

November 16, 2012

Attn: BOF COMMENTS
Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
FAX: 907-465-6094

Members of the Board:

My name is Gayla Woods, I am a lifelong Alaska Native woman living in Bristol Bay. I am an active subsistence fisher and harvest salmon in the Nushagak district. My family and I love fishing subsistence fishing on Kanakanak Beach during the summer months.

My written comment is on:

Proposal 1 – 5AAC 01.310. Fishing seasons and periods: Support
Changing the day of the week from Friday to Saturday will give the subsistence harvesters the ability to harvest and process their fish on the weekend as well as during the work week. Revising the fishing schedule to 9:00am Monday to 9:00am Tuesday, 9:00am Wednesday to 9:00am Thursday and 9:00am Saturday to 9:00am Sunday would benefit many residents in the Bristol Bay area.

Thank you for accepting my written comment.

Sincerely,



Gayla Woods
PO Box 315
Dillingham, AK 99576



Kvichak River, Alaska • www.fishasl.com

907.276.7605 PO Box 231985 Anchorage, AK 99523

November 14, 2012

ATTN: Bristol Bay BOF Comments
Board Support Section
Alaska Dept. of Fish & Game
P.O. Box 115526
Juneau, AK 99811-556

Members of the Board,

My name is Brian Kraft and I am the owner of two lodges in the Bristol Bay drainage. Alaska Sportsman's Lodge is on the Kvichak River and Alaska Sportsman's Bear Trail Lodge is on the NakNek River. I have been in business since 1992.

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

I oppose Proposal 239.

This is a "feel good" proposal that is not based upon any actual science or observations of the fishery. The escapement goals of the Nushagak King runs have been strong with the exception of 2010. The stock is healthy and therefore this proposal is unnecessary. The biological gain for the fishery should this proposal be accepted is small and basically immeasurable by ADF&G. Here are the numbers based upon the ADF&G data. My scenario below will use a unintended mortality of released Kings of 10% which is almost 3% higher than the mortality results of the Kenai River study on Kings that die after being released (that study found a 7.6% mortality).

Current number with the use of bait

Total number of fish caught including kept	40,000
Total number Kept	6,000
Total number released	34,000
10% mortality	3,400

Assumption of catch with no bait

Total number of fish caught including kept	20,000
Total number Kept	6,000
Total number released	14,000
10% mortality	1,400

Difference equals 2,000 fish. This number is potentially smaller than the number of missed fish on the sonar count as well as being smaller than the dropout mortality of kings in the commercial fleet. This proposal ignores the fact that although the sport fishery is a highly visible endeavor, it is also the group that has the smallest impact on the biological gain or loss of the fishery.

The sport fishery already has conservation measures that help insure that the caught and released fish survives. We do not take the fish out of the water if it is not going to be retained.

The ComFish will argue that they have conservation measures that restrict them and therefore the Sport Fish industry must do its share as well. The argument has no merit since the Com Fishery has the ability to severely adverse the escapement numbers based solely on the size of the fleet and number of set netters. It is not their fault and I am not trying g to pick a battle with Com Fish, but it is the reality. The Com Fish fleet intercepts and unintended takes more than 10 times as many Kings as the sport fishery. That is the reality and thus the Com Fishers play a much bigger role in the ability of enhancing or adversely affecting the run. I do not begrudge the Com Fishers the opportunity to fish or make a living. Proposal 239 does not actually do anything to ensure that the minimum escapement goals are met each year.

Alternative options:

There are methods by which the sport fish industry can enhance the probability of hooking the King in the jaw rather than in the gill or deep in the throat. The hook location seems to play a much bigger role in mortality than the sheer numbers of fish caught. The department should study commission a study of how to properly rig lures and bait to determine the best gear requirements to achieve the goal of lessening unintended mortality of caught and released Kings.

BRIN KRAST
AZASICA SPORTSMAN'S LODGE

PROPOSAL 3 - 5 AAC 67.022(x) Special Provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

I Support Proposal 3 and would like to amend to also include that an angler is not allowed to remove a fish from the water that they intend to release.

It is essential that our resident fish remain healthy and physically in good shape. There is an economic factor with this in that the sport fish business attracts anglers from all over the state and the world. These anglers incur great expense to visit Bristol Bay in an attempt to catch health fish. This willingness to pay will vanish if our fish physically become impaired due to barbed hooks. The barbed hook does not necessarily cause mortality, however, it does potentially require a longer time frame for the fish to be handled once caught. This can result in loss of scales, and potentially further harm to the fish and even could result in the fish not surviving because it was out of the water. This is also a conservation enhancement issue as more fish will survive after being released and thus the quality of the anglers' experience will be enhanced as well.

PROPOSAL 4 - 5 AAC 67.030. Methods, means, and general provisions - Finfish.

Prohibit putting fish parts in water where use of bait is prohibited as follows:
Notwithstanding 5 AAC 75.995 (36), "bait" means any substance applied to fishing gear or placed in fresh water by a person for the purpose of attracting fish by scent, including fish eggs in any form, natural or preserved animal, fish, fish oil, shellfish, or insect parts, natural or processed vegetable matter and natural or synthetic chemicals.

I Support Proposal 4 and encourage the BOF to associate a severe penalty for those caught breaking this regulation. Guides should loose their license for 3 years to guide. Anglers should loose their right to fish for a year.

It is unethical and simply decreases the quality of the experience of the Angler to chum waters where bait is illegal. Chumming also has an adverse affect on fish as it alters their natural behavior and potentially causes tremendous harm to the fish through dependence upon chumming and being handled more through repeated catching's in a single day. These fish also become very aggressive once chumming starts and one must assume that they will take the egg imitation with a hook on it much deeper and thus the potential for mortality. Additionally, Chumming greatly diminishes the overall experience for the angler by actually taking away the sport of fishing for a resident fish that will be released. I completely understand the thrill of catching a wild rainbow Trout, however, we must do so in an ethical manner that minimizes the trauma to the fish.

BRIAN KRAT

ALASKA SPORTSMAN'S LODGE

3

Katmai Service Providers Inc.

An Organization of Commercial Operators in
Katmai National Park and Preserve
4125 Aircraft Dr. Anchorage AK 99502

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.

The Katmai Service Providers is a member organization of Lodges, Guides, and Air Taxi operators that own businesses that operate in the Katmai National Park and greater Bristol Bay area. We currently have 40 active members in our organization. This group is the closest thing we have to an official sport-fishing organization in the Bristol Bay region. We have scheduled annual meetings as well as meetings whenever a member calls for one to discuss issues concerning our industry.

Katmai Service Providers Oppose Proposal 239

ADF&G already has the tools to manage the sport fish efforts on the Nushagak River. According to 5AAC 06.361 – **The Nushagak-Mulchatna Chinook Salmon Management Plan**. The Department can:

Reduce the bag and possession limits, reduce the seasonal bag limit, **prohibit the use of bait** and close the fishery to the fishing for Chinook.

Katmai Service Providers **support** the Nushagak Advisory Committees position to allow bait.

The intent of the proposal is to help insure that the Chinook run on the Nushagak remains healthy. The fishery is healthy; the Nushagak Mulchatna River Chinook Salmon Management Plan is working and provides the Department with the tools necessary to manage the fishery.

