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NOV 17 2009
BOARDS

Quality Seafood Since 1983

6118 - 12th Ave. S., Seattle, WA 98108-2768
Phone 206.764.9230 ~ Fax 206.764.5540
www.snopac.net

Dear Members of the Board,

I am writing express my opposition to proposition 15. As a seafood buyer operating in Bristol Bay for more than 25 years, it is my belief that this proposition would do little to increase the overall quality of salmon harvested in Bristol Bay.

Snopac is among the leaders of quality development in Bristol Bay, and our entire fleet utilizes slush-ice to store and deliver their fish after harvest. Our fleet includes boats with varying packing capacities, both with and without RSW systems. Our fish-ground testing allows us to rank the quality of fish coming off of each individual boat in our fleet, and has shown that those boats operating without RSW systems are just as capable of producing high quality fish as wider and larger tonnage vessels with RSW systems. By taking ice from tender vessels, even smaller boats in the Bristol Bay fleet can produce slush ice fish that exceeds the levels of quality produced from larger boats.

Proponents of this measure argue that larger boats will inherently produce higher quality salmon. Even if we believe this assumption, then the small handful of fishermen capable of buying or upgrading their vessels would have little impact on overall salmon quality in Bristol Bay. It is my belief that the proposed size-limit change would, in the end, come at significant competitive and financial costs in exchange for a limited benefit to the industry as a whole.

Sincerely,

Greg Blakey

President, Snopac Products Inc.

Public Comment # 83

1/2



Quality Seafood Since 1983

6118 - 12th Ave. S., Seattle, WA 98108-2768
Phone 206.764.9230 ~ Fax 206.764.5540
www.snopac.net

Dear Members of the Board,

I am writing in regards to proposition 13, to be considered by your board this December. This proposition will help to ensure the continued health of the salmon spawning habitats in the Nushagak and Kvichak drainages. These unique river systems support some of the largest wild salmon runs in the world, and are crucial to the Alaskan economy and the thousands of people who make their living working in Bristol Bay. I am not alone in supporting more robust development regulations for the Bristol Bay salmon habitats. These salmon runs support sport, subsistence, and commercial fishermen as well as Alaskan seafood processing companies such as my own. I urge to pass our message on to state legislators, and help protect a resource on behalf of all of us who rely on Bristol Bay for its sustainable harvests of salmon. Thank you for your consideration.

Sincerely,

Greg Blakey

President, Snopac Products Inc.

Public Comment # 83

Paul Sorenson & Jeanne Sorenson
36800 Chinulna Drive
Kenai, Alaska 99611

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November 16, 2009

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

RE: 2009 BRISTOL BAY FINFISH PROPOSALS

We are a family commercial fishing operation in Egegik, Alaska. We have fished Egegik for the past twenty years.

PROPOSAL 14 – requiring the removal of all setnet gear during drift gillnet openings.

OPPOSED – Our family fishes 4 permits and 4 setnet sites. It takes us about four days to set our gear which is based on the weather and tide. To be required to pull gear (anchors, running lines, buoys, etc.) and set it up in a timely and safe manner to fish the next day is not feasible. This would truly cause a hardship on setnetters. It is difficult to obtain help at the present time, but with the additional labor and safety issues to move gear and the loss of production would make it more difficult.

PROPOSALS 16,18, and 19 – Allow multiple setnet permit use ...

SUPPORT – if a permit holder owns two permits, they should be allowed to fish double the amount of gear. This will make it possible for individual fishermen to run a more profitable business. This will also allow more flexibility in family operations when college students leave or parents become too old to participate in their later years. We would rather see a proposal that includes doubling the amount of drift gear with ownership of two permits, as well as for setnets.

PROPOSAL 20

SUPPORT AS AMENDED – We support this with the following amendment:

Allow one person to own two permits and use **[300 fathom] nets**.

See comment on Proposal 16.

PROPOSAL 21

SUPPORT – See notes on proposals 16 and 20. We would prefer that the drift permit holders be allowed to hold and fish two permits with double the gear.

2 permits and double their gear. See notes on PROPOSALS 16, 20, and 21.

1/2

Public Comment # 04

be some sort of study or research into how those changes in effort will affect allocation.

PROPOSAL 38 – Suspension of allocation if <400 boats or processor limits in Egegik

SUPPORT – If the effort in Egegik is below a certain boat number and the drift fleet cannot stop the flood of fish or reach their allocation in a timely manner due to that lack of effort, we believe the allocation should be suspended. This situations can lead to over escapement as well as setnet fishermen miss the opportunity to make a reasonable profit.

PROPOSAL 39 – Removal of all setnet gear during closures in Egegik

OPPOSED – See reasoning from PROPOSAL 14

2/2

Public Comment # 04

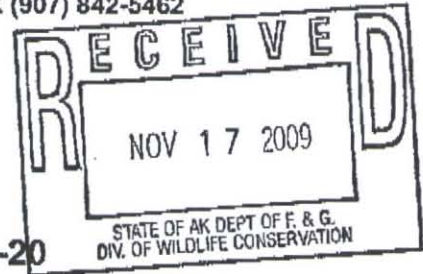


CHOGGIUNG LIMITED

ALASKA NATIVE VILLAGE CORPORATION

P.O. Box 330 104 MAIN STREET DILLINGHAM, ALASKA 99576
PHONE (907) 842-5218 FAX (907) 842-5462

**CHOGGIUNG LIMITED
BOARD OF DIRECTORS
Resolution 2010-02**



Title: Oppose Proposals 15-20

Which attempt to restructure the Bristol Bay salmon fishery

WHEREAS, the Choggiung Limited Village Corporation is the largest corporation in the Bristol Bay region with over 1800 shareholders and is comprised of the villages of Dillingham, Ekuk and Portage Creek; and

WHEREAS, the Choggiung Limited Board on behalf of its shareholders opposes any restructuring proposals that will be considered during the Alaska Board of Fisheries, December 2009 Bristol Bay Finfish meeting in Anchorage; and

WHEREAS, Choggiung believes that any attempts to fundamentally alter the Bristol Bay Fishery regulatory structure should only be considered after the Board of Fisheries has the opportunity to fully understand the economic and social impacts to local Bristol Bay village fishermen; and

WHEREAS, the fishing industry has been the backbone of the Bristol Bay region for over 100 years providing over \$300 million dollars in annual revenue and is the largest taxpayer in the region; and

WHEREAS, Choggiung shareholders participation in the Bristol Bay salmon fisheries could be threatened by repealing the existing 32 foot vessel limit and existing permit stacking regulations; and

NOW THEREFORE BE IT RESOLVED, the Choggiung Limited Village Corporation opposes Proposals 15-20 that propose to restructure the Bristol Bay Finfish Fishery regulatory structure without the benefit of first engaging in a meaningful dialogue with local stakeholders to assess the benefits and impacts; and

BE IT FURTHER RESOLVED, the Choggiung Limited Village Corporation specifically opposes any restructuring proposals that seek to repeal the 32-foot vessel limit and the existing permit stacking regulations.

