is so high that they cannot afford it." Crewmember Drift Dillingham 2

"I think you do not make any money fishing dual. The guy with the boat wants a bigger share and if you are the one to jump on the boat, you do not make any money but it is better than having no boat... Several people with permits have fished the season with someone else, as a dual permit. One here in Togiak, another in another village. The one from here who does not have a boat has to fish with an 18-foot Lund since the first guy with the boat went home. Fish the channel with an 18 foot Lund but you get a 1000 pounds or less per delivery." Crewmember Set Togiak 1

"I am not convinced that fishing a dual permit helped us. We had to bring extra crewmembers and the extra permit and I am not convinced it was worth it or that we caught more fish. It can be worth it if the two permits are in the family." Permit Holder Drift Dillingham BBEDC 1

"It helped me a lot. I do not have to pay for any expenses. I do not have a boat, nets, the only thing I have to worry about is working on the boat." Permit Holder Drift Dillingham BBEDC 2

"I think it hurts local fishermen... Most do not have the capacity (on their boats)... If you took another permit for a dual permit, I haven't seen the crewmembers shares go up on it... It goes against the intent of Limited Entry." Permit Holder Drift Dillingham 5

In New Stuyahok, there are many permit holders who either do not have a boat at all or a boat in working order so these people have been fishing as dual permit holders with another Outside fishermen

rather than other permit holders in New Stuyahok who have a boat. Many boats in New Stuyahok are too small to accommodate the extra crewmembers and crewmembers.

People think locals benefit from fishing on another person's boat when they do not have a boat. This only works well when the two permit holders treat each other fairly. Several permit holders in New Stuyahok have had negative experiences fishing as dual permit holders with non-local permit holders. These permit holders felt inexperienced in writing up a contract with their partner so they accepted the terms they were given but afterwards they felt the non-local permit holder took advantage of them. Or they had a hard time collecting payment at the end of the season.

"The first time I tried a D boat, it helped a lot but the last 2 experiences somewhat hurt me because I did not get my fair share." Permit Holder New Stuyahok 7

A situation where it may not work well for the permit holder who owns the boat is if the second permit holder jumps onto another boat, leaving the boat owner with too much gear and too many crewmembers. Permit Holder New Stuyahok 4 said that when the boat he was on broke down, he jumped to another boat to continue fishing. If this permit holder continued to jump from boat to boat than it would not help the boat owner. In different situations it could be bad for either permit holder.

"I did that a couple of times. When we broke down, I jumped onto another boat." Permit Holder Drift New Stuyahok 4

The implication for increasing local permit ownership is that it helps people retain their permit if they do not have a boat. Secondly, this regulation is helping crewmembers buy into the fishery because they can fish a dual permit on someone else's boat rather than have to spend more money on a boat. Still the main obstacle is if they fish on their family member's boat, the boat may not be able to accommodate the extra gear or crewmembers.

Proposal 54: Gillnet Specification and Operations

I oppose Proposal 54 because it would only benefit people who are wealthy enough to own 2 permits and these permit holders are likely non-residents. Residents have more family members who fish with them so they can put the second permit in the family member's name. This regulation would benefit people who are trying to set up illegal operations where they own multiple permits and leases. They

may have all the leases in one person's name who is considered the owner of the other permits that are in his crewmembers' names. This is illegal because a person isn't legally allowed to own all of those set net permits and if they are in his crewmembers' names then they have no legal obligation to give the permit back to the "real owner." If you want to bust these operations then you look at who is leasing all of these sites and realize that this person is controlling more than 2 permits per person.

October 9, 2012



Darryl F. Pope
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Alaska Board of Fish,

I am writing you about proposals to combine set and drift permits within the Bristol Bay Fisheries region to reduce the overall number of permits within that constituency. Currently, Commercial Fisheries Entry Commission's (CFEC) optimum number of permits is between 800 and 1200 in the drift fisheries of Bristol Bay.

There have been few, if any, optimum studies done in regions other than Bristol Bay such as the S.E. Seine, or the Cook Inlet's set net and Bristol Bay set net fishery

In my view, Bristol Bay Fishery has been recently based more on production than on quality. There is generally a bigger price paid by the processor for production than on quality, and generally only the top ten boats of the said processors get the top bonuses. Therefore, many boats are not thinking of the quality of the fish they catch, but rather the number because the number yields greater profit. Responsibility of quality rests on the shoulders of the lesser processors and the fishermen. Consolidation of the processors has made it tough for the processors to process quality product when the salmon run is at peak season. So, a lot of this "salmon quality talk" is Hocus Pocus. A better price paid for *quality* fish rather than *quantity* will bring better profits to the Bristol Bay Fishers.

By reducing the number of permits in the Bristol Bay Fishery from one person owning two D-permits to a single permit, ~~this will also~~ reduce the total number of permits circulating within the constituency. If the permits remain separate as they are now, owners will continue to sell their permits as single items, rather than a joint pair, thus repeating the cycle and in turn furthering the issue of having too many existing permits. The second, independent permit gives opportunity to catch more, which brings more profit to those able to afford the extra permit. Currently, are there enough permits to go around so that all fishers have an equal and fair opportunity? Is the playing field shared in an equal fashion? Will one owner of two permits be able to have two vessels fishing in two different river systems, or one vessel fishing two permits in two different river systems? The fisher that doesn't have the tools to obtain a second permit loses out on the production and their bonuses therefore, catching less fish and receiving the lesser amount for those fish. These are just a few of many questions; CFEC *needs* to address these vital issues.

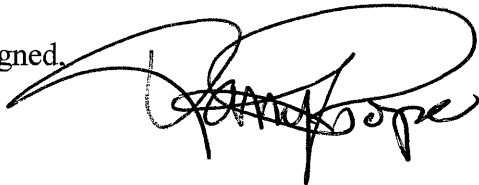
Some would argue that if there were no dual permits (D Permit), then those extra permits wouldn't even be participating in the fishery, especially in the lean years. Maintaining the Sunset Clause might create a fire sale on Bristol Bay permits. However, we're not in this fishery to market permits, we're in the fishery to catch a *quality* product and be *paid* for that quality product. That will increase the price of permits and bring more profit to fishery.

The fishermen that have invested in second, and sometimes third permits, are asking for the board to repeal the Sunset Clause and be able to fish with two permits. But turning those invested permits into *one* D Permit for both set and drift gill net fishers, well, I'm not sure how many Investor fishers are willing to do that. Most of those proposals are vague on the permanent reduction of permits, though it does reduce the number of boats. Owning two separate permits means you can in turn *sell* two separate permits. This does *nothing* for the optimum number study to reduce permits in the Bristol Bay Fishery.

If there were ever a need for proposal # 62 -5aac39 xxx Bristol Bay Salmon Industry, restructuring the D Permit would be good topic to start with. The fishers, organizations, and investors that wrote proposals for D permits and the repeal of the Sunset Clause acutely sit at a table and commit to that investment of permits. They then turn them into one dual 200-fathom drift permit and one 100-fathom set net permit forever. The S.E Seine fishery has permanent reduction in permits in a buyback, Bristol Bay needs it too!

Togiak doesn't want dual permits; Nushagak doesn't like them when fishing is allowed in the Naknek special harvest area. Proposal #40 proposed by John Webb states that a "high percentage of "D" vessels fishing Nushagak made it harder for single permitted vessels to compete." It will be hard for a single permit to compete with a dual D-permit for fish and price in all of the river systems within Bristol Bay. Bristol Bay fin fish proposals scheduled for 2012 on permit stacking do nothing for reduction of permits in the fishery. The issue is clear. A resolution needs to take action. Same number permits, same number of boats. Let the Sunset Clause run its course.

Signed.

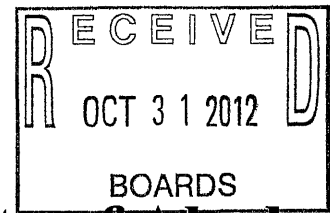


Darryl Pope

503T 593516



Memorandum
 Department of Natural Resources



State of Alaska
 Division of Mining, Land, and Water

TO: Through the Chairman, to the Alaska Board of Fisheries, ADF&G,
 Monica Wellard, Director, Boards Support Section, ADF&G

THRU: Richard Thompson (Natural Resource Manager III) Southcentral Regional Manager *[Signature]*
 Adam Smith (Natural Resource Manager II) Southcentral Leasing Section *[Signature]*

FROM: Ryan Hickel (Natural Resource Manager I) Shore Fishery Leasing Unit *RH*

DATE: October 4, 2012

SUBJECT: Bristol Bay Finfish Proposals (Proposed changes in regulations)

This memo provides the Alaska Board of Fisheries (BOF) with agency comments for **Proposals 44, 45, 46, 47, 48, 49, 50, 51, 52, 53 and 54** regarding the proposed changes to the Bristol Bay Finfish Regulations, (5 AAC 06.331(u)) set gillnet specifications and operations. *These proposals seek to repeal the sunset clause of 5 AAC 06.331(u) that currently allows dual set gillnet permit holders to operate two legal units of set gillnet gear simultaneously.*

Background: As the land manager of the state-owned tide and submerged lands, the Department of Natural Resources (DNR), issues Shore Fishery Leases for commercial setnet fishing development. Obtaining a Shore Fishery Lease from DNR is not required, although with a lease the leaseholder has “first priority right” to use the site, and may exclude others from fishing their leased site, when they are physically present and fishing. The establishment and existence of DNR setnet leases is an excellent land management tool that in large part creates a sense of order/management to the fishery, and minimizes conflict. Shore Fishery Leasing Regulations (11 AAC 64) direct the administration of the setnet leasing program, and to manage our program using the distances, gear and open fishing areas as established for each Limited Entry Permit (LEP) holder, per the Commercial Finfish Regulations (5 AAC 03 – 5 AAC 39). Therefore proposals to the Board that result in changes to the Alaska Department of Fish and Game (ADF&G) Finfish Regulations do have pronounced effects on the administration of our DNR setnet leasing program.

