

Public Comments for Bristol Bay Finfish
December 1-8, 2009

KAFC PC1
Kevin Schrier PC2
Reid Ten Kley PC3
Stosh Anderson PC4
Sidney A. Nelson PC5
Bristol Bay Borough PC6
Jennifer Aspelund PC7
Howard Knutson PC8
Claudia Anderson PC9
Tony Jones PC10
USFWS PC11
Dan Farren PC12
Harley Ethelbah PC13
Steven D. Bruno PC14
Don Alvarado PC15
Darryl Pope PC16
James Coyle PC17
Ketchemak Bay Conservation Society (KBCS) PC18
Bruce Whiting PC19
Warren Gibbons PC20
Rick Johnson, et al. PC21
George Matz PC22
Katmailand Inc. PC23
Marilyn A. Hansen PC24
Women's Flyfishing PC25
Bruce Jolma PC26
Bruce and Colleen Whiting PC27
Eli Kriegh PC28
Eric Hesslroth PC29
John Schandelmeier PC30
Danny Togiak PC31
Aleknagik Traditional Council PC32
Katherine Carscallen PC33
Gust Bartman PC34
Sarah Evans PC35
Rollman Family PC36
Copper River Seafoods PC37
Becky Savo PC38
Scott Cheledinas PC39
Ralph Mancuso PC40
Cecil Ranney PC41
Ludwig Family PC42
Joel Ludwig PC43
Gene Maltzeff PC44
Betty Bonin PC45

Public Comments for Bristol Bay Finfish

December 1-8, 2009

Tommy Evon PC46
Eric Rosvold PC47
Bobby Larson PC48
Jack Smith PC49
Robert Clark PC50
John Wise PC51
Dave Hansen PC52
Michael Palmgren PC53
Sally Gumlickpuk PC54
NMWT Land Trust PC55 (Nushagak-Mulchatna-Wood-Tikchik Land Trust)
Dan Dunaway PC56
Corey Arnold PC57
Harlan Bailey PC58
National Park Service PC59
Madson Family PC60
NMWT Land Trust PC61 (Nushagak-Mulchatna-Wood-Tikchik Land Trust)
Donald Mack PC62
Braund & Olson PC63
Christine Most PC64
Royal Coachman Lodge PC65
Copper River Lodge PC66
Reid Ten Kley PC67
John Herrity PC68
Joseph Faith PC69
Diane Wetter PC70
Arthur Bloom PC71
Roseleen Moore PC72
Charles Treinen PC73
CAMF PC74 (Concerned Area M Fishermen)
The Nature Conservancy PC75
Kevin Marilley PC76
Jason Kohlhas PC77
Kvichak Setnetters Assoc. PC78
Koliganek Natives LTD PC79
Lake and Pen. Borough PC80
Peter Thompson PC81
Todd Granger PC82
Greg Blakey PC83
Paul & Jeanne Sorenson PC84
Choggiung LTD PC85
Dan Layland PC86
Chad Norris PC87
Konrad Schaad PC88
Vincent Maritime Services PC89
Heather DeBolt PC90
Vukich Family PC91

Public Comments for Bristol Bay Finfish

December 1-8, 2009

Hopkins Family PC92
Thomas Quinn PC93
Kim Rice PC94
John & Christine O'Connor PC95
Charles Borbridge PC96
Nick Lee PC97
Verner Wilson PC98
Kurt Johnson PC99
Eric & Karyn Slotten PC100
The Pebble Partnership PC101
Misty Fjord Seafood PC102
Gunnar Knapp PC103
Shannon Ford PC104
Popa Family PC105
AIFMA PC106 (Alaska Independent Fishermen's Marketing Association)
Kendra Zamzow PC107
Trout Unlimited PC108
Carol Ann Woody PC109
Jack Keane PC110
BBDA PC111 (Bristol Bay Driftnetters Association)
David Rogotzke PC112
Todd Overby PC113
Bruce Marifern PC114
Dennis Gudmundson PC115
BBEDC PC116
Chris Napoli PC117
Meg Schroeder PC118
Keggi Tubbs PC119
Marilyn Wilson PC120
Helen Smeaton PC121
Charlene Lopez PC122



**Kenai
Area
Fisherman's
Coalition**

RECEIVED
OCT 08 2009
BOARDS

PROTECTING YOUR FISHING RIGHTS & RESOURCES

P. O. Box 375 Kenai, Ak. 99611 (907) 283-1054 dwimar@gci.net

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

Dear Board Members

Kenai Area Fisherman's Coalition (KAFC) would like to take this opportunity to ask the Board of Fish to support Proposal 13 at their December meeting and to pass a resolution recommending to the Alaska Legislature that additional regulatory protections be enacted to ensure the health and viability of fish habitat in the Kvichak and Nushagak drainages.

KAFC is a private angler's group with 10 retired fisheries biologists in its membership. We also represent over 200 members who reside throughout the Kenai Peninsula and Cook Inlet basin. We feel that with its unique habitat and exceptionally large runs of salmon, Bristol Bay merits special protections. Proposal 13 simply asks that fish stocks and habitat be maintained, while also protecting the interests of all existing user groups, in this case commercial, sport, and subsistence fishers. With these watersheds supporting the state's largest runs of Chinook salmon and the world's largest run of wild sockeye salmon, this seems the least we can do in an effort to maintain these stocks and keep them healthy for future generations.