The sport industry has already taken steps to insure that the fishery remains strong: Regulations prohibit a Chinook from being removed from the water unless retained. Anglers can only take 4

DATE: November 16, 2012

FROM: Hodge's Outfitters, Jim Hodge Owner/Outfitter/Master Guide-13836 Lake Otis Parkway
Anchorage AK 99516 Ph# 907-349-0520 Fax # 907-349-4091

TO: Alaska Department of Fish and Game - Boards Support Section

ATTENTION: BOF COMMENTS

I **OPPOSE** Proposal 239-5 AAC 67.022(g)(6) only unbaited, single-hook, artificial lures may be used May 1 through July 31.

I have operated a sport fishing camp on the Nushagak River for the last 12 years. This river has been a well managed king salmon fishery and continues to produce the largest king salmon run in the world. That is due largely to the (NMKSMP) Nushagak-Mulchatna King Salmon Management Plan 5 AAC 06.361. Through that plan the ADF&G already has the ability to restrict bait and has used that restriction the past two seasons and many times throughout the history of the NMKSMP.

The sport fishing industry needs the opportunity to catch king salmon. In high murky water without bait, that opportunity is lost. The Nushagak King Salmon allocation is clearly outlined in the NMKSMP. The restriction of bait should not be used as an allocation issue. Additionally this is not a conservation issue as the AKDF&G has the tools needed for conservation as outlined in the NMKSMP.

The catch and release mortality rate was already factored into the allocation for sport fishing when the Nushagak-Mulchatna King Salmon Management Plan was negotiated between sport fishermen and commercial fishermen.

The Nushagak is a pulse fishery. The kings come in waves. A large escapement on day can be followed by low escapement the following few days. The catch per fisherman drops off significantly on the down days. Eliminating bait would dramatically effect an angler's ability to catch king salmon on the low volume days. Eliminating bait would also affect all the local Dillingham anglers who fish the Nushagak. Many times due to work, locals have a limited day of two to catch king salmon. On days of low escapement their opportunity to harvest king salmon is restricted without bait.

There are stories from the local fishing magazine, FISH ALASKA, about anglers catching upwards of 100 kings per day. That number is greatly exaggerated. High catch rates are associated with a very large daily escapement.

The mortality rate associated with catch and release King Salmon fishing is less that the dropout rate in the commercial fishery when using sockeye gear. The kings get tangled in the gear and drown and when the net is being retrieved the net straightens out and the kings go to the bottom of the bay.

I would be in favor of eliminating treble hooks and double hook sets as a compromise.

Again I would like to reiterate the fact that the Nushagak-Mulchatna King Salmon Management Plan used by the ADF&G provides all the tools necessary for managing that fishery with regard to catch and release mortality rates, escapement, bait restriction and allocation issues.

November 15, 2012

ATTN: Bristol Bay BOF Comments
Bristol Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

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

Members of the Board,

Thank you for the opportunity to comment as I am unable to attend the meeting in person due to the logistical challenges of timing and location and previously committed business.

I OPPOSE 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 for the Following Reasons:

1. According to, 5AAC 06.361. NUSHAGAK-MULCHATNA CHINOOK SALMON MANAGEMENT PLAN, The Department already has the ability to:
 - a. Reduce bag limit and possession limits
 - b. Reduce season limits
 - c. Prohibit the use of bait
 - d. A closure of the salmon sport fishery
2. The **Catch and Release Mortality** rate was already factored into the allocation for sport fishing when the **NUSHAGAK-MULCHATNA SALMON MANAGEMENT PLAN** was negotiated between sport fisherman and commercial fisherman.
3. The Restriction of bait should not be used as an allocation issue. The Nushagak Chinook Salmon allocation is clearly outlined in the **NUSHAGAK-MULCHATNA CHINOOK SALMON MANAGEMENT PLAN.**
4. There is no evidence cited or data presented that supports the theory of single hook baits having a higher mortality rate than single hook lures.

5. High catch rates are associated with a very large daily escapement. The volume of Chinooks can be so large that the mortality rate associated with a catch and release fishery does not have an impact.
6. The Sport Fishing industry needs every opportunity to catch fish. In dirty water without bait, which is common on the Nushagak River, we lose that opportunity.
7. Eliminating bait would affect all of the local Dillingham Anglers who fish the Nushagak River. In most cases, the local community has limited access or opportunity to fish the Nushagak River for Kings. On the days of low escapement their opportunity to harvest Kings is greatly restricted or reduced without the use of bait. Most all of the Dillingham anglers who sport fish use bait.
8. The Nushagak run of Kings come in waves. A large escapement one day can be followed by a low escapement the following three days. The catch rate per unit drops of significantly on the down days. Eliminating bait would dramatically affect an angler's ability to catch kings on the low volume days.
9. The Nushagak River has the most prolific Chinook Salmon fisheries in the world. It also has the least amount of sport fishing pressure when compared to other systems across the state or country. There is no justification outside the guidelines of the **NUSHAGAK-MULCHATNA CHINOOK SALMON MANGEMENT PLAN** to accept this proposal.

I have worked at, or operated a small sport fishing camp on the Nushagak River for the last 29 years and believe that we all, Sport fisherman and commercial fisherman, should have the opportunity to catch King Salmon.

With the **NUSHAGAK-MULCHANTNA CHINOOK SALMON MANGEMENT PLAN** in Place and **Chogguing Limited** limiting the number of Sport Fishing camps and number of anglers on the river I believe that we (Sport Fisherman, Alaska Dept. of Fish and Game, BOF and Chogguing Limited) have done everything to insure that this King Salmon fishery will go on forever.

The sport fishing camps on the lower Nushagak River rely on the Chinook Salmon run. Sport Anglers come from all over the world to catch Nushagak River Kings and any reductions in the success of these anglers will reduce greatly the opportunity to attract or retain future business. Eliminating the use of bait will reduce the success rate and therefore negatively affect local Sport fishing businesses. The trickle down affect will impact the local economy by way of reducing the amount of tourist into Dillingham and supporting the local economy by way of Hotels, B&B, groceries, cabs, fuel, etc. Chogguing Limited will be also affected by less angler's results in less lease money supporting them. In a normal sport fishing season I spend upwards to \$40,000 in the town of Dillingham on fuel, supplies, air taxi's and local business. With a decline in anglers that will transpire into less money spent in the local economy.

The last three years the Sport fishery has seen emergency regulations placed on them due to low escapements. Several years ago we were shut down in the middle of the season which in turn resulted in a very large portion of the Sport Fishing camps shutting down or barely holding on to their business. If

you would ask **Chogguing Limited** there is **50% less anglers or use on the Nushagak River** then there **was just 5 years ago**. In the last two years we have our limits cut down to 2 fish per year for a part of the season. Now I support these emergency regulation changes due to low escapement levels, but I do believe that any other cutbacks on our Sport Fishing Businesses will have a dramatic result in providing a quality experience for my Customers resulting the possible closure of our business.

We all should be willing to make concessions, when necessary, to protect the long term sustainability of the run. We already do according to the guidelines outlined in the **NUSHAGAK-MULCHATNA CHINOOK SALMON PLAN**.

Thank You,

Robert Kratzer

From:

Corey Arnold

6930 SE Harold St.

Portland, OR 97206

Dual set net permit holder in the Kvichak District of Bristol Bay

To:

Attn: Board of Fish Comments

Boards Support Section

Alaska Dept. of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

Comments on the 2012 Board of Fish Proposals

#15 - Oppose

There are many setnet fishermen that do not have registered sites but fish in the same area tide after tide. They may pull their nets early, or skip a fishing period, and the amount of labor to unscrew every anchor just for a tide, then put them back is extremely labor intensive. It may also be impossible to reach the anchor of an outside bouy when the tide is not down to a minus. It is already only legal to have two sites marked per permit, so it is not as if set netters are leaving gear all over and not fishing it. Most are fished very regularly. I also see this damaging many of the native fishermen who I know many who cannot afford to aquire their own lease and therefore "homestead" a site each season. I don't see this as a regular problem so making a new law seems unreasonable.

