

*Marcus Hartley*

RC24

# **The Importance of the Bristol Bay Salmon Fisheries to the Region and its Residents: An Overview**

*Prepared for the*

**Bristol Bay Economic Development Corporation**

**October 2009**

*Prepared by*



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## The Importance of the Bristol Bay Salmon Fisheries to the Region and its Residents

This document is an executive summary of a much more detailed examination of the importance of the harvesting of Bristol Bay Salmon to residents of the Bristol Bay Region. The larger study is available from the Bristol Bay Economic Development Corporation (BBEDC), the sponsors of this project.

In this very brief summary we will cover the following topics:

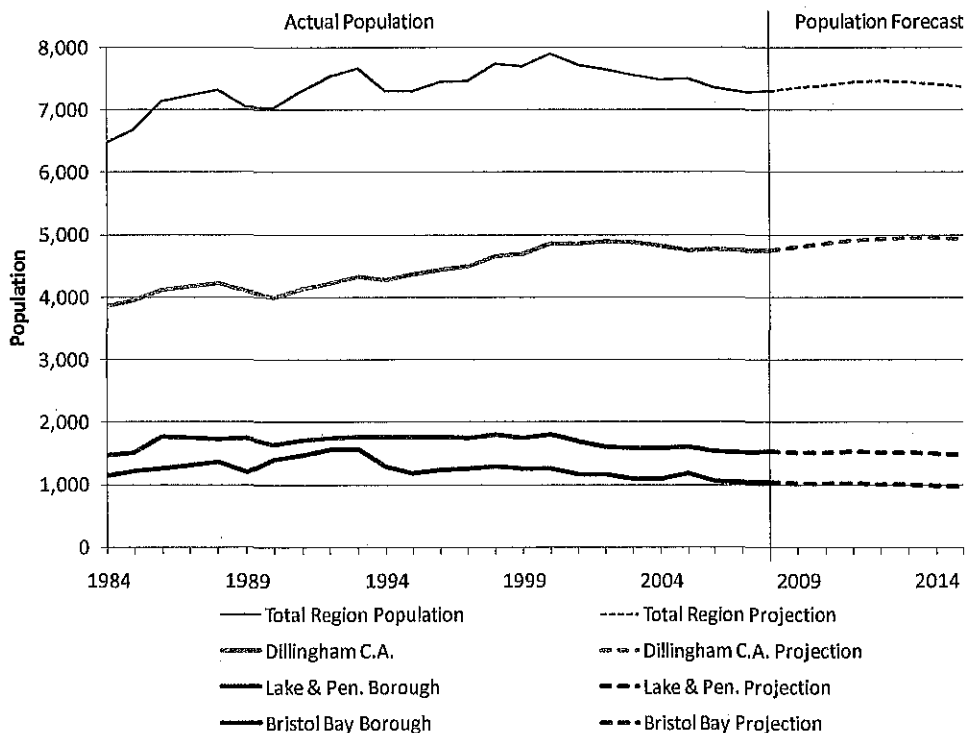
- Population in Bristol Bay
- Cost of Living in Bristol Bay
- The Drift Gillnet Fishery
- Capitalization of Drift Gillnet Vessels
- The Set Gillnet Fishery
- The Bottom Line

This summary as well as the larger document consists of a series of figures each with a paragraph or two of explanatory text. While we at Northern Economics developed the figures, the information is derived almost entirely from publically available data.

### Population in Bristol Bay

The total population in the Bristol Bay rose from 1984 through the turn of the century before slipping into a decade-long decline. The current population of the region is roughly the same as it was fifteen years ago and the 5-year forecast is basically flat. Population in the Dillingham Census Area increased in the 1990s's but has fallen slightly since then. Population in Bristol Bay Borough has declined steadily since 2000. Population in the Lake and Peninsula Borough dropped sharply in the early 90's but has been relatively stable since then.

**Figure 1. Population of the Bristol Bay Region 1984 – 2008 and Projections to 2014**

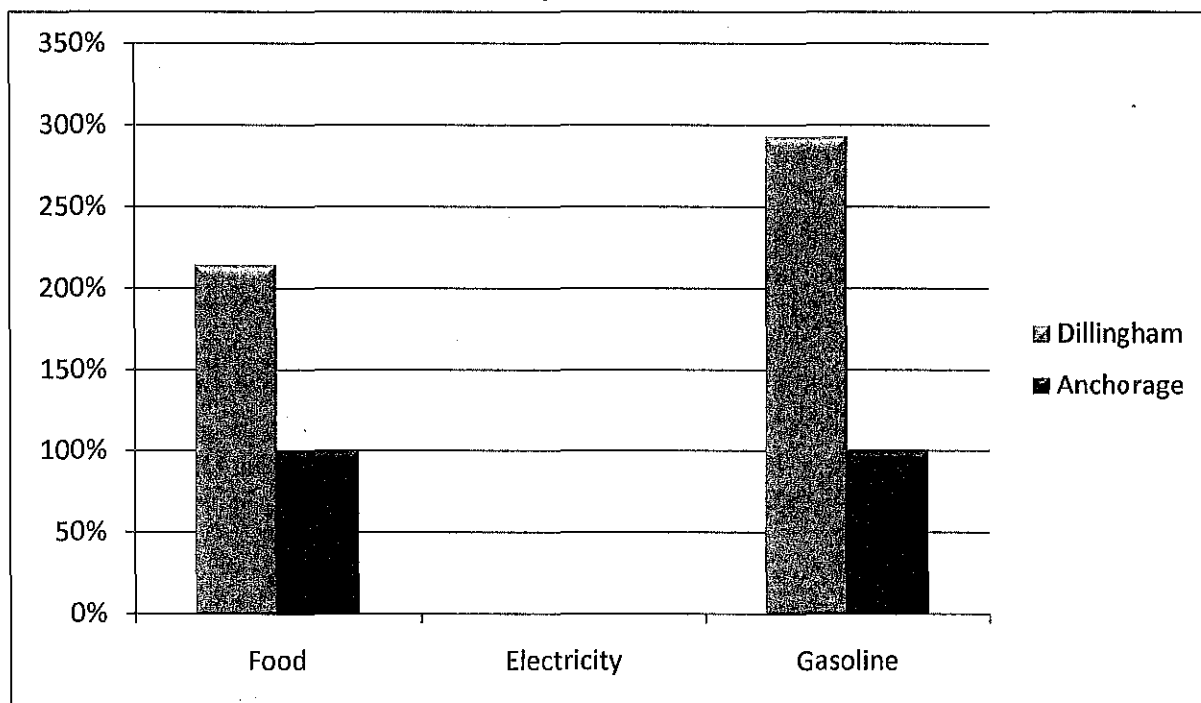


Source: Figure developed by Northern Economics based on data from AK Dept of Labor and Workforce Development (ADOLWD, 1990 - 2008) and Dr. Scott Goldsmith of ISER (Goldsmith, 2009).

### Cost of Living

This figure compares the cost of living between Dillingham in Anchorage from a March 2009 study by UAF. The cost of food, electricity and gasoline in Dillingham were all more than double the prices in Anchorage. A study conducted by 2008 by BBEDC (BBEDC, 2008) indicates that the costs of living in the coastal communities of the Bay outside of Dillingham are roughly seven percent higher than Dillingham, and it is reported that costs are even higher in inland communities such as New Stuyahok and Nondalton. Another recent study from the McDowell Group for the Alaska Department of Administration (McDowell Group, 2009) shows that the cost of living differential between Anchorage and Dillingham has increased since 1985. This finding is backed up by the series of studies on the cost of food at home conducted by the University of Alaska Fairbanks Cooperative Extension Service (UAF Cooperative Extension Service, 1996 - 2009).

**Figure 2. The Cost of Living in Dillingham Compared to Anchorage as of March 2009**



Source: Figure developed by Northern Economics based on data from UAF Cooperative Extension Service Alaska Food Cost Survey (UAF Cooperative Extension Service, 1996 - 2009).

### Drift Gillnet Fishery

In our examination of the fishery we divided permit holders into three groups: Bristol Bay residents, Other Alaska residents and permit holders from outside Alaska.

Figure 1 shows that the number of locally owned drift gillnet permits has declined at a relatively constant rate over the past 30 years. Currently there are less than 400 drift gill net permits held by residents of the watershed; only 21 percent of the permit in the fishery. The out-migration of drift gillnet permits is a long-term issue for the region. The data reveal that the out-migration of permits from the Bristol Bay region has not slowed in recent years and has continued at a relatively constant rate over the past 30 years. The majority of these permits are eventually held by individuals who live outside of Alaska; the number of "other Alaska" permits has stayed relatively constant over the last decade. It is not clear whether these data represent an out-migration of individuals, an out-migration of permits, or both.

Figure 3. Number of Drift Gillnet Permits Held By Residence, 1975 - 2008

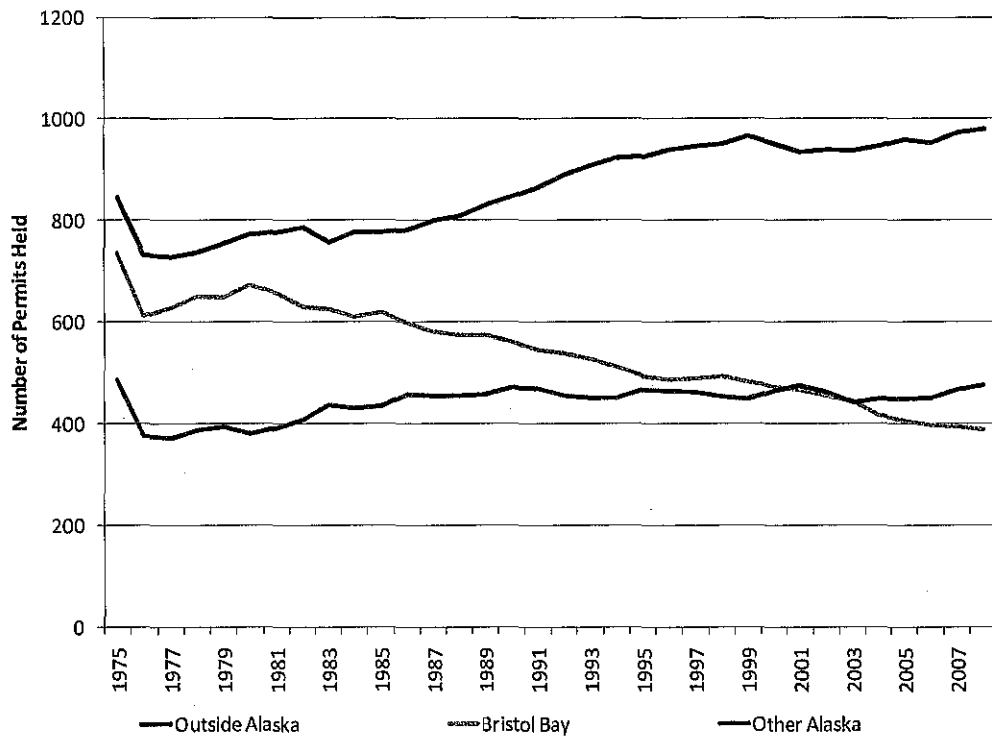
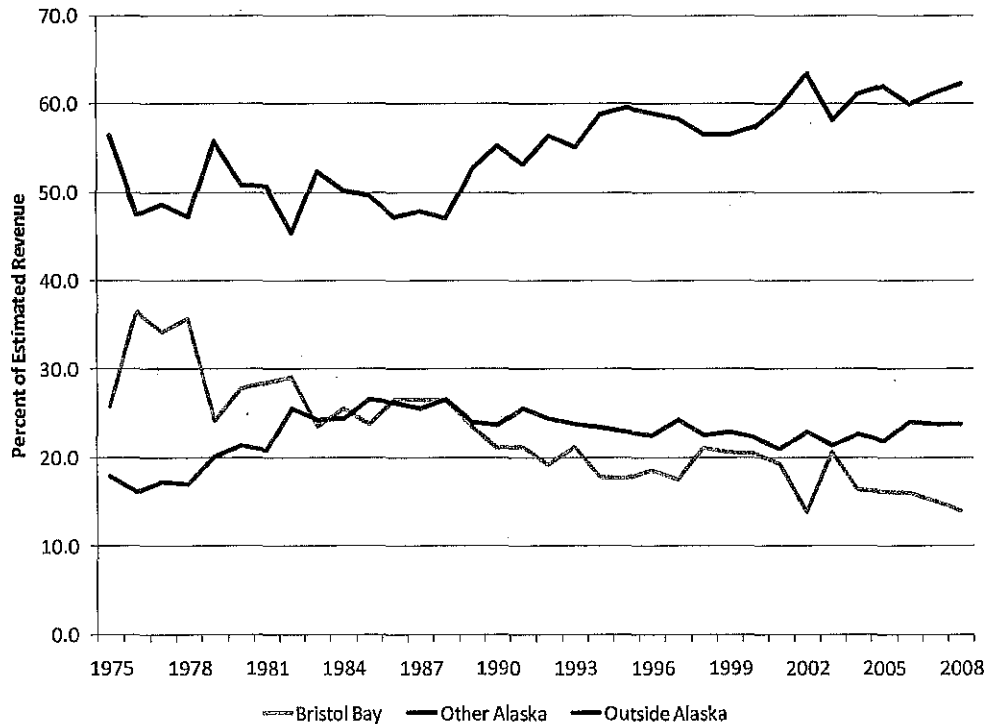


Figure 2 shows revenue for each group as a percent of total revenue. In part because of the out-migration of permits, gross revenue of local drift permit holders has fallen from over 30 percent of the total in the late 70's to about 15 percent in recent years.

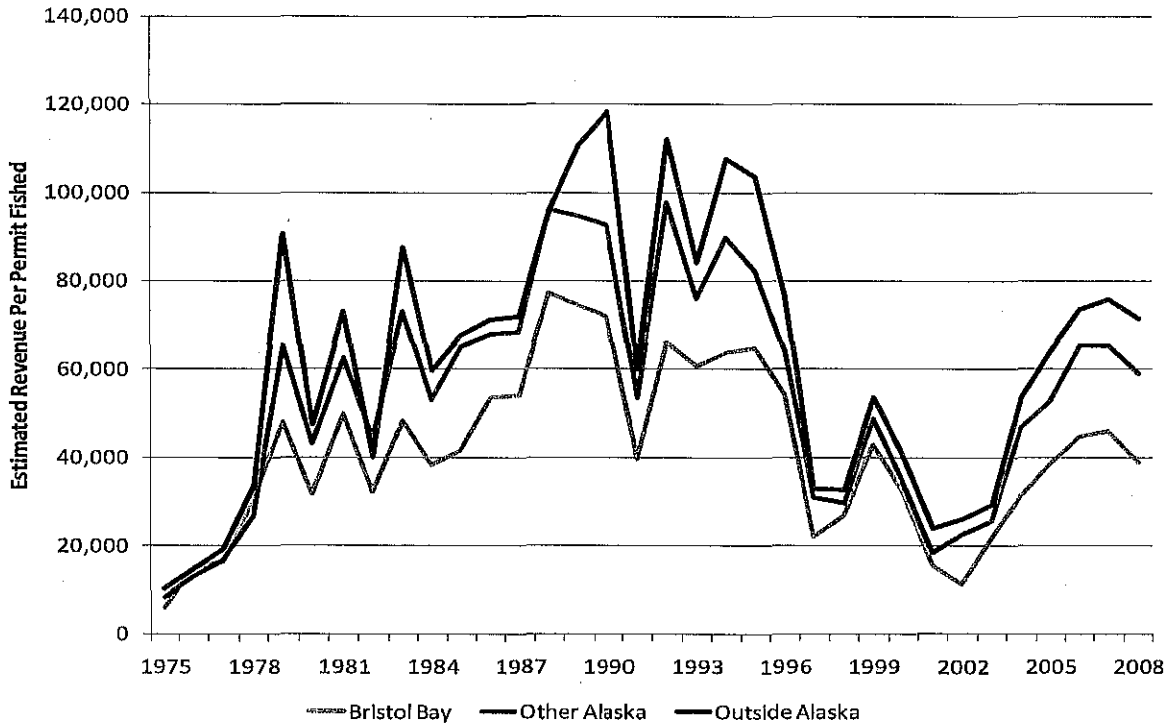
Figure 4. Percent of Total Revenue in the Drift Gillnet Fishery by Residence, 1975 - 2008



Sources: Both Figure 1 and Figure 2 were developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1980 - 2008) and (CFEC, 2009).

