

**On-Time Public Comment List**  
**Kodiak Finfish**  
**January 7–10, 2014**

---

Robert K. McDonnell & Robert M. Funkhouser .....	PC 01
John A. Cratty.....	PC 02
Rita Dieters.....	PC 03
Eric Dieters .....	PC 04
Mark Larsen .....	PC 05
Annika Jensen .....	PC 06
Gordon L. Jensen, Jr. ....	PC 07
Theodore Squartsoff, Sr. ....	PC 08
Pete Hannah.....	PC 09
James Pryor.....	PC 10
Dan & Sandra Earle .....	PC 11
Alaska Groundfish Data Bank.....	PC 12
Alaska Charter Association.....	PC 13
Leigh Gorman-Thomet.....	PC 14
Margaret Bosworth.....	PC 15
Chris Berns .....	PC 16
Jonathan Edwards.....	PC 17
United State Department of Interior Fish and Wildlife Service .....	PC 18
Ed & Judy Fisher .....	PC 19
Kevin Fisher .....	PC 20
Charles P. Fogle.....	PC 21
Keith Omlid .....	PC 22
Glenn & John Jorgensen .....	PC 23
Nina Burkolder & Gabriel Brown .....	PC 24
Carol Lather.....	PC 25
Richard Lather .....	PC 26
Kodiak Area Purse Seine Permit Holders (30 Signatures).....	PC 27
James R. Peterson .....	PC 28
Donald C. Peterson .....	PC 29
Kimberly Peterson.....	PC 30
Bruce Wehrauch, LLC (Representing Alaska Scallop Association) .....	PC 31

**On-Time Public Comment List  
Kodiak Finfish  
January 7–10, 2014**

---

Bryan Ellsworth .....	PC 32
Alaska Jig Association.....	PC 33
Deborah Nakada-Limacher .....	PC 34
Don Dumm .....	PC 35
Donald Lane .....	PC 36
Eric Graves .....	PC 37
Erik OBrien .....	PC 38
Harvey Goodell.....	PC 39
Ian Ivanoff .....	PC 40
Jane Petrich.....	PC 41
Jill Wittenbrader .....	PC 42
Mary Furuness- NOAA, NMFS Alaska Region.....	PC 43
Maureen Knutsen .....	PC 44
Mike Nugent .....	PC 45
Miker Spokas.....	PC 46
Oliver Holm .....	PC 47
Richard Blanc.....	PC 48
Susan Payne .....	PC 49
Theresa Peterson & Family .....	PC 50
Toby Sullivan .....	PC 51
Warren Brown.....	PC 52
Wendy Beck .....	PC 53
Weston Fields.....	PC 54
Patrick J. Pikus.....	PC 55
Mathew Alward .....	PC 56
Virginia C. Adams .....	PC 57
Robert Funkenhouser .....	PC 58

# On-Time Public Comment List

## Kodiak Finfish

### January 7–10, 2014

---

The following Public Comments and Record Copies were received at Chignik Finfish and Lower Cook Inlet Meetings Regarding Proposals 43, 44, and 45

Paul Olson (Representing The Boat Company).....	PC 59
Alaska Marine Conservation Council .....	PC 60
Alaska Whitefish Trawlers Association .....	PC 61
Alaska Whitefish Trawlers Association .....	PC 62
Alaska Whitefish Trawlers Association .....	PC 63
Kenai River Sportfishing Association.....	PC 64
Alaska Groundfish Data Bank.....	PC 65
Mike Shupe .....	PC 66
Alaska Whitefish Trawlers Association .....	PC 67



December 22, 2013

Boards Support Section  
Alaska Dept. of Fish and Game  
Attn: BOF Comments

Re: Proposal 95, Establish certain set gillnet-only fishing periods, beginning June 28, in the Central and North Cape sections.

To whom it may concern:

I oppose the adoption of proposal 95 by the Board of Fish.

The Westside Kodiak Salmon Management Plan has proven to be an effective management plan that protects all wild salmon runs on the west side of Kodiak. The plan that is in affect provides the sustainability that every fishery needs to continue for years to come. By allowing a gillnet only opening when the west side is closed down for escapement reasons is completely in direct contradiction of the westside Kodiak salmon plan. During this time period there is still fish going into Karluk and other systems that they are trying to protect by having the season closed. The escapement into Karluk has tapered off, but is still getting daily escapement that is vital for the overall minimum escapement goals that Fish & Game is trying to achieve. This is not right and could impact the escapement goals.

The other reason I oppose this proposal is that there is no reason to open a fishery to one gear type and not the other gear type in a area that has been a multi gear fishing area. This is allocating fish to the gillnet fishery. I encourage the board to reject this proposal for some of the reasons listed above.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Charles P. Fogle".

Charles P. Fogle  
F/V invincible  
1136 Wolkoff Ln.  
Kodiak, AK 99615



12/15/13

State Board of Fish

Dear Chairman and Members of the Board,

I am a set net fisherman in Olga Bay. I have commercial fished in Olga Bay continuously since 1975. I will not be able to attend this winters meeting because of work.

I am writing in **support** of proposal **88-5AAC 18.361**. This proposal will do away with the staggered openings and create a minimum 87 hour closure.

I feel the staggered openings did not:

- Move more fish into Olga Bay. The data shows a greater decrease.

I feel all gear in the water at the same time with an 87 hour minimum closure will:

- Not give anyone an advantage over someone else.
- Allow for a more equitable division of the resource.
- Escape a healthier fish to the streams.
- Allow for upper escapement goals to be met, so the future success of the return will not continue to drop as it has under the current management plan.

Thank you for your consideration,

A handwritten signature in black ink that reads "Keith Omlid".

Keith Omlid



Dear Mr. Chairman and Members of the Board,

I would like to show my **SUPPORT** for proposal 99.

My name is Glenn Jorgensen

I set net for salmon on Kodiak Island.

I hold limited entry permit number 50456533

I fish in the Aiitak District.

I support proposal 99 because:

*see attached  
letter.*



Dear Mr. Chairman and Members of the Board,

I would like to show my **SUPPORT** for proposal 99.

My name is JOHN JORGENSEN

I set net for salmon on Kodiak Island.

I hold limited entry permit number S04K 611602

I fish in the ALITAK District.

I support proposal 99 because:



December 22, 2013

Dear Board Members,

My name is Glenn Jorgensen. I'm a setnet fisher in the Alitak Bay Section. Between my father and me, we hold two permits in this area. I am writing this letter in support of proposal 99. We both believe that this proposal is essential for the survival for this fishery and our set net operation. Due to my father's poor health, he has not been able to participate in the last few years. This means every year we have to do a medical transfer. This is only effective for so long or take the risk of a permanent transfer to someone else. Some of my fellow fisherman and I are unable to fish all permits because we don't have anybody to hold the permit because of the risk. Due to poor returns in our area, you can't survive only fishing one permit. I need all the gear fishing every day in order to make it.

I hope the board deeply considers passing proposal 99. This proposal will allow our operation a chance to survive and be more productive for the future fishers in our family.