#16 - Support

During large holdover low tides, many set net sites have a lot of water and continue to fish. My crew fishes in rotation and fishes completely through the low tides. Others pull their nets if they are going in for a break to avoid fish going dry on the beach. Set netters can self regulate and there is no need to force setter out during low water.

#21- Support as Amended

My set net buoys are not nearly large enough to have six inch numbers as well as my last name 6 inches tall as well. Most of the time, these numbers are half submerged anyway. 6 inches is too tall, I would support 4 inch tall letters, 1/2 inch wide but not 6 inch tall.

#22- Oppose

Every drift boat has binoculars on board. This is not a problem and is excessive. The wind is so strong at times in Bristol Bay that it is hard enough keeping a large plywood sign mounted firmly to the ground. Being forced to use 12 inch letters would triple the

size of our signs and more of them would be blowing over in the wind. I don't see 6 inches as an issue.

#23 - Support

It is perfectly reasonable to only have to mark one cork on each end of the net. Why do we need more than that? It doesn't make sense

#24 - No

This is an absurd idea and would lead to unfair advantages among the seiners. The infrastructure of the fleet is set up for gillnet fish. The water is shallow and extremely difficult to seine in, and hard to manage/manuever the net with the drifters.

#25 - Support

This would benefit local fishermen and have no ill affect on Sockeye gillnetters.

#33 - Oppose

Modern Bristol Bay boats have ample room for chilling fish and can still pack a huge load at 32 feet. The beauty of Bristol Bay is that the pie is sliced up so that a large quantity of small business can thrive. Once the size limits begin to grow, the larger and the wealthier fishermen will have a much greater advantage over the others. This will harm the competitiveness of Native fishermen and Bristol Bay locals who may not be able to afford these upgrades.

#34 - Oppose

Modern Bristol Bay boats have ample room for chilling fish and can still pack a huge load at 32 feet. The beauty of Bristol Bay is that the pie is sliced up so that a large quantity of small business can thrive. Once the size limits begin to grow, the larger and the wealthier fishermen will have a much greater advantage over the others. This will harm the competitiveness of Native fishermen and Bristol Bay locals who may not be able to afford these upgrades.

#35 - Oppose

Increasing the length of drift boats would give an unfair advantage to out of town fishermen who can afford expensive upgrades. Also, processors currently hardly have the ability to keep up with the amount of fish that arrive during peak days. There is no reason to dramatically increase capacity. Native and local fishermen will have an unfair disadvantage.

#36 - Support

This would keep slightly less net out of the water and increase the profits for them and all the other fishermen in the bay. It also will improve the profitability of early and late season fishermen who stay to scratch out more fish when the numbers are much lower. the following proposal is better stated, #37

#37 - Support

I agree with this well worded explanation. I believe the entire fleet, rich or poor, set net or drift will all benefit in a reasonable amount of consolidation. The congestion in the drift fleet is problematic.

#38 - Support

#37 is better explained, same result

#40 -Support

Not supporting this would have a negative affect on young fishermen who have purchased a permit and rely on the extra income percentage received to operate in a dual permit situation. This proposal is fair.

#44 - Support as Amended

I own two set net permits, and invested in two permits in order to optimize the overhead costs of my operation. Many set netters live in encampments in remote regions of bristol bay. Doubling the amount of gear in the water does not necessarily double the amount of overhead expenses needed to run a larger operation. As a result, I'm able to hire extra crewmen, and pay them a higher percentage, and maximize profits throughout the meager runs, and low price years. Previously fishermen that wanted to fish more then two permits would put one in the name of a trusted crewman anyway, Making dual permit ownership legal simply avoids the hassle of that practice.

important amendment Many dual permit holders use two skiffs and operate both at the same time during heavy fishing days. It can be extremely impractical for the permit holder to be present during every delivery to the tender during heavy fishing periods when there can be up to 3 deliveries made per boat in one tide. Set net skiffs have a very low holding capacity and it would be ideal if a non permitted crew member were able to deliver fish to the tender so that the permit holder could stay close to managing the operation of the nets.

This would avoid the hassle of being forced to deliver both boats at the same time, or the permit holder having to be the delivery man for each skiff, when his/her time is better spent watching over the nets during critical management times when the tide is dropping and fish must be quickly removed before the net goes dry.

#45 - Support

This is the same as #44, but #44 is worded more appropriately.

#46 - Support

Same as #44

#47 - Support

Same as #44

#48 - Support

Same as #44

#49 - Support
Same as #44

#50 - Support
Same as #44

#51 - Support
Same as #44

#52 - Support
Same as #44

#53 - Support
Same as #44

#54 - Support
Same as #44

#55 - Strongly Oppose

Set net sites by regulation lie no less than 300 feet apart. With one 50 fathom length of net per site, it can already be overcrowded with nets in areas where each site is fishing the full 50 fathom lengths. Allowing 100 fathoms on one site would dramatically decrease the amount of fish that would make it to the neighbors site, effectively "corking" the majority of fish passing by and dramatically reducing the catch of a neighbor who may only hold a single permit. This proposal would overcrowd set net sites and provide an unfair advantage to those with dual permits. I'm a dual permit holder this would not benefit me, only harm me and my neighbors.

#66 - Strongly Oppose

Allocation of set vs. drift is essential to a level playing field where set netters are able to get their fair share of opportunity to catch fish. Because set netters are stationary, drift fishermen can go to the fish and dramatically reduce the size of the run before the fish hit the set net district. It is imperative to continue to allow an allocation to maintain consistency in the income of set net fishermen.

#67 - Oppose

System works fine as is.

#68 - Support

I'm a graveyard point fisherman and know several Levelock fishermen who work in the same area as myself. Allowing them to fish close to their village would be a huge benefit for them. It would also allow for another market that could continue to buy fish from the Kvichak River after all the major processors have abandoned the area. This usually happens around July 18th. Opening this small district would be very efficient.

No fuel is wasted by the need for a tender. Fishermen could have a market late into the season... Its win win, and no real losers.

Aaron Schrier
1320 Holly Dr.
Bozeman, MT 59715
Permit #SN60507
Nov. 14, 2012

Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
FAX# 907-465-6094

Comments on Bristol Bay Proposals

My name is Aaron Schrier and I've been setnetting in the Naknek/Kvichak district since 1998. Thanks in advance for sifting through all of these proposals. Please consider my comments on a few:

#15 There are many setnet sites on the Kvichak River that have filled in with mud and as a result are a ways off shore when Fish and Game opens at a typical 8 foot tide. It would be impractical for these site owners to remove their screw anchors and buoys between periods, as it takes a special tide to initially place this gear. Please reject proposal 15.

#21 and #22 Setnet markings on buoys and skiffs are adequate. These proposals are not necessary.

#23 I agree that marking just the ends of the net is sufficient. Please include setnet gear with this proposal.

#24 Fish and Game management already has plenty to deal with – please reject any new fisheries or areas. I vote NO on #24.

#32 – 35 I favor the 32 foot limit for management and enforcement. I also like that I don't have to negotiate river mouths in my skiff with lots of really long boats. Please reject #32 – 35.