1/6

APPROVED AND ADOPTED by a duly constituted quorum of the Board of Directors of Choggiung Limited this 14th day of November 2009.



Thomas Tilden, Vice President

ATTEST:



Olga Kropoff, Treasurer



CHOGGIUNG LIMITED

ALASKA NATIVE VILLAGE CORPORATION

P.O. Box 330 104 MAIN STREET DILLINGHAM, ALASKA 99576
PHONE (907) 842-5218 FAX (907) 842-5462

**CHOGGIUNG LIMITED
BOARD OF DIRECTORS
Resolution 2010-03**

Support Board of Fisheries Proposal 13 To Establish a Fish Refuge in Bristol Bay

WHEREAS, the Choggiung Limited Village Corporation represents the villages of Dillingham, Ekuk and Portage Creek with over 1800 shareholders residing in the Bristol Bay Region, in Alaska, and elsewhere; and,

WHEREAS, Choggiung Limited is a significant land owner within the Nushagak River drainage; and,

WHEREAS, Choggiung Limited shareholders depend on a healthy and sustainable ecosystem for continued subsistence use, hunting, and commercial fishing; and

WHEREAS, The Bristol Bay watershed deserves the higher environmental standards a fish refuge could provide given the concerns tied to the Pebble Mine project and the lasting damages it could inflict upon the world class resources that exist in the Bristol Bay region;

WHEREAS, Choggiung's mission statement is to achieve solid financial objectives and ensure current and future shareholder benefits, as we protect our land, and respect our people and heritage.

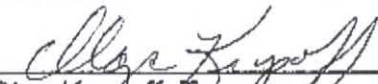
NOW THEREFORE BE IT RESOLVED, the Choggiung Limited Village Corporation strongly supports Proposal 13 as stated in the Alaska Board of Fisheries 2009/2010 Proposal Book

APPROVED AND ADOPTED by a duly constituted quorum of the Board of Directors of Choggiung Limited this 14th day of November 2009.



Tom Tilden, Vice-President

ATTEST:



Olga Kropoff, Treasurer

Public Comment # 85

3/6



CHOGGIUNG LIMITED

ALASKA NATIVE VILLAGE CORPORATION

P.O. Box 330 104 MAIN STREET DILLINGHAM, ALASKA 99576
PHONE (907) 842-5218 FAX (907) 842-5462

**CHOGGIUNG LIMITED
BOARD OF DIRECTORS
Resolution 2010-05**

**Title: Oppose Proposal 14
Requiring removal of all setnet gear during drift gillnet openings**

WHEREAS, the Choggiung Limited Village Corporation is the largest corporation in the Bristol Bay region with over 1800 shareholders and is comprised of the villages of Dillingham, Ekuk and Portage Creek; and

WHEREAS, the Choggiung Limited Board on behalf of its shareholders opposes any restructuring proposals that will be considered during the Alaska Board of Fisheries, December 2009 Bristol Bay Finfish meeting in Anchorage; and


WHEREAS, Choggiung believes that any attempts to fundamentally alter the Bristol Bay Fishery regulatory structure should only be considered after the Board of Fisheries has the opportunity to fully understand the impacts to local Bristol Bay village fishermen; and

WHEREAS, the fishing industry has been the backbone of the Bristol Bay region for over 100 years providing over \$300 million dollars in annual revenue and is the largest taxpayer in the region; and

WHEREAS, Choggiung shareholders who participate in the Bristol Bay setnet salmon fisheries will undoubtedly suffer financially as it is physically impossible in most cases to remove all set gillnet gear because of time constraints, tide restrictions, strong currents, inadequate manpower, etc.

NOW THEREFORE BE IT RESOLVED, the Choggiung Limited Village Corporation opposes Proposal 14 that will require all setnet gear, lines, anchors, stakes, bouys, kegs, etc. to be removed during drift gillnet openings without the benefit of first engaging in a meaningful dialogue with local stakeholders to assess the benefits and impacts; and

APPROVED AND ADOPTED by a duly constituted quorum of the Board of Directors of Choggiung Limited this 14th day of November 2009.



Thomas Tilden, Vice President

ATTEST:



Olga Kropoff, Treasurer



CHOGGIUNG LIMITED

ALASKA NATIVE VILLAGE CORPORATION

P.O. Box 330 104 MAIN STREET DILLINGHAM, ALASKA 99576
PHONE (907) 842-5218 FAX (907) 842-5462

CHOGGIUNG LIMITED BOARD OF DIRECTORS Resolution 2010-06

**Title: Support Proposals 1, 2, 3 and 9
Subsistence drift gillnet using 25 fathoms, and closing sport fishing within quarter
mile of Klutak, lowithla, and Koggiling Creeks**

WHEREAS, the Choggiung Limited Village Corporation represents the villages of Dillingham, Ekuk and Portage Creek with over 1800 shareholders residing in the Bristol Bay region and in Alaska and elsewhere; and,

WHEREAS, Choggiung Limited is a significant land owner within the Nushagak River drainage; and,

WHEREAS, subsistence fishing is an important part of Choggiung shareholders lifestyle and values and those shareholders depend on a healthy and sustainable ecosystem for continued subsistence use; and

WHEREAS, Dillingham has a shortage of accessible beach for those who want to harvest subsistence King Salmon; and

WHEREAS, subsistence drift gill netting has been traditionally used to harvest salmon by local village residents for many years; and

WHEREAS, allowing subsistence fishermen to drift with 25 fathoms of net will increase safety and lower expenses by reducing the amount of times needed to check a net and will increase quality and control over the amount of fish caught, thus reducing the amount of waste; and

WHEREAS, Choggiung believes that the long-term sustainability of King Salmon is at risk due to increased sport fishing at stream entrances which are important staging areas for King Salmon; and

WHEREAS, Choggiung's mission statement is to achieve solid financial objectives and ensure current and future shareholder benefits, as we protect our land, and respect our people and heritage.