There are approximately 2200 commercial setnet fishing permits (Limited Entry Permits) that have been issued statewide and there are around 1188 setnet leases authorized by DNR, and specifically administered by the Shore Fishery Leasing Unit.

In Bristol Bay in 2011, there were approximately 981 setnet LEPs, of that probably fewer than 100 are latent (unused). At least 878 of those LEPs were fished. Within those 981 Bristol Bay LEPs, DNR manages 600 individual setnet leases. Approximately 30 of those setnet lessees currently possess more than one setnet lease because of their dual permit holder status. This number has been increasing since 2010.

Proposals 44, 45, 46, 47, 48, 49, 50, 51, 52, 53 and 54: These proposals seek to repeal the sunset clause (5 AAC 06.331(u)) that would end the current practice of allowing a single individual to hold two permits (LEPs) and to operate those two permits simultaneously. DNR has had no problems administering our shore fish lease program in conjunction with the dual permit system in Bristol Bay since the system's inception in 2010.

Many sections within Shore Fishery Leasing regulations (11 AAC 64) are directed by the requirements set forth in ADF&G regulations (5 AAC 03 – 5 AAC 39). This is a relationship that has worked reasonably well since the 1960's and creates consistency in both land and fisheries management, as long as "the left hand speaks to the right". If a person meets the criteria, our Unit allows for an individual with dual LEPs to obtain additional DNR leases, as long as an ADF&G regulation is in place to allow for dual LEP usage. All DNR leases are issued consistent with ADF&G commercial fishing regulations, meaning no DNR lease exceeds the maximum amount of gear that is fishable per LEP. The loss of the dual permit system in Bristol Bay would affect DNR's shore fish leasing program through the administrative burden of having to reassign or close these existing leases and create additional burden upon those effected leaseholders.

Allowing the simultaneous use of dual LEPs by an individual within a fishery (as we have seen in Bristol Bay) can directly benefit those individuals by providing increased fishing opportunities. This arrangement can also theoretically provide greater stability to the fishery as a whole by increasing the profitability (and solvency) of individual fishing operations and by reducing the numbers of latent (unused) permits.

Summary: We appreciate the opportunity to comment on proposals 44, 45, 46, 47, 48, 49, 50, 51, 52, 53 and 54. We wish to remain neutral on these proposals but respectfully ask the Board to consider these comments during the decision making process.

To the Board, thank you for the opportunity to comment on these proposals. Your important decisions not only impact the actual fisheries, but also the surrounding state land and waters that are managed by the DNR. More information about the Shore Fish Program may be obtained at our website at: <http://www.dnr.alaska.gov/mlw/shore/index.htm> .

22 October 2012

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RECEIVED
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BOARDS

Dear members of the Board:

I am writing again because I see this fishery reaching the tipping point in safety on the water, capital controlling the catch, and the majority of drifters receiving ever smaller proportions of the catch. There are a group of proposals such as Permit Stacking (36,37) or special rights for stacking (24), Vessel length (32-35), General District (58,59,60) that working as a group will fundamentally change the fishery to its detriment.

The general district group looks for a back door to acceptance of an idea that is fundamentally flawed. There has always been a group that wants to fish the General District. The fundamental concepts of discrete stock management and closeness of the catcher boats to the brine tender make fishing on the outside counterproductive. The concept didn't pass muster when one notes its fundamental flaws but having it start after the 17th of July still does not make it a sound proposal. We have had it in the past when there was such an

overabundance of fish projected that the F&G wanted some of these early fish caught. As a special tool of the F&G it is fine in these special circumstances. As a general rule, it runs counter to the discrete stock management and closeness of the brine tenders to the traditional drifts. If they get some form of General District fishery, they will push for it to be for the whole season which is the real goal.

The special rights for double permits group will always be pushing for more; more time, special time, special area, special privileges. That is the nature of the group and they will always be looking to skew the catch that allows general area, large vessels, more net. As described in the attached 2 November 2009 letter, going to the two permit one owner system will open "Pandora's Box" to constitutional issues that will limit this Board's ability to readjust the system if this proposal further decimates the viability of the local fleet.

I always find it amusing as to how the proponents of larger vessels cite the need for increased safety. Larger vessels do not create a safer fishery; they are making the existing fishery a death trap. The danger in the fishery in the Districts is not the weather; it is the danger of fishing the line.

Our fishery by necessity must follow the concept of River of Origen based on discrete stock management. This necessitates the concept of a district, which district has lines. The line is the most productive area of a district. If you look at the catch distribution you will see that the fleet has been severely divided into high producers who basically fish the line and the remainder of the fishers who fish inside the district. This was not the case when I started in the fishery. The difference between a high boat and an average boat was minimal. High boats could be inside fisherman as well as line fisherman. We have the same districts. So what has changed?

When I started fishing in the Bay back in 1965, it was a skipper and one deckhand with no reel for the net. The retrieving of the net was a job that one did not do more than three times in the flood on the line. Nets were set slowly, drifts lasted a relatively long time as compared to today, and the cleaning of the nets took time. It was a safe productive fishery where the same amount of fish were caught by those two man boats as caught today and the differential was small between the high and the average. The boats were basically 10 to 12 feet in width; a very seaworthy boat with sufficient accommodations. The line fishery was a gentleman's fishery.

When the reel was added, it was like a third man was added to the crew. It made the operation easier and in most circumstances faster. Some boats went from a two man to a three man operation without a reel. At this point, the fishery was optimum in crew size in terms of safety, quality of fish produced (disregarding improvements in current short periods, quick deliveries, brine tenders, and knotless bailers), and producing a basically more equal distribution of the catch.

As the boats got wider from 13 to now somewhere above 16 feet, we find four and five man crews. It is no longer any trouble setting the net over 12 times or more on a flood at the line. It is no longer difficult to untangle your net from another boat or its net. With more power in the boat it is easier to tow the net, tow against the tide, tow apart two nets that are interlaced with fish, and have the manpower to clear the situation in close quarters. Today one can lay out the net at speeds and right alongside another boat's net that one would not dream of doing if the skipper did not have the crew to back up his rage. The big boat, the more nets, but especially the extra crew has turned Bristol Bay into an ugly aggressive fishery. This is a fishery very close to having people die on the line.

Some people will say that we need more state troopers. That is a joke. The more troopers the closer the fishery comes to killing people. When there is one skiff on the line, vessels setting out on the line towards each other can turn outside the line to avoid a collision; and before the skiff comes in the area, both boats are inside the line. Fudging? Yes! But it allows an avoidance of a collision. When there are three skiffs on the Johnston Hill line, there is no area outside the view of the skiffs to fudge outside the line and jungle rules are taking over. Prepare to be smashed if you are in a smaller vessel. 2012 Johnston Hill had the three skiffs and it was one of the most dangerous of the line fishery years.

Proponents of larger vessels cry we need larger boats for safety. What they mean is that they need larger vessels for its intimidation advantage on the line. The increase in the efficiency of the vessels, longer nets, and illegal deep nets on the line has made the inside drifts less productive. The increase in the size of the vessels, the gear used, and the size of the crews causes more fish to be caught on the line and less in the general district. The power of capitalization crushes the competition.

Proponents of larger vessels cry that they need more room for refrigeration. With more refrigeration space, they will ask for more time before delivery. Be realistic, does anyone sincerely believe that refrigeration on these catcher boats is the fundamental item that it is made out to be or is it only an adjunct to the early deposit of fish in the brine tenders? With 5 or 6 hour periods and immediate delivery to the tender, how important is the refrigeration on the catcher boats? Does it actually kick in and do some good when the fish is delivered within minutes of the last haul? How does some unrefrigerated catcher boats have a better temperature delivery than refrigerated boats? Has there been a true cost benefit analysis of the whole catcher boat refrigeration system given the possible refrigerant leaks and bacteria within a system that is not properly cleaned and maintained on a regular basis?

Does the Board want to maintain discrete stock management, have a fishery that is safe, have a catch that is produced throughout the districts and caught more equally by all the fishers, and deliver prime fish? Then say no to the General District, say no to permit stacking, say no to increased vessel length. Recognize that short periods and immediate delivery into brine tenders is the prime management tool for fish quality.