Another factor in the declining revenues of watershed permit holders is that they have had lower revenues per permit. In 2008, the revenues of the average watershed resident were only 54 percent permit holders from outside Alaska. We do not have data that can fully explain these differences, but they are primarily due to lower overall catches per permit and not due to lower ex-vessel prices.

Figure 5. Average Revenue per Drift Permit by Residency Group

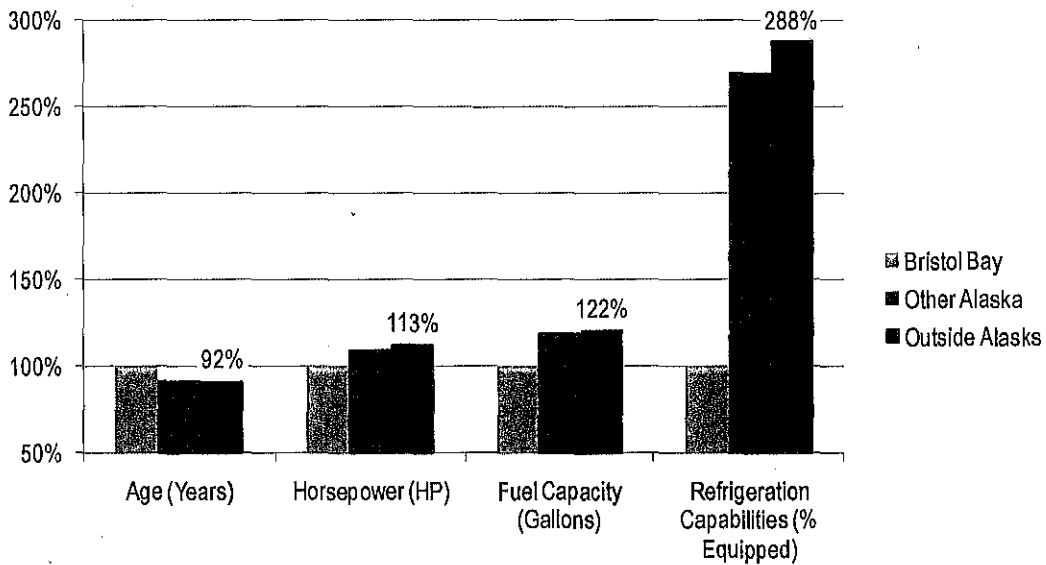


Source: Figure developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1980 - 2008) and (CFEC, 2009).

Some of the differences in revenues for watershed permit holders can be attributed to difference in vessel capacity. This figure compares vessel age, horsepower, fuel capacity, and refrigeration capacity by Residence groups as of 2008. Because the different characteristics all have their own units we have set the average of each characteristic for vessels owned by permit holders residing in the watershed to 100 percent. We then show the relative value of the vessels owned by other residency groups. For example the average age of locally owned vessels was 26 year while the average age of vessel owned by permit holders outside Alaska was 24 years or 92 percent of the age of vessels owned by watershed residents.

Drift gillnet vessels owned by local residents are on average older, have lower horsepower, have less fuel capacity, and have significantly less capacity for chilling fish. These differences have been increasing over time as is shown Northern Economics' more detailed study available from BBEDC (Northern Economics, Inc., 2009).

**Figure 6. Comparison of 2008 Drift Gillnet Vessel Characteristics across Residency Groups**

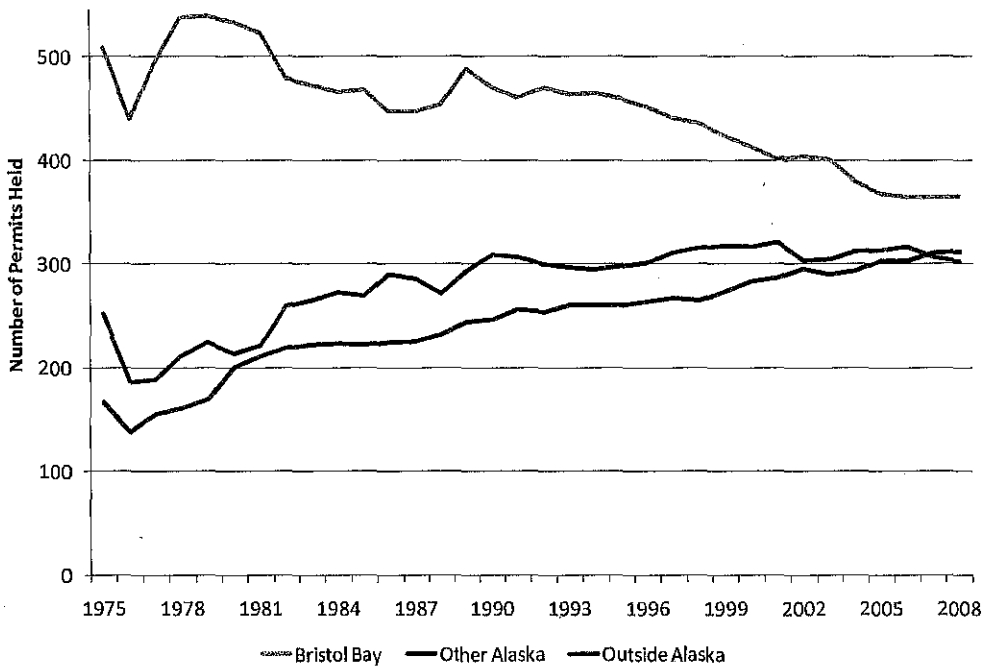


Source: Figure developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1983 - 2008).

**Set Gillnet Fishery**

The next two figures examine the set gillnet fishery in Bristol Bay. In the Set Gillnet fishery the number of permits owned by watershed residents has stabilized at about 365 after a long period of decline about 37 percent of the total number of permits, the largest of the three groups. The out-migration of set net permits was nearly zero in 2002 and 2003 then increased significantly during 2003 to 2004, and has been relatively flat from 2006 to 2008. Also note that the destination of out-migrating permits has been roughly equally distributed between the "Other Alaska" and "Outside Alaska" groups.

**Figure 7. Number of Set Gillnet Permits by Residence**



Source: Figure developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1980 - 2008) and (CFEC, 2009).

Historically, set net permit holders from the watershed have had lower average gross earnings per permit than permit holders from outside the region. In recent years however, watershed residents are basically on par with other groups. This is very different than in the drift gillnet fishery.

**Figure 8. Revenue per Set Permit by Residency Group**

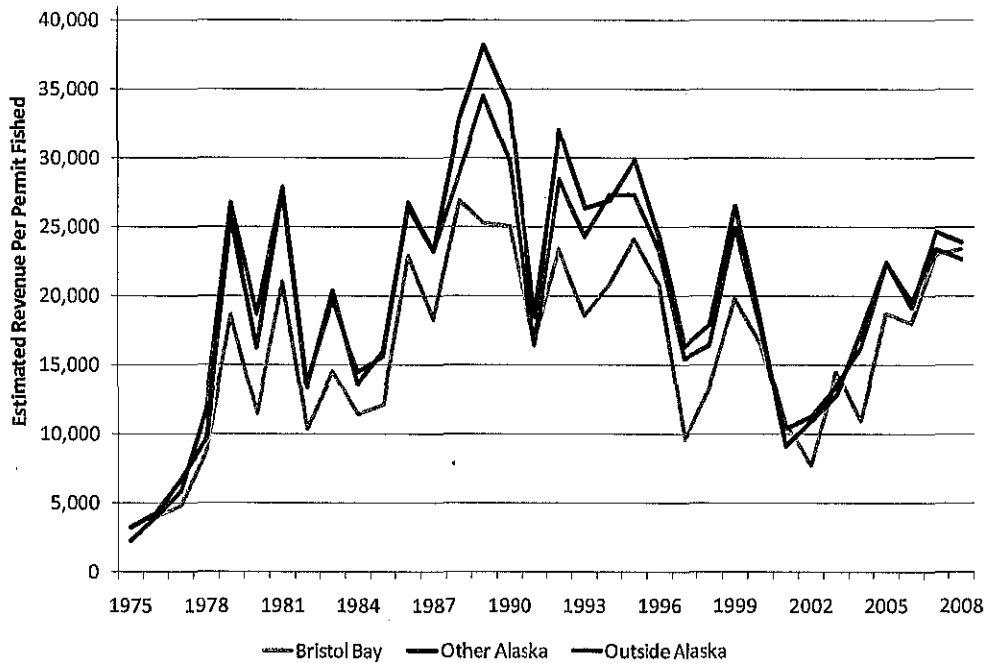
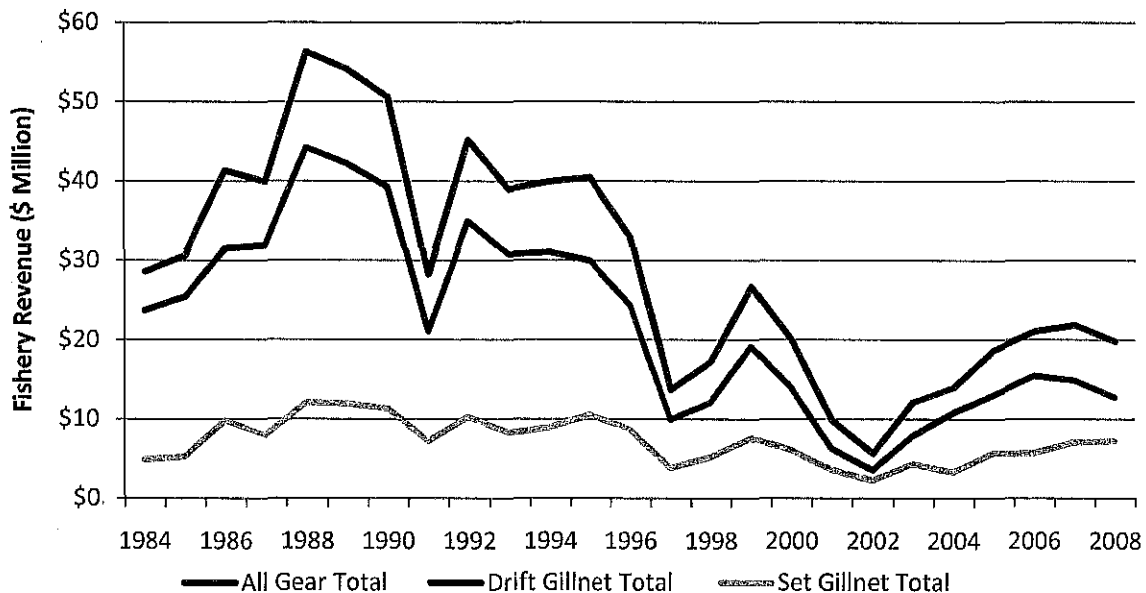


Figure 9 combines gross revenues of watershed residents for both the drift and set gillnet fisheries. The drift fishery has been much more volatile than the set net fishery. Overall there has been a markedly downward trend in total revenue from the 1980's and early 1990's.

**Figure 9. Combined Revenue of All Watershed Permit Holders**



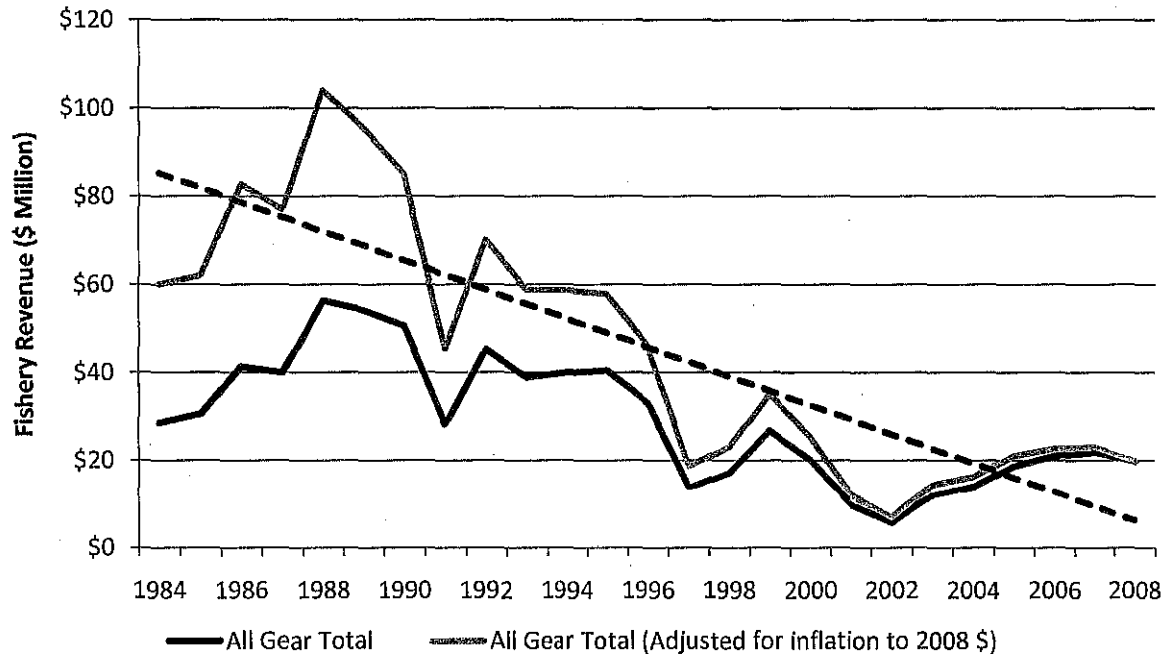
Sources: Both Figure 8 and Figure 9 were developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1980 - 2008).



In Figure 10 we adjust the combined set and drift revenues of all watershed residents for inflation. The inflation adjustment shifts revenues from previous years upward because a dollar in earlier years would buy more goods than it does now. After adjusting for inflation the downward trend in revenues from the watershed (as shown in the dashed blue line) is very apparent.

Sensitivity testing on some of the factors contributing to this decline indicates that approximately 30 percent of the decline is due to the out-migration of permits, and another 60 percent is due to the fact that ex-vessel prices have not kept up with inflation. The remaining 10 percent of the decline is not explained by the variables that we examined.

Figure 10. Inflation Adjusted Revenue of Watershed Permit Holders



Sources: Figure developed by Northern Economics based on data from Commercial Fishery Entry Commission (CFEC, 1980 - 2008) and the US Bureau of Labor Statistics (US BLS, 1980 - 2008).

### The Bottom Line

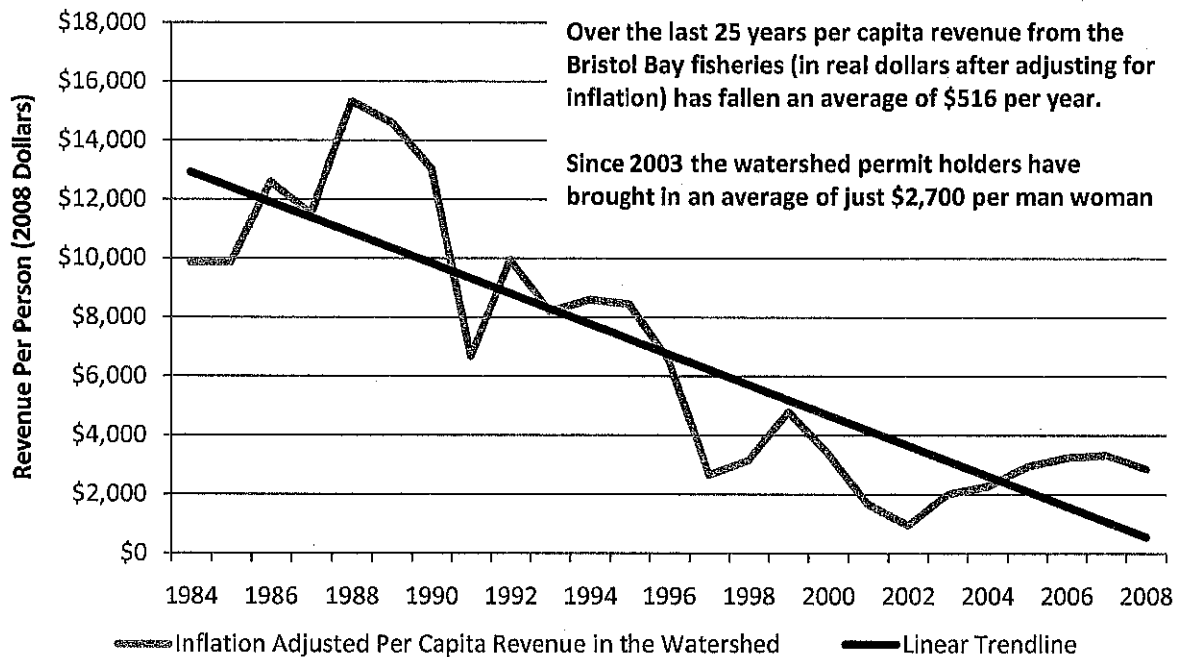
We conclude with the following statements and a final figure.