We would like to thank the board for their time and consideration of this very important proposal.

Sincerely,

Dwight Kramer
KAFC Chairman

Public Comment # 1

Attn: BOF COMMENTS
Boards Supports Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

RECEIVED
OCT 08 2009
BOARDS

From: Kevin Schrier, Kvichak Setnetter
Bristol Bay Finfish Proposals

Proposals 17, 18 and 19:

I support these proposals, as they allow a permit holder to fish more gear in these hard economic times. They also allow permits to stay in families without having to rely on crewmembers to hold permits.

Proposal 34:

I am very much in opposition to this proposal. This has been tried before with the result that the drift fleet fishes for as many as 5 or 6 openings to the setnetters' 1 opener. If anything, I feel that the present 3-to-1 drift/set ratio should be changed back to 1/1 or 2/1 – for when we all fish in the general Naknek or Kvichak districts, the drift fleet and setnet group are given roughly **equal time**. The NRSHA is a unique fishery because of its size – the result of this is that the **number of participants** is sometimes very different than what is observed in the greater Naknek/Kvichak district. If one looks carefully at the average number of drift boats in the "historic" 84/16 percent split he/she will find this number to be much larger than the average number of participants in the NRSHA.

Proposals 35 and 36:

I am very much opposed to these proposals for 3 reasons:

- 1) History has shown that the drift fleet has had minimal interest in actually fishing the Alagnak River. When given the opportunity to fish there, only 4 or 5 drift boats showed up. The setnet group, in contrast, had a much stronger showing with as many as 30 skiffs.
- 2) The Alagnak River is very shallow and has an extremely small window for fishing particularly during the smaller high tides. I believe that drift fishing during many openers would be reduced to boats that had very shallow drafts and/or jet drives. I think there would be many problems if boats with 3-4 ft. draft tried this fishery (running aground, nets going dry, etc.). In contrast, the setnet skiff with its 25 fathom gear length is ideal for this fishery.
- 3) The Wild and Scenic Alagnak River is quite small and is not suited for a large number of drift boats (if they could make it there).

If you have not seen the Alagnak, it is worth comparing it to the Naknek River. The width of the Alagnak at a 12ft. tide (Nushagak tables) in the corridor of open commercial fishing varies from approximately 200 to 300 ft. The commercial fishing zone in the Naknek River at 12ft. is more like ½ to ¾ of a mile wide.

Attn: BOF COMMENTS
Boards Supports Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

RECEIVED
OCT 17 2009
BOARDS

From: Reid Ten Kley, Kvichak Setnetter (permit holder for over 20 years)

I am a third generation fisherman, and coordinate the efforts for 6 other set net permit holders in my family and represent them as well.

Proposals 17, 18 and 19:

I support these proposals, as they allow a permit holder to fish more gear in these hard economic times. They also allow permits to stay in families without having to rely on crewmembers to hold permits.

Proposal 34:

I oppose this proposal. This has been tried before with the result that the drift fleet fishes for as many as 5 or 6 openings to the setnetters' 1 opener. If anything, I feel that the present 3-to-1 drift/set ratio should be changed back to 1/1 or 2/1 – because when we all fish in the general Naknek or Kvichak districts, the drift fleet and setnet group are given roughly **equal time**. The NRSHA is a unique fishery because of its size – the result of this is that the **number of participants** is sometimes very different than what is observed in the greater Naknek/Kvichak district. If one looks carefully at the average number of drift boats in the "historic" 84/16 percent split he/she will find this number to be much larger than the average number of participants in the NRSHA.

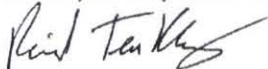
Proposals 35 and 36:

I oppose these proposals for 3 reasons:

- 1) History has shown that the drift fleet has had minimal interest in actually fishing the Alagnak River. When given the opportunity to fish there, only 4 or 5 drift boats showed up. The setnet group, in contrast, had a much stronger showing with as many as 30 skiffs.
- 2) The Alagnak River is very shallow and has an extremely small window for fishing particularly during the smaller high tides. I believe that drift fishing during many openers would be reduced to boats that had very shallow drafts and/or jet drives. I think there would be many problems if boats with 3-4 ft. draft tried this fishery (running aground, nets going dry, etc.). In contrast, the setnet skiff with its 25 fathom gear length is ideal for this fishery.
- 3) Since the average 32' drift boat makes a substantially larger wake than a set net skiff, unnecessary additional erosion of the bank would likely occur.

If you have not seen the Alagnak, it is worth comparing it to the Naknek River. The width of the Alagnak at a 12ft. tide (Nushagak tables) in the corridor of open commercial fishing varies from approximately 200 to 300 ft. The commercial fishing zone in the Naknek River at 12ft. is more like ½ to ¾ of a mile wide.

Thank you very much for considering my opinions during the meeting.


Reid Ten Kley
503.880.9170- mobile

Public Comment # 3

Stosh Anderson
Box 310
Kodiak, AK 99615

12 October 2009

907 654 3674
stosh_a@hotmail.com

Alaska BOF and Restructuring Committee

Re: Bristol Bay Salmon Fishery

Dear Sir,

I'm addressing this letter to the BOF and the Restructuring Committee since you can't separate the two as actions that may be taken are complimentary. To introduce myself I and my two sons each have BB drift vessels and my wife setnets in Egegik. My wife and I have fished in the Bay for 32 seasons and our sons grew up setnetting and transitioned to the drift fishery.