Say yes to a fishery that has a limit on crew size. The inability of a small crew to quickly clear the nets and thus return to the head drift at the line, reduces the congestion at the line and allows an orderly drift with space between nets. Open space allows longer productive drifts at the line and allows fish to penetrate into the district and have other fishers harvest in the traditional areas. Think about a rule that has a three man vessel where the net reel counts as a person. A skipper can have two crewmen and no reel or one crewman with a reel. The line will be pacified. The change in battleground fishery operations will produce a better product. Fish will disperse throughout the district, allowing for a more equitable distribution with a better participation of the in district drifters and the set netters in the catch.

This is thinking outside of the box.

Thank You,

A handwritten signature in black ink that reads "Steven D. Bruno". The signature is written in a cursive, flowing style.

Steven D. Bruno

Attachment: 2 November 2009 letter from Steven Bruno to Alaska Board of Fish

2 November 2009

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Alaska Board of Fish
Boards Support Section
Alaska Department of Fish and Game
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Dear Members of the Board:

I am writing to express the concerns that I have with some of the proposals that are being presented for consideration at the December 2009 hearings in Anchorage. I hope that the written format that I will use to present my thoughts is easy to follow and understand and will be sufficient for the purpose intended as I may not be able to attend in person. I do believe that this information is crucial to understanding the overall interrelationships of various proposals, certain fallacies, and the destructive potential that these proposals present to the health of the fishery, the welfare of its participants, and its constitutional foundations.

Your name and background in the fishery?

My name is Steven Bruno and I am a Bristol Bay salmon drift fisherman. I first started drifting for salmon in Suisun Bay which lies between the Sacramento/San Joaquin River Delta and San Francisco Bay in California in 1956. My first drift in Bristol Bay was in Egegik in 1965. I bought my first boat in the Bay in 1966. I received my drift permit in 1975. I am primarily an Eastside fisherman.

I have participated in many of the key political events since my introduction to Bristol Bay. Among my participations were the founding of AIFMA in 1966; the Naknek River price dispute in 1969; AIFMA price negotiations from 1976 through 1979; the sliding scale price contracts of 1983; the founding of the joint committee of drifters and setnetters on River of Origin in 1988; and notification and seeking assistance from the West Coast governors and Lee Iacocca, attorney Joe Alioto, and Ralph Nader in the 1991 "Japanese Boycott" price dispute. In the late 1990's and early 2000's, I worked with the Bristol Bay Coalition on various efforts to implement River of Origin concepts into the management process. Among these efforts were inviting Governor Knowles to come to the Bay and speak first hand with fishers concerning economic and management problems, discussions between ADF&G management and fishers in public meetings and radio broadcasts, and the 1997 Board of Fisheries meeting in Naknek.

What is your management philosophy?

In 1988, out of a gathering of non-line drifters and setnetters in Naknek, a committee was formed to address the problems of poor management practices by the ADF&G among which were the extending of periods which allowed for continuous fishing. During these extensions, fish production within the district would be minimal for inside drifters and setnetters. An aerial view of the districts would show the boats fighting for spots on the line and the interior district with only a few boats. Fish quality was suffering as continuous fishing which sustains a line fishery produces a poor product.

A committee of about six of us led by Jay Hammond met at his dining room table in Naknek and we came up with the concept "River of Origin," for a management philosophy which had as its principles that not only should the fish be allowed to return to spawn in their native streams so that the brood stock is protected but that the fish bound for that river should be harvested in that district by the drifters and setnetters registered in that district rather than being harvested in other districts within Area T, in Area M, or on the high seas; that a catch to escapement ratio management tool be used throughout the season; that when escapement has been reached in rivers like the Naknek and the outside district is open, that the river itself should be open to prevent over escapement; that the fishing periods be limited to one flood with the majority of the ebb being eliminated; that fish be delivered immediately at the end of the period and that those fish be delivered to brine tenders to maximize fish quality.

This management philosophy requires that the biologists follow discrete stock management, that fish be harvested near the river mouths and in the rivers that encompass their natal streams. They are not to be harvested if possible on the high seas, in Area M, or in districts in Area T outside the district to which they belong. We all recognize that there is mixing of fish in the various districts of the Bay and we never expected or required that perfect separation be achieved. We also recognize certain historical interceptions. But when forces dominate the Board or the Department to ensure further interception, then this is a problem that needs to be addressed.

How does the Board ensure interception? By allowing district boundaries to extend into the milling areas of the migrating fish; by allowing fishing in the general district; by allowing fishing in the outside area of a district when the run for that district is days away and the only fish in that district's outer area is fish from other districts; and when biologists are placed in a position to be able to shift catch, pressure will be placed on them to shift the catch.

Political pressure deciding the harvest in the 1980s was documented in a court case. The biologist for Egegik realized that the harvest of fish taking place at the Big Creek area of Egegik was basically on Naknek fish and requested one of the cannery superintendents to move the buoy in so as to restrict the area. The announcement was made on the radio of the change in area and the buoy was moved in as requested. A cannery owner who didn't like this conservation decision, decided to round up a group of other cannery superintendents and go to King Salmon and have the Egegik biologist's decision reversed. Politics prevailed, a run was damaged, all because the harvest was left up for manipulation.

How does the department allow interception? By allowing ebb fishing on big runouts so that the fish from another district washes down into the intercepting district; by not explaining to the board that interception skews their data and records, and does not give them a solid basis to manage these fisheries; that promoting fishing in the outer area of a district rather than the inner

area of a district does not reduce over escapement in the managed district but shifts catch away from the natal stream district.

Biologists have to refer to data, but their data since 1982 has been flawed because of the wholesale interception of catches. In 1993, Egegik had something like a 16 million harvest – a phenomenal number given the 1 million broodstock. This harvest was caught. In 1994, the Department, based on its flawed data, predicted a similar 16 million harvest for Egegik. But an east wind prevailed all season and millions of the predicted returning fish for Egegik swam west of the Egegik fishing nets and returned to the Kvichak. Their predictions were off by millions of fish. The reports don't document what happened and all that is referred to is the flawed data. This happens every season to a lesser degree and results in the corruption of the database.

Why was the Eastside harvest shifted south in 1982?

The harvest has historically been where the canneries are – serving the Naknek/Kvichak district. Because of the price dispute of 1982 and the desire of certain packers to harvest fish away from the non-fishing Naknek/Kvichak fleet, certain fish packers used their influence to move the harvest south in an interception mode. The 1980's are known in the history of the fishery as the decade of unlawful fishing, interception, and breakdown in the enforcement arm of the ADF&G.

Identify the proposals, their relationships, and your reasons for opposition:

The first is Proposal 15 eliminating the 32 foot limit; the second is Proposal 16 and similar ones to allow one person to operate two permits; the third is Proposal 21 asking for 300 fathoms of gear for two permits, or special openings, special areas; and fourth is Proposal 31 for the general district.

Eliminating the 32 foot limit:

The main reasons given for this proposal are quality and safety – that larger boats will allow for more refrigerated fish and a safer platform to work from. If you read the current literature on quality, one would think that the most important innovation on fish quality in Bristol Bay has been some form of chilling of the catch on the catcher-boats. This is wrong. The greatest improvement in fish quality has been due to some of the main principles of the River of Origin program which sought to alter the manner of drifting, the length of the fishing period, and the ASAP placing of the catch in the brine system of the tenders. The most important thing that this Board can do is to see that those principles are fully implemented.

Some packers advertise that their product comes from a fully refrigerated fleet as if this is the determining factor in quality. How that fish is caught is the first step in quality. Let's start with a state of the art aluminum rig with a refrigerated spray system. This vessel fishes on the lower line, holding the net in a tow against the tide. That net is tight as a drum with the meshes breaking the fish, bones, and flesh; the fish being cut from the net when pulled aboard and dropped to the aluminum deck; and finally pushed into the hold under the flush deck. Then there is a spray system, spraying chilled water over a mass of a thousand pounds. Does the spray reform the broken bodies? Does the spray really pull heat out of that mass of flesh? Should this boat be allowed to forgo immediate delivery to the tender at the end of the period because of this spray as some have argued?

The best drift product is caught by the small boat drifting with the tide and not fighting a line, not pulling the net in against the tide, not dragging the nets over the shallows, not ripping the fish apart as nets are separated after they have been sewn together by fish in close fishing on the line.

The big boats prevail on the line because of their ability to dominate other boats through pure size, engine power, special hydraulics, and larger crews. These boats are able to engage in all the practices that destroy the quality of fish. The argument that larger boats mean better quality is false and if you reflect on it, it is obvious that the small boat with its lack of power, lack of variable speed hydraulics, and smaller crew size fishes in a more traditional manner and thus in a manner more protective of fish quality.