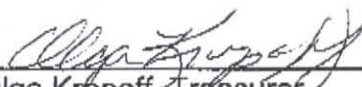
NOW THEREFORE BE IT RESOLVED, the Choggiung Limited Village Corporation supports Proposals 1, 2, 3 and 9 as stated in the Alaska Board of Fisheries 2009/2010 Proposal Book

APPROVED AND ADOPTED by a duly constituted quorum of the Board of Directors of Choggiung Limited this 14th day of November 2009.



Tom Tilden, Vice-President

ATTEST:



Olga Kropoff, Treasurer

To: The Alaska Board of Fish
From: Dan Layland, Nushagak River Set Net Fisherman
Date: November 17, 2009
Re: Comments /Response to Proposal 14

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This memo is to provide written feedback on Board of Fish Proposal 14, authored by Todd Granger, in which the issue is "set net gear left in the water...during driftnet only openings in Bristol Bay."

Semi-permanent in-season set net anchors and site markers have been an integral part of Alaska's set net fisheries. Set net sites throughout Bristol Bay and other regions of Alaska have utilized semi-permanent low water markers to establish set locations. These location markers maintain orderly distances required by both drift and set gear types. To have to remove those site markers would be unreasonable because they would be accessible only at low water. Requiring set net fisherman to remove site markers will disrupt the order of set net fisherman and their locations to each other. My understanding is that we all want to maintain an orderly fishery.

Please do not complicate our fishery any further by removing our ability to maintain order among set net-to-set net operations and set net-to-drift net operations.

Public Comment # 86

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

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My name is Chad Norris and I'm a Kvichak setnetter. Below I have respectfully submitted my stance on a few key Bristol Bay fishing proposals.

PROPOSAL 14:

Oppose: Some setnetters can only set up their sites on a minus tide. It would be extremely difficult if not impossible to remove and re-set screw anchors and running lines potentially multiple times in a season.

PROPOSALS 17, 18 and 19:

I am in favor of these proposals as they allow a setnetter to earn a living wage.

PROPOSAL 32:

I am in favor of this proposal. Presumably we want to stop as many fish as possible. The drift fleet now fishes 75 fathoms instead of 50, so the setnetters should be able to fish 35 fathoms.

PROPOSAL 34:

Strongly oppose: We've tried this (84% Drift, 16% Set) and it's unfair. The setnetters sit on the beach and wait for the drift fleet to fish for as many as 6 openers in a row. In the regular season, we all get roughly the same fishing time! I think the 3/1 drift-set ratio should stand.

PROPOSALS 35 and 36:

Strongly oppose: The drift fleet has not shown much interest in the past; only a few boats showed up. Setnet skiffs and their short nets are ideal for such a small river.

Vince Webster, Chair
& Members of the Board of Fish
Alaska Boards Section: Board of Fish
PO Box 115526
Juneau, AK 99811-552

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Re: Prop 20

I'm writing in support of Prop 20, that would allow one person to own and fish 2 drift permits in the Bristol Bay salmon fishery.

I'm a long time Alaskan and have fished Bristol Bay since the mid eighties, and since 1993 I operate my own boat. Since the heydays, when we got a \$1.60 to \$2.40 a pound, we have come a long ways; it's not that long ago when all we got was 40 cents, and now we are approaching a price we were paid in 1985! With ever increasing expenses we need ways to maximize our operations.

I believe that the last few years were fairly successful for most Bristol Bay fishers partly because of fewer boats competing with each other.

To be able to fish 1 extra shackle of gear (50 fathoms) with a 2nd permit may be worth the investment for some, while it eliminates 100 fathoms of gear for the benefit of all. What we currently have in place (2 permit holders on a boat) works well for the people who have a trustworthy deckhand or family member, but it does leave out quite a few skippers who would invest in a second permit if they wouldn't have to worry about who the permit holder should be.

This is not a locals vs outsiders issue: Everybody benefits with fewer boats "corking" each other.

Some years ago some ideas circulated to reduce the number of drift permits to the optimum number (as low as 900) through a buy-back program. Permit stacking is essentially a free buy back. By allowing one person to own and operate 2 permits you would add a lot of strength to the existing "2 permit on a boat" regulation.

I hope you will adopt proposal 20, for the benefit of all participants in this fishery, D-Boats or not!

Sincerely
Konrad Schaad
53200 N Mc Neil Pt.
Homer Ak 99603
schaad@gmail.com

1/2

Public Comment # 90

Vince Webster, Chair
& Members of the Board of Fish
Alaska Boards Section: Board of Fish
PO Box 115526
Juneau, AK 99811-552

Re: Prop 15

I'm writing in support of proposal 15, which would eliminate the antiquated 32 foot boat length limitation in Bristol Bay.

The original idea behind the 32 ft limit was to regulate the catch. But nowadays Bristol Bay is one of the best managed fisheries based on escapement and openings, and the boat length is not a factor at all.

What was intended to be a limit for catch, turned into a limit for quality. The biggest hurdle to overcome low salmon prices is the quality of our fish(copper river salmon fetch about twice the price of Bristol Bay fish). The fish we catch is as good as any other Alaskan sockeye, but we don't have the time, the manpower and the deck space to do a whole lot to keep those fish in the best form.

While we can't do much about the time, we can improve on deck space, and with that on manpower. More space allows for better handling techniques like bleeding, but most of all we wouldn't have to cram chiller units into lazarets, hot engine rooms, onto flying bridges or even sacrifice bunkspace.