#44 – 54 These proposals allow dual ownership of setnet permits with “normal” fishing rights for each permit. I am strongly in favor of making this law permanent. I currently own 2 permits and this has been a boon to the way I operate. I can set more gear if I think fishing will be slow, and set fewer nets if a large haul is anticipated. My sites are

considered "fair" by most, and the dual permit clause has allowed me (with hard work!) to earn a living. I vote a strong YES on #44 - 54.

#58 - 61 I am opposed to the General District. Fishing there could result in unintended interception of fish headed for the Kvichak River and this has been an area of concern in the past. I also feel that management already has enough on their plate.

#66 Before allocation we setnetters on the Kvichak would sit for days waiting for escapement. Allocation has been an extremely effective management tool and has given ADF&G the flexibility to allow all user groups to get their fair share. Please reject proposal #66.

#67 Fish and Game has done an incredible job of managing salmon runs during the past decade, and a "Fishing Schedule" would tie their hands. Please give ADF&G maximum flexibility and reject this proposal.

#68,69,71, 72 Management and Enforcement have plenty to do without opening special areas with special "triggers." Please reject #68, 69 and 71.

#70 Last time the Alagnak was open to fishing, a large group of setnetters showed up and only a handful of drift boats. I think many of the drift boats were scared away by the shallow water and narrow river bed (definitely not a place for the majority of the drift fleet). I think Fish and Game should manage this river as it has in the past, alternating with drift and set, then giving the majority of openings to the user group that participates most. I strongly recommend rejecting proposal #70.

#76 Please give ADF&G maximum flexibility - reject proposal #76

Thanks very much,

A handwritten signature in black ink, appearing to read "A-Schrier". The signature is fluid and cursive, with a long horizontal stroke at the end.

Aaron Schrier
Kvichak setnetter

RE: December BOF meeting Bristol Bay – Naknek, December 4-12, 2012A.D.

Attn: BOF
Board Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811

Respectable Members of the Board,

Please find input on a few of the salmon fishing proposals regarding Bristol bay 2012-13. I feel it is important to respond as I see the pros/cons are being influenced by collectives/associations that have organized in a lobbying format, and are 'resubmitting' by blanketing their own stance. I believe there are many "interests" not represented because many individuals are not cultured to bureaucratic processes and thereby are denied representation. I don't claim to speak for many. I only hope to bring balance to the pile of pages that you weigh in making decisions for/against where the tall stack is not automatically deduced the wise choice. And where maneuvering through multiple propositions of the same issue tends to confuse and shift awareness from the single point at hand.

The first year I saw Naknek, and Nushagak in 1974 I realized something special existed in Bristol Bay. My father had a 225 foot freezer ship(North star) here in the late 50's early 60's. My experience has been from an Outsider position, yet I hold Bristol Bay as a spiritual homeland.

Changes continue to press upon the people of the Bay and I pray that you all are able to find discerning insight to help you resolve the important issues at hand.

PROP 17 – Prohibit Set Gillnet Seaward of another Set Gillnet YES.

The capital intensive focus of dual permit setnetters is ESPECIALLY inequitable when a "corking" of fish is detrimentally emplaced by the 'illegal' placement of additional net beyond an existing site.

PROP 23 – Remove Gillnet Marking Distance of Corks YES. (CHANGE.)

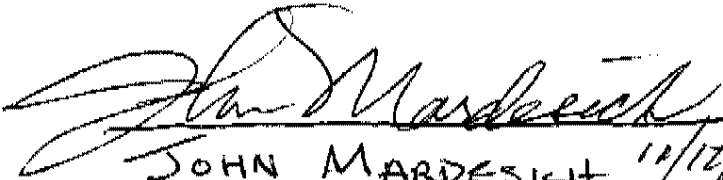
Only an additional input that markings be made in the middle of a shackle.

PROP 25 – Create King Salmon Troll Fishery YES.

PROP 32-35 Increase Vessel Lengths NO.

PROP 36 – 38 Retain Dual Setnet Permit NO.

PROP 56 – District Registraton YES.



JOHN MARDESICH 11/12/2012
PERMIT HOLDER

Luke Laird
5300 Elk Ridge Rd.
Missoula, MT 59802

Nov. 15, 2012

Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax #907-465-6094

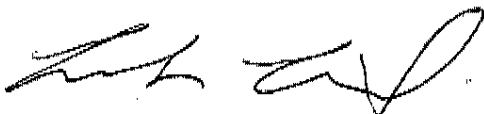
My name is Luke Laird and I've been a setnet crew member on the Kvichak River for the past 4 seasons. Thanks for considering my thoughts on the following proposals:

#15 There is a lot of mud on the Kvichak and we have to move our gear in and out with the tide. Please don't make us move our screw anchors and buoys every tide as this is all we'd do!! While I agree that running lines have no place way offshore (very dangerous), this proposal is too far-reaching. Please reject #15.

#44 - 54 I see these proposals as win-win. I have witnessed several operations with dual permit owners at their helm and these have been organizations of the highest quality. Dual permits allow fishermen the luxury of choosing how much gear to fish and in my opinion allow me to make more money as a crewman. And if I want to enter the fishery, there are currently setnet permits for sale and I don't see this as a problem in the future. With the price of fuel, airfare, food and fishing gear going up precipitously each year, it just makes economic sense for many operations to fish more gear. I strongly support proposals #44 - 54.

#66 As Kvichak setnetters, we live and die by allocation. I've heard from seasoned setnet friends about waiting for escapement for days before the passage of allocation. Allocation has been a great management tool for Fish and Game, allowing all user groups a piece of the action in a more sustained manner. Please reject #66.

Thank you.



Luke Laird

Dear Board Member:

I write to you representing the six set net permits owned and fished by my family for over 50 years. In addition to fishing we have branched out to having a large portion of our catch custom processed for direct sales so we know what it takes to be progressive, and we realize the difference that quality harvesting methods make to the end consumer. PLEASE don't just go with the status quo. Bristol Bay lags the market in terms of quality, and we MUST rethink our harvesting methods in order to gain a competitive edge and improve the value of our fishery. Please think outside the box as you consider proposals and make changes to our fishery management. Allowing beach seines, trawls or traps in a way that let existing permit holders who pursue quality to consolidate their permits and trade them in for an alternate harvesting permit.

Also, our set net sites are in the Kvichak section. We are the LAST fishermen in the Bristol Bay fishery. Please take steps to protect fish headed for the Kvichak River so they are not intercepted by fisheries further south of us. Thank you so much for your thoughtful consideration of my opinions on these issues. Sincerely, Reid Ten Kley (age 34)
Family Member Permits: S04T65887, S04T55823, S04T60872, S04T59539, S04T60574, S04T55821

Proposal 16

☹️ **OPPOSE**. This would allow illegal fishing for one gear type. These fishermen would be better off appealing to ADF&G with a request to modify opening times.

Proposals 21 & 22

☹️ **OPPOSE**. Current sign and marking regulations are sufficient. Realistically knowing the name of a piece of set net gear will not aid in establishing communication between a drift boat fisher and a set net fisher since most set net boats do not carry VHF or telephones, and even if they did have VHF the drift fisher would not know which channel to reach them on. If the purpose of having the name were to aid in reporting them to ADF&G, then the permit number is sufficient for such purpose and is already required.