If this Board is serious about quality, look for proposals to place the catch in the brine hold of the tenders as soon as possible. We now have the short periods, but what of the buyer that makes his fleet wait in long lines to fill one tender first before filling the next? What of buyers that only have one tender in a large district requiring the boats to travel hours to unload? What of buyers that claim highest fish standards because of their refrigerated catcher boats and yet have no ability to sort the fish that they receive? Refrigerating broken fish caused by destructive fishing methods does not upgrade the fish from a number three to a number one. But sorting fish prior to processing can give a processor 100% of number ones for the fresh and frozen market.

The safety argument is also false. It may be safer for the big boat in a line battle with smaller boats, but the larger size is part of what makes the line fishing so dangerous. Bristol Bay is a close quarters fishery, be it on a line or in the river. Boats need to drift together and be able to maneuver in close quarters. We are not dealing with a troller which is out in the open ocean. Does the Board want a 50 foot giant causing havoc in the inside Egegik River fishery? These boats could only operate properly in the open ocean and maybe these fishermen should transfer their operation down the Peninsula.

Two permits operated by one man on one vessel:

The proposal for one man to operate two permits on one vessel seems to be a small change from the current rule of double permits where two men can each operate one permit simultaneously on one boat with the second permit allowed just 50 fathoms. But this is a fateful step that will ensure a special class. Right now with the double permit system, we have one permit with one fisherman. The Board can do away with the double permit system and each fisherman walks away and can either fish or leave the permit on the beach. Nothing has been taken away from either of them.

As soon as you grant each man the right to work two permits on one boat, there is no going back to the former system of one man, one permit, and one boat. There will be fishermen who will purchase the extra permit so as to fish his two permits on his one boat. You cannot put the genie back into the bottle. There will be serious claims against the State of Alaska with any attempt to return to the original system.

The present double permit system looked to be a good compromise for the situation the fishery was in a few years ago with poor fish returns and low prices for the fish and the permits. It allowed that permit sitting on the beach to have some value as a supplement to an ongoing fishing

operation. It was an additional 50 fathoms for that boat that took it aboard. But what seems to make sense in a practical sense can be totally wrong in a legal sense.

The reasons for the double permit system have past. We are not in the middle of the no fish – no price era. Is it a cheap way for the state to reduce the number of boats by forcing everyone to go to two permits? Why should the state try to reduce the number of boats in the water? Economics does it for the state at no cost. How many boats are sitting on the beach each season or have the excess boats left the fishery? The boat operations that can make a go of it will do so with one man, one permit on one boat. The permits that cannot make it work will stay on the beach. Is the Board trying to create work for boat builders, permit brokers, or add value to certain fishermen's personal balance sheets?

One of your legal advisors may have told you that it will pass legal scrutiny, but that is only an opinion. The Board does not make practical rules in a vacuum. Its rules have to comply with the Federal and State of Alaska Constitutions and applicable legislation. Ask any old time fisherman from Puget Sound if what they thought was right was interpreted that way by the Boldt Decision.

There are serious legal problems with the current double permit system that is not going to be solved by giving one man the right to operate two permits on one boat. The Board is just going to open itself up to further litigation and rightly so.

300 Fathoms for two permits:

How does the Board justify one man owning two permits and operating them on one boat limiting the second permit to operate just 50 fathoms? For all the reasons listed by the proposal for 300 fathoms of gear, this raises serious concerns. This proposal is an eye opener that gives the Board a roadmap as to where this departure from one man, one permit, and one boat rule will lead. Does a special class make any sense, special times, and special areas? The whole process of trying to adjust the double permit system is a futile effort and the double permit system should be abandoned so as to maintain the regulations within the constitutional framework that established the Limited Entry System.

General District:

Do you see how these proposals all work together to create a different fishery: larger boats, more permits per boat, more gear per boat, and now an open ocean in which to work? Where is the biological justification for fishing on non discrete stocks of fish? This overturns the most basic rule of proper management: placing the catch of each fisherman in the district catch in which the permit holder is signed up for and is fishing in. Doing otherwise just further corrupts the database. This is a prime example of the illogical thinking that permeates sections of the fleet and certain processors. They don't want to understand that it matters when the numbers for the catch are placed in one column or another. It is not a meaningless entry. It is the basis for the biological decisions as to how to manage the fishery.

The logistics of bringing the catch to the tenders is further complicated by distance and area, making the goal of submersing the catch in the tender tanks as soon as possible more difficult. Remember, squirting some water over a mass of fish does not replace submerging them in refrigerated brine tanks on the tenders.

In 1981, the fish for the eastside districts came up a narrow strip along the east shore. A large amount of each fleet went into the general area illegally and harvested the fish. It was a poor season for the parts of the fleet that worked within the legal boundaries. All of the drifts and knowledge that a person accumulated was made worthless by the catches on the outside. Allowing fishing in the General District transfers catch away from those who know how to catch the fish within their districts and allows anyone to drift out in the ocean. It changes the rules of catching fish without any benefit to the management of the fishery. In fact, it harms management because it denies management knowledge of what fish belonging to what river have been harvested.

Conclusion:

I hope that these views on the above proposals have helped the Board in its efforts to do the best possible to support the escapement and harvests, provide for an orderly and safe fishery, ensure that the fishery produces a quality product within the limitations and parameters of Bristol Bay, and keeps the regulations within the constitutional boundaries of the law.

Thank You,



Steven D. Bruno

BRISTOL BAY NATIVE ASSOCIATION

**P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257**



**RECEIVED
NOV 05 2012
BOARDS**

November 2, 2012

Tribal Councils
Served by BBNA:

- Aleknagik
- Chignik Bay
- Chignik Lagoon
- Chignik Lake
- Clarks Point
- Curyung
- Egegik
- Ekuk
- Ekwok
- Igiugig
- Iliamna
- Ivanof Bay
- Kanatak
- King Salmon
- Kokhanok
- Koliganek
- Levelock
- Manokotak
- Naknek
- New Stuyahok
- Newhalen
- Nondalton
- Pedro Bay
- Perryville
- Pilot Point
- Port Heiden
- Portage Creek
- South Naknek
- Togiak
- Twin Hills
- Ugashik

Ms. Cora Campbell, Commissioner
Alaska Department of Fish & Game
PO Box 115526
Juneau, Alaska 99811-5526

Dear Commissioner Cambell:

Attached are two resolutions:

Resolution 2012-30 Resolution Opposing Regulation changes to "Restructure" the Bristol Bay Salmon Fishery in ways that would increase the capital cost of the Fishery.

Resolution 2013-02 A Resolution Supporting Proposals 62 at the Alaska Board of Fisheries.

These resolutions were passed by our BBNA Executive Committee October 17, 2012. BBNA, the regional non-profit for the Bristol Bay region, represents 31 tribes.

These resolutions represent a formal statement of considered opinion, intent, and resolve of the Association and its tribes. We have taken this action out of concern for our social, economic, and cultural well being. We communicate these resolutions to inform you of our position and to earnestly solicit your assistance in our efforts.

Sincerely,

BRISTOL BAY NATIVE ASSOCIATION

A handwritten signature in black ink, appearing to read "Ralph Andersen". The signature is fluid and cursive.

Ralph Andersen
President & Chief Executive Officer

Enclosure(s)

Cc: Jeff Regnart, Director, Division of Commercial Fisheries
Monica Wellard, Executive Director, Board of Fisheries

BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310

DILLINGHAM, ALASKA 99576

(907) 842-5257

By the Executive Committee


Resolution 2013-02

A RESOLUTION SUPPORTING PROPOSAL 62 AT THE ALASKA BOARD OF FISHERIES

- WHEREAS: The Bristol Bay Native Association is the regional Alaska Native non-profit corporation and tribal consortium serving the Bristol Bay Region; and
- WHEREAS: The Bristol Bay Region is highly dependent on the commercial salmon fishery; and
- WHEREAS: The Alaska Board of Fisheries is considering Bristol Bay finfish regulations at its December, 2012 meeting; and
- WHEREAS: During each review cycle when the Board of Fisheries considers Bristol Bay finfish regulations, it considers various “restructuring” proposals that could have substantial economic, social, or biological impacts on the Bristol Bay salmon fishery or require significant changes to the management of the fishery; and
- WHEREAS: Such proposed restructuring changes are typically intended to increase the value of the fishery for some participants by, for example, consolidating fishing effort, changing harvest allocations, eliminating or increasing the 32-foot limit on drift gillnet vessels, or making other changes in harvest methods; and
- WHEREAS: The Board of Fisheries has no formal guidelines or systematic method for identifying and evaluating restructuring proposals; and
- WHEREAS: It is critical that restructuring proposals be evaluated systematically under clear guidelines because of a high probability of unintended adverse consequences, the potential for disruption of the fishery and of the acceleration of out-migration of permits from the watershed residents; and
- WHEREAS: Proposal 62 in the current Board of Fisheries Bristol Bay review cycle was submitted by the Nushagak Advisory Committee, and would establish clear guidelines for the Board of Fisheries to evaluate Bristol Bay restructuring proposals; and

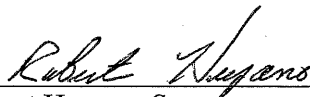
WHEREAS: Proposal 62 establishes a definition for restructuring proposals, a process for submitting and considering them which would include community outreach, and criteria for evaluating such proposals that take into account the economic benefit, interactions within the region, mitigation measures for adverse impacts, biological impacts, and specifically including a criterion that the proposal promote have positive economic and social impacts within the Bristol Bay communities;

NOW THEREFORE BE IT RESOLVED by the Bristol Bay Native Association Board of Directors that it supports Proposal 62 and urges its adoption by the Alaska Board of Fisheries.