Longer boats are more fuel efficient and ride the rough seas so much better, you actually wonder who came up with that silly 32 ft limit for the Bering Sea. Lengthening a boat is not that big a deal; it's been done hundreds of times, to small gillnetters as well as crabbers. When it was decided to allow engines on Bristol Bay Sail boats, the same argument was heard that only the rich can afford to do the change. Well, everybody managed to get a boat with an engine, and we don't hear any complaints of people who still want to fish with a sail only.

I'm a longtime Alaskan and have fished with my 2 boys since they were about 10 years old. Both of them are in college now and we rely on this fishery to pay for school. But we can only expect a fair price for our fish if we deliver the quality the market demands! I hope you will be in favor of Prop 15 and will allow a change for the better. Longer boats mean better quality fish.

Sincerely
Konrad Schaad
53200 N Mc Neil Pt
Homer Ak 99603
907 235 7091
schaad@gmail.com

2/2

Public Comment #



Vincent Maritime Services LLC

Marine Surveying and Consulting

16404 38th Avenue Northwest
Stanwood, Washington 98292
Phone 360-652-8254
Facsimile: 360-652-7792
Email: *vincentmaritime@hotmail.com*

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NOV 17 2009

BOARDS

15 November 2009

Re: Proposal 20- One person ownership of two permits

To Whom It May Concern:

Proposal 20 and the Realities of Bristol Bay Fishery Economics

Recent and future inflationary pressures are, and in my opinion will continue to cause a rise in the costs of shipping, labor and materials. These pressures are already, and will continue to negatively affect the existing marginal level of profits and likely, exaggerate the loss of profit the fleet is experiencing in the Bristol Bay Salmon Fisheries. Change is needed if this fleet is to gain credibility with regard to fish quality in the competitive world markets (Bristol Bay currently ranks at the lower end of this spectrum). Of equal importance, change is needed in order to improve vessel safety and safety culture onboard.

As the president of the North Pacific Fishing Vessel Owners (vessel safety awareness) Association and a SAMS® Accredited Marine Surveyor with nine years of experience, I have performed safety inspections and condition and valuation surveys on numerous Bristol Bay vessels and vessels ranging up to corporate owned factory stern trawlers. I am very concerned with the aging of the Bristol Bay fleet and the lack of profits available that would enable vessel owners to update vessels and safety equipment.

My findings when inspecting Bristol Bay Gillnetters are alarming. Often I find immersion suits aged to the point of being unusable, fire suppression systems outdated and inadequate, alarm systems inadequate, distress signals outdated and throwable floatation devices missing or in need of renewal. Vessel safety examination decals issued in this fishery are on the decline, and I am of the strong opinion that vessel owners sometimes illegally falsely represent ownership of certain safety devices to USCG inspectors, in order to obtain a safety decal. This is done by borrowing from another vessel owner in the fishery in order to make ends meet, then returning the device after obtaining the decal. Based upon my experience and simply put, I am finding that in general, whenever I am contracted to inspect a Bristol Bay gillnetter, I am usually inspecting an aging vessel that receives a deficient amount of routine scheduled maintenance and necessary upgrades, due to lack of profits.

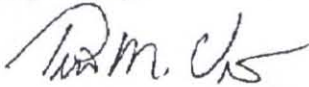
Public Comment # 09

It is therefore that I am in favor of Proposal 20, which would allow one person the ownership of two permits. This is based upon some of, but not all of the following reasons:

- This proposal will reduce the number of vessels participating in the fishery. This will in turn make the fishery safer, creating less chance for vessel collisions and gear conflicts, particularly in instances of line fishing, where these hazards are well documented. Less gear conflict would also enhance the environmental stewardship aspects of this fishery.
- A reduction of vessels participating in the fishery would allow vessel operations more time and space to conduct their operation. This would in turn allow operators greater flexibility, in order to focus on a higher quality product through bleeding and better handling. A higher quality product Bay wide will lead to increased profit margins.
- Proposal 20 would allow the chance for an increase over existing profit margins, or decrease of profit losses. This positive economic trend would enable vessel owner/operators to upgrade their operations and make them safer. This would also help stimulate the local economy as vessel owners reinvest in their operations.
- Bristol Bay permits are considered by most in the industry to be an equitable asset that at some point in the future could be used for retirement. It is my opinion approval of Proposal 20 would eventually lead to an increase in the value and economic sustainability of the permits. This would be of great benefit to all permit owners, particularly those who live locally in the watershed upon entering their senior years. While it is true this would increase entry costs, the vast array of fishery grants and/or loans available from the state and federal governments, BBEDC and regional marketing groups should make up for any shortfall.

I would like to personally thank you for your time and consideration of this important proposal, and how it relates to the overall well being and long term sustainability of this great fishery. If you have any questions, I can be reached at the contact numbers or email listed above.

Respectfully,



Timothy M. Vincent, A.M.S.®

Principal Surveyor, Vincent Maritime Services, LLC.

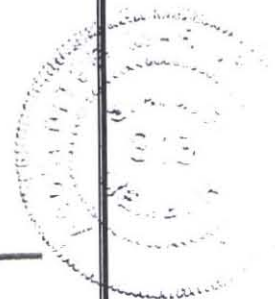
Dated 15 November 2009

Member: Society of Accredited Marine Surveyors, SAMS AMS # 913
President, North Pacific Fishing Vessel Owners (Vessel Safety) Association, (NPFVOA)
Marine Insurance Association of Seattle, (MIAS)



Page 2

Public Comment #



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

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Members of the Panel:

Please pass Proposal 13 to enact more rigid regulations to protect fish habitat in the Nushagak and Kvichak drainages.

My family has commercial fished in Bristol Bay since 1929 and I would like to ensure that legacy for our children. Open-pit mining is a short-term benefit solution to a depressed economy in Bristol Bay. I believe members of the panel should consider the entire system at work and realize the effects a loss of fish habitat would create for the members of the local community.

It is true that fishermen need to problem-solve around issues of financial sustainability in commercial fishing, however they are evolving to meet the demands of the modern economy. Evidence of this new economy is seen in the local food movement and increased consumption of fair trade items.

The last great run of salmon should be protected with the utmost care so that we do not find ourselves in a similar scenario to Scotland, England, the east coast of the United States, and all the other places salmon used to run.

Please pass Proposal 13.