Proposal 23

☺️ **SUPPORT** with modification. Modify wording to include both set and drift nets. Markings at either end of a net are sufficient to aid in identifying "ghost" gear or gear that is cut and run from in an illegal fishing situation. Every 10 fathoms is excessive and ambiguous since by the time you stretch out your gear it is wet and the markings don't stay on well. The ends of the net can easily be marked while the gear is dry and in the net bag.

Proposal 24

☺️ **SUPPORT** with modification. The ability to do ANYTHING more progressive than gillnetting in Bristol Bay would help us compete with higher quality harvesting methods, which are used around the West Coast. Seine fish have no net marks and can be loaded into the tender alive greatly improving quality. This proposal is horribly worded and not well thought out, but the concept is worth considering. Make the permit trade up work for set or drift permits, and require more like 3 drift permits for a seine permit, or 3 set net permits for a beach seine permit. If it is argued that seines won't work in Bristol Bay, change the harvest type to a trawl, anything that would allow live harvest and minimize net marks.

Proposals 32 & 33

☺ **SUPPORT.** Catcher processors are a great way for a fisherman to add value to their catch and produce a higher income with fewer fish. The 32 foot limit was put in place before such things as direct marketing or catcher processing existed. Having a longer vessel is the only practical way to produce any significant volume of processed fish aboard a fishing vessel. The current processing regulations require all sorts of gear that simply cannot fit on a regular drift or set net boat without interfering with your fishing space. Require the permit holder to be a licensed and active catcher processor OR direct marketer and 50% of the catch to be processed as such.

Proposals 34 & 35

☹ **OPPOSE.** There is no reason to have a bigger boat unless you are processing your own catch.

Proposals 36 & 37 & 38

☺ **SUPPORT with modification.** Permit stacking aids in consolidation and creates more opportunity for all fishers. If a permit owner stacks a permit, make that a permanent change of the permit by eliminating one permit and adding a D to the remaining. This prevents de-consolidation in the future should the per-pound value of the fish increase.

Proposals 41 & 42

☹ **OPPOSE.** Don't limit opportunities for some because others don't want to invest in the fishery. If they want equality, then they can simply fish harder and use that extra money to buy another permit.

Proposals 44 through 54

☺ **SUPPORT.** Allowing a permit holder to operate more than one net increases the financial return and makes fishing a more viable career choice. With prices down (on an inflation adjusted basis) a single set net permit does not provide sufficient annual income.

Proposal 55

☹ **OPPOSE.** While this would be a very convenient way to fish multiple permits on a site it would not be fair to owners of the adjacent sites.

Proposal 57

+Please consider WASSIP report. Create better management plans that help stake holders in different river systems catch the fish bound for their system. For example, if Kvichak River fish are being harvested by Egegik, but Kvichak fishers are not catching Egegik fish then take steps to pull the Egegik line in with more frequency when significant pushes of Kvichak fish are moving into the district.

Proposal 66

☹ **OPPOSE.** Prior to the implementation of the allocation Kvichak set net fishers spent the majority of the season on the beach while the drift and set net fleet in the Naknek district caught the majority of the fish headed for the Kvichak tower. Allocations might not work in other districts, but in the Naknek/Kvichak district it is of paramount importance. This is the only split district where one half of the district can completely intercept fish bound for the other district, therefore a joint allocation plan is necessary.

Proposal 68

☹️ **OPPOSE**. These sites would be HUGE producers. Therefore they would greatly impact the allocation for the other set net fishers in the district. If you do approve this, please at least use a lottery style drawing for the sites so that all permit holders have equal access to this new fishing area.

Proposal 69

😊 **SUPPORT**. Harvesting excess Alagnak river fish is a great idea, and a targeted area at the mouth of the river is a great way to go. HOWEVER, don't count fish caught here in the allocation percentages for the Kvichak or Naknek section.

Proposal 70

☹️ **OPPOSE**. Do not create an allocation here because nearly no drifter comes up for the openings, and this area is really only suited for set net fishing. Consequently, all the set net fishers interested in participating would be waiting for very few, if any, drifters to catch their allocation. Furthermore, this area is rarely fished, and when it is the purpose is to stop excess fish from escaping, which can be done most effectively by set net fishing.

Proposal 73

😊 **SUPPORT**. Having only the fishable amount of gear onboard will reduce round hauled nets, and therefore improve quality.

Proposal 76

😊 **SUPPORT**. Any proposal to break up the fishing and prevent the line fishing, and over the line fishing that occurs will benefit all users upstream, especially set net fishermen and sport fishermen.

Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811

November 17, 2012

Subject: BOF Comments - Kvichak Setnetters' Association

Dear Board Member:

The Kvichak Setnetters' Association (KSA) is comprised of 44 members who fish sites in the Kvichak sub-district of the Naknek/Kvichak district (please see attached map). Due to the nature of our district and the fact that we are located at the end of Bristol Bay we have unique needs and perspectives on the effective management of our salmon. Our mandate is to give voice to our members especially at Board of Fish meetings. We work to ensure that set net fishers in the Kvichak sub-district are given fair access to sockeye bound for the Kvichak River. Our specific comments on the proposals before you are listed in the table below for your convenience. Please consider our opinions as you form the rules and regulations that govern our fishery.