- The decline in value derived from the fishery by watershed residents has had a significant impact on the region's economy.
- The decline however does necessarily diminish the fishery's overall importance to residents.

The final figure shows the inflation adjusted per capita revenue from the Bristol Bay drift and set gillnet fisheries of permit holders residing in the Watershed. Over the last 25 years per capita revenue from the Bristol Bay fisheries (in real dollars after adjusting for inflation) has fallen an average of \$516 per year.

In the 1980's per capita revenue was over \$10,000. However, since 2003 watershed permit holders have brought in an average of just \$2,700 per man, woman, and child living in the Region.

**Figure 11. Inflation Adjusted Per Capita Fishery Revenue of Residents of the Bristol Bay Watershed**



Source: Figure developed by Northern Economics based on data from ADOLWD (ADOLWD, 1990 - 2008), CFEC Commission (CFEC, 1980 - 2008) and US Bureau of Labor Statistics (US BLS, 1980 - 2008).

**References**

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We the Gillnet Permit Holders, The set net Permit holders, and Subsistence People of Clarks Point, AK give Lawerence Olson, Harry Wassily and Richard Clark permission to Report on these Fishery Proposals on their Behalf as follows:

GILLNETTERS

NAME

SIGNATURE

- 1.) Morris George
- 2.) Logan Walker
- 3.) Henry Wassily
- 4.) Jimmy Wassily
- 5.) Harry Wassily

*Morris George*  
*Logan Walker*  
*Henry Wassily*  
*Jimmy Wassily*  
*Harry Wassily*

SETNETTERS

NAME

SIGNATURE

- 1.) Joseph Wassily
- 2.) Louis Gardiner
- 3.) Emily Olson

*Joseph Wassily*  
*Louis Gardiner*  
*Emily Olson*

SUBSISTANCE FISHERMAN

NAME

SIGNATURE

- 1.) Morris George
- 2.) Logan Walker
- 3.) Betty Wassily
- 4.) Joel Clark
- 5.) Sandra Johansen
- 6.) Gusty Wassily
- 7.) Betty Wassily Gardiner
- 8.) Louis Gardiner
- 9.) Robert Wassily
- 10.) Judy George
- 11.) Paul George
- 12.) Edward Anderson
- 13.) Margaret Gardiner
- 14.) Jacinto George
- 15.) Mary Wassily
- 16.) Jimmy Wassily
- 17.) Joseph Wassily
- 18.) Harry Wassily
- 19.) Pauline Wassily
- 20.) Henry Wassily

*Morris George*  
*Logan Walker*  
*Betty Wassily*  
*Joel Clark*  
*Sandra Johansen*  
*Gusty T. Wassily SR*  
*Betty Gardiner*  
*Louis Gardiner*  
*Robert Wassily*  
*Judy George*  
*Paul George*  
*Edward Anderson*  
*Margaret Gardiner*  
*Jacinto George*  
*Mary Wassily*  
*Jimmy Wassily*  
*Joseph Wassily*  
*Harry Wassily*  
*Pauline Wassily*  
*Henry Wassily*

- 21.) Karen Wassily Karen Wassily
- 22.) Tom Egbert Tom Egbert
- 23.) Diane Anderson Diane Anderson
- 24.) Emily Olson Emily Olson
- 25.) Lawerance Olson Law Olson
- 26.) Anthony Clark Anthony Clark
- 27.) Sharon Clark Sharon Clark
- 28.) Marino Floresta
- 29.) Aurora George Aurora George
- 30.) Justin Gardner Justin Gardner
- 31.) Brittany Wassily Brittany Wassily
- 32.) Justine Wassily Justine Wassily
- 33.) Gusty Wassily Sr Gusty Wassily Jr

Clarks Point High School Students that are \*fishing partners & subsistence users:

- 1) \*Sam Clark
- 2) Ladoyna George
- 3) Chelsea Wassily
- 4) \*Michael Wassily
- 5) \*Susie Wassily
- 6) \*Nadine Wassily
- 7) \*Kathleen Wassily

(Children) Clarks Point Village subsistence users:

- 1) Jon T. Egbert
- 2) Kayla Walker
- 3) Kaylee Walker
- 4) Joseph Walker
- 5) Amaya Walker
- 6) Ciciyak Walker
- 7) Logan Walker
- 8) Alaskiss Walker
- 9) Tiffany Melovidov
- 10) Jacinto George
- 11) Mayla Golia
- 12) Samantha Clark
- 13) Ryland Clark
- 14) Devynn Wassily
- 15) Samuel Slattengren
- 16) Trevallian Lundgren II

CLARKS POINT

5 PERMITS for Gillnetters

3 PERMITS for Setnetters

56 Subsistence Grown up and Kids

RC 26

RC relating to Proposal 6 (5 AAC 27.865 (b) (7) Bristol Bay Herring Management Plan)

Spawn-on-kelp fisheries occurred virtually every year in the Togiak District through 1996, and then due to changes in the salted roe market in Japan, the spawn-on-kelp fishery in Togiak became sporadic, occurring in 1999 and the final fishery in 2002.

2002 - There was one company registered to purchase spawn-on-kelp product in 2002, but stated that they were interested in only a limited amount. Department staff decided that there would need to be a market for at least 30 metric tons of product before a commercial opening would be feasible. Kelp surveys were done on May 10, 11 and 13. On May 13, buyers determined there was commercially marketable spawn-on-kelp product available and an opening was announced for the evening of May 14. Since there was only a market for 30 metric tons of product, the opening was scheduled for two hours duration. The opening resulted in 50 deliveries for 67,793 pounds (15% of the allocation). Department staff observed approximately 65 participants picking kelp.

In 2006, the regulatory change occurred allowing 750 tons of the 1500 ton spawn-on-kelp allocation in the Bristol Bay Herring Management Plan (5 AAC 27.865 (b) (7) to be re-allocated back to the sac roe fishery to be harvested 70/30 by purse seine and gillnets in Togiak. This additional allocation of 750 tons, only half of the unharvested 1500 ton spawn-on-kelp allocation, has not taken since the regulatory change in 2006.

*Dan Veerkusen*

Steven Shade  
PO Box 872  
Dillingham, AK 99576

RC 27

December 1, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Chairman and Members of the Board,

My name is Steven Shade, a lifelong resident of Dillingham and a commercial fisherman since I was a six years old.

I am in favor of Proposals 1, 2, 3 & 4 that would make subsistence fishing more effective.

I oppose Proposals 5, 6, 7, 8, 9, 10, 11, & 12 that would change the herring fishing regulations.


I oppose proposals 14, 15, 16, 17, 18, 19, 20 and 21.

I support Proposal 22, 23 and 24 to eliminate all permit stacking.

I support Proposal 25 that would make all bays super-exclusive until all escapement goals are met.

I oppose Proposals 26 to 31.

Thank you,

  
Steven Shade

RC 28

Dear BOF Members,

We respectfully request that you will consider adopting this amended version of Proposal 13. Here is a brief summary of the changes:

The word "regulatory" was changed to "statutory" throughout the proposal as the legislature creates statutes rather than regulations.

The word "consistent" was changed to "pursuant" indicating that acting in keeping with the spirit of the Board of Fish and Alaska Legislatures statutory provisions.

The final whereas was deleted for redundancy.

Brian Kraft



**PROPOSAL XYZ - 5 AAC 75.xxx. New Section.** Support designation of a fish refuge in Bristol Bay area watershed as follows:

In support of the necessary steps to establish a fish refuge in Bristol Bay area watersheds, pursuant with AS 16.05.251(a)(1), this proposal requests the Board to make a recommendation, via resolution, to the Alaska State Legislature. The recommendation follows:

**A RESOLUTION OF THE ALASKA BOARD OF FISHERIES Supporting Legislative Action To Augment Protection Of Fish Habitat in the Kvichak and Nushagak River Drainages**

WHEREAS, The Kvichak and Nushagak River drainages of the Bristol Bay region are among the most productive wild salmon watersheds in North America and sustain the largest wild sockeye salmon runs in the world, as well as world-class trout fishing; and

WHEREAS, The existing mainstays of the economy in this region – subsistence use, commercial fishing, and sport fishing and hunting – are highly dependent on these productive watersheds; and

WHEREAS, The important fishery resources within these watersheds could suffer negative environmental consequences from potential large scale sulfide mine development, including effects on fish habitat, acid mine drainage, and other water quality issues resulting from mine tailings and exposed rock, that may require ongoing remediation efforts for an indefinite period of time; and

WHEREAS, The Board of Fisheries' Policy for the Management of Sustainable Salmon Fisheries states that "in the aggregate, Alaska's salmon fisheries are healthy and sustainable largely because of abundant pristine habitat and the application of sound, precautionary, conservation management practices" (5 AAC 39.222(a)(1)); and

WHEREAS, The Policy for the Management of Sustainable Salmon Fisheries states that in the management of salmon fisheries: "all essential salmon habitat in marine, estuarine, and freshwater ecosystems and access of salmon to these habitats should be protected"; that "salmon habitat in fresh water should be protected on a watershed basis, including appropriate management of riparian zones, water quality, and water quantity"; that "salmon habitats should not be perturbed beyond natural boundaries of variation" (5 AAC 39.222(c)); and

WHEREAS, The highly productive fishery resources within these watersheds merit more than the standard level of protection that is now provided under State law and regulation; and

WHEREAS, The Alaska Board of Fisheries is aware of legislation introduced in the 2007-2008 Alaska State Legislative session to create the Jay Hammond State Game Refuge (SB 67) under Title 16 of the Alaska Statutes (wherein "game refuge" is inclusive of "fish" and "fish habitat") which encompassed the Nushagak and Kvichak River drainages; and

WHEREAS, Following board deliberations at their March 9-13, 2007 board meeting, the Alaska

Board of Fish “found that the current habitat protections for Bristol Bay fishery resources are not sufficient and acted to continue its Bristol Bay habitat committee”<sup>1</sup>; and

WHEREAS, At their March 9-13, 2007 board meeting, the Alaska Board of Fisheries voted to not take action on the 2006 Bristol Bay Finfish Proposal #121<sup>2</sup> which proposed to create a fish refuge within these watersheds because of its redundancy with pending legislation<sup>3</sup> to create the Jay Hammond State Game Refuge (SB 67); and

NOW THEREFORE BE IT RESOLVED That the Alaska Board of Fisheries recommends to the Alaska State Legislature that additional statutory protections be enacted as needed to ensure the continued health and viability of fish habitat in the Nushagak and Kvichak River Drainages.

BE IT FURTHER RESOLVED That the Alaska Board of Fish recommends to the Alaska State Legislature that any additional statutory protections for fish habitat in these drainages would allow subsistence, recreational and commercial fishing, hunting, and trapping under state and federal regulations.

<sup>1</sup> See: “Preliminary Summary of Actions Alaska Board of Fisheries Statewide Finfish and Supplemental Issues March 9 - 13, 2007 Anchorage” available at:  
[http://www.boards.adfg.state.ak.us/fishinfo/meetsum/2006\\_2007/bof-mar07-psum.pdf](http://www.boards.adfg.state.ak.us/fishinfo/meetsum/2006_2007/bof-mar07-psum.pdf)

<sup>2</sup> Proposal available at:  
[http://www.boards.adfg.state.ak.us/fishinfo/meetinfo/2006\\_2007/fprop2006-2007.php](http://www.boards.adfg.state.ak.us/fishinfo/meetinfo/2006_2007/fprop2006-2007.php)

<sup>3</sup> See: “Preliminary Summary of Actions Alaska Board of Fisheries Statewide Finfish and Supplemental Issues March 9 - 13, 2007 Anchorage” available at:  
[http://www.boards.adfg.state.ak.us/fishinfo/meetsum/2006\\_2007/bof-mar07-psum.pdf](http://www.boards.adfg.state.ak.us/fishinfo/meetsum/2006_2007/bof-mar07-psum.pdf)

**ISSUE:** The watersheds of the Bristol Bay region support some of the most productive wild salmon ecosystems in North America and sustain the largest wild sockeye salmon fishery in the world. The existing mainstays of the economy in this region - subsistence use, commercial fishing, and wilderness sport fishing and hunting— are also dependent on these productive watersheds. The Board of Fisheries’ Policy for the Management of Sustainable Salmon Fisheries states that “in the aggregate, Alaska’s salmon fisheries are healthy and sustainable largely because of abundant pristine habitat and the application of sound, precautionary, conservation management practices” (5 AAC 39.222(a)(1)). But some salmon habitat in the Nushagak and Kvichak River watersheds of the Bristol Bay region faces potential major, environmental impacts from one or more large-scale metallic sulfide mines for copper and gold which are being considered in these watersheds that support these fisheries. Large-scale sulfide mining poses risks to fish and fish habitat especially from acid mine drainage, a process that dissolves metals and renders them toxic to fish and other wildlife. Acid mine drainage and other water quality issues resulting from mine tailings and exposed rock may require ongoing remediation action and monitoring in perpetuity. There is considerable uncertainty about whether state policy “to effectively assure sustained yield and habitat protection for wild salmon stocks” 5 AAC 39.222(a)) and that “salmon habitats should not be perturbed beyond natural boundaries of variation” 5 AAC 39.222(c) can be upheld in light of the scale of development being considered.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If additional regulatory protections are not provided for the fish habitat within the Nushagak and Kvichak River, there is considerable risk of fish habitat loss and reduced sustained yield of wild salmon and resident fish stocks.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** This proposal requests that the Board pass a resolution supporting legislative action to augment protection of fish habitat in the Kvichak and Nushagak River Drainages. Depending on action taken by the legislature this could result in a greater level of protection, all those who fish, hunt, trap or otherwise use fish and wildlife from the Kvichak and Nushagak watersheds, as well as those who provide services to such users, will have greater assurance that the fish and wildlife stocks will be available in future years.

**WHO IS LIKELY TO SUFFER?** Action resulting from this proposal is not intended to impinge in any way on subsistence, recreational and commercial fishing, hunting, and trapping allowed under state and federal regulations. It is not anticipated that users of fish or wildlife from the Kvichak or Nushagak watersheds will suffer or be faced with any displacement of their usual practices. Operators of large-scale non-renewable resource extraction projects may have to modify their operations if they result in environmental effects on fish habitat that are not compatible with protections enacted by the Legislature.

**OTHER SOLUTIONS CONSIDERED?** We considered requesting the Alaska Board of Fisheries to establish a fish refuge, subject to approval by the Alaska State Legislature, per their authority under AS 16.05.251(a)(1). However, we feel that the Alaska State Legislature is the most appropriate institution to take the lead in establishing a refuge as one potential means of extending additional protections to the fish habitat within these watersheds.

**PROPOSED BY:** Leader Creek Fisheries LLC, Norman VanVactor and John Lowrance; Naknek Family Fisheries, Izetta Chambers; Alaska Sportsman's Lodge and Alaska Sportsman's Bear Trail Lodge, Brian Kraft; and Curyung Tribal Council, Chief Tom Tilden (HQ-09F-155)  
\*\*\*\*\*

# Propositions 40 & 41

## (Nushagak River "Dude Fishery")

RC 29

Dear Chairman Webster and Board of Fisheries Members:

My name is Fritz Johnson. I've been a resident of Dillingham, Alaska, and a Bristol Bay drift fisherman for the past 30 years. I am writing this in support of my Proposals 40 and 41.

- **Proposal 40 would delete the sunset provision** of regulations authorizing the Nushagak River "Dude Fishery" special harvest area and regulations.
- **Proposal 41 would expand the dates** when the Dude Fishery could take place.

By way of background, the Nushagak Dude Fishery was created by regulations adopted following the 2006 Bristol Bay meeting and expressions of support from the Dillingham Chamber of Commerce, local Bed and Breakfast operators, the then-manager of Peter Pan Seafoods and others interested in promoting a novel new business opportunity. The intent was to provide a new tourist industry experience and business opportunity for Bristol Bay fishermen during times when commercial salmon fishing is slow.