Best,

 11-17-09

Heather DeBolt
4th Generation Bristol Bay Fisherman
Deckhand, Naknek River
Small business entrepreneur marketing Wild Alaskan Salmon

m PO Box 7012
Olympia, WA 98507
e heather.debolt@gmail.com
p 509.240.7800

November 14, 2009

Board of Fish Members
State of Alaska

Re. Bristol Bay Fishery Proposals

Dear Sirs:

We strongly oppose the proposals to:

- increase boat length past 32' and;
- stack permits with a drift net of 300 fathoms

We have participated in the Bristol Bay Salmon Fishery since 1985 and own one drift net permit and one set net permit. We own two 32' vessels and multiple skiffs and gear.

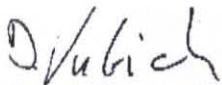
These changes do not enhance the fishery and increase the quality of the fish. It does not change the capacity for processing the fish or the revenues ultimately paid to the fisherman.

The State of Alaska Fish & Game has done an incredible job managing the resource and ensuring escapement and future returns.

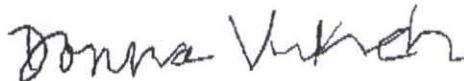
Limited Entry Permit Holders are the owners of the harvestable fish after escapement, not the processors or the State.

Thank you for the opportunity to address my concerns. Thank you for the work that the Board of Fish has done for our fishery throughout the years.

Sincerely,



Danislav Vukich
Bristol Bay Permit Holder



Donna Vukich
Bristol Bay Permit Holder

PO Box 177
Naknek, AK 99633
907-246-7608

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NOV 17 2009
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Todd and Kimberly and Caleb Hopkins
7450 E Waldron Cove CT
Palmer, AK 99645

November 16, 2009

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

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RE: 2009 BRISTOL BAY FINFISH PROPOSALS

We are a family commercial fishing operation in Egegik, Alaska. Todd (S04T59012I), Kimberly (S04T60927K) and Caleb (S04T60287L) are all current permit holders. We would like to comment on several of the proposals for the Bristol Bay Fin Fishery.

PROPOSAL 14 – requiring the removal of all setnet gear during drift gillnet openings.

OPPOSED – Our family fishes 3 permits and 4 setnet sites. Our gear is set at the beginning of the season and not removed until the end of the season. Having to set anchors and running lines would not be possible for each opening. When set at the beginning of the year, they are set at slack water. Small operations like ours do not have the manpower or the time to set up each site every opening. Also, our running line system also moore our skiffs and make it so that they are floating at all points of the tide. If the gear were to be removed we would have to drive several miles down to beach to launch our skiffs each opening.

PROPOSAL 15 – Elimination of 32 foot limit on Bristol Bay drift vessels.

OPPOSED – We are opposed to this as this would lead to a continued overcapitalization in a fishery that has already been determined to be overcapitalized.

PROPOSALS 16 – Allow multiple permit use as ...

SUPPORT AS AMENDED – We support this with the following amendment:

Allow anyone who owns two setnet permits to operate them in accordance with existing regulations and anyone who owns two drift permits to be allowed to fish [300 fathoms].

We believe that if regardless of gear type, if two permits are owned, the permit holder should be allowed to fish twice as much gear as a fisherman with a single permit. The stacking of permits as currently implemented in 5 AAC 06.333 removes potential drift gear from the water. This reduction in the amount of drift gear in the water forces the drift fleet to take longer to catch their allocated percentage of fish and leads to setnet fishermen sitting on the beach waiting for the drift fleet to catch up. We have sat out many days near the peak in this partly due to the reduced gear from current permit stacking.

1/3

Public Comment # 92

PROPOSALS 17, 18, and 19 – Allow multiple setnet permit use ...

SUPPORT – if a permit holder owns two permits, they should be allowed to fish double the amount of gear. This will make it possible for individual fishermen to run a more profitable business. This will also allow more flexibility in family operations when college students leave or parents become too old to participate in their later years. We would rather see a proposal that includes doubling the amount of drift gear with ownership of two permits, as well as for setnets.

PROPOSAL 20

SUPPORT AS AMENDED – We support this with the following amendment:

Allow one person to own two permits and use **[300 fathom] nets**.

See comment on Proposal 16.

PROPOSAL 21

SUPPORT – See notes on proposals 16 and 20. We would prefer that the drift permit holders be allowed to hold and fish two permits with double the gear.

PROPOSALS 24 – Repeal permit stacking as currently exists

SUPPORT – We would like to see drift boats be able to fish 2 permits and double their gear. See notes on PROPOSALS 16, 20, and 21.

PROPOSALS 25, 26 – Registration changes

OPPOSE – When making changes to the district registration system there is the potential to alter the effort in a district to a degree that the allocations between gear groups could get completely out of proportion. This can already be seen as a side effect of the regulation allowing D vessels in the fishery. Before changes are made that can alter effort in a district, there should be some sort of study or research into how those changes in effort will effect allocation.

PROPOSALS 27, 28 – No transfer period if drifting and setnetting in same district or SHA

SUPPORT – This proposal would allow operations to choose which gear type to fish in the same district without having to wait 48 hours. I believe this could have a positive impact economically for operations that choose to participate in the fishery with both gear types.

PROPOSAL 31 – Allow fishing in the General District ...

OPPOSED – We believe that fishing in the general district early in the season can have a direct, negative impact on the escapement of rivers in Bristol Bay. If too many fish are caught that are heading to a river like the Kvichak early in the season, there will be very little that can be done to manage fishing effort to help ensure the attainment of season escapement goals. Once the fish are caught in the general district, it is too late. The only option would be to shut down fishing on the Kvichak. This could

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lead to a situation where setnetters and drift fishermen that do not fish in the general district do not have the opportunity to harvest later on.

PROPOSAL 37 – Concurrent fishing of gear groups in Egegik

SUPPORT – We believe that many of the issues (PROPOSAL 14 - removal of setnet gear, PROPOSALS 27, 28 – removal of 48 hour transfer between gear types) would be solved if both gear types fish concurrently on each opening as is mentioned in this proposal. We have been affected negatively during peak days when we have had to watch the drift fishermen catch up on their quotas on days when the fish were thick at our sites. As setnetters inside the river, fish are not always at our sites during an opening, but sometimes they are. If we have to sit out a tide when the fish are at our sites it can dramatically affect our season. We really want the opportunity to fish each tide with the drift fleet and have the opportunity to have nets in the water when the fish are at our sites. Having small windows of time and opening just before or just after the drifters seemed to work very well during the 2009 season.