I believe there is link between conservation of the resource, and subsistence, sport, and the economic viability of the commercial and guided industries. Without a viable salmon industry, the resource and the habitat will be at a disadvantage with competing development. Already there are pressures both seaward with oil development and in the headwaters with mining development. I believe ADF&G, the Restructuring Committee and the BOF needs to prioritize the proposals before them and implement measures that increase economic value of the resource without increasing capital expenditure in the fisheries. Subsistence and sport fisheries have their social and economic value but that is not the topic in this writing.

Increase harvest and processing opportunity:

Proposal 31 proposes a general district. I favor the concept but not this proposal. Providing a longer season to process the harvest will benefit the fishery in several ways without significant capital expense for the processors or the harvesters. By expanding the traditional districts in June to harvest 10 to 15 % of the forecasted harvestable surplus is the basic concept. This will reduce the glut of fish during the peak of the season and increase the percentage of product in more valuable markets. There is often a cry to issue foreign processing permits (FPP) however, I believe expanded districts will increase the processing capacity in two significant ways and reduce the need for limits or FPP. First it will extend the days of processing but as important, it will put more fish through the plants early to train workers and tune machinery. By expanding districts rather than a general district, other regulations and issues that are dependent on fish and fishermen being attributed to a specific district will not be impacted. Proposal 29 and 30 address the traditional overlap zone between Area M and T. The BOF implemented the use of this zone by Area M fishermen after many years of no one using the overlap zone. Allowing

RECEIVED
OCT 12 2009
BOARDS

1/2

Public Comment #

4

area T fishermen in the overlap zone as an added area to Ugashik district would enhance the availability to harvest early fish especially in years that the run has a rapid increase in strength. ADF&G will need the management flexibility to implement closures in the respective districts to provide passage of enough early escapements to insure spawning diversity.

Permit Stacking:

I support set and drift permit holders of two permits to be able to use privileges of both permits. The BOF may reduce the privileges of the second drift permit as is the current practice with the use of 50 fms by a second permit holder. This is the most cost effective way to achieve the goals of CFEC optimum number study. Economics will determine what level of drift permit stacking will occur as the profitability of the fishery changes. If we are to attract crewman and young fishermen in Alaska and BB to become permit and vessel owners, they need to see that it is a profitable venture and livelihood. This does not significantly increase capital in the fishery but will transfer it from one permit holder to another.

32 Foot Limit:

I do not support removing the 32 foot vessel limit in the Bay. This will require significant capital to be invested in the fishery in a fleet that is already capable of harvesting more than the processing industry can process. Unfortunately, overcapitalization of fellow fishermen causes a ripple affect that does not improve the order, economics and conservation of the resource.

Allocation Plans:

Allocation plans were implemented to protect the economic interest of the setnet and drift fleets. Managers for the most part have done a respectable job in implementation. There are a few issues the need to be addressed to assure that the original intent is achieved. First, when harvesting limits are imposed by the processing industry the limits skew harvesting and processing patterns. The allocation plan should be suspended and let the chips fall where they may. Another instance is when the drift fleet is underrepresented in the district. This happens by chance early in the season and by attrition late in the season. It doesn't make any rational sense to not let the setnet fishermen fish when the drift fleet is not there to catch their share. This happens late in the season most years as drift fishermen quit.

Sincerely,

stosh anderson

2/2

Public Comment # 4

Comment on proposal #5, Bristol Bay Herring.

Since I wrote proposal #5 we have discovered that someone at ADF&G has attempted to completely eliminate our fishery.

The permit renewal forms mailed in December of 2008 did not list our BB kelp permits. I thought maybe they forgot so I sent the money anyway. They took the money and sent other permit cards, but not the BB kelp permit card. Later they sent a refund and said the fishery was closed for 2009. The decision was made back in 2008. No explanation has been given yet. If you do not renew the permits, they take them away. We deserve an explanation.

We need the Board's help on proposal #5 and we need the plastic permit cards for 2010.

We will decide when it is time to give up. That is not the job of some coward in ADF&G that won't admit to what they did.

Sidney A. Nelson

Sidney A. Nelson 10-12-09
Box 564, HOMER, AK. 99603
907-235-4021

1/2

Public Comment #

5

RECEIVED
OCT 15 2009
BOARDS

Comment on proposal #15, Bristol Bay 32 ft. salmon boat limit

I hope the Board of Fish keeps the 32 foot limit for the Bristol Bay salmon fishery. There are some people who believe that larger boats would let us take better care of our fish and that higher prices would soon follow.

That is the sort of economic theory you might learn if you took a college course taught by Gunnar Knapp.

In the real world you would learn that the canneries set the price just high enough so that most of us come back and patch up the boats for one more year.

I see larger boats as a restructuring plan that would change us to be more like the Togiak herring seine fishery. The canneries consider that to be a near perfect fishery where a few of their chosen pets with bigger boats and bigger nets catch the whole quota. The price is set at rock bottom but the pets make a good payday on huge volumes.

The rest of us, who used to fish Togiak, are gone.