The regulations allow a boat operator who owns a Bristol Bay commercial salmon drift permit license to fish a small amount of gillnet in a safe area close to town and charge tourists to work on board the boat as "crew." Small catch limits are enforced by ADF&G and any fish harvested above the catch limit must be forfeit to the State. ADF&G's district management biologist must approve all fishing openings which must be requested on a case-by-case basis. Tourist clients must purchase a 7-day commercial crew license – the so-called Alaska Dude License approved by the Alaska Legislature in 2004 -- and at least one dude-licensed paying customer must be on board the vessel in order for the ADF&G district manager to allow a dude fishing opening.

The regulations adopted in 2006 will sunset on Dec. 31, 2009, if they are not extended. Specifically, unless the sunset clause is deleted, this fledgling business opportunity will disappear.

It would be an exaggeration to say this new business venture has been a success. It has not. Customers have been few, in part because the present Nushagak dude fishing season overlaps the peak of the Bristol Bay sockeye salmon run, which my boat and crew cannot afford to miss in exchange for a few dude fishing trips. Proposal 41, to open the dude fishing season earlier, would be a great benefit because typically during the month of June the Nushagak gillnet fleet is on hold waiting for king salmon escapements and the sockeye run to build.

I am sensitive to concerns expressed by some that to allow dude fishing in June would impact king salmon escapements and subsistence harvests. As noted above, dude fishing trips are allowed only upon request and by the authorization of the local commercial fishing manager. Furthermore, existing regulations limit the total catch by dude fishing operators to 90 fish or less a day, of which no more than 15 may be king salmon. Catch logs must be recorded and delivered to ADF&G. I would encourage the Board to give ADF&G latitude to reduce that number of king salmon allowed if conservation issues became a concern.

I'd appreciate the Board's support for proposals 40 and 41.

Thank you.

Fritz Johnson  
1129, Dillingham, AK 99576  
907-842-2674

# Picture Yourself Here

Hauling gear on Bristol Bay, home of the world's last great wild salmon fishery.

To commercial fishermen, Bristol Bay's wild salmon runs are legendary. But hands-on participation in the fishery, located in Southwest Alaska on the edge of the Bering Sea, is an experience few will ever know.

Thanks to new regulations approved for a three-year trial period, visitors to Bristol Bay can experience the thrill of catching salmon from the deck of a commercial fishing boat. More than a million sockeye salmon are harvested each year, and during the peak of the season, fishing will continue around the

*AlaskanWild offers custom day trips to the Bristol Bay fishing grounds for up to four guest fishers on board the 32' fishing vessel Jazz. Standard day charter rate after July 15 is \$1500. Rain gear and meals provided, and fish processing and packing can be arranged. Daily catch limit of 90 salmon per trip is strictly enforced by the Alaska Department of Fish & Game.*

*\*Regulations permit fishing tours starting July 1, but run strength and timing make standard day charter rates in early July uneconomic for the vessel and crew. All reservations will be honored, however, weather permitting.*

*Inquiries via email preferred.*

Fritz Johnson  
P.O. Box 1129  
Dillingham, AK 99576

RC30

Alaska Board of Fisheries  
Dec. 1, 2009

Dear Chairman Webster and Board Members,

My name is Fritz Johnson. I've been a resident of Dillingham and a Bristol Bay drift fisherman for the last 30 years. For the last two years I've been employed by the Bristol Bay Economic Development Corporation as its Regional Fisheries Coordinator, where part of my job is to help build capacity for icing among the local fishing fleet.

I have two areas I'd like to speak to. The first is my opposition to Proposal 15 that would remove the 32-foot limit on Bristol Bay salmon boats. The second is my opposition to any proposals that would expand permit stacking: Proposals 16, 17, 18, 19, 20 and 21.

From the record copies in your packets, you're familiar with the arguments for and against lifting the 32' vessel limit. If you haven't already, you will hear testimony that bigger boats are safer, and will allow fishermen to produce a better product by taking better care of their fish.

It's my understanding that safety is not the purview of the Board of Fish. Although the Coast Guard enforces safety regulations, safety is primarily the responsibility of a boat's captain and its crew. And so is fish quality.

Taking proper care of salmon is a question of attitude, not boat size, and those who would try to persuade you that Bristol Bay needs bigger boats to take proper care of fish I believe have a different agenda, either consciously or unconsciously. I can't blame a fisherman for wanting to catch more fish, or wishing they had a bigger boat to hold more when the fishing is heavy. It's only human nature.

But you don't need a bigger boat to produce quality fish. What you need to produce quality fish is a commitment to take proper care of the fish your boat can hold.

You have also heard that lifting the 32'boat limit and allowing multiple permits, will disadvantage residents of the Bristol Bay watershed. I don't want to belabor that -- you

already have the research in your packets, and have heard the testimony of Northern Economics and Dr. Gunnar Knapp detailing relative catch statistics, vessel profiles, cost of living and alternative sources of income, between watershed residents and fishermen living elsewhere, that describe what is likely to happen if these restructuring proposals are enacted.

To do so will be make non-resident fishers richer and watershed residents poorer. The people most dependent upon this fishery, for whom this fishery is often their sole source of income, would be become increasingly marginalized at a time when local efforts like those of BBEDC and local communities are just beginning to make a difference.

As Robin Samuelsen said earlier, since 2004 BBEDC has invested more than \$6 million in icing infrastructure. Specific projects have included two ice barges with more than 120 tons of daily ice capacity, a 20-ton ice plant at Ekuk, distribution of hundreds of insulated totes and thousands of slush ice bags to local fishermen. It's made a major investment in Ocean Beauty Seafoods, one of the largest seafood company in the U.S. BBEDC has launched a permit loan program aimed at bringing permits back to the region, and is promoting joint ventures between local communities and other processors, and the newly formed Regional Seafood Development Association, aimed at promoting our fisheries value and local fisheries economic development.

Changing the rules of the fishery to allow bigger boats and multiple permits will work against these efforts, accelerate the loss of permits in the region, and lead to a future where watershed residents are sitting on the beach while others do all the fishing.

I'd like to encourage the Board to look at all these issues from a different perspective, not just in terms of adjusting fishing regulations. As Board members you can take a proactive role in building up this industry for Alaska, by encouraging state investment in the fishery, in icing infrastructure, for instance, and lower cost energy strategies -- much as you are being asked to take a proactive position on Proposal 13 to create a Bristol Bay fish reserve. But don't change the regulations in ways that will handicap the ongoing and continuing efforts by Bristol Bay residents to improve this fishery. Thank you.

RC 31

**1950**  
**ANNUAL REPORT**

Alaska Fisheries Board  
and  
Alaska Department of Fisheries

Ernest Gruening  
Governor

J. Howard Wakefield  
Chairman

C. L. Anderson  
Director

**REPORT NO. 2**

**JUNEAU, ALASKA**

*Submitted by Tim Troll  
Nushagak-Mulchatna +  
Wood-Tikechik Land Trust*



## LOOKING AHEAD

### WATERSHED MANAGEMENT

In studying the history of the decline of the salmon runs of the Pacific Coast, it is striking to notice how invariably these declines are blamed on over-fishing. These statements come most often from those least acquainted with the subject and are frequently made to cover up other causes, which may be of their own making. For an illustration, the builders of the great hydro-electric and irrigation projects in the Columbia River basin are prone to blame the declining salmon stocks of this river to over-fishing. The actual fact is that the fall runs, which have been as heavily fished as the others, are still in reasonably good shape. The fall salmon runs spawn in the tributaries and main stem of the river which, so far, have been least affected by man's encroachments.

On the contrary, the spring populations are in deplorable shape. Some are completely and permanently annihilated. Most of the up-river spawning areas, formerly used by these early runs, are absolutely blocked by high dams. Grand Coulee and a number of lesser ones could be mentioned. No attempt whatsoever was made to elevate the mature salmon over these edifices. The spawning areas above were simply, and finally, written off by the dam builders. It would seem that if just a part of the creative genius required to plan and build these structures, had been applied to the problem, spawning salmon would still be going above Grand Coulee to complete their life's mission and their offspring would be coming down safely to the sea.

While it is true that over-fishing is responsible for many declines, there is evidence to show that in numerous cases it is of minor or no consequence. The actual reasons are often found to be changes in the environment of the salmon due to natural and unnatural (man-made) conditions. This is especially true of the fresh water stages of its existence. Many examples could be cited. Some of the natural ones are cyclic climatic changes, floods, droughts, freezes, earthquakes, earth-slides, beaver dams and increase in predators. On the other hand there are such man-made, or unnatural, causes as deforestation due to logging; hydro-electric, irrigation, flood control, and navigation projects; pollution, especially from pulp mills; soil conservation and reclamation schemes; gravel washing and mining operations; road construction such as stream culverts; insect control using poisonous sprays; and many others. The listing of these does not necessarily mean that all are inimical to the continuation of our salmon fisheries. It does mean, however, that if such projects are improperly and unwisely planned, the results will be disastrous to our fisheries. Alaska needs new industries, but not at the expense of her most important resource, which if properly cared for, will produce year after year.

Luckily the advance of civilization has, as yet, had but very minor adverse effects on our fisheries. These have been mostly of a localized character. However, a new era of progress and industrialization for Alaska is at hand. With it will come the attendant evils to our fish and game resources, just as it came to every other frontier territory. It behooves us to profit by the mistakes of others before it is too late. At

least two federal agencies are already quietly planning for the future and we may wake up some morning with a series of dams planned for our major streams without regard to the damage they might inflict on our major industry.

It therefore seemed appropriate that the Alaska Department of Fisheries institute, as soon as possible, a section devoted exclusively to the above related subjects. This new division, to be known as "watershed management," will be started as soon as competent personnel can be acquired. The duties usually ascribed to "stream improvement" will be handled, but it will be somewhat broader in scope, so as to include all fresh water phases of the salmon's life. Utilization of barren lakes and streams will be stressed.

While this new division will become a "watchdog" to ward off the evil effects of advancing civilization, it is not intended to block progress. By profiting from the mistakes of the past and by cooperation of all parties, it should be possible to have new industries and still maintain our fisheries.

### SPORT FISH PROGRAM

In comparison with the states, Alaska is still a sport fishermen's paradise. There are countless lakes and streams that are barely touched and where the novice may take a limit of trout or grayling with little effort. However, conditions are changing due to the increased population and greater accessibility through roads and by small planes. The sport fishing pressure is rapidly accelerating. Evidence of decline in our game fish populations is already manifesting itself close to the major cities, such as the increasing scarcity of trout in the Anchorage area and fewer grayling in the Fairbanks district.

Here again it would seem fitting that Alaska profit from the mistakes of others. The inauguration of a sound sport fish program at this early date might avoid many of the pitfalls experienced by the states. Because of our early start it may be possible to maintain good angling with a minimum of expense.

In line with this thinking, the Alaska Fisheries Board has authorized the establishment of a sport or game fish division within the Department of Fisheries. The headquarters for this program will be at the University of Alaska. This location is more convenient than the main office of the department at Juneau, since it is planned to start the first work in the more critical areas around Fairbanks and Anchorage. Furthermore the University authorities have kindly offered to furnish office space for the staff and full use of its library and laboratory equipment.

Other districts of Alaska are having, or will have, their sport fish problems. As the need arises and funds become available all sections will be covered. In Southeastern Alaska king and silver salmon are highly important game fish as well as commercial. These two species are already being given intensive attention by the department.

Efforts to introduce grayling to lakes near Juneau will be continued in cooperation with the Territorial Sportsmen, Inc. If this experiment proves successful, this fine sport fish could then be introduced to suitable waters convenient to other cities.

**Bristol Bay Drift Gillnet Vessels**  
**Average Harvests per Vessel, by Engine Horsepower Category**

Year	50 – 199 hp			200 – 399 hp			400 – 599 hp			600 – 799 hp			800 and Over			Excluded			Year Totals	
	Vessels	%	Avg Lbs	Vessels	%	Avg Lbs	Vessels	%	Avg Lbs	Vessels	%	Avg Lbs	Vessels	%	Avg Lbs	Vessels	%	Avg Lbs	Vessels	Avg Lbs
1978	939	54.8	49,312	397	23.1	59,673	10	0.6	53,332	8	0.5	87,742	1	0.1	141,903	360	21.0	20,892	1,715	46,001
1979	897	48.5	63,494	524	28.3	89,193	17	0.9	60,144	8	0.4	129,823	1	0.1	110,653	404	21.8	39,306	1,851	65,754
1980	729	37.8	61,538	700	36.3	84,788	27	1.4	74,209	16	0.8	100,690	1	0.1	92,386	455	23.6	55,382	1,928	69,045
1981	693	37.0	71,204	736	39.3	96,439	33	1.8	93,570	19	1.0	76,389	1	0.1	80,450	399	21.0	60,044	1,875	79,222
1982	652	34.7	42,663	835	44.5	65,664	42	2.2	64,806	19	1.0	58,180	1	0.1	28,925	329	17.5	45,807	1,878	54,085
1983	620	33.4	91,671	923	49.8	126,481	56	3.0	114,604	20	1.1	139,990	1	0.1	201,407	235	12.7	85,382	1,855	109,467
1984	600	31.4	65,716	980	51.3	92,149	65	3.4	80,635	25	1.3	92,480	3	0.2	76,449	239	12.5	55,361	1,912	78,844
1985	565	29.9	56,097	1,048	55.4	79,309	80	4.2	86,763	30	1.6	71,217	3	0.2	92,378	165	8.7	44,595	1,891	69,552
1986	532	28.5	41,474	1,112	59.5	51,610	107	5.7	58,174	22	1.2	50,177	7	0.4	60,198	89	4.8	40,895	1,869	48,605
1987	519	27.7	41,953	1,123	59.9	52,932	113	6.0	58,509	23	1.2	54,273	8	0.4	65,388	90	4.8	42,989	1,876	49,823
1988	476	25.2	42,486	1,142	60.4	48,744	151	8.0	57,951	34	1.8	40,464	8	0.4	57,795	81	4.3	35,626	1,892	47,232
1989	433	22.6	59,612	1,165	60.9	82,591	174	9.1	99,774	49	2.6	95,406	22	1.1	93,100	71	3.7	47,176	1,914	78,090
1990	407	21.1	67,224	1,163	60.4	95,909	199	10.3	112,225	59	3.1	117,845	27	1.4	128,299	70	3.6	59,497	1,925	91,333
1991	360	18.8	52,154	1,160	60.7	71,930	221	11.6	94,016	78	4.1	98,739	34	1.8	106,090	58	3.0	42,722	1,911	71,574
1992	348	18.0	64,143	1,168	60.3	87,571	243	12.5	107,316	81	4.2	120,759	36	1.9	124,016	61	3.1	48,892	1,937	86,686
1993	324	16.6	82,735	1,150	58.8	112,566	284	14.5	135,139	84	4.3	157,068	42	2.1	153,987	71	3.6	54,129	1,955	111,581
1994	295	15.3	67,758	1,130	58.7	93,425	288	15.0	115,171	92	4.8	135,462	45	2.3	148,023	74	3.8	45,810	1,924	94,200
1995	273	14.2	90,501	1,144	59.6	111,209	305	15.9	129,762	102	5.3	149,534	49	2.6	143,850	47	2.4	89,211	1,920	133,543
1996	257	13.4	68,660	1,120	58.2	83,975	317	16.5	99,494	119	6.2	109,324	59	3.1	115,900	51	2.7	69,339	1,923	86,647
1997	237	12.5	26,614	1,096	57.6	30,775	333	17.5	37,724	129	6.8	47,786	59	3.1	45,729	49	2.6	22,972	1,903	32,889
1998	223	11.9	24,292	1,082	57.9	26,025	329	17.6	30,621	133	7.1	32,965	57	3.0	34,641	46	2.5	20,839	1,870	27,255
1999	236	12.6	45,751	1,068	56.9	58,802	331	17.6	69,271	134	7.1	75,756	56	3.0	86,273	51	2.7	40,094	1,876	60,530
2000	214	11.6	47,186	1,053	57.1	54,966	337	18.3	63,074	138	7.5	69,050	57	3.1	72,331	44	2.4	40,253	1,843	56,785
2001	179	11.4	41,397	900	57.3	48,483	285	18.1	58,893	117	7.4	65,767	48	3.1	77,555	42	2.7	33,049	1,571	51,327
2002	131	11.1	35,773	661	56.2	42,413	226	19.2	54,198	86	7.3	67,360	38	3.2	68,505	34	2.9	23,478	1,176	46,058
2003	145	10.3	39,409	795	56.5	51,768	264	18.8	67,022	111	7.9	73,878	51	3.6	86,390	42	3.0	30,759	1,408	55,725
2004	128	9.3	64,332	780	56.9	87,443	271	19.8	114,789	105	7.7	135,173	50	3.6	148,531	38	2.8	54,001	1,372	95,641
2005	138	9.9	69,102	773	55.7	91,391	283	20.4	110,250	100	7.2	144,497	50	3.6	142,418	45	3.2	58,250	1,389	97,606
2006	140	9.5	63,873	815	55.3	93,474	301	20.4	127,001	112	7.6	155,572	59	4.0	177,906	47	3.2	47,770	1,474	104,150
2007	111	7.9	72,927	788	56.0	99,247	293	20.8	128,140	116	8.2	150,187	57	4.1	167,860	42	3.0	72,583	1,407	109,371
2008	102	7.3	72,629	787	56.3	90,163	300	21.5	114,069	118	8.4	133,573	53	3.8	160,247	37	2.6	61,457	1,397	99,582

Notes: Excluded vessels are those that fail to match to the CFEC vessel license file, or vessels with an engine horsepower that has been identified as an outlier.