PROPOSAL 38 – Suspension of allocation if <400 boats or processor limits in Egegik

SUPPORT – If the effort in Egegik is below a certain boat number (we are not sure on the exact number) and the drift fleet cannot stop the flood of fish or reach their allocation in a timely manner due to that lack of effort, we believe the allocation should be suspended. Also, if processor limits are in place that hinder the drift fleets ability/effort to catch their allocation we believe the allocations should be suspended. These situations can lead to over escapement as well as setnet fishermen sitting on the beach watching the fish and subsequently their seasons swim by.

PROPOSAL 39 – Removal of all setnet gear during closures in Egegik

OPPOSED – See reasoning from PROPOSAL 14

Thank you for the opportunity to comment on these issues.

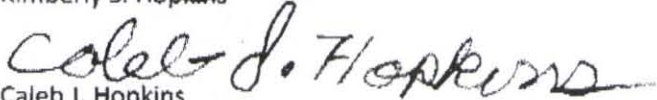
Sincerely,



Todd J. Hopkins



Kimberly S. Hopkins



Caleb J. Hopkins

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NOV 17 2009

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

November 16, 2009

To the Board of Fisheries:

I am writing in support of Proposal 13, and strongly urge the Board of Fisheries to recommend a fish refuge for the Kvichak and Nushagak Rivers. I base this support on 30 years of professional experience in fisheries research, including field work in the Kvichak and Nushagak regions annually since 1987. My experience in southwestern Alaska is balanced by direct experience in the state of Washington, where I live. I also stand on my knowledge of salmon biology and conservation, acquired as a teacher and scientist. I served on the National Research Council's panel on the Protection and Management of Pacific Northwest Anadromous Salmonids, published in 1996 as "Upstream: Salmon and Society in the Pacific Northwest", and I wrote a major book on the subject, "The Behavior and Ecology of Pacific Salmon and Trout", published by the American Fisheries Society and the University of Washington Press.

The depletion and extinction of salmon and trout in many rivers of the Pacific Northwest (California, Oregon, Washington and Idaho) is well-known, and the listing of many population complexes under the United States Endangered Species Act only formalizes the tragic state of affairs. Fishermen are deprived of their livelihoods or pitted against each other in a fight for the small harvestable surplus that remains. Everyone points the finger of blame at someone else, vast sums of money are spent, and the benefits are difficult to discern. There are many lessons from this on-going tragedy, but chief among them is that restoration is much more costly and much less certain than protection.

During professional meetings on salmon conservation and management, those of us living in the "lower 48" states are often chided by Alaskan biologists for the careless treatment of our habitat, and the ludicrous sums of money spent trying to restore things after the fact. I can only reply that Grand Coulee Dam was built a long time ago, when the region and the nation were in truly desperate economic times, and that people were led to believe that we could mitigate for the loss, and have both the salmon and the dams. Since then, the full value of habitat quality has become obvious, as has the importance of complex population structure and diverse life history patterns of salmon and trout. The failure of "after the fact" mitigation has also become clear.

During my years on the faculty at the University of Washington, I have worked at the Fisheries Research Institute's field camps in western Alaska, and especially on Iliamna Lake. I have walked the streams year after year, worked with my colleagues and students on the patterns of abundance, the links of salmon to resident fish, wildlife, and to the lives of people in the villages of the area. I was therefore incredulous when I heard of the proposed land-use activities, including vast mine pits, between the Kvichak and Nushagak drainages. Bristol Bay is the jewel in the crown of Alaska's salmon fisheries, and I could not believe that such a proposal would be allowed to move forward.

As the nature and magnitude of the proposed activities became more clear, so did my conviction that this would be a devastating and permanent blow to the sustainability of the region's fisheries and the communities that depend on them. The

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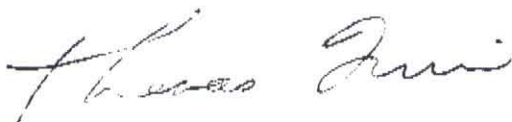
information that my colleagues (Ray Hilborn, Daniel Schindler, and the late Don Rogers) and I have collected reveals the importance of the complex of populations within the Bristol Bay region, each balancing the ups and downs of the others during different periods of time. We in the Pacific Northwest, having lost the diversity of salmon populations, suffer accordingly.

If the 21st century has any watchword it is sustainability, and wisely managed fisheries are the epitome of sustainability. During the 50 years of Alaska's statehood, the priority placed by the Alaska Department of Fish and Game for escapement has meant that the salmon, the ecosystems, and the human communities are all sound. Against this fabric of interwoven human and natural systems we see proposals for huge open pit mines, vast reservoirs of toxic waste, appropriation of surface and ground water, roads crossing multiple salmon-bearing streams, and other activities. These activities, if permitted, would change this region from one based on sustainable fishing to one based on short-term mining, in which some fishing will also occur. When the mine has played out, the region will be left permanently scarred and degraded, with the constant threat of a catastrophic event. Is this really in the best interest of the state? Given the opportunity, it would be negligent of the Board not to act and create a fish refuge in these areas. If the proposed mine-related activities do not constitute a threat to salmon, what would? If these rivers are not worth protecting, which ones are? If we do not create a refuge here, against this threat, we have abdicated our responsibilities as stewards of this resource. If we do not draw a line in the sand here, there is none to be drawn.

A smokescreen of arguments has been raised in defense of the proposals, including such things as the salmon fisheries in the Fraser River, recent number of returns per spawner in the Kvichak River system, the uncertainty in aerial counts of adult salmon, and other equally irrelevant matters. You are vested with authority and responsibility; do not be confused by these distractions. If you think about what is being proposed, visualize the magnitude of the habitat destruction, and ponder the risk of disaster, you will find the need for a salmon refuge clear enough.