Sidney A. Nelson

2/2

Public Comment #

5

P.O. Box 189
NAKNEK, ALASKA 99633

www.theborough.com



TELEPHONE
(907) 246-4224
FAX
(907) 246-6633

Bristol Bay Borough

BRISTOL BAY BOROUGH

RESOLUTION NO. 2009-29

RECEIVED
OCT 20 2009
BOARDS

A RESOLUTION OPPOSING THE 2009 BOARD OF FISHERIES PROPOSAL 13 ESTABLISHING A FISH REFUGE IN BRISTOL BAY TO AUGMENT PROTECTION OF FISH HABITAT IN THE KVICHAK AND NUSHAGAK RIVER DRAINAGES.

WHEREAS, Alaska's Board of Fisheries meets four to six times each year to consider proposals to change fisheries regulations in regions around the state; and,

WHEREAS, the board of fisheries proposal #13 is in direct opposition of economic development; and,

WHEREAS, the Borough has a commitment to not trade our fish resource for a mine; and

WHEREAS, the Borough feels a strong obligation to proper public process, which would include working with it's citizens to objectively and thoroughly review the proposed Pebble Project once detailed site-specific, accurate project and environmental information is provided, and;

WHEREAS, the local Advisory Committee's do not support this proposal, and;

WHEREAS, the proposed refuge does not provide any additional protections for the water quality or water rights, and;

WHEREAS, there is a better public process for protecting our valuable natural fish resource, and;

WHEREAS, in turn, the Board will benefit from the clearest understanding of the viewpoints of those whose local economies, livelihoods, and traditions are most directly affected by its decisions; and,

NOW THEREFORE BE IT RESOLVED, that the Bristol Bay Borough opposes the 2009 Board of Fish Proposal #13 establishing a fish refuge in Bristol Bay to augment protection of fish Habitat in the Kvichak and Nushagak River Drainages, and.

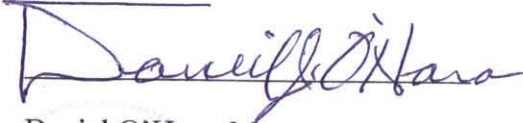
NOW THEREFORE BE IT FURTHER RESOLVED, the Bristol Bay Borough strongly encourages the Board of Fisheries to vote down Proposal #13 at the annual meeting in December 2009

1/2

Public Comment #

6

Approved and adopted the 5th day of October, 2009.



Daniel O'Hara, Mayor



Tami Johnson, Borough Clerk

2/2

Public Comment # 6

To" State of Alaska Board of Fisheries
Bristol Bay Finfish Regulations

RECEIVED
OCT 26 2009
BOARDS

ALASKA DEPARTMENT OF FISH AND GAME
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

(907) 465-6094 FAX

October, 23,2009

Dear Board of Fish members, from December 1st to the 8th 2009, the board will hear many proposals in regard to commercial fisheries in the Bristol Bay region. I am writing you all today regarding proposal 14, which will be discussed during your winter meetings. Please read the below statement.

Proposal 14, - 5 AAC 06.335. Minimum distance between units of gear. Require removal of all set net gear during drift gill net openings as follows.

Proposed by Todd Granger

Proposal 14 states that set net fisherman be required to remove all gear from the waters of Bristol Bay when there are drift net only openings, It is stated this will ensure the allocation plans can be met.

I oppose proposal 14, for the following reasons.

Requiring the removal of set net gear will not have an impact on the allocation plan as stated in this proposal. The department of fish and game has been able to achieve the goals of allocations between gear types for many years. To state the removal of set net gear will help the allocation plan is not a true statement.

To rely on the criminal statue AS. 16.10.055(interference of commercial fishing gear) as a defense lacks merit. I believe, when the state in acted laws regarding commercial fishing, stakeholders took into account that set net fisherman would place needed equipment in order to fish. Using this statue to support this proposal cannot and should not be applied here.

It is my opinion that set net fisherman do not interfere with drift net only openings. In the fishing districts of Bristol Bay drift net fisherman are allowed to fish within the regulated boundaries throughout the district fishing areas when openings have been announced and listed regulations are obeyed. This has not caused a hardship on drifters as they are able to move and make numerous sets within a vast area. In some cases the 48 hour transfer is waived which is a benefit to the drift fleet as well.

1/2

Public Comment #

7

Whereas set net fisherman are required to remain anchored in one place during openings and within legal distance of each other.

In addition, drift net fishers are given more fishing time in order for allocations between gear types to be met. The board of fisheries should take note the omission in this proposal of the potential for grounding of drift boats. Many times throughout the fishing season drift net fishermen will go dry outside set net sites. This might be attributed to a boat having mechanical problems or using poor judgment. Regardless, what is not being stated here is the potential for set net fishermen to encounter dangerous situations and to lose fishing time in the event a drift boat goes dry on or near a set net site. This situation can be very dangerous for both the drift boat fisherman as well as set netters. The possibility that revenue for the set net fisher is lost is great, if boats are allowed to come all the way in and then run a ground. In addition the potential for the allocation plan to be met will be compromised when set netters do not fish because of the interference of the drift boat fleet. Further I believe that studies should be done on the erosion of the beach area. Many times when boats that have jet engines get to close to shore and then increase the jet driven power, this can cause very large holes to appear on the beach, this can be seen when the tide turns. When fish are moving into their home river to spawn they often seek out the beach area to get their bearings. It is my belief that when erosion occurs this can have an impact on the fish,

It is stated in this proposal that no one will suffer. This is not true. When set net sites are established each year, anchors are placed, markers placed, lines laid out and nets placed. To place and remove anchoring gear is extremely difficult. To insinuate this takes minutes to accomplish is misleading. It can take a half day to get screw anchors in, to get lines strung out and markers placed. To remove this gear takes equal time. To say that because this has been done for decades and that it does not cause suffering is not a fair statement. If this proposal is addressed and eventually becomes a regulation then maybe in future proposals I may submit a proposal requesting that **ALL DRIFT BOATS BE REMOVED FROM ANY AND ALL WATERS OF THE BRISTOL BAY REGION WHILE THERE IS A SET NET ONLY OPENING!** Proposal 14 should be tabled permanently.