Sincerely,

Glenn Jorgensen

John Jorgensen

Two handwritten signatures in black ink. The top signature is for Glenn Jorgensen and the bottom signature is for John Jorgensen.





Nina Burkholder

35717 Walkabout Rd.

Homer AK 99603

Dear Chairman and Members of the Board,

I would like to show my **support** for proposal 99. And my sons **support**

I hold limited entry permit # SO4K 59836 and my son Gabriel Brown holds permit number SO4K 60622. We fish in the Alitak District. My father started fishing here in 1957 and the area I fish has been in the family since that time. This is what I do and who I am and I want this opportunity for family yet to come.

I support this proposal with the condition that the permits remain in the family business, fished in their original or close proximity to where they have historically been fished, not causing any further consolidation of gear. Allowing a family owned operation with multiple permits to remain in tacked under situations that cause a permit holder to be absent.

If this proposal was not put into permanent regulation and simply just sunset to be reviewed every so many years it could discourage the sale of a permit for the sole purpose of stacking. We do have a situation in the fisheries right now were a family member may have to seek employment else were because it's simply not viable. There are health issues & college commitments as well. Most all of us love what we do and want to keep our operations going. Most situations are temporary and this could offer a crutch to help a family business through a tuff time.

Thank you for your consideration.

Nina Burkholder and

Gabrial Brown

A handwritten signature in cursive script that reads "Nina Burkholder".

A handwritten signature in cursive script that reads "Gabe Brown".



Dear Mr. Chairman and Members of the Board,

I would like to show my **SUPPORT** for proposal 99.

My name is CAROL LATHER

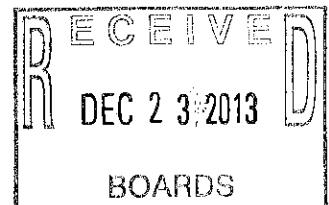
I set net for salmon on Kodiak Island.

I hold limited entry permit number 59426-G

I fish in the UGANIK District.

I support proposal 99 because: *I HAVE OLDER FAMILY I AM CARING FOR - SO I HAVE HAD TO LEAVE TOWN DURING FISHING & LOSE 2-3 WEEKS INCOME*

*Carol M Lather*





Dear Mr. Chairman and Members of the Board,

I would like to show my **SUPPORT** for proposal 99.

My name is RICHARD LATTER

I set net for salmon on Kodiak Island.

I hold limited entry permit number SO4K62116S

I fish in the UGANIK District.

I support proposal 99 because: WE HAVE YOUNGER FAMILY PERMIT HOLDERS WHO HAVE - SCHOOL & COLLEGE ~~OBG~~ OBLIGATIONS THAT PREVENT US FROM FISHING THAT PERMIT ALL SUMMER. WE HAVE FAMILY MEDICAL ISSUES THAT PREVENT OLDER MEMBER - PERMIT HOLDERS FROM BEING PRESENT ALL SEASON.  
Richard Latter





December 2, 2013

Boards Support Section  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, AK 99811-5526  
**Attn: BOF Comments**

Re: Proposal 98, to allow Kodiak Area CFEC seine salmon permit holders to operate additional gear under a dual permit or joint venture.

To whom it may concern:

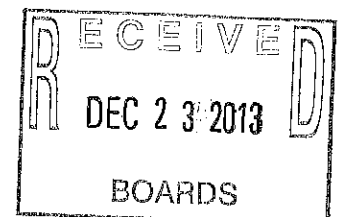
We support the adoption of proposal 98 and moving it forward into regulation, with option 1 (allowing dual permit holders) being the preferred option.

There are currently about 376 permits annually issued in the Kodiak area purse seine salmon fishery. In the 2012 fishery, the most recent for which the data are available, only 166 of the available permits were actively fished. This means that there are over 200 latent permits out there, which we would argue is an excessive amount given the characteristics of this fishery. Although the Kodiak area is relatively large, boats tend to concentrate in certain locations at certain times during the season due to the vagaries of geography and the timing of the salmon runs, such that overcrowding becomes a problem. Indeed, at certain sites the lineup can be such that boats may only make 3 or 4 sets in an entire day. If a significant number of these latent permits become active, which is a distinct possibility given the current renewed interest in the Alaska salmon fisheries, overcrowding in the fishing grounds may become a serious problem moving forward into the future. Also, during peak pink salmon years, the processors sometimes institute a daily catch limit, as happened recently in the 2013 season. An excessive increase in active permits would likely lead to more days of catch limits. And with the market being as fickle as it is (surely many remember when pinks were less than 10 cents a pound), the case of overcrowding on the grounds, more daily catch limits, and a low price would diminish the economic viability of the Kodiak salmon fishery for the active participants.

We see this proposal as a means to incentivize current permit holders to acquire a second permit (either themselves under option 1 or to have a crewman with a permit under option 2), thus reducing the potential of harm from excessive latent entry in the future. The proposal would help provide long-term stability for the current active participants that depend on the fishery. Allowing a 20% increase in seine length to 300 fathoms seems a reasonable incentive that shouldn't create any problems on the fishing grounds, and shouldn't harm those fishing with the current 250 fathom net. There is a precedent for this model; such a situation already exists in the Bristol Bay drift gillnet fishery (5 AAC 06.333), where joint operations, with two permits on board, are allowed a longer gillnet. Kodiak area purse seine permit prices are relatively low because there are so many of them. The cost of acquiring a second permit would not be excessive when compared to the overall costs involved in the fishery. Thus, we would argue that this proposal represents a reasonable way to achieve the goal of reducing the number of latent permits in the Kodiak Area purse seine salmon fishery.

Thank you for your consideration.

Sincerely,  
  
(all of the undersigned are Kodiak area purse seine permit holders)





Signature

Printed name

Charles P. Foyle

Charles P. FOYLE

Steve L

Steven E Horn

Bryan H

Bryan Horn

Sam Murch

Sam Murch

Matt Hegge

Matt Hegge

Dale Pruitt

DALE PRUITT

Mitch Keplingen

Mitch Keplingen

Teremic Pikus

Teremic Pikus

Craig Schauff

Craig Schauff

William Schauff

William Schauff

Robert J Schauff

ROBERT J SCHAUFF

DI Vinberg

DI Vinberg



Signature

Printed name

*Dan McLean*

Dan McLean

*Hurt Carlson*

Hurt Carlson

*Alex Roth*

Alexander Roth

*Renee Weddle*

Renee Weddle

*Matthew Alward*

Matthew Alward

*Greg Johnson*

Greg Johnson

*Steven Roth*

~~Steven Roth~~

*Adam C Barker*

Adam C Barker

*Erik Fellows*

Erik Fellows

*William Costello*

William Costello

*Ken Christensen*

KEN CHRISTIANSEN



Robert Dierich

*[Handwritten signature]*

ROBERT DIERICH

TIM GOSSETT

Raymond May

*[Handwritten signature]*

Raymond May

LUKE LESTER

James R. Horn

JAMES R. HORN







Dear Mr. Chairman and Members of the Board,

My name is James R. Peterson. I set net for salmon on Kodiak Island. I hold limited entry set net permit number S04K 61186F

I would like to show my **SUPPORT** for proposal **PROPOSAL 99 - 5 AAC 18.331**. Gillnet specifications and operations. Reinstate dual set gillnet permits for single permit holders.....