Fred T. Angasan, Chairman

CERTIFICATION:

I, the undersigned Secretary of the Bristol Bay Native Association do hereby certify that the foregoing resolution was duly passed by majority vote of the Executive Committee of the Board of Directors of the Bristol Bay Native Association at a duly called and noticed meeting this 17th day of October, 2012, and that a quorum was present.


Robert Heyano, Secretary

**BRISTOL BAY NATIVE ASSOCIATION
P.O. BOX 310
DILLINGHAM, ALASKA 99576
(907) 842-5257
By the Executive Committee**

Resolution 2012-30

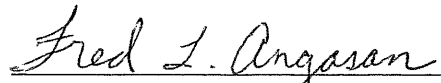
**A RESOLUTION OPPOSING REGULATION CHANGES TO “RESTRUCTURE” THE
BRISTOL BAY SALMON FISHERY IN WAYS THAT WOULD INCREASE THE
CAPITAL COST OF THE FISHERY .**

- WHEREAS: The Bristol Bay Native Association is a tribal organization and the regional Alaska Native non-profit corporation serving the Bristol Bay Region; and
- WHEREAS: The Bristol Bay Region is highly dependent on the commercial salmon fishery; and
- WHEREAS: The Alaska Board of Fisheries is considering Bristol Bay finfish regulations at its December, 2012 meeting; and
- WHEREAS: The Board of Fisheries will consider a several fishery restructuring proposals carried over from its December 2009 meeting, including proposals that would eliminate the 32 foot limit for vessels in the Bristol Bay drift gillnet fishery; and
- WHEREAS: Eliminating the 32 foot limit would trigger a dramatic capital-intensive upgrading of the fleet in which local resident fisherman would be at a competitive disadvantage, and would ultimately increase the migration of the limited entry permits from the region and undermine the sustainability of Bristol Bay communities; and
- WHEREAS: The Board of Fisheries should not as a matter of sound policy and state constitutional principles enact regulatory changes that primarily benefit outside fishermen at the expense of Alaska coastal communities;

NOW THEREFORE BE IT RESOLVED by the Bristol Bay Native Association Full Board of Directors that it strongly opposes proposals that will restructure our fishery in ways that would increase the capital cost of the fishery.


BE IT FURTHER RESOLVED that the Bristol Bay Native Associations supports, in regard to the Bristol Bay drift gill net fishery, regulatory changes that would allow two individuals with two drift permits to fish a single vessel with an additional 50 fathoms of gear, and in regard to

the set net fishery, allowing the current regulation that allows an individual to own two set net permits and fish two full complements of gear.


Fred T. Angasan, Chairman

CERTIFICATION:

I, the undersigned Secretary of the Bristol Bay Native Association do hereby certify that the foregoing resolution was duly passed by majority vote of the Executive Committee of the Board of Directors of the Bristol Bay Native Association at a duly called and noticed meeting this 17th day of October, 2012, and that a quorum was present.


Robert Heyano, Secretary

ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

November 6, 2012

Members of Board-

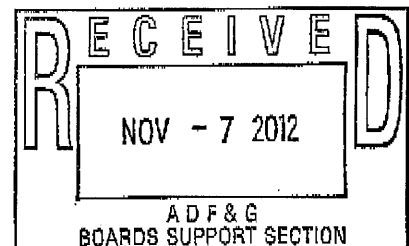
PROPOSAL 239 – 5 AAC 67.022(g)(6). Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

We as a lodge from our inception have refrained from fishing salmon eggs on the Nushagak River for any species (king, chum, silvers etc.). Rapids Camp Lodge wholeheartedly would support this proposal. It is not necessary to fish any bait on this river in order to provide guests a great experience. I firmly believe that the use of salmon eggs has caused a decline in the strong return of king salmon to this river. Not only is it detrimental to the resource but fishing without bait makes those people guiding the guests better guides. The Nushagak has had declining runs since I starting guiding the river in 2000. This seems like a very logical solution to a continuing problem.

Sincerely,

Daniel Herrig

Rapids Camp Lodge



ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

November 6, 2012

Members of Board-

PROPOSAL 239 – 5 AAC 67.022(g)(6). Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

My name is Brian Lull and I have been guiding sport anglers on the Nushagak for 6 seasons. Myself, my management, and our clients from all over the world invest lots of time and money in participating in this world-class fishery. We all have a very vested interest in continuing the healthy runs of king salmon on the Nushagak system, Alaska's greatest king salmon sport fishery.

Our techniques already voluntarily focus on "best practices" where catch and release fishing on king stocks is concerned. I would say that 99% of the time we are fishing de-barbed single point hooks on our spinners and plugs.

With regards to bait, we very seldom see deep hooked fish and when we do, we encourage retention if there is room on the angler's card.

Bait is an important tool to get our clients' fish on days when the fishing is slow, particularly after a commercial opener down in the bay. Taking this away from us would dramatically affect our clients' angling experience on those days.

Please do not restrict us further as the economy has already done that to our customer base.....I would estimate there are at least 40% fewer boats/anglers/ and camps operating than when I first started guiding in the '07 season.


Best regards,

Brian O. Lull
USCG 25GT Master
Licensed Alaska Sportfishing Guide #8434
206-331-8719
Seatac, WA



To: Monica Wellard, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish & Game

Date: November 7, 2012

 From: Commercial Fisheries Entry Commission
Bruce Twomley, Chairman
Benjamin Brown, Commissioner

Subject: Proposals to the Board:
2012/2013 Bristol Bay Finfish meeting.

This memorandum provides comments by the Commercial Fisheries Entry Commission (CFEC) on proposals that the Alaska Board of Fisheries (Board) will consider at their December, 2012 meeting in Naknek.

In addition to this memorandum, CFEC has submitted two reports that we anticipate will help the Board in their deliberations. The reports are, respectively:

CFEC Permit Holdings, Harvests, and Estimated Gross Earnings by Resident Type in the Bristol Bay Salmon Gillnet Fisheries; CFEC Report No. 12-04N. A report with summary information on changes in the distribution of Bristol Bay permit holdings that have occurred since 1975, along with time-series statistics on harvests, earnings, and participation in both the drift and set gillnet fisheries.

Bristol Bay Set Gillnet Permit Stacking; CFEC Report No. 12-02N. A report providing data on some of the changes that have occurred under regulations that allow Bristol Bay set gillnet permit holders to hold and fish two CFEC entry permits.

We submit the following comments to help the Board in their deliberations. Although we are not taking positions on these proposals at this time, we are, as always, interested to hear different perspectives on the proposals, especially those that address restructuring options. We appreciate hearing about both the problems and the benefits of regulations, and on how they might enhance efficiency, quality, fishery management, and resource conservation.

Proposal 24 and Proposal 25

Proposal 24 seeks to allow the use of seine nets for Bristol Bay drift gillnet permit holders who hold two permits. Proposal 25 suggests a new troll fishery for coho salmon.

In general, CFEC sees no conflict from the standpoint of limited entry if the Board allows an alternate gear in a fishery, provided that the privilege of using the gear in that area is not already allocated to another limited entry fishery. This is consistent with what CFEC has said in the past.

Considering this position, Proposal 24 would not raise issues, but Proposal 25 would present a problem. Hand and power troll permits are issued as statewide permits, and can be used wherever the Board allows trolling. To create a permit for trolling only in Bristol Bay, CFEC would have to open its own regulatory proceeding to determine if Bristol Bay should represent a separate troll area from the current statewide designation. Although CFEC would carefully consider the Board's rationale and deliberations if the new fishery was authorized, it is possible that CFEC could reach a different conclusion than the Board with regard to the proposed fishery.

We also note that Proposal 25 mentions the proposed fishery would "allow Bristol Bay residents to troll for coho." We are unsure if this clause suggests the new fishery should be for the exclusive use of individuals who live in the Bristol Bay region. If that is indeed the intention of the proposal, we note this would not be possible under state law.

Proposals 39, 40, 41, 42, 43

These proposals each address the use of dual permits on drift gillnet vessels.

In general, CFEC has helped disseminate the idea of dual permit operations as an option for restructuring Alaska's salmon fisheries.¹ In typical dual permit operations, two permit holders fish concurrently on one vessel. The vessel is then allowed to deploy more gear than a single-permit operation, but less than two full complements of gear.

Under some conditions, dual permit regulations may serve as an important means of fleet consolidation, and to reduce fishing effort. The dual permit option also provides a means for an entry-level person to participate in the fishery without incurring the costs of obtaining a boat and other gear. To the extent that each of these results may help sustain the long-term economic viability and conservation of the fishery resource, CFEC supports such options.