I would ask the board of fish to strike proposal 14 from any further action or discussion. This is not a proposal that benefits both gear types as stated; in fact this proposal will cause a hardship to all set net fishers.

Sincerely,
Jennifer Aspelund
Box 25355
Seattle WA 98165

2/2

Public Comment # 7

ATT: BOF COMMENTS

Boards Support Section

Alaska Dept. of fish and Game

PO Box 115526

Juneau, AK 99811

Dear Board Members:

Thank you for taking the time and effort to be members of the Board of Fish; it is truly an awesome responsibility. The decisions you will make will affect the livelihood of many individuals and the future of our industry. My comments will mostly concern fish quality, conservation, and keeping a level playing field between the gear groups.

Proposal 14, support. This is another tool to aid management in controlling allocation between gear groups.

Proposal 15, support. I am a long time proponent of elimination of the 32 foot limit. I will say again, what I testified to 28 years ago. There is no biological or other reason for maintaining a 32 foot limit. A longer vessel would be safer, draw less water, go faster on less fuel, have a larger work area for better and easier handling of fish, provide more room for refrigeration equipment, and provide more room for shallow fish holds. There is no negative. It is important to remove the limit now, so that as equipment is gradually replaced, Fishers would have the option of having a longer, more proportionate, and efficient vessel. Considering the current economics of the BB fishery, it is not likely that we would see a sudden surge in larger vessels, but over a period of many years, our fleet would gradually be upgraded. There is no need to specify maximum length because the nature of the fishery would dictate the practicality of the vessels length.

RECEIVED
OCT 28 2009
BOARDS

1/2

Public Comment #

8

If the purpose of the 32 foot limit was to restrict capacity, then we have already defeated that purpose by building 16 and 18 foot wide boats, and who's to say, where that will stop, short of the ultimate, a 32 foot wide.

Leaving the 32 foot limit in place is like building an obstacle course in our pursuit of a better product. 28 years ago, in comments to the BOF, I predicted that some time in the not too distant future, fish processors would refuse to buy unrefrigerated fish. We are very close to that now.

The local BB Fishers, which I understand makes up approximately 25% of the fleet, will benefit more than any other group by having more seaworthy boats. They will be better equipped to participate in other fisheries. Even Gillnetting Herring in Togiak would be safer and more profitable for the residents of BB. The people who like to take their boats up the rivers to the villages will find that the longer boats will draw less water and use less fuel than their present boats. The residents of BB will benefit more than anyone else with the opportunity to have better designed, more sea worthy boats.

Proposal 16 and 17, oppose. This proposal would not reduce the amount of gear on the grounds, which as I understand it is the purpose in allowing the stacking of Permits.

Proposal 18, opposed as written. This proposal could be amended to read: a CFEC permit holder who holds two BB set Gillnet CFEC permits may operate no more than than two set gillnets, with no more that 67 fathoms of set gillnet gear in the aggregate. This would be the same percentage of increase as Proposal 20 concerning Drift fishers.

Proposal 19, oppose. Proposal is inequitable.

Proposal 20, support. This proposal is in line with reducing the amount of gear on the grounds.

Proposal 21, oppose. This proposal defeats the purpose of stacking gear.

Sincerely,



Comments on Bristol Bay Proposals for the Alaska Board of Fisheries

Claudia Anderson
PO Box 310
Kodiak, AK 99615
907-486-3673
claudiaa.ak@hotmail.com

RECEIVED
NOV 02 2009
BOARDS

Proposal

13 support

14 oppose – ridiculous

15 no opinion

16 support

There are valid arguments opposing consolidation of ownership. However, this proposal allows only 2 permits which is reasonable.

17 – 20 support

21 – 24 no opinion

25 oppose

26 oppose

27 – 28 sure

If someone wants to work that hard, why not.

29 – 30 support

31 I don't know

32 – 36 no opinion

37 NO, NO, NO

It was never the intention of the allocation to harm certain areas of the beach for the benefit of other areas. Everyone who set nets on the flats at the north end of the district would be seriously disenfranchised by this proposal. I estimate the flats to be approximately 2 miles of beach with at least 35 setnetters. Right now on the opening of a fishing period, we are flat dry - no water. Having an extra 15 – 30 minutes of no water time would totally skew the allocation towards certain sites.

Historically in the Egegik District after escapement was reached, the district went "wide open." On the front beach that was when we could add up our poundage, however, the in-river does not fish well then. Because of a new regulation enacted during the last cycle, even after escapement is reached, the district does not go wide open. #37 is just

another proposal to enhance the catch in certain areas.

The north end has 2 small land based processors who also need a steady supply of fish.

38 support

Many unforeseen situations have occurred that affect the allocation. For example:

- 1) When Egegik fishes the 110 line, we have no data for historic allocation.
- 2) When some processors go on limit, other harvesters should not be punished.