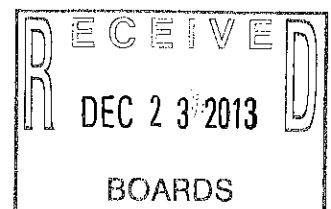
I am a lifelong Alaskan and have fished in the Alitak Bay district since 1965. Our fishing sites had been around and operated long before limited entry for salmon permits was established in 1972. I was awarded my permit and two others when limited entry was established and I purchased the sites from my boss the previous owner. Throughout the years I was able to rely on various family members and deckhands to hold the permits so we could fish the sites that we have always traditionally fished since before limited entry came to pass.

When permit stacking was trialed the last time we just fished our sites as usual. All we are interested in doing is fishing the fishing sites that I bought originally and permit stacking allows us to do this and keeps the ownership of our fish camp secure.

I would be open to any ideas on how to make this work.

Thank-you,

James R. Peterson





Dear Mr. Chairman and Members of the Board,

My name is Donald Peterson and I have been set netting on Kodiak with my family since I was born. I am set net permit holder S04K 62133M

I would like to show my support for proposal 99 to bring back permit stacking for Kodiak salmon set net permits.

I am 25 years old now and permit stacking is important to me because I want to see our family business stay intact and hopefully take it over some day if that is in the cards. Because of other career opportunities I am unable to spend entire summers fishing at my family's set net camp and mostly just go to camp to keep the shore leases associated with my permit active.

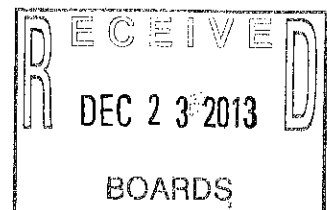
I would not be able to make a living or even come close to making expenses if I fished my permit by myself. My permit is part of the greater whole so to speak of our family fish camp operation. Presently our camp is not fishing to capacity because I can't be there all the time in the regular season.

The intention of permit stacking for our family is to just keep our currently registered fishing sites actively fishing allowing our camp to remain viable and exist for future generations.

Thank-you,

A handwritten signature in cursive script that reads "Donald C. Peterson".

Donald C. Peterson





Dear Mr. Chairman and Members of the Board,

My name is Kimberly Peterson and I have been set netting on Kodiak with my husband and our family since 1985. I am set net permit holder S04K 61848J.

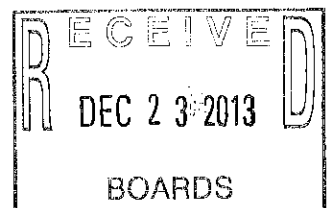
I would like to show my support for proposal 99 to bring back permit stacking for Kodiak salmon set net permits.

It is important to understand that most set net camps are run by families with limited entry permits in grandparents, parents and kids names. What happens if someone dies or if the kids decide they don't want to fish anymore? Most camps can run profitably only because they are able to fish multiple permits.

I have heard some good suggestions on how to keep people from abusing the system if they are able to permit stack. I hope that we can discuss these options and come up with a way to make permit stacking palatable to the people that oppose it.

Thank-you

Kimberly Peterson



LAW OFFICE OF  
**BRUCE B. WEYHRAUCH, LLC**

whyrock@gci.net

114 S. FRANKLIN ST.

SUITE 200

JUNEAU, ALASKA 99801

TELEPHONE: (907) 463-5566

FAX: (907) 463-5858



PC 31  
1 of 4

December 23, 2013

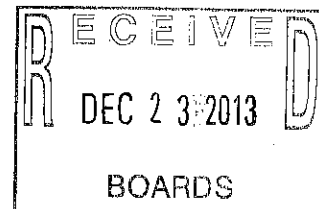
Mr. Karl Johnstone, Chairman  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Chairman Johnstone:

We represent the Alaska Scallop Association and submit these comments to the Alaska Board of Fisheries related to Proposal 369 on Alaska's Scallop Management.

We thank ADF&G scallop managers for their efforts to work with commercial fishermen on Proposal 369. Except for a few modifications, we believe Proposal presents a workable plan that will allow this very small fishery to be harvested in a manner that respects those fishermen with a long history and dependence on it, while ensuring the appropriate conservation and management of the fishery for sustained, healthy harvests.

As a preface to specific comments on Proposal 369, it is not well known some specifics about the Alaska scallop fishery. It is expected that the state fishery allocation around Kodiak is a very small 20 thousand pounds, which is not a very big. Three other scallop management areas will see small allocations (e.g., Yakutat, 20 thousand lbs, Area 16 Cape Fairweather, 5 to 10 thousand pounds, and Dutch Harbor, 5 thousand pounds). However, all of that is spread over a distance of 1,200 miles, from Cape Fairweather to Dutch Harbor. Since 1993, the department has been able to manage this far-flung fishery well by working closely with participants and the observers on the vessels participating in the fishery to maintain a close watch on scallop harvests. That had resulted in a stable fishery with long term benefits to the resource and participants.





Chairman Karl Johnstone  
December 23, 2013  
Page 2

We ask the Board to amend Proposal 369 in three specific ways. Section (e) of Proposal 369 reads, with our suggested revision, as follows:

Based on the department's assessment of vessel effort, ~~manageability, and available harvest in state waters,~~ IF ONE OR MORE NON-FEDERALLY PERMITTED VESSELS REGISTERS AND FISHERS IN A REGISTRATION AREA'S STATE WATER FISHERY, the commissioner ~~may~~ SHALL manage weathervane scallop in the state waters separately from weathervane scallop in the federal waters of the exclusive economic zone.

The reason for these revisions is that if any vessel fishes state waters only, then the department needs to manage the state waters in a registration area separately from federal waters. Just because a vessel owner registers their boat in an area does not mean that they will fish in the registration area for which they are registered.

Anytime a state-only vessel fishes on a bed, it could take more then it should reasonably be allocated to only the state side. If the department did not make a separate GHIL for the state side, the default GHIL for the state only vessel could be the entire GHIL & bycatch for both waters, federal and State. This amended language recognizes that danger to the resource, particularly crab bycatch, and instead of discretionary "may" language, the mandatory "shall" language is used to carefully monitor and manage the scallop fishery in the state waters separate for the state waters.

Section (i) of Proposal 369 reads as follows:

If the commissioner determines that a trip limit will contribute to conservation or promote an orderly fishery, the commissioner may close, by emergency order, the commercial weathervane fishery in a registration area, or portion of a registration area, and reopen the fishery during which a trip limit is in effect based on the guideline harvest level or remaining guideline harvest level divided by the number of vessels that are registered preseason under (d) of this section.