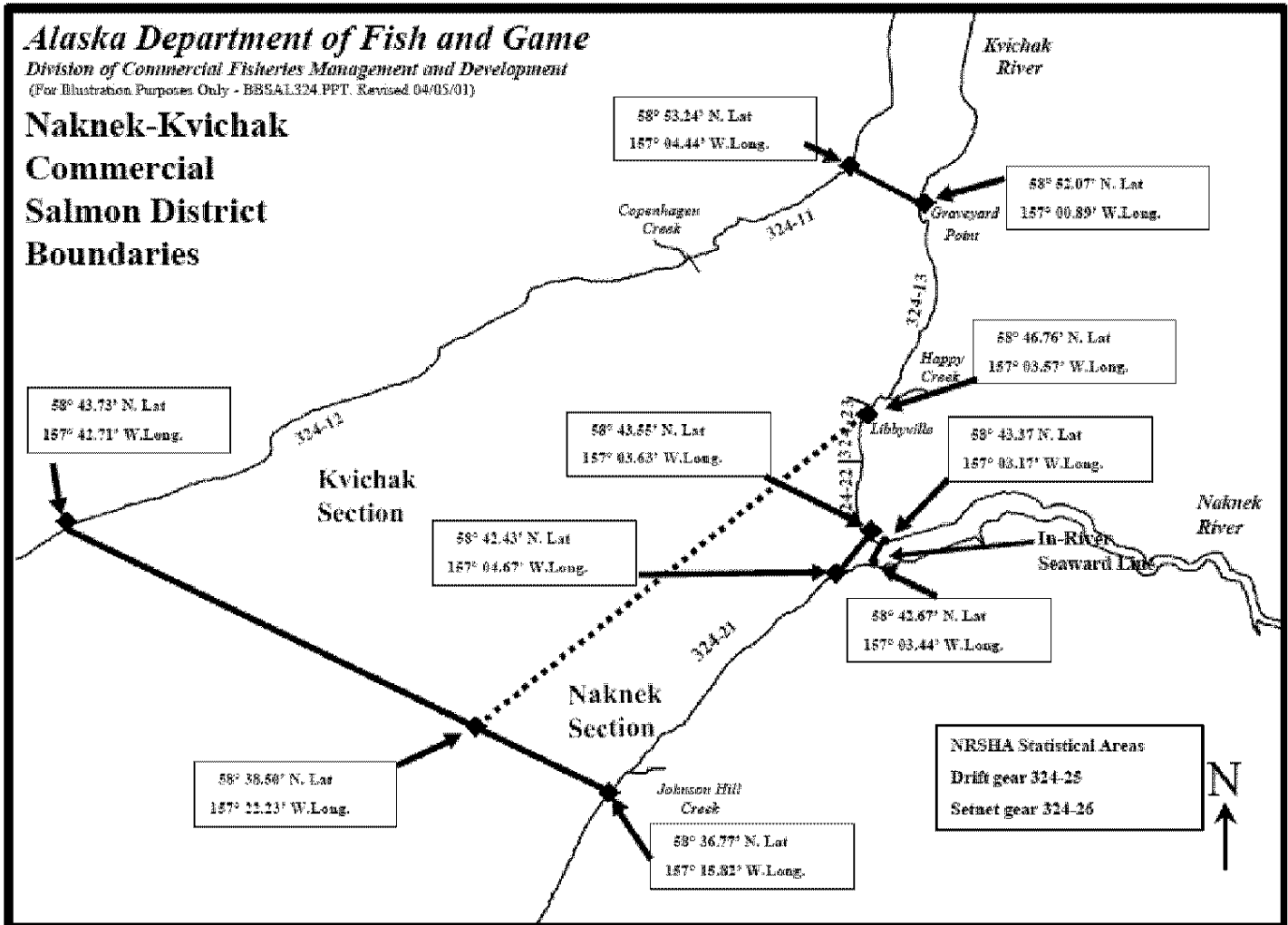
Proposal	KSA Opinion	Comments/Notes
9	Support	We agree that a management plan is necessary.
15	Oppose	This proposal is too broad as written, and does not specify what a registered site is. Does a registered site mean those that have a lease on the site, or can it include someone that has established themselves on a site by fishing the required number of time? That aside, we are opposed to forcing anyone to serially remove and replace their anchor tackle and running line.
21&22	Oppose	Current sign and marking regulations are sufficient. The buoys are often too small to accommodate six inch numbers and names. In addition, knowing the name of a piece of set net gear will not aid in establishing communication between a drift boat fisher and a set net fisher as it doesn't list a phone number or a VHF channel.
24	Oppose	The majority of KSA oppose this proposal with dissenting votes. While we value ways to improve the quality of Bristol Bay salmon, we oppose this proposal. This is a restructuring proposal that requires more guidance, research, and analysis.
32-35	No Comment	Note: We have no official position on this proposal, but we would like to request that the allocation remain as it currently stands regardless of boat lengths.
44-54	Support	The majority of KSA support this proposal with dissenting votes. Allowing a permit holder to operate more than one net increases the financial return and makes fishing a more viable career choice. With prices down (on an inflation adjusted basis) a single set net permit does not provide sufficient annual income.
55	Oppose	Fishing 100 fathoms of net on one set net site would block a good portion of the fish from getting to the neighboring nets.

57	Support	Please consider WASSIP report. Create better management plans that help stake holders in different river systems catch the fish bound for their system. For example, if Kvichak River fish are being harvested by Egegik, but Kvichak fishers are not catching Egegik fish then take steps to pull the Egegik line in with more frequency when significant pushes of Kvichak fish are moving into the district.
58-60	Oppose	This could result in unintended interception of Kvichak fish.
61	Oppose	This could have unforeseen impacts on future salmon returns.
62	No Comment	Note: We have no official position on this specific proposal, but we are supportive of a more in-depth process to submit restructuring proposals that require more guidance, research, and analysis.
63-65	No Comment	Note: We have no official position on these proposals; however, we would like to point out that the wording <u>must</u> include the existing allocation split between the Naknek section and the Kvichak section. Please don't approve any of these proposals without making that allocation distinction.
66	Oppose	Prior to the implementation of the allocation, Kvichak set net fishers spent the majority of the season on the beach while the drift and set net fleet in the Naknek district caught the majority of the fish headed for the Kvichak tower. Allocations might not work in other districts, but in the Naknek/Kvichak district it is of paramount importance. This is the only split district where one half of the district can completely intercept fish bound for the other district; therefore, a joint allocation plan is necessary.
67	Oppose	We feel this would limit ADF&G management options.
69	Oppose	The majority of KSA opposed this proposal with dissenting votes.
70	Oppose	This area is better suited for set netting and the allocation should remain the same.
71&72	Oppose	This would result in new permanent in-river sites. If these are created, sites should be offered on lottery system to any Bristol Bay set permit holder.
73	No Comment	Note: We have no official position on this proposal; however, we value ways to improve the quality of Bristol Bay salmon.
76	Oppose	We feel this would limit ADF&G management options.
194-209	No Comment	Note: We have no official position on these proposals, but we are concerned about the interception of Naknek/Kvichak fish, and we ask that you keep that in mind as you discuss these proposals.

Thank you for your time, and the consideration of our comments.



Eike Ten Kley
President | Kvichak Setnetters' Association
503.929.9635



To: Alaska Board of Fisheries

11/13/12

P.O. Box 115526

Juneau, AK. 99811

Dear chairman and board members,

My name is Robert Fellows and I have been an Alaskan resident for over 30 years and have fished commercially for herring statewide for 20 years. This testimony is in opposition to proposals 12, 13 and 14 concerning Bristol Bay Herring.

The Togiak herring biomass is and, for the last several years, been very healthy. In fact the 2012 spawning event was one of the largest and longest that I have witnessed. There is absolutely no biological or environmental reason for changes to the current management of the commercial herring fishery in the Togiak area. The State of Alaska has some of the best fisheries managers in the world and they have been doing an excellent job with the herring stocks around the state.

As for the reallocation of a portion of the seine quota over to the gillnet fleet, it makes no sense what so ever. The gillnet fleet struggles to catch the allocation that they currently have. There is plenty of opportunity for a gillnetter to get involved with the fishery. There hasn't been enough effort in the gillnet sector for several years.

Thank you,

Robert Fellows



November 16, 2012

ATTN: Bristol Bay BOF Comments
Boards Support Section
Alaska Department of Fish and Game
P.O. 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.

Members of the Board,

Thank you for the opportunity to comment as I am unable to attend the meeting in person due to the logistical challenges of timing and location.

LOPPOSE 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 for the following reasons:

1. **According to, 5AAC 06.361. NUSHAGAK-MULCHATNA CHINOOK SALMON MANAGEMENT PLAN**, The Department already has the ability to:
 - a. **Reduce bag limit and possession limits**
 - b. **Reduce season limits**
 - c. **Prohibit the use of bait**
 - d. **A closure of the salmon sport fishery**