39 oppose

RECEIVED

NOV 02 2009

BOARDS

From: Tony Jones
Dreamboat Annie Inc.
PO Box 402
Kodiak, AK 99615
[mailto:dreamboat@gci.net]

In its 2006 Bristol Bay meeting, held in Dillingham, the Board of Fisheries (BOF) was presented with nine similar proposals to either eliminate or change the length restrictions on Bristol Bay Driftnet vessels.

They, and 25 related ones, were assigned to a subcommittee, (Restructuring Committee) for recommendation.

So begins Eric Szabos 34 page comment paper to the Restructuring Committee . (BOF's web site, April 2007 meeting). In scrutinizing these papers the level of passion regarding this issue becomes apparent.

Szabo chronicles the history of vessel restrictions and makes clear that the Limited Entry Act does exactly what the federal government desired in the 1940's when it was mandated. He goes on to correlate the decline in value of Bristol Bay salmon, relative to the poor quality of product, that limits market options and sites four recent comprehensive reports documenting the causes, "the need to enhance quality as a prerequisite to increasing the ex-vessel prices." The studies all reference the 32 foot limit as an impediment to achieving a more quality-driven process. Szabo then references a separate 2002 USDA report on risk management in the fishery, which refutes the Board's 1980 argument to sustain the 32 foot limit as no longer valid. He identifies from a Bristol Bay Economic Development Council Joint Legislative Salmon Industry Task Force report of 2003, the root problem: "prices are insufficient to provide an adequate economic base for the industry, communities and support structure that has developed." It states that, " calls to restructure the Bristol Bay salmon fishery stem from a desire by those in the industry to innovate - to find new and more efficient ways to harvest fish and improve the value of the harvest. Far and away the most common input from harvesters and processors was that the quality of the catch had to improve from its current state".

The elimination of the 32 foot limit would provide the option to upgrade vessels and equipment that can fulfill world market demands. With larger vessels, from retrofitting or new , is the ability to safely flood fish holds, thereby floating the fish and thus largely eliminate bruising which would facilitate for more number 1's. This assures more product to the fillet market . Secondly, it would safely allow the volume of chilled water to actually chill fish in the time restraints required. I have queried multiple processor superintendents on this, who all agree. Most Bay boats are easily adaptable to the modifications necessary to utilize retrofitting over new construction. I called a builder of Bay boats who quoted \$30,000 in the zone for an extension behind the rudder post, the amount for labor (1 foot or more) all the same, and 15% more for glass. When considering building new the benefit is apparent. One only needs to refer to how many 42 foot Delta/LeClercq seiners have been lengthened compared to new. I am a proponent of applying the same rules in the Bay as the rest of the state, but am acutely aware of those who oppose modernization. Regulations must be imposed that provide adequate deck space for bleeding totes and the necessary displacement to retain shallow draft ability. A significant beneficiary of this change would be all governmental agencies, local, state and federal that rely on tax revenue.

Also before the BOF in December, are proposals 16 through 24 in favor of single holder permit stacking. These proposals would make a permanent change to the regulation. Proposal No. 25 from the BOF April meeting provides flexibility, in that, economics will contract and expand the number of permit holders holding and utilizing two permits. The Commercial Fisheries Entry

Commission (CFEC) has defined an optimum number range for permits and vessels in Bristol Bay. This proposal will facilitate achieving these goals. As a second permit may be transferred and used on a vessel by itself in the future or transferred to a permit holder as a second permit, flexibility will respond to the economics of the fishery. By adopting the optional additional harvesting qualifications, a harvester holding a second permit in possession will be eligible to use 200 fathoms of gillnet from the vessel, thus the incentive factor. This is the gear currently permitted with two holders on a vessel. The benefits are obvious, no direct allocation of fish, the transferability of permits are not changed, ADF&G will have fewer vessels to monitor, the total amount of gear in the water would be less so that over harvest opportunity is reduced. Lastly, CFEC's optimum range number will be achieved by consolidation. CFEC identified this as the major component in achieving the range numbers. The stability of the harvesting sector and economic health of the fleet are apparent and the ability to attract and hold qualified crew may be the first indicator. As crew experience a healthier and viable fishery, they will evolve to become owners and permit holders. This is an important consequence to watershed residents progressing in the fishery, the ability to identify attractive opportunities.

The socio/economic and conservation components are here in that by reducing the number of vessels, the remaining operations will remain viable in good times and bad so that the local communities will value the fisheries more by the aforementioned affects thus providing a sustainable business model. As other resources are developed in the region, long term detrimental effects on sustainability, habitat and fish stocks may occur. Economics drive political decisions so management strategies and legislation that promote viability must be implemented. The burden of paying for the cost of reducing the number of vessels will be born of choice by those who may benefit most.

I write here from the vantage of someone with a vested interest in promoting the quality of all Alaskan seafood. A recent blurb from Intrafish.com says it all: "skin-on, C-trim sockeye fillets this year have been only \$0.50 to \$0.60 higher per lb. than farmed Atlantic, but noted there is not nearly enough of equal quality...fresh or once frozen to fill farmed salmon requirements."

Tony is a lifelong fisherman and resides in Kodiak. He has owned nine fish boats and fished from southern California to the Russian border through the Aleutians and is currently involved in multiple fisheries.