Chairman Karl Johnstone  
December 23, 2013  
Page 3

Trip limits are not needed because each vessel participating in the scallop fishery has an observer onboard. When an observer is onboard, the department can readily track what the harvest is, and can easily and quickly close an area in order to manage, conserve, and develop the scallop resource. ADF&G staff has managed scallop areas, big and small, for decades using observer reports. With these observer reports the department can call a closure (and has) very close to the guideline harvest level (normally within 0.1%).

If the Board continues with the trip limit language, then the limit should be managed by time, not weight. That would be an equitable method of managing the fishery and recognizes the various skill, equipment, and investment by fishermen. Calculation of time limits would not be difficult for the department to determine, using the catch rates determined by current and historical data.

Section (f) of Proposal 369 Proposal 369 reads, with our suggested revision, as follows:

If the commissioner determines that it is necessary for management and conservation purposes, the commissioner may require a vessel operator to register as provided by 5 AAC 38.076 for either the state waters of Alaska or the federal waters of the exclusive economic zone. The operator of a participating vessel may change registration only by notifying the designated department office in the area responsible for management of the fishery for which the vessel is currently registered. The vessel operator shall notify the department ~~at least 12 hours~~ before a change in registration under this subsection. Before changing registration and leaving the applicable waters, the vessel operator shall ensure that all harvested scallops are shucked and the harvest weight is reported BY THEIR OBSERVER to the department ~~on a fish ticket~~.

There is no need for any notice with observers aboard each vessel in this fishery. Observers count and report all catch and bycatch to ADF&G. Scallopers have been doing this kind of reporting to the department for 21 years when switching areas within regions, such as Shelikof, and NE Kodiak. Accurate catch accounting has never been a problem. Leaving in the language stricken above would lead to costly, unnecessary downtime, and opens participants to needless



Chairman Karl Johnstone  
December 23, 2013  
Page 4

potential violation issues with enforcement agencies related to technicalities on the language in the Proposal. This can be accomplished by amending section (g) of Proposal 369 as follows:

(g) A registered vessel OBSERVER ~~operator~~ must report each day to the designated department office in the area responsible for management of the fishery any information that the commissioner determines is necessary for the management and conservation of the fishery.

Alaska's Weathervane scallop fishery has been well managed for years and has earned a "Green" rating from the Monterey Bay Aquarium's Seafood Watch. Without requiring observers onboard each boat participating in this fishery, this fishery will not only lose that highest rating for environmental stewardship of the scallop resource, it will obtain "RED AVOID" rating. That will move both product demand down and force prices down.

Without observers on scallop vessels, as has been the case for many, many years, ADF&G will have no way to effectively track catch rates and crab bycatch. Also, without observers, fishermen will have no incentive to move off areas of high crab bycatch, because they will only target areas of the highest scallop catch. The Tanner crab biomass could be unduly harmed without observer coverage.

While the Scallop observer program is not specifically mentioned in Proposal 369, mandatory observer coverage should be part of this fishery, but over the past 21 years since 1993, scallop fishermen have witnessed great benefits to having them. Solid data collected by the observers has defended participants and the department against pre-conceived notions that the fishery should be halted.

In addition, scallop fishermen, in working closely with department managers and observers, have been able to open areas closed to them for 40 years that would be unimaginable to open without the information observers provide.

We thank the Board for considering these comments on Proposal 369.

Very Truly Yours,

A handwritten signature in black ink that reads "Bruce B. Weyhrauch".

Bruce B. Weyhrauch



Submitted By Bryan Ellsworth

Affiliation

Phone 9075123003

Email [bryanellsworth@gmail.com](mailto:bryanellsworth@gmail.com)

Address 1948 Marmot Dr  
Kodiak, Alaska 99615

Bryan Ellsworth

Board of Fisheries Proposal 98

Dec. 23th 2013

Board of Fish Members,

I would like to strongly oppose the ability for seine operators to have the ability to stack permits or joint venture in order to utilize more gear in the water. Over the last 20 years the seine fleet has become more and more efficient. Boats have become larger, mechanical technology including seine skiffs and hydraulic blocks have become amazingly powerful and efficient, and the communication technology that allows the fleet to communicate and work together has redefined the fishery. This proposal would go the next step in this progression and allow the biggest boats further advantage over smaller operators and the set-gillnet fleet.

Mentally compare the advances of the last twenty years that have helped the set-gillnet fleet around the island. Better net washing systems are the only real advances in the technology that has helped the set-net fleet harvest more efficiently. I personally have suspicions that with bigger boats and better technology the seine fleet has been able to fish more effectively off of the capes in more adverse conditions over the last decades, allowing them to intercept a larger proportion of fish overall.

Providing them the opportunity to become more efficient by fishing more total gear only benefits the larger boats and magnifies their advantage in the fishery. The stacking of permits will limit the ability for young entry-level operators in the fishery. The ability of more gear in the water to intercept more fish traveling on the coast is logical. This efficiency is then a reallocation away from other seiners down flow, set-gillnet operators working in the bays and smaller seiners working more protected waters. Therefore the most capitalized fishermen are the only ones who benefit from proposal 98. Moreover, there increased efficiency could have impacts on the overall opportunity of all gear types if it had impacts on salmon escapement at the river. This would expand the impact of this proposal on smaller operations and the historic nature of the fishery.

With higher prices many latent seine permits have become active. Proposal 98 only limits opportunity for smaller operators and set-gillnet fishermen. For this reason I oppose this proposal and think it will harm the Kodiak Island salmon fisher.

Sincerely,

Bryan Ellsworth

1948 Marmot Dr.

Kodiak, Ak





Submitted By Bryan Ellsworth

Affiliation

Phone 907 512 3003

Email [bryanellsworth@gmail.com](mailto:bryanellsworth@gmail.com)

Address 1948 Marmot Dr  
Kodiak, Alaska 99615

Bryan Ellsworth

Board of Fisheries Proposal 95

Dec. 23th 2013

Board of Fish Members,

I am writing in support of proposal 95. As an owner of a set-gillnet fishing site operating in the central district this proposal would allow valuable opportunity to catch Spiridon bound sockeye. As you know these fish are headed to the KRAA enhanced system that is a terminal harvest area and by regulation seine only. Due to the way our fishery is managed on years when the Karluk early reds are in low abundance, we are limited in our fishing opportunity and thus don't have the ability to catch these returning fish. As set-gillnet fishers we don't have the ability to easily move our operations to take advantage of other open areas, many of which are not open to set-gillnet fishing. When the Central district is closed to fishing, a seiner can always park in the Spiridon Bay terminus and actively fish these reds while we must sit and wait for further escapement on the Karluk system.

This proposal is modest in my opinion, and allows a short window of opportunity to help the central district set-gillnet fleet target this enhanced run that we all have paid taxes to support. Of course some fishermen, especially seiners will say, that it is unfair to have a set-gillnet only opening. However, taking into consideration the general economic realities of the two gear types, it is clear that the mobility of the seine fleet provides them far greater opportunity than set-net fishers. Many of the areas that the seine fleet will fish if the West side of Kodiak is closed, are off limits to set-gillnet fishing by regulation. This includes all of the terminal harvest areas that are supported by KRAA enhancement that I know of. For these reason I think that Proposal 95 provides a fair and valuable opportunity for central district set-gillnet fishers to target these Spiridon reds that our enhancement tax revenues have supported.