Proposals 36 and 37

Proposals 36 and 37 each contain elements of what CFEC refers to as "permit stacking" rather than the typical "dual permit" option. In a permit stacking operation, a single permit holder is allowed to increase the amount of gear they can fish by holding two separate permits (contrasted with a dual permit option, which involves two persons fishing together, each holding their own permit). Permit stacking is currently allowed in the Bristol Bay set gillnet fishery.

With respect to Proposals 36 and 37, we urge caution. These proposals would allow permit stacking in the drift gillnet fishery. As written, one permit holder, fishing two permits, would be allowed to deploy

¹ For example, see *Outline of Options for Fleet Consolidation in Alaska's Salmon Fisheries*. A special report prepared for the Governor's Salmon Forum. Commercial Fisheries Entry Commission; December, 1998.

200 fathoms of drift gillnet. As it currently stands, a drift gillnet permit holder fishing independently (not as a dual) is allowed a maximum of 150 fathoms of gillnet.

We acknowledge the potential benefits of gear reduction in these proposals. However, we also note that these proposals stray from the second prong of reasoning that supports the traditional dual permit option – that of providing a lower-cost means to enter the fishery.

Proposals 35 and 36 would create new markets for limited entry permits, possibly increasing demand and raising prices for permits. There is evidence that permit stacking may have resulted in higher permit prices in the set gillnet fishery.² CFEC data also indicates a drop in the number of new entrants (persons who participate for the first time as a permit holder) in the set gillnet fishery after permit stacking was implemented.³ Moreover, obtaining a second permit for a stacked operation would tend to favor individuals who have easier access to financial capital.

We also ask that the Board consider the implications of using permits obtained by emergency transfer as the second permit in a permit stacking option. Data from the set gillnet fishery indicates a substantial number of stacked permit operations are formed by obtaining the second permit from an individual who emergency transfers to the main operator.⁴

Proposals 44 through 54

These proposals address permit stacking in the set gillnet fishery. As noted, we have prepared a report with data that will illustrate several considerations with regard to permit stacking in Bristol Bay.

Also noted above, we urge caution with regard to permit stacking options. Unlike dual permit operations (as in the drift gillnet fishery), regulations that allow one person to fish a full complement of gear for each permit they hold does not fulfill the goals of reducing gear in a fishery. Moreover, there are other considerations, such as the effects on permit prices, the effects on latent (unused) permits, the outcome on persons seeking to enter the fishery, and the consequences of using permits obtained through emergency transfers that should be considered. Each of these considerations is outlined in our report, which we respectfully submit.

Please also consider that despite our general concern for the concept of stacked permit options, we also defer to the opinions of the Department of Fish and Game for their consideration of the possible benefits that stacked permit fisheries may provide to effective management of the fishery.

² See Gho, Marcus; *Bristol Bay Set Gillnet Permit Stacking*, CFEC Report No. 12-02N.

³ *ibid.*

⁴ *Ibid.* CFEC data indicates that in 2010 and 2011, 43% and 19% of the respective stacked permit operations in the set gillnet fishery involved at least one permit that was obtained through an emergency transfer.

November 7, 2012

ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

PROPOSAL 239 – 5 AAC 67.022(g)(6). Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

Dear Sirs,

Please consider modification to Proposal 239-5AAC 67.022(g)(6)
"SUPPORT AS AMENDED"
Support "Single Hook"
Oppose "No Bait"

The King is becoming a species of concern throughout Alaska waters. We are blessed it has a healthy population returning to the Nushagak.

Fish and Game has done an outstanding job of managing the King Salmon Escapement **through provisions in the Nushagak Mulchatna King Salmon Management Plan**. The Plan was adopted for the assurance of the best long term survival and health of the Kings.

Single Hook Provision:

I am in favor of eliminating treble hooks and going to single hook only for the entire Nushagak Mulchatna watershed. We have only used single hooks for many years at our Sport Fishing Camp on the Nushagak River. The (NMKSMP) is our best chance for success. It can be tweaked and the single hook requirement is a big step in the right direction for improving management.

The mortality rate associated with catch and release King Salmon fishing is very low,

Use of single hooks will lower that mortality rate.

The catch and release mortality rate was factored into the allocation for Sport fishing when the Nushagak – Mulchatna King Salmon Management Plan was negotiated between sport fishermen and commercial fisherman. Reducing mortality by adopting single hooks is a sound management tool.

No Bait Provision:

I am not in favor of No Bait as that management tool already exist as Emergency Orders In the Nushagak Mulchatna King Salmon Management Plan. It is already implemented when needed but only when needed.

Restricting ALL use of Bait in Sport fishing on the Nushagak is not the answer to the long term health of the King Salmon Escapement on the Nushagak River.

The sport fishing industry needs the opportunity to catch fish. In high dirty water without bait we lose that opportunity.

During the run the Kings come in waves. A large escapement one day can be followed by low escapement the following 2-4 days. The catch rate drops off significantly on the down days. Eliminating bait would dramatically effect an anglers ability to catch a king on the low volume days.

Eliminating bait would affect all of the local Dillingham anglers who fish the Nushagak and almost all use bait. With only a limited day or two to catch Kings on days of low escapement their opportunity to harvest kings is restricted without bait.

The Nushagak – Mulchatna King Salmon Management Plan and the ADF&G already has the ability to restrict bait and has used that restriction the past several seasons and many times throughout the history of the NMKSMP.

The temporary or total elimination of bait by the AK Department of F&G is a part of the (NMKSMP) through Emergency Orders when numbers are down, and the Escapement is uncertain. That conservation measure already exists as a management tool.

It is not necessary to alter the allocation by implementing no bait during times it is not needed as a management tool. Without the use of bait the allocation will be reduced substantially.

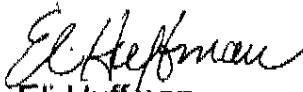
The restriction of bait should not be used as a allocation tool. The Nushagak King Salmon allocation is clearly outline in the (NMKSMP).

Sport fishing is allocated 5,000 Kings...Due to the depressed economy that harvest allocation is probably closer to 2,500 as attendance on the Nushagak have been reduced by approximately 50%.

Our business has barely survived the economy over the last 4 years please do not place this restriction on our guests and neighbors on the Nushagak. The mortality rate due to use of bait on single hooks is a very low number.

Thank you for your consideration.

Respectfully,



Eli Huffman

Owner Operator

Nushagak Salmon Camp LLC

Sport Fishing Guide and Buss license 17522

USCG License # USA0000499903

www.jakesalaska.com

866-692-9085

October 29, 2012

RE: SAAC 06.333

Dear Board of Fisheries:

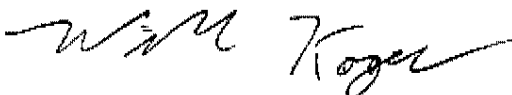
Hi my name is Will Koger I am a 3rd generation Bristol Bay Commercial Drift Fisherman and I have fished the bay for the last 22 consecutive seasons. I have Owned and fished F/V Annie for the last 12 years.

Over the years Bristol Bay has become an overcrowded and cutthroat fishery; however I feel that this can be corrected. There are currently 1800 permits fishing Bristol Bay this number exceeds the Entry Commissions optimal survey number from 2005 of 900-1400 permits. I feel that if the Board of Fisheries was to allow permit holders to put 2 permits in their name this would naturally reduce the number of boats fishing the Bristol Bay waters, and get in the range of what the optimal number suggested. Currently only a setnet fisherman can have 2 permits in their name, this has been a big help to these fisherman and the same benefit should be extended to the driftnet fisherman.

By allowing these fishermen to put 2 permits in their name, it will not only benefit the overall sustainability of the fishery, but would also be a benefit to the set and drift fisherman as this would reduce the overall amount of gear in the water by 100 fathoms per dual permit holder. I do not see any negative impacts to allowing both the setnet and driftnet fisherman to stack permits, I also believe that this would help with the management of the fish and game department.

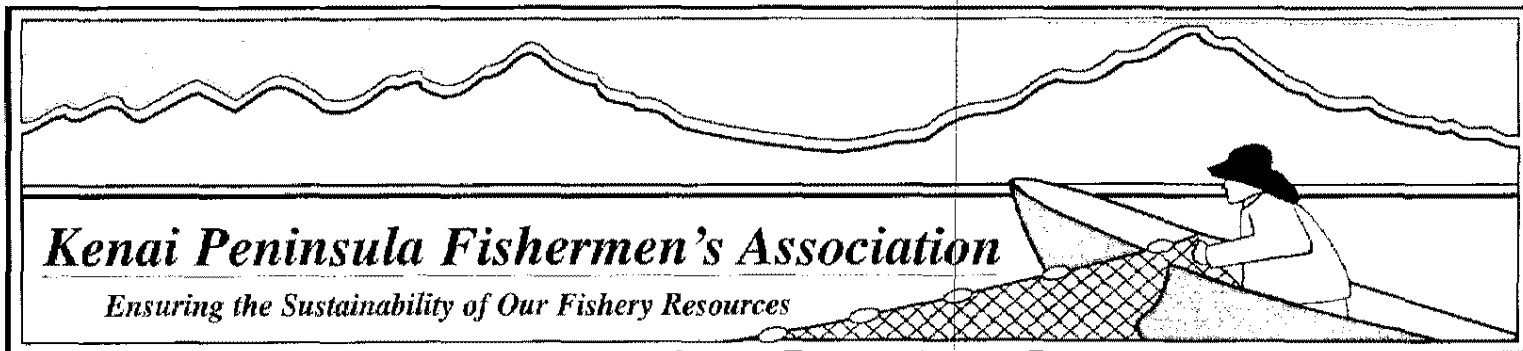
This is one of the most important issues being addressed by the Board and is why I am sending my first ever letter asking that you take careful consideration as this could have a beneficial impact to the Bristol Bay fishery for years to come. I feel that this change would receive great support from both the set and gill net fishermen alike. Once again thank you for your careful consideration of this matter.