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



FWS/OSM/9137/BOF BB

NOV 4 2009

Mr. Vince Webster, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 25526
Juneau, Alaska 99802-5526

RECEIVED
NOV 04 2009
BOARDS

Dear Chair Webster:

The Alaska Board of Fisheries will deliberate 2009/2010 regulatory proposals that address Bristol Bay commercial, sport, and subsistence finfish fisheries beginning December 1, 2009. We understand that the Board will be considering approximately 48 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and does not believe that adoption of any of these proposals will have an impact on Federal subsistence users and fisheries in this area. We may wish to comment on these proposals if issues arise during the meeting which may have an impact on Federal subsistence users and fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Peter J. Probasco
Assistant Regional Director

cc: Denby S. Lloyd, ADF&G	Jeff Regnart, ADF&G, Anchorage
Michael Fleagle, Chair FSB	James Hasbrouck ADF&G, Anchorage
John Hilsinger, ADF&G, Anchorage	Jim Fall, ADF&G, Anchorage
Craig Fleener, ADF&G, Juneau	Tina Cunning, ADF&G, Anchorage
Charles Swanton, ADF&G, Juneau	George Pappas, ADF&G, Anchorage
Rob Bentz, ADF&G, Juneau	Jim Marcotte, ADF&G, Juneau
Marianne See, ADF&G, Anchorage	Interagency Staff Committee



Public Comment #

11

11-5-09

Attn: BOF Comments

Proposal # 20

Duel Permit

RECEIVED

NOV 09 2009

BOARDS

Support

Reason:

- Allowed by 2006 Legislation
- Fleet Reduction
- Makes it less complicated when registering for fishing districts.

Thank You,

Dan Farren

F/V Fishtrap

1/2

Public Comment #

12

11/4/09

Attm: BOF Comments

Proposal #15 Repeal 32' limit

RECEIVED
NOV 09 2009
BOARDS

"Oppose"

Reason: • Adding capital to a fishery that has just recently started to show some signs of economic recovery.

• Lack of local infrastructure to handle larger vessels.

• Conflicts with larger vessels when many boats fish congested areas.

Thank You for considering the economic health of all Bristol Bay Fisherman.

Dan Farren

% Fishtrap

Public Comment #

12

2/2

Harley Ethelbah
P.O. Box 972
Petersburg, AK. 99833

November 5, 2009

To: Chairman Webster and members of the Alaska Board of Fisheries
Re: Agenda Item, Proposal #15

Dear Chairman Webster and members of the Alaska Board of Fisheries:

I support proposal #15.

As a Bristol Bay fisherman and a fisherman involved in many fisheries throughout the state I have the opportunity to provide insight as why the 32 foot boat length limit should be changed! The days of needing to limit the number of participants in the fishery through boat length restrictions are no longer needed. We now have limited entry and super exclusive boats laws that prevent boats from coming and going into the salmon fisheries throughout the state. The bar has been raised when it comes to the quality of our fish. The era of "dry boats" (boats that do not refrigerate their fish), are coming to an end. The seiners went through it in the early 80's. Now it is our time. But we as a fleet are up against a wall as there is only so much room on a 32 foot boat. Where do we put it all? Where does one put the refrigerated salt water (RSW) unit, the ice making machine, the hydraulics, the insulation, the plumbing. The list goes on. Many of us have done it; we have built or bought bigger boats that can accommodate the space needed for this equipment.

Now you might say then it can be done. Well it can be done, marginally. The small spray brine systems do marginal work. What is needed is true tanking capacity in a boat, (being able to fill the boat with water), and chill it fast. I personally have one of the largest vessels in Bristol Bay; I thought I had my bases covered. Not so. I am out of room and I cannot safely fish with my boat tanked down. It's too much weight, the boat would roll over. In order to meet the demands of my processor, my boat needs a bigger refrigeration unit; it's not going to happen due to space constraints of my vessel. I am now bleeding my fish for quality, thus an extra 10 cents a pound more payment to me. This adds up, but once again I am out of room on deck. I could bleed my fish much more effectively if I have more room. It's not rocket science to see that better quality equals more money to the fisherman and thus more money to the surrounding communities and the state. The only way we are going to make more money off of this product is through quality.

I have heard the comment from those against changing this regulation, that larger boats would out-compete the smaller boats. Well, my response to that is, if it were true it would be going on now. We now have monster 32 foot boats competing with smaller wood boats and smaller fiberglass boats. The smaller boats compete and often do better than the large vessels. It's all in who is running the boat. I will say one thing to this effect: if I had or could have a larger vessel to fish within Bristol Bay, let's say a 45 foot vessel, I can honestly say I would lose production as I would not be able to get in shallow like I currently do, the smaller 32 foot boats could easily out maneuver me in the "line fishery," and the wind would make it more of a challenge to control my net with the larger vessel. The only thing the larger boat would do for me would be to allow me to take care of my fish more effectively. I also would feel safer in a larger vessel in rough weather and when running around with a tank of water. I also would probably burn less fuel in a season due to the fact a larger or longer hull is more efficient in the water, thus burning less fuel.

Another plus to having a larger vessel is it would allow me and many others to experiment with other chilling systems for our fish. Slurry ice for one. It's an option, but it takes a genset to run such a system, and we currently are not going to fit genset systems in our 32 foot boats, there is no room. It takes a larger boat. RSW is not the end all be all for chilling fish. Being a fisherman from Southeast Alaska, I

Public Comment #

13

1/2

have the opportunity to see all kinds of chilling systems. They all take up room and require larger systems to power.