Sincerely,

Bryan Ellsworth

1948 Marmot Dr.

Kodiak, Ak



Submitted By Bryan Ellsworth  
Affiliation  
Phone 9075123003  
Email [bryanellsworth@gmail.com](mailto:bryanellsworth@gmail.com)  
Address 1948 Marmot Dr  
Kodiak, Alaska 99615

Bryan Ellsworth

Board of Fisheries Proposal 99

Dec. 23th 2013

Board of Fish Members,

I am writing this letter to voice my opposition of Proposal 99. As the owner of a set-gillnet operation on Kodiak and a permit holder in this fishery I have insight and concerns about this proposal. The majority of set-gillnet operations have no need for this regulatory change. Many have traditionally been single permit sites or if they are multiple permit sites they are truly family run operations who have an adequate number of permit holders on site. In my perspective the sites that will benefit from this regulation change are those that are trying to run three or more permits. Some of the larger, multi-permit operations can benefit from this proposal because it allows them to consolidate permits under fewer individuals freeing others to participate in other salmon fisheries around the state. When permit staking was allowed for a short period of time this happened commonly, and one-time permit holders were free to travel to Bristol Bay to participate in that fishery while their gear remained active in Kodiak. I don't believe providing this opportunity for a small number of fishermen is what best serves our fishery.

The negative consequences of Proposal 99 and allowing the staking of permits need to be considered. Unlike the Bristol Bay fishery, which needed permit stacking as a tool to help manage the fleet size, Kodiak's set-gillnet fishery is stable and healthy with few latent permits and a balanced fleet. Allowing permit stacking will consolidate the fleet into larger multi-permit operations and limit the potential for new entry into the fishery. Permits availability will decrease and permit prices will increase. Single permit operations might also be negatively impacted as gear is shifted in location disrupting the "traditional" distribution of effort and catch, as larger multi-permit sites are established or as they increase in overall size due to the consolidation of permits.

The Kodiak set-gillnet fleet is very divided on this issue because it benefits some and not others, and has ramifications for the future of our fishery. Thank you for considering the rational for why I oppose Proposal 99.

Sincerely,

Bryan Ellsworth  
1948 Marmot Dr.  
Kodiak, AK



Submitted By Darius Kasprzak  
Affiliation Alaska Jig Association  
Phone 907.942.7930  
Email [kas\\_dar@yahoo.com](mailto:kas_dar@yahoo.com)  
Address 807 Jackson Lane  
Kodiak, Alaska 99615

Alaska Board of Fish members,

The Alaska Jig Association (AJA) supports the BOF advisory committee's recommendations and amendment to Proposal 44. This amendment requests the BOF to remove the Maximum Retainable Allowance (MRA) walleye pollock restraints from the State Pacific cod jig fishery, and thus establish a management plan for a State jig directed pollock fishery.

The jig fisheries provide entry level opportunity into Gulf of Alaska (GOA) fisheries, which is an integral component of maintaining working waterfronts. Jig fisheries sustain a dedicated jig gear only vessel contingent, and in addition contribute to a diversified fishing portfolio for other combination gear fishing vessels ported throughout coastal Alaskan communities. Increased jig participation is most likely to benefit coastal Alaskan residents and the local economies they rely upon. Increased jig deliveries promote local hire, encourage niche processing activity and foster onshore fleet services that are found throughout coastal communities.

Currently our Kodiak jig fleet has extremely minimal opportunities to harvest pollock. The brief Federal pollock opens that occur in waters relatively close to processing infrastructure, are essentially high volume and trawl gear dominated derbys, that leave no time for the far more selective and slower paced jig vessels to prosecute a viable fishery.

Currently, the only remaining recourse to jig harvest pollock is by attaining a MRA in other targeted jig fisheries such as cod. In 2013 the jig fleet has had great difficulty harvesting the State jig cod guideline harvest level (GHL) due to a lack of cod available inshore. Most of the jig harvest occurs after all other sectors have prosecuted the Federal A cod season, and in times of low cod abundance inshore the fleet has reduced opportunity.

Vessels have been encountering increased catches of pollock and have had to move away from pollock (as well as the cod associated with, and often mixed with schooling pollock biomass) as they are not able to retain more than 20% under a MRA. Without the cod to provide the allowance for the pollock, there is a loss of opportunity.

The GOA jig fleet has been recognized by Federal and State management authorities, and provided for in the context of directed harvest allocations and set asides for both cod and rockfish. Yet, abundant pollock remains among the last jig gear accessible species to be denied in practical terms to our sector as a target fishery.

Considerations:

- 1) The beleaguered Kodiak jig fleet is reeling from a double whammy of abnormally low inshore cod biomasses, coinciding with abnormally low ex-vessel cod prices. Meanwhile, inshore pollock biomasses and ex-vessel prices are up. Establishing a State jig pollock fishery could provide a substantial measure of emergency relief to the Kodiak jig fleet. Hopefully, such a measure could be accomplished in 2014, allowing the jig fleet to harvest pollock as soon as possible.
- 2) Value of Alaskan waters pollock harvest would most likely increase by allowing jig sector participation. Jig gear of the type normally used for cod typically harvests a large, superior grade of pollock. The hand tended fishing technique allows the potential for individual bleeding of fish, as well as gutting/gilling onboard and careful hand icing and layering. These quality improvements may encourage niche processing and artesian marketing. The debut of exceptionally high quality jig harvested Alaskan walleye pollock on the market may increase awareness and appreciation of this product, leading to improved overall market conditions for all pollock harvesting sectors.
- 3) Jig fishers need a structure to provide maximum flexibility to the jig fleet under the current overall MRA allowance. We are not asking for more of an initial allocation than is already set aside and accounted for under the current overall MRA allowance.
- 4) Consider a portion of the overall MRA to be available as a directed pollock GHL jig fishery, and a portion to remain as an MRA for the directed cod and rockfish jig fisheries.
- 5) Consider a stairstep increase to a following year's jig pollock GHL available, if harvested to within 90% on a given year. Likewise, GHL could stairstep back down if not harvested within 90% in two consecutive years. GHL would not stairstep down below parameters of initial allocation.
- 6) Considering mirroring legal gear requirements of the current GOA jig fisheries- specifically, a maximum of 5 jig machines limited to a maximum of 30 hooks each.

Thank you for your consideration, and I look forward to meeting with you during Jan.7-10 in Kodiak.