SUBMITTED BY CFEC

RC 32

RC 33

**Bristol Bay Salmon Drift Gill Net Two-Permit Operations:  
Preliminary Estimates from 2009 District Registration Data**

CFEC Report No. 09-6N

SUBMITTED  
BY CFEC

Prepared by:

Kurt Schelle  
Nancy Free-Sloan  
Craig Farrington

## **Alaska Department of Fish and Game and the Office of Equal Opportunity (OEO) Statement**

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If you believe you have been discriminated against in any program, activity, or facility please write:

- ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526
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- Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers:

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## **Abstract**

In 2003, the Alaska Board of Fisheries passed a regulation (5 AAC 06.333) for the Bristol Bay salmon drift gill net fishery, that allows two Commercial Fisheries Entry Commission (CFEC) permit holders who opt to fish together on a single vessel to use 200 fathoms of gear (an additional 50 fathoms) under certain conditions. This report uses Alaska Department of Fish and Game (ADF&G) district registration data coupled with CFEC permit data to estimate the use of two-permit operations in the Bristol Bay salmon drift gill net fishery during the 2009 season. The report examines the number and percent of vessels and the number and percent of CFEC permit holders involved in one-permit and two-permit operations. Data are provided for the fishery as a whole and for individual districts. The report also examines the use of one-permit and two-permit operations by resident-type.

## 1.0 Introduction

This report examines 2009 Bristol Bay district registration data for the Bristol Bay salmon drift gill net fishery (S03T<sup>1</sup>) and provides estimates of the numbers of Commercial Fisheries Entry Commission (CFEC) permit holders taking advantage of an Alaska Board of Fisheries (Board) “permit-stacking” regulation.<sup>2</sup> Estimates are provided for the fishery as a whole, by fishing district, by resident-type of the permit holder, and by fishing district and resident-type.

Economic returns in Alaska’s salmon fisheries declined near the beginning of the 21st century. One reason for the decline was a decrease in ex-vessel prices due to growing production and competition from high quality farmed salmon. This was particularly true in the Bristol Bay salmon fisheries where the sockeye harvest faced strong price competition from farmed salmon in Japan.

As the total ex-vessel value of the Bristol Bay fishery declined, so did permit values and participation rates. From 1984 through 2000, over 1,800 permits were fished each year in the Bristol Bay salmon drift gill net fishery. In 2002, only 1,184 permits were fished in the fishery. The market value of an S03T permit peaked in 1989 at almost one quarter of a million dollars. The market value of an S03T permit declined during the 1990s and reached an estimated low of \$19,700 in 2002.<sup>3</sup>

The decline in the economic value of the salmon fisheries led Alaska’s legislature to study options for “restructuring” to make the salmon fisheries more profitable. The legislature asked the Board to examine restructuring options. In 2003, the Board passed a regulation (5 AAC 06.333) for the S03T fishery that allows two CFEC permit holders who opt to fish together on a single vessel to use 200 fathoms of gear (an additional 50 fathoms) under certain conditions. This “permit-stacking” regulation first went into effect for the 2004 season.

The objective of the regulation was to allow two permit holders to team up on a single vessel to reduce their combined harvesting costs and to create a more profitable operation. To the extent that both permit holders would have fished anyway, the number of fishing vessels, the total amount of gear in the fishery, congestion, and harvesting cost would be reduced. To the extent that some permit holders who otherwise would not have fished, but instead decide to join a two-permit operation, the amount of gear would increase. However, more permit holders would be able to derive benefits from the fishery.

---

<sup>1</sup> “S03T” is the permit fishery code used for the Bristol Bay salmon drift gill net fishery on Commercial Fisheries Entry Commission permits. “S” is the code for salmon, “03” is the code for drift gill net gear, and “T” is the code for the Bristol Bay salmon administrative area.

<sup>2</sup> 5 AAC 06.333.

<sup>3</sup> These figures are in “nominal dollars” which are the dollars reported in each year’s data. The changes in permit values are more pronounced when the numbers are adjusted for inflation to create “real dollar” (a.k.a. “constant-value dollar”) estimates. See tables 3.1a and 3.1b in the *Bristol Bay Salmon Drift Gillnet Fishery Optimum Number Report*.

While ex-vessel prices and conditions in the S03T fishery have improved considerably since 2002, there are still many unused permits in the fishery. For the 2009/2010 Board of Fisheries meeting on Bristol Bay finfish, there are several proposals ranging from eliminating the current permit stacking regulation for the fishery to expanding the regulation to also allow individuals who hold two permits for the fishery to fish an additional amount of gear also.

Currently, the regulation requires that two permit holders combine to form the two-permit operation to get the privilege of using the additional gear. Expanding the regulation to also allow a person who holds two permits to fish the additional amount of gear could serve as a catalyst for a further market-driven reduction in the number of fishing operations without the need for a buyback program.

While the topic of “permit stacking” has been a matter of considerable interest, there has not been a definitive source of data on how widely two-permit operations are used in the Bristol Bay salmon drift gill net fishery. Alaska Department of Fish and Game (ADF&G) fish ticket data do not necessarily identify all two-permit operations since the harvest might be delivered on only one person’s permit.<sup>4</sup>

Bristol Bay district registration data provide an alternative source of data for making estimates. The registration data also have some problems which will be discussed in this report. However, the district registration system and data were revamped and improved for the 2009 fishing season. This report uses these 2009 registration data to estimate the extent to which two-permit operations were utilized during the season.

## **1.1 Outline of the report**

The remainder of the report is divided into the following four sections:

*Section 2* briefly describes the 2009 district registration data and explains issues and assumptions that may impact the estimates in this report.

*Section 3* provides estimates on the number of one-permit and two-permit operations for the fishery as a whole. Breakouts of the estimates are provided by the resident-type of the person holding the permit at the time of the district registration. In addition, resident-type combinations of persons involved in two-permit operations are examined.

*Section 4* provides estimates on the number of one-permit and two-permit operations in each individual district. The five Bristol Bay registration districts are Togiak, Nushagak,

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<sup>4</sup> There are other problems with using the ADF&G fish ticket data. For example, the vessel number on the permit card is sometimes not the vessel that the person uses in the fishery. By regulation, a permit holder may register a different vessel during the Bristol Bay district registration process (5AAC 06.370(h)). When this occurs, the vessel number on the permit sometimes is the one recorded in the fish ticket data rather than the vessel number actually registered and used by the permit holder.



Naknek-Kvichak, Egegik, and Ugashik. Breakouts of the estimates within each district are provided by the resident-type of the person holding the permit at the time of the registration. Resident-type combinations of persons involved in two-permit operations are also examined.

In addition, the vessels registered for each district are examined to see the total number of Bristol Bay districts they used during 2009. Separate counts are provided for one-permit operations and two-permit operations.

*Section 5* provides a brief summary of the results.

## **1.2 Resident-Type Definitions Used in the Report**

The resident-types used in this report are the same ones used in CFEC's annual report on the distribution of permit holdings.<sup>5</sup> Alaska communities are classified as "rural" or "urban" based upon 2000 census data. Alaska communities are also classified as "local" or "non-local" to the Bristol Bay salmon fishery. Since there are no urban communities that are "local" to the Bristol Bay fishery, for this report, permit holders are classified into the following four resident-types based on the location of the community where they reside:

**ARL:** *Alaska* resident of a *rural* community that is *local* to the Bristol Bay fishery.

**ARN:** *Alaska* resident of a *rural* community that is *non-local* to the Bristol Bay fishery.

**AUN:** *Alaska* resident of an *urban* community that is *non-local* to the Bristol Bay fishery.

**NON:** *Nonresident* of Alaska.

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<sup>5</sup> For a full description of these resident-type definitions, see Appendix A. of *Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2008* (CFEC 09-4N). The following is a link to the report: [http://www.cfec.state.ak.us/RESEARCH/09\\_4N/ChapterAppA%2008.pdf](http://www.cfec.state.ak.us/RESEARCH/09_4N/ChapterAppA%2008.pdf)

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## 2.0 Background on Data and Assumptions

In 2009, a new computerized Bristol Bay district registration system and database were introduced. The new system provides a web-based application for permit holders and authorized agents to carry out district registration and transfer transactions over the internet, saving everyone time and labor costs. The 2009 data are now stored in a relational database in several tables.

This report relies on the 2009 ADF&G district registration data and CFEC permit data. While the 2009 district registration data represent an improvement over earlier years, there still are data issues. As a result, the data used for this report may be incomplete and may contain errors.

The following is a description of some of the data issues and the assumptions used to produce this report:

- a.) Two permit holders who register with their respective vessels for the same district can join together on one of their vessels and conduct a two-permit operation without the need for an additional transaction on the registration file. Thus when such an event occurs, there is no way to identify the switch to a two-permit operation from the computerized registration transactions. One Department of Fish and Game fishery manager suspects that, while such events occur, they are relatively infrequent.<sup>6</sup> To the extent that such events do occur, the number of two-permit operations will be underestimated in this report.
- b.) The district registration data have some transactions with no start date and other transactions where the stop date occurs before the start date. After reviewing these observations and discussing the transactions with the designer of the database, the authors concluded that such registration transactions were errors. Such transactions were eliminated from consideration in the report.
- c.) Registration transactions only have an exit date (a.k.a. stop date) if the permit holder transfers to another district. When there is no stop date it is not possible to determine when a permit holder's activity in a district ends. Thus, it is possible that a two-permit operation can become a one-permit operation if one person quits fishing before the other.

Similarly, there are cases where the registration dates for two persons registered to the same vessel overlap in time, but one of the permit holders has an earlier start date. In such cases, it is possible that the vessel started as a one-permit operation and then became a two-permit operation at a later date.

For purposes of this report, an operation was counted as a two-permit operation as long as the registration periods for the two permit holders on the vessel

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<sup>6</sup> Information based on an 11/16/2009 conversation with ADFG biologist Tim Sands.

overlapped in time. If the registration periods did not overlap in time, the vessel was assumed to be a one-permit operation.

- d). Sometimes, no additional district registration transaction occurs if a permit is emergency transferred in-season to another permit holder. This could impact data reports by resident-type if the emergency transferee of the entry permit is a different resident-type than the transferor. For purposes of this report, the authors used the resident-type of the original permit holder who had registered for the district if no additional transaction was available in the registration data to identify the transferee.
- e.) Some vessels may represent a two-permit operation in one district and a one-permit operation in another district at a different point in the season. For the fishery as a whole, these vessels are counted as two-permit operations.
- f.) District registration transactions are usually no longer required for a district after the 48 hour waiting period has been waived. Thus if some two-permit operations form after the peak of the season, they do not appear in the data and cannot be counted.

In summary, the data used in this report come from the 2009 ADF&G Bristol Bay district registration database with additional fields from CFEC data. The reader should be aware that there are some issues with the data. Because of these issues, the data provided in this report should be considered estimates, and viewed with caution.

### 3.0 Estimates of One-Permit and Two-Permit Operations in the 2009 Fishery – All Districts Combined

During the 2009 Bristol Bay salmon drift gillnet fishery, 2,470 district registration observations were recorded. These observations represented 1,610 distinct individuals, 1,608 distinct CFEC permits, and 1,331 distinct vessels. Two-permit operations occurred on an estimated 20.9% (278/1,331) of the vessels while one-permit operations occurred on an estimated 79.1% (1,053/1,331) of the vessels.

#### 3.1a. Resident-Type of Permit Holders – All Districts Combined

The 1,610 CFEC permit holders who registered for the Bristol Bay drift gillnet fishery at some time during the 2009 season were classified by resident-type and operation-type in Table 3.1a.<sup>7</sup> Approximately 65.3% (1,052/1,610) of these permit holders were determined to be in a one-permit operation, and 34.7% (558/1,610) were in a two-permit operation.

Table 3.1a. Resident-Types of S03T Permit Holders by Operation-Type in 2009.<sup>8</sup>

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	294	18.3%	241	82.0%	53	18.0%
ARN	136	8.5%	93	68.4%	43	31.6%
AUN	233	14.5%	151	64.8%	82	35.2%
NON	947	58.8%	567	59.9%	380	40.1%
TOTAL	1,610	100.0%	1,052	65.3%	558	34.7%

Of the 1,610 distinct permit holders, nonresidents were the largest group representing 58.8% (947/1,610) of the distinct persons who registered at least once for the Bristol Bay salmon drift gill net fishery. Persons from the local Bristol Bay area (ARLs) were the second largest group representing 18.3% (294/1,610) of the distinct persons who registered for the fishery. Permit holders from urban areas in Alaska outside the local Bristol Bay area (AUNs) represented 14.5% (233/1,610) of those who registered, and permit holders from rural areas in Alaska outside the local Bristol Bay area (ARNs) represented 8.5% (136/1,610).

<sup>7</sup> There are some vessels that represented a “one-permit” operation in one district and a “two-permit” operation in another district at a different point in the season. For the fishery as a whole, these vessels are counted as “two-permit” operations in Table 3.1a.

<sup>8</sup> In this report, “Distinct” means that the person has only been counted once in the totals irrespective of the number of times the person had a registration transaction.

Nonresident permit holders were more likely than other resident-types to be involved in a two-permit operation. Of the 947 nonresident permit holders registered for the fishery, 40.1% (380/947) were determined to be in a two-permit operation. In contrast, only 18.0% (53/294) of permit holders from the local Bristol Bay area were determined to be in a two-permit operation.

**3.1b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in 2009 – All Districts Combined**

Table 3.1b provides counts of resident-type combinations of permit holders classified as two-permit operations at some time during the 2009 season. The table shows that 59% (164/278) of two-permit operations occurred on vessels where the permit holders were both classified as nonresidents (NON-NON). Permit holders from urban areas in Alaska outside the local Bristol Bay area and nonresidents were the second largest resident-type combination representing 11.9% (33/278) (AUN-NON) of the two-permit operations.

*Table 3.1b. Resident-Type Combinations of Permit Holders Registered to Vessels Classified as Two-Permit Operations during 2009.*

<b>Resident-Type Combinations</b>	<b>Number of Two-Permit Operations</b>	<b>Percent</b>
ARL-ARL	19	6.8%
ARN-ARL	3	1.1%
AUN-ARL	4	1.4%
ARL-NON	8	2.9%
ARN-ARN	15	5.4%
AUN-ARN	1	0.4%
ARN-NON	9	3.2%
AUN-AUN	22	7.9%
AUN-NON	33	11.9%
NON-NON	<u>164</u>	<u>59.0%</u>
Total	278	100.0%

With the exception of the high frequency for the “AUN-NON” resident-type combination, two-permit operations among permit holders from the same resident-type tended to be more common than two-permit operations among permit holders from different resident-types. Collectively, two-permit operations among persons from the same resident-type represented 79.1 % (220/278) of all two-permit operations.<sup>9</sup>

<sup>9</sup> The transaction costs needed to form a two-person operation may be lower for persons who know each other and/or have a prior relationship. Such persons may tend to come from the same resident-type. Some two-person operations may be among persons who are related.

**3.1c. Number of Districts Used by Vessels Registered for the Bristol Bay Drift Gillnet Fishery during 2009 - All Districts Combined**

Of the 1,331 distinct vessels with a 2009 registration observation for the Bristol Bay drift gillnet fishery, 65.5% (872/1,331) were registered for a single district, 27.2% (362/1,331) were associated with registrations in two districts, 7.1% (94/1,331) were associated with registrations in three districts, and 0.2% (3/1,331) were associated with registrations in four districts. These data are shown in Table 3.1c.