Now the question remains where to set the boat length limit if it gets changed. The answer is simple: 60 feet. Is someone going to come in and fish a 60 foot vessel? I hope so, because I will spin circles around them all day. I throw 60 foot out there because that is the maximum boat length limit up to 3 miles offshore, "State Water Fisheries." The boats will limit themselves as to length. There is a limit to what you can gillnet effectively. Also larger vessels will provide opportunity for those living in the coastal community of western Alaska, i.e. Dillingam, Naknek, Egegik, and Pilot Point. The worlds largest Pacific cod fishery is just out their front door. With bigger boats they could take advantage of this, something they cannot do with a 32 foot vessel.

It's an evolutionary process; the seiners went through it in the 80's with much protest. But the days of "dry fish" fish are coming to an end. There is not another fishery within the state of Alaska that allows unchilled fish to be sold other than Bristol Bay.

I strongly urge you as a board member to support raising the 32 foot boat length limit. From a safety standpoint, and from the standpoint that the fish need to be chilled in some manner effectively, it takes room. We are out of room on our boats to do what is needed to make this fishery better.

I thank you for your time and I also thank you for allowing me the opportunity to testify on this subject.

Sincerely,

Harley Ethelbah

4/2

Public Comment #

13

2 November 2009

Steven D. Bruno
P.O. Box 1054
Carmel Valley, CA 93924
T&F 831-655-2296
steven.d.bruno@gmail.com

RECEIVED
NOV 09 2009
BOARD

Alaska Board of Fish
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Members of the Board:

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

Your name and background in the fishery?

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

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

What is your management philosophy?

1/6

Public Comment #

14

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

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

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

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

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

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

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

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

Why was the Eastside harvest shifted south in 1982?

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

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

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

Eliminating the 32 foot limit:

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

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

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

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

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

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

300 Fathoms for two permits:

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

General District:

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

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

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

Conclusion:

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

Thank You,


Steven D. Bruno

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

RECEIVED
NOV 09 2009
BOARDS

Proposal # 13

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am in support of Proposal 13 and the creation of a "fish refuge". I do not trust the mining "experts" to do what is right for Bristol Bay and protect our fishery. Please pass Proposal #13 and save our fishery from potentially catastrophic damage.

Respectfully,



Don Alvarado

1/7

Public Comment #

15

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

Proposals # 14 and 33

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am against Proposal 14 and 33. Both proposals want all set net gear removed during drift openings. It does not matter if it is out in the Bay or in a special harvest area. It takes many hours and special parts of special tides to reach a set net screw anchor location. It is not an easy task or something that is taken lightly. When a special harvest area set period or Bay set period is over the tide still covers the location and removal of gear is not possible. Please do not pass Proposals 14 and 33.

Respectfully,



Don Alvarado

27

Public Comment #

15

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

Proposals #16,17 and 19

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am in favor of Proposals 16,17 and 19 which would allow a single owner of two set or two drift permits and to allow the owner to be able to fish the legal amount of gear for the two permits. It makes economic sense to have the legal amount of gear fishing each period. It is difficult to get all family members to the Bay each year and permits that have been family owned are sitting idle. These proposals are asking for fair treatment and responsible fishing that does not require unnecessary selling of permits. Please support Proposals # 16,17 and 19.

Respectfully,



Don Alvarado

3/17

Public Comment #

15

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

Proposal # 31

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am against Proposal #31 that asks for a reopening of the General District. This was tried a few years ago and the interception of Kvichak bound fish was well documented. It was a bad idea a few years ago and it is a bad idea this time. The Kvichak has made its escapement goal for several years in a row through careful Fish and Game management. The general district proposal eliminates the careful biological monitoring of the early run segment of the fishery and provides an unfair harvest advantage for the drift fleet. Please do not pass Proposal # 31.

Respectfully,



Don Alvarado

417

Public Comment # 15

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

Proposal # 34

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am very much against Proposal # 34 that asks to revert to the punitive 84% drift and 16% set allocation in the Naknek Special Harvest Area. I have participated in every Special Harvest since its inception. The drift fleet effort has never been strong during a Special Harvest fishery. Many of the drifters transfer to other districts or stay tied to the docks. It then becomes a few hundred drift boats trying while the entire set net fleet comes in to the river to fish. Proposal # 34 would allow that small drift fleet to try for 84% of the fish. The set net fleet would seldom get a net in the water. The existing three tides to one rule is draconian enough and has resulted in an unfair harvest number favoring the drift fleet. Please do not pass Proposal # 34.

Respectfully,



Don Alvarado

6/7

Public Comment #

15

Attention: B of F Comments
Boards Support Section
Fax (907) 465-6094

Proposals # 35 and 36

Boards Support: My name is Don Alvarado and I have been set netting in Bristol Bay and the Naknek / Kvichak District since 1981. I am very much against Proposals # 35 and 36 to make the seldom used Alagnak River Special Harvest Area fishery an 84% drift and 16% set allocation. HERE WE GO AGAIN! I have participated in every(only three so far) Alagnak fisheries. There has been almost zero drift effort! And this proposal is asking for 84% drift allocation. The set net fleet would never get a net in the water. Please reject Proposals # 35 and 36 and the previously mentioned 34. They are all unfair to the set net fleet and ask for special treatment of a minimal effort drift fleet.

Respectfully,



Don Alvarado

7/7

Public Comment #

15