Sincerely,

Darius Kasprzak  
President, Alaska Jig Association

Submitted By deborah

Affiliation

Phone 907-299-1852

Email [debaloha@hotmail.com](mailto:debaloha@hotmail.com)

Address pobox3001  
homer, Alaska 99603



PC 34  
1 of 1

My name is Deborah Nakada-Limacher and I have been a commercial salmon and longline halibut fisherwoman in Cook Inlet for over 30 years. I have been setnetting since 1987 and have seen decreasing stocks of king salmon over the years. I have stood by and listened to the numbers of king salmon that have been wantonly wasted by the gulf trawlers and I beseech you to please sign this proposal into effect which will give the fleet 100% coverage. I attended meetings for this issue and it occurred to me that whatever coverage increase there was going to be was being extended to the smaller fleet of groundfish fisherman. I ask that this coverage be to the big trawl fleet that catches 10,000's of pounds of salmon and tanner crab and halibut each year only to be dumped overboard... Thank you, Deborah



Submitted By Don Dumm  
Affiliation  
Phone 9074863737  
Email [sourdoughsolar@gmail.com](mailto:sourdoughsolar@gmail.com)  
Address PO BOX 1723  
KODIAK, Alaska 99615-1723

Dear Members of the Board,

The following comments are in opposition to Proposals 99 and 98.

My wife and I both own and fish setnet permits on the West side of Kodiak Island. We have been against permit stacking since it's inception.

Dual permit stacking is derived from two state statutes which were passed to address the abundance of salmon set net permits in Bristol Bay. In that fishery it was determined that reduction of permits and gear was necessary and appropriate. No such determination has been made for the Kodiak set net fishery.

Proposal 99 as written would only consolidate permits and gear in fewer hands. This drives up the value of permits, reduces the number of permits available for sale, and severely limits opportunity for new entrants to the fishery. These are the conclusions of CFEC Report 12-02-N which addresses the effects of stacking in Bristol Bay.

In my opinion the Board needs to establish criteria where permit stacking is appropriate and in line with the intent of state statute. In fisheries that do not fit the criteria, proposals to stack permits should not be considered. This would save the Board time and possibly eliminate a bone of contention among permit holders.

Regarding Proposal 98:

I believe this proposal would primarily benefit purse seine permit holders who already have the means to accommodate a larger net to become even more competitive in the seine fishery. This would put other smaller boats at a disadvantage. In short, it would benefit some at the expense of others. For that reason alone, I am opposed to it.

Regarding Proposal 95:

I am in favor of this proposal as amended. It does give set net permit holders access to Telrod fish at a time when they would only be available to the seine fleet. I do not see it as a reallocation issue. At the same time I would not be opposed to including the seine fleet in the proposal as it would give all gear types more opportunity to harvest these fish.

Sincerely, Don Dumm

Submitted By Donald Lane  
Affiliation commercial Fisherman  
Phone 9072357898  
Email [drl@xyz.net](mailto:drl@xyz.net)  
Address PO Box 2921  
Homer, Alaska 99603



PC 36  
1 of 1

RE: ACR State Water Weathervane Scallops, FMP

Sirs: I support a FMP for state waters weathervane scallops fishery. Homer once had an active small boat scallop fishing fleet. After the F/V Mister Big scandal and Federal takeover that small boat fleet has disappeared. The State of Alaska has been very successful at creating and managing a state waters p-cod fishery among others. These state waters fisheries have provided opportunities for coastal fishing fleets which bring that value back to their coastal home ports. An open access state waters scallop fishery will prove to be another program that offers opportunity and benefit to coastal Alaskan fleets and ports. This benefit from state water scallops has mostly been displaced by a distant consolidated fleet with but a few owners.

I disagree with CFEC's analysis of what is "break even" in costs and profits. I think the analysis CFEC often uses in these recent discussions do not account for the diversity of our coastal Alaskan Fleet. A state waters scallop fishery would provide just one more thing, that taken together with maybe p-cod, salmon, and a bit of halibut, make our diverse small boat fleets very viable. Many of the small boat scallop fleet out of Homer in the 1980 and early 90's were in the 45ft range, used a six foot dredge, and used scallops as a supplemental opportunity. They brought those shucked scallops back to Homer which were well received by the public.

In addition, in the alternative ACR that I submitted asking for FMP for state waters Weathervane scallop fishery. What was left behind in the State of Alaska ACR was I asked that a vessel using a 6 ft dredge or smaller be required to carry an observer if requested by regional ADF&G. The observer costs for a smaller boat with small dredge may be an unnecessary and prohibitive burden.

I think this Open access State Water Scallop fishery is an opportunity for coastal boats and their homeports. Thanks for the consideration.  
Don Lane

Submitted By Eric Graves

Affiliation set netter

Phone 506-663-9112

Email [auggiegraves@charter.net](mailto:auggiegraves@charter.net)

Address 4430 Canyon View Place  
Wenatchee, Washington 98801



PC 37  
1 of 1

My name is Eric Graves. I am writeing this letter in support for proposal 99.

My dad started setnetting in Olga Bay of the Alitak district in 1953. He was abe to make a living for his family with one permit for several years. I am in support of this proposal because of the high costs and difficulty of transferring permits. In 1990, we bought a second permit from our neighbor. After that, my father retired and I am buying the operations from him. Our families operation now has two permits. Fishing in Olga has been a family tradition and I would like to keep it that way. The permit is in my sons name, however, the length of the season interfears with his school year, so he is unalble to be at the fish sight for the entire season. Due to our location of sites, in order to make setnetting a profitable endavor, both permits need to be used at all times. When we were able to stack our permits a few years ago it worked great for us and I did not hear of any problems.Thank you, Eric Graves



## Kodiak Setnet Fishery

The Kodiak Setnet Fishery is unique in comparison to other State fisheries, and thus justifies a specific management plan to fully utilize the resource for the maximum benefit of Alaskans. Four primary distinctions require specific consideration of the appropriate management plan.

1. Full participation in the fishery requires a time commitment of five months, four of which are required at a remote fishing site
2. Capital equipment required to execute the setnet fishery is not compatible with other gear types, limiting diversification
3. The low annual value of per-permit income, in comparison to capital requirements limits business profitability
4. The setnet fishery is culturally and historically based on family cooperation, requiring teamwork to maintain the camp and harvest operations

### **1. Full participation in the fishery requires a time commitment of five months, four of which are required at a remote fishing site:**

Although season-to-season variability exists, participants need to be prepared for early season openers and late season extensions. Alaska Department of Fish & Game (ADF&G) regulates the potential Kodiak salmon season, beginning on June 1st, ending October 31st [i]. While this five month season is rarely fished to the maximum extent, after the early season over escapement to the Karluk River in the relatively warm springs of 2002 – 2006, substantial discussion has taken place to allow openers as early as May 15, further extending the potential season beyond five months. Between 2002-2012, deliveries were made between June 1st and September 23 [ii]. Preparations for the fishing season require mobilization of supplies for the long season, further complicated by the remote locations of most fishcamps. Often times supplies are ordered throughout the winter, nets often need four month advance, skiff and building supplies can be even longer; most supplies are shipped from Kodiak and Seattle from late-April. Many participants are at their fishcamp in early May to receive supplies and begin preparing camp. At the season's end, demobilizing engines, fishing gear and the camp can take from one week to multiple, depending on weather conditions and other unforeseeable.