2. The catch and release mortality rate was already factored into the allocation for Sport fishing when the NUSHAGAK – MULCHATNA CHINOOK SALMON MANAGEMENT PLAN was negotiated between sport fishermen and commercial fisherman.
3. The restriction of bait should not be used as an allocation issue. The Nushagak Chinook Salmon allocation is clearly outlined in the NUSHAGAK – MULCHATNA CHINOOK SALMON MANAGEMENT PLAN.
4. There is no evidence cited or data presented that supports the theory of single hook baits having a higher mortality rate than single hook lures.
5. High catch rates are associated with very large daily escapement. The volume of Chinooks can be so large that the 5 to 7 % mortality rate associated with a catch and release fishery does not have an impact.
6. The sport fishing industry needs every opportunity to catch fish. In dirty water without bait, which is common on the Nushagak River, we lose that opportunity.
7. The mortality rate associated with catch and release King Salmon fishing is less than the dropout rate in the commercial fishery when using sockeye gear. The kings get tangled in the gear and drown and when the net is being retrieved the net straightens out the kings go to the bottom of the bay.
8. Eliminating bait would affect all of the local Dillingham anglers who fish the Nushagak River. In most cases, the local community has limited access or opportunity to fish the Nushagak River for Kings. On days of low escapement their opportunity to harvest kings is greatly restricted or reduced without the use of bait. Most all of Dillingham anglers who sport fish use bait.
9. The Nushagak run of Kings come in waves. A large escapement one day can be followed by low escapement the following 3 days. The catch per unit effort drops off significantly on the down days. Eliminating bait would dramatically affect an angler's ability to catch kings on the low volume days.
10. The Nushagak River has the most prolific Chinook salmon fisheries in the world. It also has the least amount of sport fishing pressure when compared to other systems across the state or country. There is no justification outside the guidelines of the NUSHAGAK-MULCHATNA CHINOOK SALMON MANAGEMENT PLAN to accept this proposal

I have a small camp on the Nushagak River and believe that we all, sport fishing and commercial fishing, should have opportunity to catch fish.

I am greatly concerned about the sustainability of our natural resources. The data has shown us that numbers have been declining over the years. As a result concessions are made, but the results impact the local sport fishing operators significantly more than other businesses. The most recent example was in 2010 when sport fishing was closed in mid season. The result of this closure put many operators in financial trouble or out of business.

The camps on the lower Nushagak River rely on the Chinook run only. We do not have other species to fall back on. Any reduction in success reduces the opportunity to attract or retain business. Eliminating the use of bait will reduce the success rate and therefore negatively affect local sport fishing businesses. The trickle down affect will impact the local economy by way of reducing the amount of tourist into

Dillingham and supporting the local economy by way of Hotels, B&B, groceries, cabs, fuel, etc. With declining markets, the local sport fishing operators on the Nushagak River will also spend less towards the local economy for supplies and fuel to operate.

We all should be willing to make concessions, when necessary, to protect the long term sustainability of the run. We already do according to the guidelines outlined in the NUSHAGAK – MULCHATNA CHINOOK SALMON MANAGEMENT PLAN.

Thank you,

A handwritten signature in black ink, appearing to read 'RF' followed by a stylized flourish.

Rob Fuentes
Alaska's Bearclaw Lodge
Dillingham, AK

**Letter of Support
Proposal 10**

November 19, 2012

Re: Bristol Bay Herring Management Plan

Dear Chairman Johnston and Members of the Board,

A brief history: After years of not being able to control the Dutch Harbor Food and Bait fishery it was mutually agreed to voluntarily co-op the fishery. Since 1982 I've owned and operated a fishing vessel that participates in this Herring fishery. The last 10 years I've delivered to Trident Seafoods, Inc. and then share those proceeds with six local Sand Point fishermen and one from Kodiak.

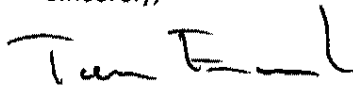
This is one of these win, win situations that don't come around very often. On the proposal form, probably the most contentious question is "who is likely to suffer?" If this proposal is enacted no one will suffer. We will not be taking anything from anyone. It is my understanding that none of the 1500 tons that was allocated to roe-on-kelp has been harvested for several years now, half of which has already been designated to the Togiak seine fleet. I cannot think of a good reason for the other half not to be allocated to the Dutch Harbor Food and Bait Fishery. The Togiak fishery takes place months before Dutch Harbor so if the roe-on-kelp quota is harvested, fine, but if not, why not allocate, what would remain in the water, to Dutch Harbor?

I was also told that this proposal was brought up once before and was voted down because one Board member raised the question, "If they are not catching the quota that they have now, why give them more?" That is correct, for a few years we did not catch the quota that was allocated to us, but last summer we did have the situation where demand was more than supply. It seems that there has been a slow and steady increase in demand for good quality bait and food fish. The reason, I believe, is that we have been supplying a good quality product. If we have to start "racing for fish" again, the quality will begin to suffer. There would not have been a problem this past summer with an extra seven hundred and fifty tons. Again, no one suffers.

I will not be able to attend the Board meeting in Naknek, but if any of you have questions please feel free to e-mail me at tomevich@comcast.net.

Thank you for your time.

Sincerely,



Tom Evich
Owner/Operator
F/V Karen Evich

November 18, 2012

To whom it may concern...

My name is Wayne Van Wey. Myself and 12 to 15 friends have journeyed to Alaska every year for the past 20 plus years to fish the Nushagak River for king salmon. We have seen the ups and of the king returns. We've had good years and dismal years. We have brought our children here to fish and now our grandchildren are coming with us. We take pride in teaching our camp to fish responsibly and to have minimal impact on the fishery.

We have fished with 6/0 factory barbless hooks from day one on this river. We use bait. If we catch a salmon that is bleeding, it goes on our tag. We keep only the legal amount of fish and often not that many. We don't even take a net with us, we just grab the hook with our hands and slip it out. If you cannot see the hook, cut the line as close to the nose as possible.

As I see it, bait is not the problem, barbed hooks are the problem! How do you release a salmon caught on a Kwikfish with 2 barbed treble hooks all tangled up in a net? How do you release that fish without taking it out of the water and without hurting it?

The purpose of barbless hooks is aid in releasing fish unharmed!

We fish with heavy lines and play the fish hard so as not to deplete the energy of the fish. That way, they maintain the energy needed to navigate the river and spawn. We care about this fishery and want to preserve it for ourselves and our children.

There are lots of ways to minimize impact. The best is education. Teach the true value of this resource.

Proposal 239 - 5 AAC 67.022(g)(6) - ISSUE: Release related mortality in the fishery.

What will happen if nothing is done? The only data I've seen on mortality has nothing to do barbed hooks but with time spent out of the water.

Will the quality of the resource harvested or products produced be improved? No.

Who is likely to benefit? I cannot see anybody benefitting from this.

Who is likely to suffer? The village at Portage Creek, all the airlines flying clients in and out of Alaska and Dillingham, the grocery stores, restaurants, gift shops, hotels, boat maintenance and storage areas, the entire Dillingham business community, et cetera.

Other solutions considered? None? Wow! Sport fisherman take a real low percentage of the fish.

Myself and friends have 3 boats we use on the Nushagak. Storage is \$500 per year, each. Some years we don't use all three but storage fees are still in place. We have put in excess of \$15,000 the last 2 seasons just for maintenance on the running gear on just 1 boat. We have put out countless dollars over the years for these boats.

Food for 12 people runs about \$1500 for two weeks, all bought in Dillingham.

Fuel for the run up the river and back plus fishing for 2 boats ran about \$2000 and we only used 1 boat for fishing.

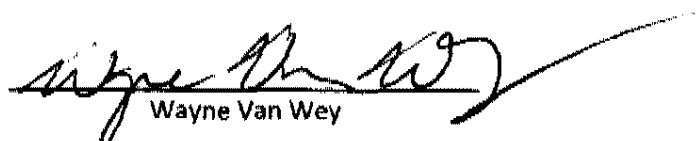
\$500 in restaurants coming and going.

Chog got a \$1000 for hotel rooms, coming and going plus fees for camping on their land.

Alaska gets license fees from each of us.

Airlines are getting more expensive lately. We fly from Oregon every year.