*Table 3.1c. Number of Districts Used by Vessels Registered for the Bristol Bay Drift Gillnet Fishery during 2009 - All Districts Combined.<sup>10</sup>*

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	872	65.5%	748	71.0%	124	44.6%
2	362	27.2%	244	23.2%	118	42.4%
3	94	7.1%	59	5.6%	35	12.6%
4	3	0.2%	2	0.2%	1	0.4%
Total	1,331	100%	1,053	100%	278	100%

Two-permit vessels were more likely than one-permit vessels to be used in multiple districts over the course of the season. For the fishery as a whole, 55.4% (154/278) of the two-permit vessels were used in multiple districts, while only 29.0% (305/1,053) of one-permit vessels were used in multiple districts.

<sup>10</sup>In most circumstances, the Bristol Bay district registration requirement is waived after July 17 at 9:00 a.m.

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#### 4.0 Estimates of One and Two-Permit Operations by Bristol Bay District

Section 4.0 provides estimates of the number of one-permit and two-permit operations for each of the five individual fishing districts during 2009. The five fishing districts are Togiak, Nushagak, Naknek-Kvichak, Egegik, and Ugashik.

#### 4.1 Togiak District

There were 54 registration observations for the Togiak District in the 2009 Bristol Bay drift gill net district registration data. These observations represented 53 distinct vessels, 54 distinct CFEC permits, and 54 distinct individuals. One vessel had registration observations for two CFEC permit holders. It was the only two-permit operation for the district.

Registration and re-registration for the Togiak District is covered in 5AAC 06.370. For most of the season, the Togiak District is regulated almost like a “super-exclusive” registration district for permit holders. During that time period, permit holders who register for the Togiak District cannot switch to another district and permit holders who register for other districts cannot switch to the Togiak District.<sup>11</sup> The fishery in the Togiak District tends to be slower-paced and less congested which may make two-permit operations less attractive than in the other Bristol Bay districts.

#### 4.1.a. Resident-Types of Permit Holders in the Togiak District

The resident-types of the 54 CFEC permit holders who registered for the Togiak District at some time during 2009 are shown in the Table 4.1a.

*Table 4.1a. Resident-Types of Togiak-Registered Permit Holders by Operation-Type in 2009.*

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	48	88.9%	48	100%	0	0%
ARN	1	1.9%	1	100%	0	0%
AUN	3	5.6%	3	100%	0	0%
NON	2	3.7%	0	0%	2	100%
TOTAL	54	100.0%	52	96.3%	2	3.7%

Of the 54 distinct permit holders who appear in the 2009 Togiak District registration data, 96.3% (52/54) were determined to be in one-permit operations, and 3.7% (2/54) were in two-permit operations.

<sup>11</sup> 5 AAC 06.370(k).

Persons from the local Bristol Bay area (ARLs) were the largest group representing 88.9% (48/54) of the distinct persons who registered for the Togiak District. Permit holders from urban areas in Alaska outside the local Bristol Bay area (AUNs) were the second largest group representing 5.6% (3/54) of the distinct persons who registered for the district. There were two nonresidents who registered for the Togiak District.

**4.1b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in the Togiak District**

Resident-type combinations of permit holders registered in the Togiak District to vessels with two-permit holders are shown in Table 4.1b. The two nonresidents (NON-NON) constituted the only two-permit operation for Togiak.

*Table 4.1b. Resident-Type Combinations of Permit Holders Registered to Vessels Classified as Two-Permit Operations in the Togiak District during the 2009 Season.*

<b>Resident-Type Combinations</b>	<b>Number of Two-Permit Operations</b>	<b>Percent</b>
ARL-ARL	0	0.0%
ARN-ARL	0	0.0%
AUN-ARL	0	0.0%
ARL-NON	0	0.0%
ARN-ARN	0	0.0%
AUN-ARN	0	0.0%
ARN-NON	0	0.0%
AUN-AUN	0	0.0%
AUN-NON	0	0.0%
NON-NON	1	100.0%
Total	1	100.0%

**4.1c. Number of Districts Used by Vessels Registered for the Togiak District in 2009**

Of the 53 distinct vessels with a 2009 registration observation for the Togiak District, only one was classified as a two-permit operation (Table 4.1c). In addition, that individual two-permit vessel was the only Togiak-registered vessel that used another district during 2009.

Table 4.1c. Number of Districts Used by Vessels Registered for the Togiak District during 2009.<sup>12</sup>

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	52	98.1%	52	100%	0	0%
2	1	1.9%	0	0%	1	100%
3	0	0%	0	0%	0	0%
4	0	0%	0	0%	0	0%
Total	53	100%	52	100%	1	100%

#### 4.2 Nushagak District

There were 555 registration observations for the Nushagak District in the 2009 Bristol Bay drift gill net district registration data. These observations represented 431 distinct vessels, 542 distinct CFEC permits, and 542 distinct individuals. Some CFEC permits and permit holders had more than one registration observation in the Nushagak data due to in-season district changes and returns. Some vessels had more than one observation for similar reasons and also because some vessels had registration observations with more than one CFEC permit. Of the 431 vessels with at least one 2009 registration observation for the Nushagak District, 320 (74.2%) of the vessels were classified as one-permit operations and 111 (25.8%) of the vessels as two-permit operations.

##### 4.2a. Resident-Types of Permit Holders in the Nushagak District

The resident-type of the 542 CFEC permit holders who registered for the Nushagak District at some time during 2009 are shown in Table 4.2a below.

Table 4.2a. Resident-Types of Nushagak-Registered Permit Holders by Operation-Type in 2009.

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	145	26.7%	108	74.5%	37	25.5%
ARN	79	14.6%	52	65.8%	27	34.2%
AUN	71	13.1%	45	63.4%	26	36.6%
NON	247	45.6%	115	46.5%	132	53.4%
TOTAL	542	100%	320	59.0%	222	41.0%

<sup>12</sup>In most circumstances, the Bristol Bay district registration requirement is waived after July 17 at 9:00 a.m.

Of the 542 distinct persons who appear in the Nushagak data, 59% (320/542) were determined to be in one-permit operations and 41% (222/542) were in two-permit operations. Nonresidents were the largest group representing 45.6% (247/542) of the distinct persons registered for the district. Permit holders from the local Bristol Bay area (ARLs) were the second largest group, representing 26.7% (145/542) of the distinct persons registered for the district.

Nonresidents who registered for the Nushagak District were much more likely than any other resident-type to be in two-permit operations. Of the 247 distinct nonresidents who registered for the district, 53.4% were in two-permit operations.

In contrast, persons from the local Bristol Bay area who registered for the Nushagak District were much more likely than any other resident-type to be in a one-permit operation. Of the 145 distinct persons from the local area who registered for the district, 74.5% (108/145) were associated with vessels classified as a one-permit operation, while 25.5% (37/145) were associated with a vessel that was classified as a two-permit operation.

#### **4.2b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in the Nushagak District**

Table 4.2b shows the resident-type combinations of permit holders registered to vessels with two permit holders in the Nushagak District at some time during 2009. An estimated 51.4% (57/111) of two-permit operations in the Nushagak District occurred on vessels where the permit holders were both classified as nonresidents (NON-NON). Permit holders from areas local to the Bristol Bay area (ARL-ARL) represented 12.6% (14/111) of the two-permit operations in the district.

*Table 4.2b. Resident-Type Combinations of Persons Registered to Vessels Classified as Two-Permit Operations in the Nushagak District During the 2009 Season.*

<b>Resident-Type Combinations</b>	<b>Number of Two-Permit Operations</b>	<b>Percent</b>
ARL-ARL	14	12.6%
ARN-ARL	3	2.7%
AUN-ARL	3	2.7%
ARL-NON	3	2.7%
ARN-ARN	9	8.1%
AUN-ARN	0	0.0%
ARN-NON	6	5.4%
AUN-AUN	7	6.3%
AUN-NON	9	8.1%
NON-NON	<u>57</u>	<u>51.4%</u>
Total	111	100.0%

Two-permit operations among persons from the same resident-type tended to be more common than two-permit operations among persons from different resident-types. Collectively, two-permit operations among persons from the same resident-type represented 78.4% (87/111) of all two-person operations, while two-permit operations among persons from different resident-types represented 21.6% (24/111).

**4.2c. Number of Districts Used by Vessels Registered for the Nushagak District**

Of the 431 distinct vessels with a 2009 registration observation for the Nushagak District, 52.7% (227/431) were registered for a single district, 32.5% (140/431) were associated with registrations in two districts, 14.2% (61/431) were associated with registrations in three districts, and 0.7% (3/431) were associated with registrations in four districts (Table 4.2c).

*Table 4.2c. Number of Districts Used by Vessels Registered for the Nushagak District.*

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	227	52.7%	186	58.1%	41	36.9%
2	140	32.5%	95	29.7%	45	40.5%
3	61	14.2%	37	11.6%	24	21.6%
4	3	0.7%	2	0.6%	1	0.9%
Total	431	100.0%	320	100.0%	111	100.0%

Of the vessels that registered for the Nushagak District at some time during 2009, two-permit operations (63.1%) were more likely to have been used in multiple districts than one-permit operations (41.9%).

**4.3 Naknek-Kvichak District**

There were 757 registration observations for the Naknek-Kvichak District in the 2009 Bristol Bay drift gill net district registration data. These observations represent 597 distinct vessels, 715 distinct CFEC permits, and 716 distinct individuals. Some CFEC permits and permit holders had more than one registration observation in the Naknek-Kvichak data due to in-season district changes and returns. Some vessels had more than one observation for similar reasons and also because some vessels had registration observations with more than one CFEC permit.

Of the 597 vessels with at least one 2009 registration observation for the Naknek-Kvichak District, 80.2% (479/597) of the vessels were classified as one-permit operations and 19.8% (118/597) of the vessels as two-permit operations.

#### 4.3a. Resident-Type of Permit Holders in the Naknek-Kvichak District

The resident-type of the 716 CFEC permit holders who registered for the Naknek-Kvichak District at some time during 2009 are shown in the Table 4.3a.

Table 4.3a. Resident-Types of Naknek/Kvichak-Registered Permit Holders by Operation-Type in 2009.

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	73	10.2%	61	83.6%	12	16.4%
ARN	57	7.9%	36	63.2%	21	36.8%
AUN	110	15.4%	82	74.5%	28	25.5%
NON	476	66.5%	299	62.8%	177	37.2%
TOTAL	716	100%	478	66.8%	238	33.2%

Of the 716 distinct permit holders who appear in the 2009 Bristol Bay district registration data for the Naknek-Kvichak District, 66.8% (478/716) of the permit holders were determined to be in one-person operations, and 33.2% (238/716) were in two-person operations. Nonresidents were the largest group of permit holders, representing 66.5% (476/716) of the distinct persons registered for the district. Alaska residents from urban communities that are not local to the Bristol Bay area (AUNs) were the second largest group of permit holders representing 15.4% (110/716) of those registered for the district.

Alaska residents from rural communities not local to the Bristol Bay area (ARNs) and nonresidents who registered for the Naknek-Kvichak District were more likely than the other resident-types to be in a two-permit operation. Of the 57 ARNs who registered for the district, 36.8% (21/57) were in two-permit operations. Similarly, of the 476 distinct nonresidents who registered for the district, 37.2% (177/476) were in two-permit operations.

In contrast, persons from the local Bristol Bay area who registered for the Naknek-Kvichak District were more likely than any other resident-type to be in a one-permit operation. Of the 73 distinct persons from the local area who registered for the district, 83.6% (61/73) were determined to be in a one-permit operation and 16.4% (12/73) were in two-permit operations.

#### 4.3b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in the Naknek-Kvichak District

Resident-type combinations of permit holders in the Naknek-Kvichak District registered to vessels classified as two-permit operations are shown in Table 4.3b. An estimated 64.4% (76/118) of the two-permit operations occurred on vessels where the permit holders were both classified as nonresidents (NON-NON). Permit holders from urban

areas in Alaska outside the local Bristol Bay area and nonresidents were the second largest resident-type combination representing 13.6% (16/118) (AUN-NON) of the two-permit operations in the district.

*Table 4.3b. Resident-Type Combinations of Permit Holders Registered to Vessels Classified as Two-Permit Operations in the Naknek-Kvichak District.*

<b>Resident-Type Combination</b>	<b>Number of Two-Permit Operations</b>	<b>Percent</b>
ARL-ARL	4	3.4%
ARN-ARL	0	0.0%
AUN-ARL	1	0.8%
ARL-NON	3	2.5%
ARN-ARN	8	6.8%
AUN-ARN	1	0.8%
ARN-NON	4	3.4%
AUN-AUN	5	4.2%
AUN-NON	16	13.6%
NON-NON	<u>76</u>	<u>64.4%</u>
Total	118	100.0%

With the exception of the high frequency of the “AUN-NON” resident-type combination, two-permit operations among persons from the same resident-type tended to be more common than two-permit operations among persons from different resident-types. Collectively, two-permit operations among persons from the same resident-type represented 78.8% (93/118) of all two-permit operations, while two-permit operations among persons from different resident-types represented 22.2% (25/118).

#### **4.3c. Number of Districts Used by Vessels Registered for Naknek-Kvichak**

Of the 597 distinct vessels with a 2009 registration observation for the Naknek-Kvichak District, 53.4% (319/597) of the vessels were registered for a single district, 35.0% (209/597) were associated with registrations in two districts, 11.1% (66/597) were associated with registrations in three districts, and 0.5% (3/597) were associated with registrations in four districts (Table 4.3c).

Table 4.3c. Number of Districts Used by Vessels Registered for the Naknek-Kvichak District at Some Time during 2009.

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	319	53.4%	282	58.9%	37	31.4%
2	209	35.0%	149	31.1%	60	50.8%
3	66	11.1%	46	9.6%	20	16.9%
4	3	0.5%	2	0.4%	1	0.8%
Total	597	100.0%	479	100.0%	118	100.0%

Of the vessels that registered for the Naknek-Kvichak District at some time during 2009, two-permit vessels (68.6%) were more likely to have been used in multiple districts than one-permit vessels (41.1%).

#### 4.4 Egegik District

There were 709 registration observations for the Egegik District in the 2009 Bristol Bay drift gill net district registration data. These observations represented 528 distinct vessels, 663 distinct CFEC permits, and 664 distinct individuals. Some CFEC permits and permit holders had more than one registration observation in the Egegik data due to in-season district changes and returns. Some vessels had more than one observation for similar reasons and also because some vessels had registration observations with more than one CFEC permit. One CFEC permit in the Egegik data was held and registered by two separate individuals at different points in the season.

Of the 528 vessels with at least one 2009 registration observation for the Egegik District, 74.2% (392) of the vessels were classified as one-permit operations and 25.8% (136) of the vessels as two-permit operations.

##### 4.4a. Resident-Types of Permit Holders Registered to Vessels in the Egegik District

The resident-type of the CFEC permit holders who registered for the Egegik District at some time during 2009 are shown in the Table 4.4a.<sup>13</sup> Of the 664 distinct permit holders who appear in the 2009 Bristol Bay district registration data for the Egegik District, 59.0% (392/664) were determined to be in one-permit operations, and 41.0% (272/665) were in two-permit operations.

<sup>13</sup> Note that one permit holder had 2009 registration observations in the Egegik district with both a one-permit vessel and a two-permit vessel.



Table 4.4a. Resident-Types of Egegik-Registered Permit Holders by Operation-Type in 2009.

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	38	5.7%	28	73.7%	10	26.3%
ARN	53	8.0%	40	75.5%	13	24.5%
AUN	106	16.0%	60	56.6%	46	43.4%
NON	467	70.3%	264	56.5%	203	43.5%
TOTAL	664	100.00%	392	59.0%	272	41.0%

Of the 664 distinct permit holders, nonresidents were the largest group representing 70.3% (467/664) of the distinct persons registered for the district. Alaska residents from urban communities that are not local to the Bristol Bay area (AUNs) were the second largest group of permit holders representing 16.0% (106/664) of the distinct persons registered for the Egegik District.

Alaska residents from urban communities that are not local to the Bristol Bay area (AUNs) and nonresidents who registered for the Egegik District were more likely than the other resident-types to be in two-permit operations. Of the 106 AUNs who registered for the district, 43.4% (46/106) were determined to be in two-permit operations. Similarly, of the 467 distinct nonresidents who registered for the district, 43.5% (203/664) were in two-permit operations.

Persons from rural communities that are not local to the Bristol Bay area (ARNs) as well as persons from the local Bristol Bay area (ARLs) who registered for the Egegik District were more likely than any other resident-types to be in one-permit operations during the 2009 season. Of the 53 distinct ARNs who registered for the district, 75.5% (40/53) were determined to be in one-permit operations, while 24.5% (13/53) were in two-permit operations. Of the 38 distinct ARLs who registered for the district, 73.7% (28/38) were determined to be in one-permit operations, while 26.3% (10/38) were in two-permit operations.