### **2. Capital equipment required to execute the setnet fishery is not compatible with other gear types, limiting diversification:**

Cabins, skiffs, outboards, lines, anchors, gillnets, shore leads, and pressure washers are not suitable equipment to facilitate entry into another fishery; and accumulation of capital to execute the setnet fishery is generally not possible in a single outlay without excessive debt or preexisting wealth. The minimum requirements to enter the setnet fisher are one – set, net, skiff and shelter, which alone can be acquired at relatively minimum cost; however the useful life of each component is short, where at any time maintenance, repair or replacement can prevent fishing. Almost all Kodiak setnet sites are in remote locations, increasing time and cost for all aspects of the operation (let alone the safety concern of unsafe marine equipment in harsh conditions). Most operations thus hold backup gear, such that unforeseen circumstances do not prevent harvest. Poorly maintained gear will eventually increase costs of operation and ultimately lost fishing, so continual reinvestment is required for full participation. While the Kodiak setnet fishery is a relatively long, every season occurs in the warm summer months, and closes for about eight months every winter. Capital acquired for participation in the setnet fishery sits idle during the offseason with little or no alternative use or means of production. The high cost of holding unused capital during the offseason, limits setnet fishermen's ability to acquire capital appropriate for participation in other gear types or fisheries.

### **3. The low annual value of per-permit income, in comparison to capital requirements limits business profitability:**

Acquiring the necessary capital to participate in the setnet fishery is risky due to the ratio of fixed outflow (buying into the fishery) and anticipated revenue on a single permit. According to Dock Street Brokers a single "turn-key" setnet operation can be purchased for between \$200K and \$275K [iii], while, the cost of the permit alone is only \$78,400. [iv]; the majority of cost for entry level fishermen is gear, equipment and housing. According to CFEC, average returns over the past 10 years for Kodiak setnet operations are only \$37,876 [v]. A \$250,000 loan at 7.5% discount rate for a period of 10 years, requires a fixed annual outlay of \$36,421, which is nearly the entire expected return for a single setnet operation. In addition to covering the cost of capital, annual fixed costs easily consume an additional \$5K annually, bringing total fixed costs to purchase a Kodiak setnet to \$41,421 – an annual loss of \$3,545. These costs can be offset by combining two compliments of gear (stacking two permits), and increase annual yield to \$75,752. The addition of one more permit increases annual fixed costs by \$14,500, and more effectively covers the fixed gear requirements which outweigh the cost of permits by a factor of two.

Due to the remoteness and labor intensity of setnet fishing, consumable costs can be substantial relative to expected returns. Food and fuel can easily cost over \$3,000: food - \$5/day/person & about an hour run time on a 60hp outboard. Travel can easily cost \$1,500 – two charter flights to remote locations. With the assumption that only one crew receives 15% share, this leaves \$27,694 for a permit holder's four-month commitment – a loss of \$8,727 based on empirical data necessary to cover fixed capital. However adding an additional compliment of gear, can easily be fished with the same two people that are required to operate one permit, and thus consumables do not increase with the exception of small increases in fuel use. Additionally, the crew doubles their potential income to what could be





#### **4. The setnet fishery is culturally and historically based on family cooperation, requiring teamwork to maintain the camp and harvest operations:**

The minimum participants necessary to effectively execute the Kodiak setnet fishery is two individuals, for either one or two permits; however, the secluded lifestyle of living in remote beach locations is aptly suited to support a family structure, and predictably, most operations are run as a family business. The most efficient means of production over the short term is for a two-unit family to each hold and fish one permit, combining profits and sharing costs. This option is only most effective over the short term, as passing the operation to the next generation requires new entrants. New entrants can either purchase all holdings from the previous owners, or can begin to work with the existing operation to learn the necessary skills while they incorporate more and more of the operation under the new entrants control. Historically, passing the operation between generations is the primary means of allowing new entrants into the fishery. As the family structure becomes more complex, moving away from the two-unit, single generation family towards multigenerational participants, some members are either too old or too young to maintain harvest operations. Instead these more complex family units collaborate around the camp - cooking, cleaning, upkeep, building and machine maintenance, and help on the water when conditions allow (neither young or old cannot be expected to work the long physical hours, nor manage harsh weather). Diversification of labor requires a multigenerational commitment where old and young help where they can, but generally have life commitments that interrupt full participation leaving middle aged members to bridge the gap and sustain a long-term commitment to the fishery.

Most Kodiak setnet operations in existence today were initiated between the 1970's-1980's, leaving the original purchaser and heads of households to be approaching an age of retirement. The average age of Kodiak setnetters has risen to 49.6<sup>[v]</sup>. As Kodiak setnet provides a way of life, and promotes family operations, emotional considerations weigh heavily into market dynamics – this very strong bond has measurable affects on transition considerations. Many heads of household would prefer to pass the operation to a next generation family member, although life does not always facilitate this decision. As outlined earlier, the time commitment required, and the limited diversification of capital equipment often has prevented heads of households from pursuing alternative careers apart from setnet fishing. This means that setnet fishing may be the only income, and thus siphoning off additional money to transfer ownership to the younger generation may inhibit the wealth generating ability of new entrant family members, especially in a single-permit framework. In short what may be suitable to sustain one two-unit family may not provide appropriate incentive for younger generations to participate as more complex family structures evolve. This scenario has played out multiple times in single permit operations, leaving an aging generation of setnetters with no new family members interested in retaining the operation. Alternatively, other operations have kept younger generations involved, and importantly, well paid, promoting a new generation of young entrants into the fishery.

#### **Conclusions**

The Kodiak setnet fishery has many special distinctions that set it apart and make it unique from other fisheries, even within the gear type. Setnet gear is not compatible with other fisheries, tying up capital and limiting options for diversification; further complicated by the four-month commitment to staying on-site at remote fishing locations. The average returns on a single setnet operation over the past 10 years does not provide sufficient yields to cover the cost of capital, consumables, labor and investment over the long-term; however, stacking dual compliments of gear can incur negligible additional costs while almost doubling revenue, bringing annual yields to a level sufficient to sustain the operation over the long-term. The most efficient operational structure is a single-generation, two-unit family, sharing revenue and spreading costs; however, historically and culturally the Kodiak setnet fishery supports multigenerational complex family units, where cooperation is required to facilitate the operation, and especially transition between family members who require flexibility that is not inherent in Kodiak setnet fishing. Long-term challenges exist for new entrant participation into the fishery, and especially the family fishing operation if ownership restrictions limit holdings to a single permit.

---

[i] Source: ADFG

[ii] Source: Kodiak ADFG

[iii] <http://www.dockstreetbrokers.com/permits.php?category=Alaska>, 8/3/13

[iv] [http://www.cfec.state.ak.us/pmtvalue/X\\_S04K.HTM](http://www.cfec.state.ak.us/pmtvalue/X_S04K.HTM), 8/3/13

[v] <https://www.cfec.state.ak.us/RESEARCH/12-3N/12-03%20DNR%20CFEC%20Set%20Gillnet%20sites.pdf>

[vi] [http://www.cfec.state.ak.us/RESEARCH/13-1N/CFECRpt13\\_1N\\_TStudy\\_2012.pdf](http://www.cfec.state.ak.us/RESEARCH/13-1N/CFECRpt13_1N_TStudy_2012.pdf)



As the Proposer of the controversial Stacking Proposal (99), I knew that the key to gaining Board support would have to start with broad-based support from participants in the directed setnet fishery. Unfortunately, full consensus on this specific tool for addressing structural problems facing the setnet fishery fell short; although what became apparent was that the Kodiak setnet fishery faces long-term challenges that need to be addressed. The most important finding I have learned through this process is that as a group, we share a common interest in addressing these challenges.