Bottom line... without bait, I will likely not show up. I am a good custodian of the fishery but each fish I keep costs close to \$1500. I have to draw the line somewhere. I just wish it weren't on the Nushagak.


Wayne Van Wey

Kenneth M. Jones
PO Box 1044
Homer, AK 99603
907.235.6417
ken_jonz@hotmail.com

Alaska Department of Fish and Game
Board Support Section
907.465.6094 (fax)

Comments on proposed changes in the regulations of the Alaska Board of Fisheries,
Bristol Bay fin fish.

1. I would like to stand against proposal #12, a gillnet-seine 50/50 split in the Togiak herring fishery.

There is usually a ten (10) day window when quality herring is available in Togiak.. If you constrain the fishery too much during that period, reasonable harvest quotes won't be met.

It seems hard enough for the gillnet fleet to catch 30% of the biomass.

I wouldn't change anything on the way the catch is currently regulated between gear groups.

2. I stand against proposal #13, closing the Togiak herring fishery for three (3) years.

There is no problem with the health of the herring stocks and I would respectfully disagree that there is any shortage of roe on kelp in the district. There is always an expansive spawn in the Togiak Bay, Anchor Point and Ungalithluk Bay areas which are close to the village.

Perhaps more locals can be aided to participate in the gillnet fishery.

3. I would like to stand against proposal #14, expanding the closure lines of Togiak Bay.

The existing closure lines adequately protect both green and spawned out herring which gather in Togiak Bay.

The rocky beaches around Anchor Point naturally protect the kelp resource because it's too shallow and rocky to set a seine inshore, while allowing a seine fishery to occur off shore.

Of course, Ungalithluk Bay is already closed to commercial fishing.

Eli Kriegh
4490 Donald St.
Eugene, OR 97405
Setnet permit #61499
Nov. 13, 2012

Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax #907-465-6094

My name is Eli Kriegh and I've been both a crew member and permit holder in the Naknek/Kvichak district of Bristol Bay. Thanks for considering my thoughts on the following proposals:

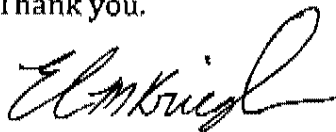
#15 Setnetters need flexibility to move around as the tide goes in and out. It is not practical to remove anchors or buoys between fishing periods. Please reject #15.

#44 - 54 These proposals allow dual ownership of setnet permits by an individual. I support these proposals, as they allow business opportunity for those wanting to expand their operation and also allow families to keep permits in their name rather than put them in a (possibly) transient crew member's name. I know several people who currently have dual permits and it has worked extremely well for them in the last 3-year cycle. Please do not allow dual permits to sunset (I vote YES on these proposals).

#66 Allocation has given us (Kvichak setnetters) a fair shake at catching fish. Before allocation we would be the last to get a chance to fish. Please reject #66.

#70 The drift fleet was given the opportunity to fish here in the past, but only a few showed up. This river (the Alagnak) is quite small and I can't imagine a large group of drifters fishing there. Please reject proposal #70.

Thank you.



Eli Kriegh
Kvichak setnetter

Owen Moore
69890 Holmes Rd.
Sisters, OR 97759

Nov. 14, 2012

Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax #907-465-6094

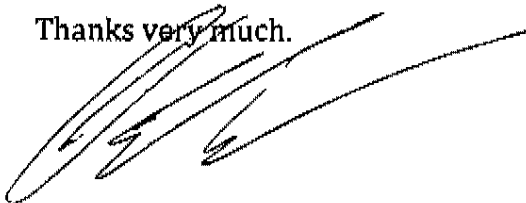
My name is Owen Moore and I've been a crew member on a setnet skiff in the Naknek/Kvichak district for several seasons. Thanks for considering my thoughts on the following proposals:

#15 It would be almost impossible to remove our screw anchors and buoys between fishing openers, and setnetters need flexibility to move around as the tide goes in and out. Please reject #15.

#44 - 54 These proposals address the sunset clause for dual ownership of setnet permits. I worked for a fisherman that had dual permits and his operation was smooth and productive. I believe I benefitted directly from his dual ownership by making more money. I can also see that putting permits in crew names could sometimes be risky and cumbersome. Please keep dual ownership of setnet permits possible by making it permanent - I support #44-54.

#66 The Kvichak setnetters are surviving because of allocation. Many of my fishing friends have told me about the slim seasons before allocation. Please reject #66.

Thanks very much.



Owen Moore
Setnet crewman

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. Limit sport and sport fishing for King salmon in the Nushagak River drainage, excluding the Wood River drainage, to unbaited, single-hook, artificial lures from May 1 through July 31 as follows:

(g) In the Nushagak River drainage, excluding the Wood River drainage, and unless otherwise specified in 5 AAC 06.361 or 5 AAC 06.368, the following special provisions apply:

(6) Only Unbaited, single-hook, artificial lures may be used May 1 through July 31.

Proposal 239: I Oppose (No Bait) As Eliminating bait would affect all the local and nonresident anglers. Most of the anglers have very limited time to fish, At times of low escapement and high dirty water, Eliminating bait would dramatically affect the anglers ability to catch king's, (on low volume days).

Proposal 239: I Support (Single-Hook) I am in favor of eliminating use of treble hooks and going to single-hook only. Myself and the organization that I have worked for the last ten years on the Nushagak River only use single-hooks. Use of Single-hook is a good Conservation measure. Mortality rate associated with a catch and release Sport fishery is very low and does not have much impact. But the use of single –hooks will lower that mortality rate, and that is better for the fish.

Proposal 239: Implementation of this proposal will have a terminal and devastatating effect to the tourism industry in Bristol Bay, Dramatically effecting local and nonresident employees from hotels, grocery stores, fuel suppliers, float plane operators, airlines, barge operators, Native Corporations, sport fishing lodges, etc.

Without the Tourism in Bristol Bay I won't have a job there! I love my Job!


Thanks, Michael Thomas

11/16/2012



THE SCHLEINING
COMPANIES

November 19, 2012

To: Alaska Fish & Game

Re: Nushagak River Bait Fishing

I am strongly opposed to restricting bait fishing on the Nushagak River. Our family has fished the Nushagak for the past 19 years as private sports fishermen.

First, there is no scientific evidence, study, or data to support that bait fishing release hurts the fish. None. In our group we all fish with single barbless hooks and release the fish in the water. The fish are not netted or brought into the boat. The fish are released without harm and there is absolutely no legitimate reason to stop bait fishing. Every year for the past 19 years we have brought into the Dillingham / Portage Creek economy more than \$10,000 per year x 19 years = \$190,000. We have 3 boats and equipment in Dillingham and Portage Creek and pay for storage, repairs, food, lodging, restaurants, fuel, etc. In addition to our family we have brought many friends to our camp which has brought in additional significant money, at least \$250,000 to the Dillingham / Portage Creek area.

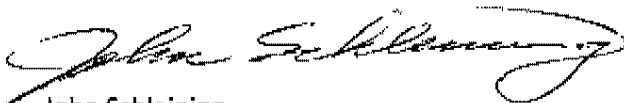
I am a fish advocate and suggest the following:

- 1 Sport fishermen use single barbless hooks on all lures, spinners and bait fishing.
- 2 Release fish in the water without nets or bringing the fish into the boat.
- 3 Escapement should identify bucks or does, not just fish.

There is no scientific study or data to back up the elimination on bait fishing so please do not implement a solution with no problem. If you end bait fishing, we will not be back.

Please call me. 541-779-8390

Sincerely,



John Schleining