#### 4.4b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in the Egegik District

Resident-type combinations of permit holders who registered in the Egegik District to vessels with two permit holders are shown in Table 4.4b. An estimated 65.4% (89/136) of two-permit operations in the District occurred on vessels where the permit holders were both classified as nonresidents (NON-NON).

Table 4.4b. Resident-Type Combinations of Permit Holders Registered to Vessels Classified as Two-Permit Operations in the Egegik District during the 2009 Season.

Resident-Type Combinations	Number of Two-Permit Operations	Percent
ARL-ARL	3	2.2%
ARN-ARL	1	0.7%
AUN-ARL	0	0.0%
ARL-NON	3	2.2%
ARN-ARN	5	3.7%
AUN-ARN	0	0.0%
ARN-NON	2	1.5%
AUN-AUN	13	9.6%
AUN-NON	20	14.7%
NON-NON	<u>89</u>	<u>65.4%</u>
Total	136	100.0%

Permit holders from urban areas in Alaska outside the local Bristol Bay area and nonresidents (AUN-NON) were the second largest resident combination representing 14.7% (20/136) of the two-permit operations.

With the exception of the high frequency for the “AUN-NON” resident-type combination, two-permit operations among permit holders from the same resident-type tended to be more common than two-permit operations among permit holders from different resident-types. Collectively, two-permit operations among persons from the same resident-type represented about 80.9 % (110/136) of all two-permit operations in the Egegik District during 2009.<sup>14</sup>

#### 4.4c. Number of Districts Used by Vessels Registered for the Egegik District

Table 4.4c provides insights on the use of multiple districts by vessels that were registered for the Egegik District at some time during the 2009 season.

Of the 528 distinct vessels with a 2009 registration observation for the Egegik District, 46.2% (244/528) of the vessels were registered for a single district, 39.2% (207/528) of the vessels were associated with registrations in two districts, 14.0% (74/528) of the vessels were associated with registrations in three districts, and 0.6% (3/528) were associated with registrations in four districts.

<sup>14</sup> The transaction costs needed to form a two-person operation may be lower for persons who know each other and/or have a prior relationship. Such persons may tend to come from the same resident-type. Some two-person operations may be between persons who are related.

Table 4.4c. Number of Districts Used by Vessels Registered for the Egegik District.

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	244	46.2%	200	51.0%	44	32.4%
2	207	39.2%	142	36.2%	65	47.8%
3	74	14.0%	48	12.2%	26	19.1%
4	3	0.6%	2	0.5%	1	0.7%
Total	528	100.0%	392	100.0%	136	100.0%

Two-permit vessels registered for the Egegik District were more likely than one-permit vessels to have used another district(s) at some time during the 2009 season. About 67.6% of the two-permit vessels registered for Egegik used another districts(s) at some time during the 2009 season. In contrast, about 49.0% of the one-permit vessels switched districts during the 2009 season.

#### 4.5 Ugashik District

There were 395 registration observations for the Ugashik District in the 2009 Bristol Bay drift gill net district registration data. These observations represented 281 distinct vessels, 370 distinct CFEC permits, and 370 distinct individuals. Some CFEC permits and permit holders had more than one registration observation in the Ugashik District due to in-season district changes and returns.

Some vessels had more than one observation for similar reasons and also because some vessels had registration observations with more than one CFEC permit. Of the 281 vessels with at least one 2009 registration observation for the Ugashik District, 68.3% (192/281) of the vessels were classified as one-permit operations, and 31.7% (89/281) of the vessels were classified as two-permit operations.

##### 4.5a. Resident-Types of Permit Holders in the Ugashik District

The resident-type of the CFEC permit holders who registered for the Ugashik District at some time during 2009 are shown in Table 4.5a.

Table 4.5a. Resident-Types of Ugashik-Registered Permit Holders by Operation-Type in 2009.

Resident Type	All Permit Holders		Permit Holders on One-Permit Operations		Permit Holders on Two-Permit Operations	
	Number	Pct.	Number	Pct.	Number	Pct.
ARL	41	11.1%	32	78.1%	9	22.0%
ARN	33	8.9%	23	69.7%	10	30.3%
AUN	77	20.8%	38	49.3%	39	50.7%
NON	219	59.2%	99	45.2%	120	54.8%
TOTAL	370	100.00%	192	51.9%	178	48.1%

Of the 370 distinct permit holders who appear in the 2009 Bristol Bay district registration data for the Ugashik District, an estimated 51.9% (192/370) were in one-permit operations, and 48.1% (178/370) were in two-permit operations.

Of the 370 distinct permit holders, nonresidents were the largest group representing 59.2% (219/370) of the distinct persons registered for the district. Alaska Residents from urban communities that are nonlocal to Bristol Bay area (AUNs) were the second largest group representing 20.8% (77/370) of the distinct persons registered for the district.

Nonresidents who registered for the Ugashik District were much more likely than any other resident-type to be in two-permit operations. Of the 219 distinct nonresidents who registered for the district, and 54.8% (120/219) were in two-permit operations.

In contrast, persons from the local Bristol Bay area who registered for the Ugashik District were more likely than any other resident-type to be in a one-permit operation. Of the 41 distinct persons from the local area who registered for the district, an estimated 78.0% (32/41) were determined to be in one-permit operations, while 22.0% (9/41) were in two-permit operations.

#### 4. 5b. Resident-Type Combinations of Permit Holders in Two-Permit Operations in the Ugashik District

Resident-type combinations of permit holders in the Ugashik District who registered to vessels with two permit holders are shown in the Table 4.5b.

About 53.9% (48/89) of two-permit operations occurred on vessels where the permit holders were both classified as nonresidents (NON-NON). Permit holders from urban areas in Alaska outside the local Bristol Bay area and nonresidents were the second largest resident-type combination representing 21.3% (19/89) (AUN-NON) of the two-permit vessels.

*Table 4.5b. Resident-Type Combinations of Permit Holders Registered to Vessels Classified as Two-Permit Operations in the Ugashik District During the 2009 Season.*

<b>Resident-Type Combinations</b>	<b>Number of Two-Permit Operations</b>	<b>Percent</b>
ARL-ARL	3	3.4%
ARN-ARL	1	1.1%
AUN-ARL	0	0.0%
ARL-NON	2	2.2%
ARN-ARN	3	3.4%
AUN-ARN	0	0.0%
ARN-NON	3	3.4%
AUN-AUN	10	11.2%
AUN-NON	19	21.3%
NON-NON	<u>48</u>	<u>53.9%</u>
Total	89	100.0%

With the exception of the high frequency for the “AUN-NON” resident-type combination, two-permit operations among permit holders from the same resident-type tended to be more common than two-permit operations among permit holders from different resident-types. Collectively, two-permit operations among persons from the same resident-type represented 71.9 % (64/89) of all two-permit operations.<sup>15</sup>

#### **4.5c. Number of Districts Used by Vessels Registered for Ugashik**

Table 4.5c below provides insights into the use of multiple districts by vessels registered for Ugashik at some time during 2009. The Ugashik District appears to have the highest percentage of vessels associated with registrations in two or more districts. Of the 281 distinct vessels with a 2009 registration observation for the Ugashik District, 10.7% (30/281) were registered for a single district, 59.4% (167/281) were associated with registrations in two districts, 28.8% (81/281) were associated with registrations in three districts, and 1.1% (3/281) were associated with registrations in four districts.

---

<sup>15</sup> The transaction costs needed to form a two-person operation may be lower for persons who know each other and/or have a prior relationship. Such persons may tend to come from the same resident-type. Some two-person operations may be among persons who are related.

Table 4.5c. Number of Districts Used by Vessels Registered for the Ugashik District.

Number of Districts	All Vessels		One-Permit Vessels		Two-Permit Vessels	
	Number	Pct.	Number	Pct.	Number	Pct.
1	30	10.7%	28	14.6%	2	2.2%
2	167	59.4%	108	56.2%	59	66.3%
3	81	28.8%	53	27.6%	28	31.5%
4	3	1.1%	3	1.6%	0	0%
Total	281	100.0%	192	100.0%	89	100.0%

Two-permit vessels registered for the Ugashik District were more likely than one-permit vessels to have used another district(s) at some time during the 2009 season. About 97.8% (87/89) of the two-permit vessels registered for Ugashik used another district(s) at some time during the 2009 season. In contrast, about 85.4% (164/192) of the one-permit vessels used another district(s) at some time during the 2009 season.

## 5.0 Summary of Results

In 2003, the Alaska Board of Fisheries (Board) passed a regulation (5 AAC 06.333) for the Bristol Bay salmon drift gill net fishery, that allows two Commercial Fisheries Entry Commission (CFEC) permit holders who opt to fish together on a single vessel to use 200 fathoms of gear (an additional 50 fathoms) under certain conditions. The regulation first went into effect for the 2004 season.

This report has used ADF&G district registration data coupled with CFEC permit data to estimate the use of two-permit operations in the Bristol Bay salmon drift gill net fishery during the 2009 season. The report examines the number and percent of vessels and the number and percent of CFEC permit holders involved in one-permit and two-permit operations. Data are provided for the fishery as a whole and for individual districts.

For the fishery as a whole, two-permit operations occurred on an estimated 20.9% (278) of the 1,331 vessels registered during the season and one-permit only operations occurred on 79.1% (1,053) of the vessels.

Of the 1,610 distinct permit holders who registered during the season, 34.7% (558) were involved in a two-permit operation during the season, while 65.3% (1,052) were involved in a one-permit operation only.

Permit holder involvement in two-permit operations varied by fishing district, from a low of 3.7% of permit holders registered for the Togiak District to a high of 48.1% of permit holders registered for the Ugashik District. Table 5.0 below summarizes use of one-permit and two-permit operations by fishing district.<sup>16</sup>

*Table 5.0. Counts of Distinct Permit Holders by Fishing District and Operation Type.*

Fishing District	Total Permit Holders	One-Permit Operations		Two-Permit Operations	
		# of Permit Holders	% of Permit Holders	# of Permit Holders	% of Permit Holders
Togiak	54	52	96.3%	2	3.7%
Nushagak	542	320	59.0%	222	41.0%
Naknek-Kvichak	716	478	66.8%	238	33.2%
Egegik	664	392	59.0%	272	41.0%
Ugashik	370	192	51.9%	178	48.1%
All Districts	1,610	1,052	65.3%	558	34.7%

The report classifies permit holders into one of four resident types based upon the community in which they reside. The four resident-types are defined as Alaska residents living in a rural community that is local to the fishery (ARLs), Alaska residents living in a rural community that is non-local to the fishery (ARNs), Alaska residents living in an

<sup>16</sup> Note that the sum of the counts of distinct permit holders registered for each district is more than the count of distinct permit holders over all districts since some permit holders switched districts during the season.

urban community that is non-local to the fishery (AUNs), and nonresidents of Alaska (NON).

Nonresidents were involved in two-permit operations more than any other resident-type. For the fishery as a whole, 40.1% (380/947) of nonresidents were involved in a two-permit operation during the season. In contrast, local permit holders were involved in two-permit operations less than any other resident-type. For the fishery as a whole, 18.0% (53/294) of local permit holders were involved in two-permit operations.

Two-permit operations were more common among permit holders from the same resident-type. For the fishery as a whole, two-permit operations formed by permit holders from the same resident-type represented an estimated 79.1% (220/278) of all two-permit operations during 2009.

The vessels used in two-permit operations were more likely to be registered in multiple districts during 2009 than the vessels used in one-permit operations. For the fishery as a whole, 55.4% (154) of the 278 two-permit vessels switched districts at some time during the season, while only 29.0% (305) of the 1,053 one-permit vessels switched districts.

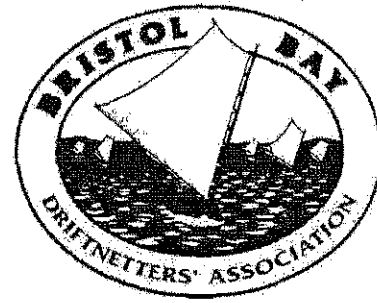
More detailed data on these topics, specific to each district, can be found in Section 4 of this report.



RC 34

**Bristol Bay Driftnetters Association**

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Vince Webster, Chair  
& Members of the Board of Fish  
Alaska Boards Section: Board of Fish  
PO Box 115526  
Juneau, AK 99811-5526

Nov 30<sup>th</sup> 2009

**RE: Issues with Comment Letter 58 from the Director of the Kvichak Setnetters Assoc.** *Comment letter 58 discusses Proposals 34 and 35, returning the NRSHA and the ARSHA respectively, back into the comprehensive allocation plan created in 1997 and then removed at setnetter request in 2006.*

BBDA also was at the B o F session in 1997. The vast majority of the Bristol Bay Board's time in 1997 was used to create a comprehensive Bristol Bay wide allocation plan for Bristol Bay sockeye. We believe the author's rendition of a brief history from that meeting is too brief. Although the author is correct in his statement that the explicit allocations within these special harvest areas were not discussed he does leave out some important details. The Special Harvest Areas are part of the N-K District by definition. In 1997 the Regulation book describes "Naknek-Kvichak District: all waters North and East Ioran C line 9990-Y-32430". That line is the Johnston Hill line on the south end of the District. This description explicitly includes both the NRSHA and the ARSHA within the N-K District.

Also, all of the sockeye harvested within the NRSHA were counted as part of the 20 Base Years (1977-1996) that were used to create the 1997 allocation plan. The ARSHA had not been created as of 1997. However **all** of the fish traveling to the mouth of the Alagnak River have always traveled through and been harvested within the N-K District. Those fish were historically harvested by both gear groups within the N-K District for many decades and certainly were counted in the allocation Base Years of 1977-1996. If the 1997 Board had expected to leave these sections out of the comprehensive allocation plan they would not have included the sockeye harvested within Special Harvest Areas inside the Base Year harvest amounts.

Dr Elizabeth Moore has shown herself to be an advocate exclusively for the setnet gear group in the past and we don't believe her research should be utilized within the Board process until after it has gone through a rigorous peer review process.

During the allocation base years of (1977-1996) the setnet gear group harvested **11.66 %** of all sockeye harvested in the N-K District. Since Allocation went into effect in 1998 the Setnetters in the N-K District have harvested **19.73%** of all sockeye harvested in the N-K District. The N-K setnetters have experienced an increase of 69% from their previous level of harvest (11.66%). If that is a "particular hardship" then the driftnet fleet wants that kind of hardship too. The original wording of the 1997 comprehensive allocation plan was quite well reasoned, comprehensive and fair. It solved a lot of allocation problems. For example, even at this meeting proposal 32 would have no allocative impact upon the Driftnet gear group under the 1997-2006 allocation wording. Since 2007 the allocation plan states that the explicit ratio of 16% to 84% within the NRSHA is gone and now the gear groups are opened according to a ratio of 1 setnet opening to 3 driftnet openings.

Sincerely,

Dan Barr  
President,  
Bristol Bay Driftnetters Association

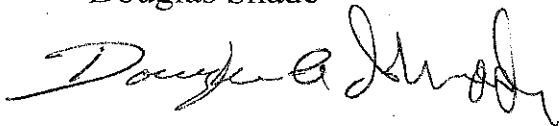
Barney Johnson  
Vice President,  
Bristol Bay Driftnetters Association

RC 35

Mr. Chairmen and Board members,

My name is Douglas Shade and I'm a 3rd generation fishermen. I started fishing with my grandmother in Clarks Point beach at the age of five. I am 48 years old now and am attempting to have a forth generation fishermen in my family. But with the proposals brought before the Board of Fish today I am wondering if there should be forth generation with the hard economic times of today, and the talk of longer boats, owning more than one permit, and opening the bay up to a general district, and waving the 48-hour transfer time would only create a free for all intercept outside all of the districts in Bristol Bay. I feel that will only discourage the future generations of the region from seeking a future in our salmon fishery in the Bristol Bay. Thanks you for your time.

Douglas Shade

A handwritten signature in cursive script that reads "Douglas Shade". The signature is written in dark ink and is positioned below the printed name.

Testimony Before the  
Alaska Board of Fisheries

by  
Douglas Shade

December 1, 2009  
Anchorage, Alaska

I'm in favor of proposals 1, 2 and 3 subsistence proposals on going practice.

MAKE IT LEGAL! Locals have been doing it regardless for many years, so it should be legalized anyways.