Please understand that I am not against development. I drive a car, live in a house, eat meat and fish, and have all the other trappings of modern life. I fully understand that compromises must inevitably be made among competing needs in society, and that living natural resources are not the only important thing in the world. However, I am confident that if you weigh the costs and benefits, the risks and gains, it will be obvious that your duty is to the sustainability salmon, the people who need them, and the ecosystems on which they depend. Protection of these areas will be a blessing that you can confer forever to the commercial, subsistence, and recreational fisheries of the region, and indeed the region itself. This is clearly the best use of these rivers, and as the Board of Fisheries it is critical that you take this step. I appreciate the opportunity to provide input into this important process, and hope that you will act to provide a fish refuge for the Kvichak and Nushagak rivers.

Sincerely,
Thomas Quinn, Professor
School of Aquatic and Fishery Sciences
University of Washington
Seattle, WA 98195



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November 16, 2009

Dear Board of Fisheries Members,

My name is Kim Rice and I have fished in Bristol Bay since 1986. My fishing history includes driftnetting, but I have Setnetted for the past 22 years in Egegik with my family. We fish 3 Setnet permits. I would like to comment on several proposals that my family and I are in support of and against

IN SUPPORT OF:

PROPOSAL #:

13- Protecting the fish habitat is the wise and right thing to do.

16,17,18,19- We support being able to own and fish 2 permits. That allows a family to keep a permit in the family if one of us is unable to fish one year. The family operation can continue to operate without having to transfer the permit to a crewmember.

37,38- this was the original intent set forth in The Allocation Plan. I submitted this proposal to help formulate a management plan that follows the original Setnet Allocation Plan. During the meeting, which I believe was 1997 that the Allocation Plan was written, Chairman Coffee asked ADF&G how they would operate the Allocation Plan. The response of Fish and Game was that they would give the gear group that needed to catch up a early start of 15 minutes, 30 minutes, 1 hour, or even 1 tide, with windows of no fishing to allow for fish to get into the inner district. During the the years of 2006, 2007, 2008 the Setnet Fishers were made to sit on the beach for many days waiting for the Drift fleet to catch up on their Allocation numbers.

Problem:

When the Drift fleet in the Egegik District is numbers 300 to 400 boats, there is not enough effort to maintain their allocation number. This is further impacted when the processors initiate catch limits further restricting their ability to increase their catch. This keeps the Setnet Fishers from being able to fish.

Solution:

Formulate a management plan that accounts for small Drift fleet numbers. If the Drift fleet is unable to bring up their Allocation numbers because there are small drift fleet numbers or catch limits have been imposed by the processors. The Setnet Fishers should be allowed to fish concurrently with the Drift Fleet.

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In the 2009 Season, the Setnet fishers were allowed opportunity to fish that had been absent in several of the previous years. That was due to an abundance of fish and a larger drift fleet.

In Summary, In the Egegik district Setnet Fishers historically fished concurrently with he Drift Flee and they should continue to do so.

AGAINST PROPOSAL

14,39- Most Setnet Fishers cannot remove their anchors and running lines between openings. It takes a full week to set our 6 set net locations. That's with good weather. Being required to pull our anchors and running lines between openings would cause economic hardship for our family and many of our co Setnetters. We pay a lease to the State of Alaska for the right to fish our sites and place our fishing equipment where we need to.

15- No increase in the 32-foot length drift boat.

21- No

31-No General district. This would be a biologically unsound plan.

33-No. Setnetters need to have set anchors.

November 16, 2009
 Alaska Board of Fisheries
 Boards Support Section
 P.O. Box 115526
 Juneau, AK 99811-5526

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 BOARDS

RE: Bristol Bay Finfish, Proposal 14. "Minimum distance between units of gear."

To the Board of Fisheries:

We are writing to oppose Proposal 14 requiring "removal of all setnet gear during drift gillnet openings." We operate a set gillnet on Ekuk Beach and believe that if this proposal is adopted it will drastically reduce catch and pose an unnecessary safety hazard to Ekuk setnetters.

Ekuk is a shore-based fishery exposed to very strong currents and frequent rough seas. As a result we anchor our gear using screw anchors and long metal pegs driven into the sea bottom at the end of our sites. We work our nets with a 1,200-foot running line connecting these "outer pegs" and shore. This allows us to operate our gear from the beach regardless of currents or rough seas. These pegs, screw anchors, and running lines cannot be casually removed. Our "outer pegs" are only accessible once or twice a season when the Nushagak experiences a negative 3-4 tide. Besides being inaccessible during the season, they must remain in place to become thoroughly seated in the ground to withstand Ekuk's strong currents. In fact we suffer significant reduction in catch if they are damaged during the season because we cannot replace them and are forced to move our nets drastically inshore. This has been the setnetting method used on Ekuk Beach for over 50 years. Skiffs are rarely used and then only occasionally and by a very small minority of permit-holders.

Requiring removal of our traditional anchoring equipment would damage our setnet operation drastically. We would be forced to attempt to anchor our nets with the use of temporary anchors and skiffs. This is completely impractical. Most setnetters on Ekuk do not own skiffs. Also, temporary anchors will not hold a set gillnet on large sections of Ekuk Beach due to our very strong currents. On rare occasions setnetters who have lost their running line or pulled outer pegs have attempted this – it does not work. The strong currents pull the anchors. Instead fishermen who have lost outer pegs move their sites drastically inshore where new outer pegs and a running line can be placed. This reduces catch drastically.

There is also a safety issue. Setnetting in a skiff is often impossible because of the very strong currents and rough waters that are common along our beach; this is why Ekuk has always been a shore-based fishery. And again – most setnetters on Ekuk Beach do not own skiffs and would not be able to even attempt a new fishing method regardless of safety or effectiveness.

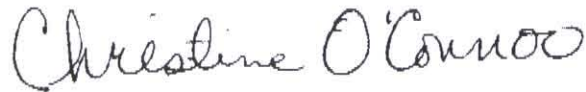
Because this proposal requires a complete change to our fishing method, we disagree with staffs' analysis which states, "The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery." Removing our traditional anchoring systems would require Ekuk fishermen to purchase skiffs at considerable expense in order to be able to place and remove temporary anchors – which would also have to be purchased. Disregarding safety, this expense alone would likely prevent some current fishermen from participating in a season under these proposed rules.