Sincerely,



10-29-12

Will Koger
F/V Annie
3840 Railway Ave
Everett, WA 98201
360-770-7480
wkoger@yahoo.com



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276
(907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

October 24, 2012

State of Alaska
Department of Fish & Game
Board Support
PO Box 115526
Juneau, AK 99811-5526

Chairman Johnstone,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954. Primarily comprised of setnet salmon limited entry permit holders, we also include other Cook Inlet (CI) gear types, crewmembers, fish processors, local businesses and general interest in our membership.

Our Association represents salmon setnet permit holders from Kachemak Bay to the Susitna River flats, to the Westside of CI, Kalgin and Fire Island, the north shore of the Kenai Peninsula and the East Side beaches of the central district.

The decision to form a "task force" and a Board Generated Proposal (BGP) as a result of Record Copy (RC) 24 has resulted in many questions from stakeholders on how this committee will be constructed. We have received several conflicting notices relative to this meeting that have different definitions of the makeup of the committee. There has been some confusion on just how many individuals will comprise this group and just what interests will be represented. We would request that the Chairman and committee co-chairs issue a letter to the public defining the actual total number of seats and the associated representation groups assigned to these individual seats.

KPFA would like to offer our assistance in facilitating this taskforce;

Our Association has regular monthly and several committee meetings within the year and an annual membership meeting in June of every year. Board members are selected and voted in on the approval of the entire membership present at this annual well noticed event. Our by-laws require us to have seven board members with two alternates. The directors are chosen as representatives of many areas within CI beaches. Currently we have two representatives from the Ninilchik statistical (stat) area, one from the Coho stat area, one from the South K-Beach stat

area, two from the North K-Beach stat area and three from the Salamantof stat area. We believe that the membership selects these representatives because they are knowledgeable of the conditions and situations on their selective beaches and their ability to be accountable and available to the membership which again are defined as setnet fishing families from the entire CI region.

KPFA feels strongly that our board directors should be included as setnet representatives on this "task force", or at the very least, members from our Association.

Please feel free to contact our office at any time.

Respectfully,

Robert V. Williams,
President

cc Governor Sean Parnell, Commissioner Cora Campbell, ADF&G Directors Jeff Regnart, Charles Swanton, Representative Seaton, Representative Chenault, Representative Austerman and Representative Olson, Senator Steven, Senator Giessel, Kenai Peninsula Borough Mayor Navarre, Mayor Porter, Mayor Micciche, Stefanie Moreland Fisheries Advisor to the Governor

ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094



Katmailand
Inc.

Re: Proposal 239 - Limit sport fishing in the Nushagak River to un-baited, single hook lures.

This comment is in opposition to the above referenced proposal.

It is unnecessary because:

1. The ADF&G already has the ability to restrict the use of bait, in the Nushagak/ Mulchatna King Salmon Management Plan (NMKSMP).
2. Nor is it a conservation issue because The Department has the tools outlined in the NMKSMP, including, as I previously mentioned, the ability to restrict the use of bait.
3. The restriction of bait is not an allocation issue. The Nushagak King Salmon allocation is clearly outline in the NMKSMP.
4. The mortality rate associated with catch and release King salmon sport fishing has already been factored into the allocation for sport-fishing when the NMKSMP was negotiated between sport and commercial fishing.

It places an undue on sport fishermen as follows:

1. The sport fishing industry needs the opportunity to catch fish. In high and dirty water, that opportunity is lost without bait.
2. Local resident's opportunity to catch fish would also be negatively impacted. Most use bait and have limited days off in order to catch Kings.
3. On the Nushagak River the King Salmon escapement comes in unpredictable waves of fish. One or more days of large escapement may be followed by one or more days of low escapement. Eliminating bait would dramatically affect an angler's ability to catch fish if his only "fishing window of time" happens to be during a low volume period, during a period of "off color" water or both.

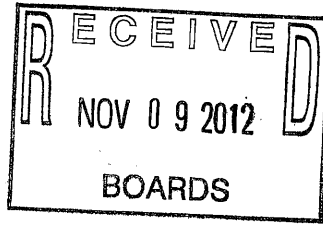
Thank you for the opportunity to comment

Sincerely,

Sonny Petersen
Owner, Katmailand Inc., Kulik Lodge, Brooks Lodge, Katmai air

Located in Katmai National Park

Websites: www.katmailand.com or www.bear-viewing.com • E-mail: info@katmailand.com
4125 Aircraft Drive • Anchorage, Alaska 99502 • 907-243-5448 • Toll-Free Reservations 800-544-0551 • Fax 907-243-0649
BROOKS LODGE • KULIK LODGE • GROSVENOR • KATMAI AIR • KATMAI-BRISTOL BAY FIRE



November 9, 2012

Members of the Board,

I on behalf of myself and children have two subjects I would like to address regarding the Bristol Bay proposals.

- 1) Dual set net permits Proposal 44-54. I am opposed to one person owning and operating two set gillnet permits in Bristol Bay. I believe that this provision will result in the consolidation of permits in the hands of fewer and fewer people. That it will reduce the number of permits owned and operated by non Bristol Bay and non Alaskan residents and that it will make it more difficult for new and especially younger people to enter the Bristol Bay salmon fishery. The price of set gillnet permits has increased since the 2009 board decision that allowed dual operation of set gillnets. I believe that more and more operations will become dual operations if the regulation is not changed. More and more participants will buy two permits and run dual operations to be competitive and because it is more economical. By the time my children are old enough to buy into the fishery they will need to buy two permits and two sites because most operations will be that way. This will be a significant additional barrier to entry especially for local residents. It is important for local residents to continue as participants in this fishery if the Bristol Bay salmon fishery is to remain an integral part of the Bristol Bay community.

- 2) Board Generated Proposal 239: I oppose this proposal. I am concerned that the Board generated its own proposal dealing with the use of bait for sport fishing on the Nushagak River. The Nushagak Mulchatna king salmon management plan is a very complicated and in depth plan. For the board to address one user group's use without considering all user groups together concerns me. For this proposal to be generated by the board and not appear in the proposal book also concerns me. The sport fishery on the Nushagak River is one of the most regulated and restrictive sport fisheries in the state already. Why does it need to be more restrictive when there is no biological concern? The state already has the ability to restrict the use of bait if there are biological concerns why should the board do it in the absence of concern. No user submitted this proposal. The locals who know the issues and concerns the best didn't feel this was necessary why does the board? This proposal is very troubling and the manner in which it comes to the board is equally troubling. There is a balance to the current management plan I urge the board to consider that balance and all the user groups that harvest this resource before they put further restrictions on a single user group. In addition the idea of restricting the fishery to single hook only is also troubling. This will surely result in tickets for locals that fish for resident species. Most lures come with treble hooks and the large quickfish used for kings are balanced to work with two treble hooks. Locals fishing for pike all have lures with treble hooks. I think this is a bad idea especially after I talked to the local sport fish biologist and he told me there is no clear evidence that treble hooks are worse than single hooks. Single hooks can be swallowed deeper and have a higher potential of a mortal gill injury than treble hooks do.

Laurel Sands, Sadie Sands, and Sawyer Sands

November 9, 2012

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Laurel Sands, Sadie Sands, and Sawyer Sands



Katmai Air, LLC

ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

Re: Proposal 239 - Limit sport fishing in the Nushagak River to un-baited, single hook lures.

This comment is in opposition to the above referenced proposal.

I feel that this proposal is unnecessary because:

1. In the Nushagak/ Mulchatna King Salmon Management Plan (NMKSMP), the ADF & G already has the authority to restrict the use of bait in years or periods of low escapement numbers. With this authority and other tools specified in the NMKSMP this is clearly not a conservation issue.
2. This is also not an allocation issue. The Nushagak King Salmon allocation for sport fisherman is already specified in the NMKSMP. This allocation includes the mortality rate for catch and release fishing by the sport fishing industry.