Since submitting the Stacking Proposal in April I have attempted to gather as much information from stakeholders as possible to better understand the implications of such a regulatory adjustment on individual fishermen, primarily those engaged in the Kodiak setnet fishery. Despite the controversial underpinnings of this discussion, the intent has always been to find solidarity within the fishery, and to create a discussion about the future of the fishery, especially my assumption that the fishery in its current form will lead to a gradual reduction in participation. My primary point of contact through this process has been an individual that has an opposing view of the merits of set-net stacking; this individual provided me with a comprehensive distribution list of setnetters (over 100 contacts). Through this contact list I distributed a survey and organized a meeting. 31 participants responded to the survey, and predictably responses were as varied as the setnet fishery. The general consensus was that the fishery faces structural problems over the long-term that require some change going forward.

Based on the feedback from this survey and discussions with stakeholders on both sides of this issue, a meeting was called to have a more thorough discussion. At our meeting (Fisherman's Hall, 11/30/13), 12 participants shared a wide range of views, with a general consensus that the current management plan for the Kodiak Setnet fishery created problems for existing participants, especially in regards to transferability to new entrants. No firm agreement was reached on what changes would create a better regulatory environment for this fishing group, although all agreed that having such a discussion was important to forming consensus. All 12 stakeholders who participated in our meeting agreed that the discussion we held was inclusive and a positive step towards understanding stakeholders concerns regarding the Kodiak setnet fishery, and commented that while no agreement was reached, the coordination of opposing views was valuable for all stakeholders.

A very similar set of conclusions could be made about the Kodiak Advisory Meeting (Kodiak Visitors Center, 12/17/13), where many addressed concerns for long-term participation in the setnet fishery, but ultimately, support for the stacking tool fell short.

The follow is a quick summation of the 31 survey respondents; while the sample pool has not been tested for biasness, the distribution list is largely representative of current participants.

Q1: Requesting participation in 11/30/13 meeting.

A: N/A

Q2: The Future of the Setnet Fisher:

A:

- Faces a consolidation problem, which risks locking out all future users. - 4 • 14.81%
- Is entering a structurally difficult transition between generations. - 13 • 48.15%
- Faces a lack of profitability to entice future participation from diversified fishers. - 14 • 51.85%
- Risks losing traditional allocation of fish to other user groups. - 17 • 62.96%
- Risks structural challenges due to low payment to crew, and capital reinvestment. - 13 • 48.15%
- Risks access to future resources due to poor management. - 15 • 55.56%
- Faces no real concerns going forward. - 2 • 7.41%

While four respondents report their highest concern is consolidation, and two report no problems, roughly 78% term structural problems.



Q3: The "special considerations" identified in comments under – *Kodiak Setnet Fishery*:

A:

- Are really not a concern for our operation. - 6 • 33.33%
- Require special attention or an improvement to setnet efficiency. - 12 • 66.67%

Q4: Considering the future of your own operation:

A:

- I never plan on selling. - 11 • 37.93%
- I will likely sell, or transfer my operation to family. - 15 • 51.72%
- I will likely sell, or transfer my operation to working crew (right-hand man). - 0 • 0%
- I will sell my operation on the open market. - 3 • 10.34%

90% of respondents will never sell or intend only to transfer assets to members of their family. This indicates that without forcing permit holders from divesting assets, the families participating today will not differ drastically from those participating in the future.

Q5: How much longer do you foresee working your permit, as the primary operator?

A:

- I no longer am the primary operator. - - 6 • 19.35%
- 1-5 years - 4 • 12.90%
- 6-10 years - 5 • 16.13%
- 11-15 years - 4 • 12.90%
- 16-20 years - 2 • 6.45%
- 20+ years 6 • 19.35%
- Other (please specify) - 4 • 12.90%

If the sample population is representative of the fishery, this indicates that 32% will no longer be the primary operators in the next 5 years – equal to the percentage that anticipates participating for more than the next 20 years (all other respondents indicated they would quit when they die). We need a model that allows for transfer to a new generation of setnet fisherman, and the best information we currently have is

that challenges to transferability, or opportunity for new entrants is being restricted by the inflexibility built into th



**My primary concern is that an overall lack of opportunity, and lack of flexibility will gradually lead to reduced participation, with no viable means of allowing new entrants to the fishery; this is a problem that will mostly affect families and professional fishermen, especially the professional fishing family.**

Submitted By Harvey Goodell  
Affiliation set gillnet permit holder



PC 39  
1 of 1

Dear Mr. Chairman and Board members,

I, Harvey Goodell, would like to go on record OPPOSING proposal 99.

( Permit Stacking in the Kodiak set gillnet fishery.)

I have testified in 2008 and 2011 board cycle opposing permit stacking.

My partner and I hold permits and fish the set gillnet fishery on the west side of Kodiak with our 2 daughters and crew.

I feel stacking permits consolidates the fishery, reducing opportunity and impacting other fisheries and employment. No study has been performed to warrant permit stacking in Kodiak.

We have seen an increase in the price of salmon in recent years. 2013 saw the highest exvessel value in 10 years @ \$55,672. When the Alaska State Legislature passed legislation allowing dual holding, HB 286 and then HB 251 salmon prices were at historic lows.

Knowing that several sockeye systems on Kodiak Island are experiencing low returns, ADF&G and the local aquaculture association (KRAA) are addressing these concerns.

In closing. Please oppose proposal 99 to maintain active participation of one permit, one person in the Kodiak set gillnet fishery.

Sincerely, Harvey Goodell



Submitted By Ian Ivanoff

Affiliation

Phone 570 637 0064

Email [ian.ivanoff@gmail.com](mailto:ian.ivanoff@gmail.com)

Address 1327 Mountain View Dr.  
Kodiak, Alaska 99615

I have fished out of Kodiak for 21 years, and follow Alaska fisheries management closely.

I support the proposal to require 100% coverage on all trawl vessels. The current level of trawl fishery observer coverage only accounts for 17% of trips. Several state and federal fisheries have experienced drastic cuts, and trawl bycatch is a significant factor in the distressed fisheries. Without more complete data the fisheries management can not make informed decisions to ensure the states fisheries remain sustainable.

The state exerts a huge amount of effort and money to manage the fisheries sustainably. Without comprehensive data collected by observers it is clear that the fisheries management efforts have not been effective. The ineffectiveness of the fisheries management is best supported by the decline in halibut and chinook fisheries.

Please take the required measures to manage Alaska's fisheries effectively.