Enacting this proposal would greatly limit our ability to operate our setnet site as we have for over 20 years – and as our relatives and friends have for over 50 years. It is solely an allocative proposal which disregards the practical impossibility of complying on Ekuk Beach.

We urge you to reject Proposal 14.

Respectfully submitted,





John and Christine O'Connor
 5701-E Alder Drive
 Wasilla, AK 99654
 907.373.5775

To: Alaska Board of Fish

11/17/09

From: Charles Borbridge, Juneau

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NOV 17 2009
BOARDS

RE: Board of Fish Proposal 13

Position: I fully support Proposal 13

My background: Set net commercial permit holder/personal use fisherman since 1980 in Naknek, Bristol Bay and commercial set net partner since 1973. Family members have commercially and subsistence fished in Naknek since the 1940's.

From the ADFG website: "The Board of Fisheries main role is to conserve and develop the fish resources of the state." Preserving the fishery is the job of the Board; it is that reason it exists; it is for that purpose that board members are appointed. In discharging this essential responsibility the board both encourages practices or policies that enhance the health of the fisheries and discourages or opposes policies or activities that threaten the states fisheries. The Pebble Mine development poses an imminent threat to the Bristol Bay fishery. If the mine proceeds, the damage would undo decades of preservation efforts by the ADF&G and years of effort by the Board of Fish. The impact would be wide spread and harm all user groups including subsistence users, sport fishers, commercial fishers, and all the residents of the communities that rely on the salmon industry for jobs, taxes for essential services, and food. With such a threat to the health and survival of such a large and vital fishery, the Board of Fish must exercise its responsibility to conserve this fishery by approving Proposal 13. This proposal offers a tool for the board to discharge its core responsibility of preserving the states fishery in a way that is consistent with past board actions.

Threat of Pebble Mine:

This mine is not simply "a mine" located near "some fishing area." A number of circumstances combine to make Pebble a uniquely serious threat. Location: The Pebble is located

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near an active volcano. The site consists of sulphide rock and the area is seismically active. Pebble is between the headwaters of two of the main salmon producing rivers in Bristol Bay in an area laced with salmon rearing streams. Type of deposit: Although the mining area is rich with metal deposits, it is not concentrated into small veins. A great deal of rock must be processed. Future plans: The future plans are for a mining district with more large mines circling Pebble—all with similar negative impacts on the fishery. Conclusion: All this means that Pebble mine is an enormous sulphide metal mine located in a salmon rearing area between two of the great rivers of the largest sockeye fishery on the planet. This type of mine kills fish in nearby bodies of water and further pollutes the water and fish with the heavy metals that the acid leaches out of the rock. Once pollution occurs, the harm is immediate and often the pollution discharge continues for years. A huge amount of rock processed means more pollutants and an enormous amount of rock that must be stored once processed. A likely enormous open pit mine means an equally enormous dam or dams to contain the toxic tailings. The tailings would be contained by earthen dams that would not last in an earthquake prone area such as the pebble location. The siphoning of water from nearby streams and rivers for processing and transporting ore would kill fish. These problems are made worse by the size of the mine and the likely satellite mines if the Pebble mine is approved. The impact of simply building the mine/mines creates a huge footprint on the ground with all the associated problems in the area of fish bearing streams. This is destruction of fishery habitat on an industrial scale. Destruction of habitat is the most damaging of any impacts. The habitat pollution may continue despite efforts to control it. Fishery managers cannot simply lower fishing effort and expect it to quickly rebound. The habitat may not recover.

Some may say the state needs a “wait and see” approach or may be comforted by the mining representatives who seem so well informed and sincere. Or that not enough is known about the impact of this project to justify adding measures to protect the fishery. The sulphide mines already developed in other areas, however, have a well established history. All mining companies offered assurances; all mining companies performed studies; all mining and government

representatives touted the rigorous nature of the permitting procedure and the extent to which it would offer habitat protection. The impacts of this type of mining development, however, are as clear as it is disturbing. All metal sulphide mines have polluted. No technology currently exists that avoids the pollution these mines create. The type of pollution these mines create kill fish and destroys habitat. All this despite receiving all the necessary permits from the government agencies. The permitting process has not prevented these mines from causing their damage. Nor have the assurances, expensive studies and scholarly looking speakers. The state of Wisconsin now will only allow a new metal sulphide mine to be established if another metal sulphide mine can be shown that either has been in operation for 10 years without polluting or has been shut down for 10 years without polluting. They are still waiting for that one example.

The type of habitat destruction would harm all user groups. Obviously destruction of the run of salmon to two of Bristol Bay's main rivers would harm commercial fishers and the nearby communities. The impact during some years would be much greater than some average of the lost catch due to closing down these rivers. What maintains a steady salmon production for Bristol Bay is the ability of high production years for river systems to balance low production years by other river systems. Obviously absent two main river systems including the enormous potential of the Kvichak river system would contribute to potentially disastrously low production years along with the significantly lower yearly catch. The very important sport fishing industry along these two large rivers could simply no longer exist along with the important jobs it creates. Business owner could be in serious financial trouble since most of these businesses cannot simply "pick up" and move to another river. Lodges simply don't travel well. Subsistence users may not be able to continue their essential activities that have occurred on the rivers for countless generations. This could either be due to not being allowed to catch depleted stocks of fish or not wanting to catch and eat fish high in heavy metals.

The affects of habitat destruction would reach beyond the Kvichak and Nushagak rivers and beyond Bristol Bay. A Bristol Bay river system in trouble usually means restricted fishing by those in other districts in the Bay. The Bristol Bay run is also fished along the Alaska Peninsula. The current positive consumer response to Alaska wild salmon branding would be harmed by either reports of disastrous impact of mining pollution to such an important fishery and, likely more so, any reports of Alaska salmon with high concentrations of heavy metals. This could hurt the price received by fishers in other parts of the state and those that depend on those fisheries. Additionally, if the state does not offer additional fishery protection for such a dangerous project, when will it? This could harm other fisheries of the state and all the users that depend on them.

In closing the need for this proposal is clear. The threat is real. If you, the board, don't speak to protect this vital fishery as is your stated primary mission...then who will?

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