It places an undue burden on sport fishermen as follows:

1. In high and dirty water, the use of bait greatly increases the chances of catching fish; and the sport fishing industry needs the opportunity to catch fish.
2. Local residents also need the opportunity to catch fish and without the use of bait this opportunity would be diminished. Some, if not most residents have a limited amount of time to pursue King Salmon and the use of bait greatly increases their chances of catching these fish.
3. The King Salmon escapement on the Nushagak River comes in highly unpredictable "waves" of fish. Some days have a large escapement and some days have a low escapement. The elimination of bait would drastically reduce angling success on low escapement days.

Thank you for the opportunity to comment.

Sincerely,



Pete Raynor
Kulik Lodge Manager
907-243-5448
pete@katmailand.com

Alaska Board of Fisheries
Juneau, Alaska

11/9/2012

Dear Sirs,

I am offering comments regarding board proposal 229. The proposal has two provisions aimed at protecting king salmon returning to the Nushagak river.

I am in favor of the section of the proposal which requires the use of single point hooks. Since many of the sport caught kings are landed and released, it is imperative that they be unhooked and released in a timely manner. Single hooks make this much easier and quicker with minimal harm to the fish.

The second provision regarding no bait I am opposed to. In my experience guiding anglers on the river and releasing thousands of fish, I have seen very few that were hooked deeply using single hooks and bait. Of the very few that were bleeding, most were retained by the anglers.

The Nushagak-Mulchatna King Salmon Management Plan already allows ADFG to restrict the use of bait using an Emergency Order if deemed necessary. A total ban on bait use would adversely impact the catch rates of local and visiting sport anglers. Sport fishing in Alaska and on the Nushagak especially, has already been crippled by the current recession. Many camps on the river have been closed due to a lack of clients. This proposed no bait provision would be just another unnecessary nail in the coffin for the remaining businesses.

Thank you for your consideration of my comments.

Sincerely,

Ron Smith
Sport Fishing Oregon
29356 Vera St.
Gold Beach, Oregon 97444



***Southeast Alaska Subsistence
Regional Advisory Council***

**Bertrand Adams Sr., Chair
P. O. Box 349
Yakutat, AK 99689**

kaadashan@alaska.net

October 9, 2012

RAC SE12016.RL

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

Dear Mr. Johnstone:

The Southeast Alaska Subsistence Regional Advisory Council, met in Sitka September 26-28, 2012. At that meeting, the Council considered a proposal from the Sitka Tribe of Alaska to close Federal public marine waters near Mahknati Island to non-subsistence uses. The Council did not support that proposal, partly based on the action by the State Board of Fisheries to close nearby areas to commercial fishing. However, the Council is concerned for the overall health and management of herring stocks in this region.

The Council supports the Agenda Change Request to add herring to the list of species in the State's Forage Fish Management Plan. Herring are clearly the most important forage fish in this region and should be included in the plan. The Council is not opposed to commercial fisheries where appropriate and is supportive of accurate stock assessments and formulation of management plans formed through collaboration with all the stakeholders.

Please address any questions regarding this request either directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, AK 99833, 1-907-772-5930, robertlarson@fs.fed.us.

Sincerely,

Bertrand Adams Sr., Chair

Karl Johnstone

Pg.2 of 2

Oct. 09, 2012

cc: Peter J. Probasco, Office of Subsistence Management
Beth Pendleton, Forest Service Regional Forester
Interagency Staff Committee

Don Alvarado
725 Palm Haven Ave.
San Jose, Ca. 95125
SN Permit 57399
Nov. 7, 2012

Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RECEIVED
NOV 13 2012
BOARDS

My name is Don Alvarado and I have been set netting in the Naknek Kvichak District since 1981. Please consider my comments on a number of the Bristol Bay Proposals when discussing and making decisions for the upcoming commercial cycle. Thank you for your time and work on these complicated and far reaching series of proposals.

#15 Set netting is a very arduous business and this proposal intends to limit the participants to only registered site owners. As set netters we have to be fluid and at times and parts of the tide there may be better fishing off a registered site. It is very hard and impractical to have to remove stationary gear. Please reject #15.

#18 Any proposal that looks to shorten the distance set netting from shore down to 600 feet is not fair to that group of set netters. The bay shore is constantly changing and often 1000 feet is still a muddy mess. Please reject # 18.

#21 and #22 refer to set net gear identification. Set net buoys and anchor balls are just barely large enough to follow the current rules. With a name like "Alvarado" I would have to find gear that would be bigger than my boat. These proposals are not practical and unnecessary.

#23 I would be in favor of this proposal if it also included set net gear. The numbers constantly wash away for us because we use the same nets over and over again.

#24 Any fishery that is created complicates the current escapement management and allocation numbers. Please reject this seine net proposal.

#32, 33, 34, 35 Each proposal book has drift requests to get larger boats in to the waters. I like the current tradition of 32 feet and feel that as an enforcement and management component it is the most fair rule. Please reject all four proposals.

#44 through 54 address the soon to sunset dual set net permits for a single permit holder. I know several set netters that through economic necessity are using this dual ownership. I see no reason to take this away. Many families are able to retain

ownership using this dual system. Please repeal the sunset clause and allow dual ownership.


#58 through 61 concern the infamous General District tried a few seasons ago. I see no advantage to these proposals. As a set netter in the Kvichak District many seasons have seen a high level of interception that has kept the Kvichak escapement from being reached. There is not enough data to disprove that these "outer districts" are not intercepting Kvichak fish. Please reject all of these proposals.

#66 is asking to remove the set and drift allocations. I have seen my set net fishing time improve dramatically with the implementation of allocation some years ago. Without allocation those of us on the Kvichak would be the "last to get fish" and the drift fleet would be free to harvest more than their fair share. Please reject #66.

#67 is asking to stagger fishing periods. I think the management of the runs by Fish and Game is masterful. I do not believe that a set system would work. Let F and G do their work and do not bind them with a set schedule. The fish do not know how to read. Please reject #67.

#67, 69, 70, 71, 72 seem to asking for a place to fish for specific groups while the rest of the NN / KV District is either at their escapement goal or nearing their goal. I do not feel that these minimum goals should mean wide open fishing in those tiny areas. Please stay with the existing regulations and reject these proposals.

Sincerely Submitted,


Don Alvarado

179 Wilson Height
Kalispell, MT 59901
November 2, 2012

RECEIVED
NOV 13 2012
BOARDS

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Dear Sirs and Madam:

I am very displeased with the attempt by the Nushagak Advisory Committee to try to eliminate my rights as a Bristol Bay Permit Holder. I am against the recommendation to eliminate the Nushagak Allocation.

As you know, the Nushagak Advisory Committee is very lopsided in membership, as there are eleven driftnetters and only one setnetter.

If allocation is eliminated it will have a very detrimental effect on setnetters.

Thank you for your consideration on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "George C. Eckley", with a long horizontal line extending to the right.

George C. Eckley
Bristol Bay Setnetter

406 Hawthorn Avenue
Kalispell, MT 59901
November 2, 2012

RECEIVED
NOV 14 2012
BOARDS

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Dear Sirs and Madam:

I stand opposed to the recommendation by the Nushagak Advisory Committee to eliminate the Nushagak Allocation.

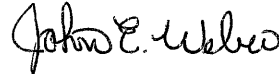
If the Nushagak allocation is eliminated, it will have a very detrimental effect on setnetters.

I believe the composition of the Nushagak Advisory Committee (eleven driftnetters and one setnetter) reveals the motivation behind this recommendation. I also believe this recommendation fails to comply with the intent of established Regulations, such as the one below.

AS 16.05.251.(17).(d) Regulations adopted under (a) of this section must, consistent with sustained yield and the provisions of AS 16.05.258 , provide a fair and reasonable opportunity for the taking of fishery resources by personal use, sport, and commercial fishermen.

Thank you for your consideration on this matter.

Sincerely,



John E. Weber
Bristol Bay Setnetter

RECEIVED

NOV 14 2012

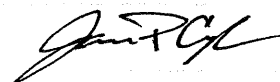
NOV 5, 2012

B.O.F. Members, I am a drift fisherman in Bristol Bay. There are 3 proposals I would like to comment on.

Proposal 12, I support this proposal. A 50/50 split in the Togiak herring quota would inevitably allow more gillnetters to participate in the fishery. This is especially important to the gillnet fleet as our boats are far less adaptable to other fisheries than purse seine vessels which are typically larger with more useable deck space. The only fishery other than salmon we can reasonably participate in is the Togiak herring gillnet fishery.

Proposal 36, I support this proposal. The miles of fishing gear removed from the water since the current dual permit rule was established has noticeably improved the fishery. Continuing to find and pay for a permit to lease is causing quite a financial burden on my family. Worry over finding and financing a second permit every year is a stressful event, therefore, I feel this rule should be retooled to allow AK. residents and non-residents alike the ability to operate 2 drift permits (as set netters have for 3 seasons) and retain control of their entire fishing operation.

Proposal 43, I do not support this proposal. I typically fish in the Togiak area about 1 year out of 3. I would hate to see dual permit holders "split up" permits thereby bringing 2 boats and 300 fathoms of net to the district rather than 200 fathoms. This proposal risks adding not subtracting gear from the Togiak district. Thanks for your time,


JAMES COYLE

F/V Signe Lind

Public Comment #20