I'm in favor of proposals 23 and 24 because eliminating permit stacking will level the playing field, in the Bristol Bay fishery.

I'm in favor of proposal 25 because where you start where you stay, and I believe it's important to keep permits spread out, so they aren't bundled into one area of the bay.

I oppose proposals 14-21 because it is a disadvantage to the single permit holder. It's hard enough for locals to afford one permit, let alone dual permits. There isn't enough local resources to help the local fishermen purchase another permit.

LC 36

Good \_\_\_\_\_ Mr. Chairman and member of the Board of Fisheries. My name is Myra Olsen. I am a resident of Egegik. I have recently retired from over thirty years of commercial fishing. I serve on the Lower Bristol Bay Advisory Committee, the Egegik City Council, and the Lake and Peninsula Borough Assembly but I am here testifying on my own behalf.

I am in favor of proposal 14 which would require removal of all set net gear during drift only commercial openings. I think that a way can be devised for all obstructive gear to be removed from the water to allow drifters in on the beach without undo hardship to setnetters. By allowing the anchor lines to drift freely, drifters can access the near shore and the setnetters can reattach their buoys and running lines when it is their turn to fish.

You have a difficult task listening to the complaints of two gear types that have a certain amount of friction between them. I don't envy you but you do need to understand what some of the worst behavior looks like. Some set netters don't even take their gear out of the water when their season is over but leave it in to be an obstruction for drift netters who wish to fish later in the season. And some will deliberately put in snags such as engine blocks, stakes, pipes, and other obstructions simply to keep drifters from fishing the water that they have every legal right to fish.

I am adding my voice to those who oppose proposal 15 which would eliminate the 32 foot vessel limit. It is important to remember that these restructuring proposals are submitted mostly by private citizens looking to gain an edge over their competition and the unintended consequences to the local fishing communities that have always depended on these resources are seldom adequately addressed.

I oppose proposals 16 – 21 which are all permit stacking proposals. The justification for permit stacking was to remove fishing gear from the water. I oppose proposal 21 because it asks for 300 fathoms and it completely abandons the goal of reducing the gear in the water. While I am against permit stacking I would never argue that the Board does not have the authority to do it and I hope you resist this proposer's argument that you don't have the authority.

Addressing proposals 27 and 28 - I have never been in favor of eliminating the 48 hour transfer period. Eliminating the 48 hour transfer requirement between gear types will be impossible to enforce and will cause allocation problems between the gear types.

I agree with the Lower Bristol Bay Advisory Committee position to oppose proposal 31 which would allow fishing in the general district. This would negatively impact stocks of concern and result in reallocation of fish between districts.

I thank you for this opportunity to speak before you and I am available to answer your questions and to serve in the committee process.

xxx

## Summary of the Nushagak Advisory Committee Positions From Meeting Minutes on 2009 Bristol Bay Proposals

Page	PROPOSAL #	COMMITTEE ACTION	COMMENTS
7	1	Support	Discussion supports identifying drifting areas.
7	3	Support	Increases fishermens efforts to harvest need in shorter time.
8	4	Support	E.O. authority is required every year. Minimal participation in fishery.
8	5	Oppose	New fishery. Wouldn't work Geographically. Economically unfeasable.
8	6	Oppose	Western Alaska stocks are fully allocated.
8	7	Support	Housekeeping. Clarifies language
4	9	Amend/Support	Amend to clarify that proposal intent is river "Mouths", not drainages.
5	12	Support	Would correct an error in current regulation.
5	13	Support	Supports reserve concept for protection of fish resources.
9	14	Oppose	Creates hardship, reduces effectiveness.
11	15	Oppose	Separation of classes. Current limits, short openings affect harvest capacity
12	16	Oppose	Majority of dual permit holders are held by non-local, outside fishermen.
12	17,18,19	Oppose	Restructuring proposal passage is unaffordable to locals.
13	20	Oppose	Moves away from original intent of stacking.
15	21	Oppose	Unreasonable request for additional gear.
15	22	Support	Helpful to the Nushagak when NRSHA is in effect.
16	23	Support	Local fishermen cannot compete
16	24	Oppose	Tracking system for dual permit registration is needed.
16	25	Oppose	Disasterous for King Salmon management.
16	26	Oppose	Super-exclusive protection is needed for local, small boat operators.
16	27	Oppose	Would be difficult for the Department to manage.
17	28	Oppose	Would mess up allocation ratio's.
17	29,30	Amend/Support	Would close mentioned area to both Area M and T fishermen. Buffer area.
17	31	Oppose	Negative impacts shown from last General District fishery.
18	40	Support	Minimal impact to resource
18	41	Support	Concern about maintaining King escapement.
13	42	Oppose	Concern on King stocks in the Wood River
14	43	Oppose	Not in the management plan. The plan would have to be re-evaluated, changed.
18	45	Support	Housekeeping.
18	47	Support	Past abuse, gives enforcement tools.
18	48	Oppose	Author wants exclusive fishery.

Jonathon Forsling  
P.O. Box 310  
Togia, AK 99678

December 1, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

RC 38

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Chairman and Members of the Board,

My name is Jonathon Forsling, I am representing the Togiak Traditional Council, as the Administrator and Togiak Seafoods as the Traditional Council's member of the management team. I would like to start off by expressing my gratitude for the opportunity to come before you today and testify. Furthermore, I look forward to answering any and all of your questions.

I would like to give a brief demographic look at our community. Togiak has more than 1,000 year round residents who are predominately Yup'ik Eskimo; we have annual growth rate of 2.8%. We have a small late run fishery in a small fishing district. If you don't factor in the fishing industry, we have a nearly 80% unemployment rate. We depend on our resource.

\_\_\_\_\_ started a processing plant in Togiak, buying fish in the 2009 season. Our plant is focused on quality, and despite freight costs, our fish sells on the fresh market. We paid the majority of our fishermen \$1.15 per pound for sockeye.

The first proposal I would like to address is proposal 23.

I will reiterate that Togiak is a small, late run fishery and many of our residents can't afford multiple permits. This makes it nearly impossible for us to compete with permit holders that transfer in after July 24 and nearly triple our fleet. The outside boats come to Togiak with 200 fathoms of nets and the power to tow them anywhere. This does two things:

1. Gives outsiders the ability to inadvertently and effortlessly cork local fishermen and
2. Reduces the quality of our resource, which is our community's source of sustainability.

The second and most important proposal I will address is proposal 26, which proposes to lift the super-exclusive status of the Togiak District. Togiak District does not have super-exclusive status. The late transfer date serves a couple of purposes. First and foremost, the exclusive status serves as a tool in the management plan. Second, this allows Togiak fisherman the same exclusive right to our late run, as other fishermen have to their primary district.

To allow fishermen to capitalize on other runs that are grossly more productive and then come to Togiak to exploit our late and small run, would be a drastic injustice to equality. We should be afforded the same luxury of exclusive access to our primary district's run as every permit holder has to their primary districts. Our village has relied on this resource for more than 6,000 years and now more than ever. Residents in Togiak pay a cost of living rate, that is three times higher than others that live in large cities and states. Our fishing industry is our economic source and it barely sustains our community.

People in Togiak don't fish there necessarily because it is our favorite district; we do so because it is our home, our tradition, our culture and most importantly our livelihood. When transfers are allowed after July 24 our fleet is tripled and the local fishermans production is cut down to levels that barely cover expenses. The Togiak run is 3 to 5 times smaller then other runs in Bristol Bay, but as it is managed now the run is sustainable and the

November 11, 2009

RC39

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

Dear Board Members:

We, the following residents of Koliganek, would like to express the following comments on the Board of Fisheries proposals as follows:

Proposal 1

We support proposal one because we believe that resident subsistence users will take only what they need, further conserving the resource. There will be less waste, and subsistence fish will be better quality. There will also be less interaction with bears, thus ensuring safety of the subsistence users. Proposal one is good for the people and good for the resource.

Proposal 2

We also support Proposal 2 for the same reasons as above (see Proposal 1 comments).

Proposal 3

We support Proposal 3 because it would allow subsistence users to harvest their catch faster.

~~Proposal 13~~ 13

We strongly support proposal 13, because it would better provide for conservation of the fishery resource. Additional protections are needed in this region for the sustainability of the fishery in perpetuity.

Proposal 14

This proposal, if enacted, would greatly disadvantage setnet fishermen, and would make it virtually impossible to adhere to State law for the lease of setnet sites. Currently, the setnet buoys are necessary to effectuate State law for keeping the net perpendicular to the beach and sets the minimum distance between setnet sites. The outside screw anchors, in particular, would be practically impossible to install, because they must be installed on the minus tide in order to reach the correct distance from the beach. Requiring removal of all setnet gear during each drift only opening would make it nearly impossible for a setnetter to operate in the Bristol Bay fishery.

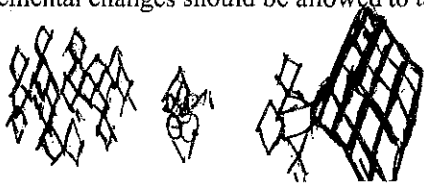
Additionally, in terms of conservation of the resource, this proposal, if enacted, could result in wanton waste if loosely anchored setnets are allowed to drift out, and perhaps untie and drift out to sea or get tangled in other setnet gear or other drift gillnetters gear. A big tide can take out a setnet if not properly anchored by a screw anchor.

Proposal 15

We strongly oppose Proposal 15 for the following reasons:

*Quality*

- Studies prove that ice is better than RSW for optimum quality of fishery resources. This proposal is largely geared at making bigger holding tanks and holds for RSW systems, and would not make as good a quality as efforts to ensure that ice is adequately available and the fishermen have slush ice bags.
- Proposal 15 would allow fish to be held longer, thus decreasing quality
- Fish would bang against one another and bruise, as opposed to iced fish, that are suspended in brailer bags and slush ice bags.
- The quality of the fishery resource *has* been steadily improving; consequently, the price has been rising over the past several years.
- Incremental changes should be allowed to take effect before drastic changes to the fishery are implemented.



*Equity*

- Proposal 15 would create two disparate classes of permit holders, which would effectively create a de facto allocation plan – bigger boats versus small boats
- Access to capital is not readily available to owners of trust land (a.k.a. native allotments) and native corporation shareholder parcels; this would seriously disadvantage local, and in particular, Alaska native resident permit holders.
- The cost of living is 40% higher for rural residents in the Bristol Bay region.
- This proposal, if enacted, would only continue the trend of local resident disenfranchisement from the Bristol Bay fishery.

Proposal 16, 17, 18, 19, 20

We strongly oppose any changes to the current permit stacking arrangements. We like the current regulations. We do not want one person to own two or more permits because it would only benefit those with access to capital, a small handful of non-watershed residents.

The commercial fishery limited entry commission was established for limited entry in the fishery. It was not intended for a consolidated effort of fishing permits owned by a handful of wealthy individuals. There are an increasing number of permits that are being sold to non-residents. Changes to the permit stacking regulations would only further disadvantage watershed residents.

Proposal 21

We strongly oppose Proposal 21. 300 fathoms of net is way too big. Bigger boats and longer nets will cork off the smaller vessels, and disadvantage those fishermen who can't afford dual permits or a larger boat. It would also contribute to wanton waste, as fish may overload the boat, and would decrease quality of the fishery resource. There is absolutely no conservation or quality argument for a longer net.

Proposal 26

We strongly oppose any changes to the Togiak super exclusive fishery. A lot of Togiak fishermen setnet for the fishery resource, and are therefore largely precluded from participation in other districts. There is only a small fishery there and Togiak residents should get the maximum benefit of the Togiak fishery.

Proposal 27

We oppose proposal 27, as we feel that the 48 hour transfer period should be kept as is. There is not a justifiable conservation reason for removal of the 48-hour transfer period.

Respectfully,

The following undersigned Koliganek resident fishermen:

Permit holder B.B. Drift

Rich Johnson  
Printed Name:

Permit holder

Glen Skina Wysocki  
Printed Name:

permit owner holder

Edward Kapatak  
Printed Name:

Permit Holder BB Drift

Herman F. Nelson Jr.  
Printed Name:

Permit Holder BB Drift

Jermy Luboff  
Printed Name:

FRED NELSON - Permit Holder BB Drift

Printed Name: 503T 57257 E





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November 26, 2009

Submitted By  
WARREN GIBBONS

## Alaska's Rural Schools Fight Off Extinction

By WILLIAM YARDLEY

NIKOLSKI, Alaska — This distant dot in the Aleutian Islands needed just 10 students for its school to dodge a fatal cut from the state budget. It reached across Alaska and beyond but could find only nine.

Built by the Bureau of Indian Affairs in 1939, the little Nikolski School will not be the last in Alaska to close. Four others have closed this fall and at least 30 more are at risk because of dwindling enrollment; one school in remote southeast Alaska survived only by advertising on Craigslist for families with school-aged children.

"We lose one or two every year," said Eddy Jeans, the director of school finance for the Alaska Department of Education and Early Development.

As Alaska celebrates its 50th anniversary of statehood amid new political prominence and urban aspirations, it is confronting a legacy of loss in rural communities that are unlike any others in the United States.

Some of these communities, like Nikolski, are linked to the earliest human settlements in North America, yet are now buckling beneath the accumulated conflict of old versus new. Alaska Natives are increasingly leaving villages for cities. Young women, in particular, have departed, and birth rates, once disproportionately higher in villages, have dropped. Jobs for the young people who remain are declining. Village elders have fewer peers who share their dialects. Heating fuel, gasoline and groceries can be expensive and medical services minimal.

The annual statewide student counting period, completed last month, is a census of the exodus. After several decades of growth, the overall rural population has declined about 4 percent since 2000 and much more in many regions. In the Aleutians, the population is down 19 percent, to about 4,500. About 20 percent of Alaska's 680,000 people live in rural areas.

Rural school districts, desperate to make the cut, are known to move students between schools to prop up enrollment during the counting period, while some have sought out families willing to relocate from other states.

“We were desperate,” said Gordon Chew, whose wife runs the school in Tenakee Springs, where two families with a total of six children relocated earlier this year in response to an advertisement on Craigslist. “It saved us.” The decline of rural schools is at the heart of a broader debate in Alaska over the treatment of native communities, which dominate the state’s rural population.

Here in the Aleutians, native Unangans, or Aleuts, are linked to people who traveled the Bering land bridge from Asia more than 10,000 years ago. They survived off the sea, making skiffs from seal skin and building houses from sod for shelter against the endless ocean gales. They endured violence and religious conversion by Russian explorers and, during World War II, forced evacuation by the American military.

Now they face budget cuts and the pressures of modern Alaska.

“If you put it in the calculus we use today to determine public policy, places like Nikolski probably have a difficult time measuring up,” said Byron Mallott, a Tlingit leader who has advised several Alaska governors on native issues. “But look at Nikolski in the context of Alaska, look at it in the context of America. These are the native homelands, and we ought to recognize that and not forget that.”

Concerns over the cost and quality of education in rural areas have long generated tension: can preserving village life be balanced with preparing students for a broader world? A court settlement in the 1970s required the state to build high schools in most villages, prompting an expensive construction boom. But by 1980, with oil revenues no longer soaring, the State Legislature decided that schools with fewer than 10 students would face severe cuts in financing. With some parents leaving villages in pursuit of better education anyway, some lawmakers said saving schools was missing the point.

“Schools may close, but the fact of the matter is, we’re in the education business,” said Gary Wilken, a former Republican state senator from Fairbanks who pushed for the higher enrollment requirement. “Our state has to provide a quality education to all, and sometimes you can do it better through the Internet with home school programs or in regional boarding schools.”

For some, more recent standardized tests showing relatively poor performance among rural and native students have confirmed skepticism over investing in declining schools. Others have pressed more aggressively than ever for schools to nurture fading native cultures and languages, once banished in the name of education.

Georgianna Lincoln, 66, a former Democratic state senator who lived in the village of Rampart, northwest of Fairbanks, until she was 9, was among the lawmakers who fought raising the financing threshold to 10 students. The school in Rampart closed shortly after the new requirement was imposed.

At the vote, Ms. Lincoln recalled: “I told everybody, ‘I don’t care if you import your cousins or your friends. Do not allow the school to close because that’s the death of the community.’”

Larry LeDoux, Alaska's commissioner of the Department of Education and Early Development, noted that the state had just filled a new position, director of rural education, but he also said that did not mean the state would try to save village schools.

Nikolski, nearly 1,000 miles southwest of Anchorage, is the last of what once were more than 20 native villages on Umnak Island. A few decades ago, the village had 80 people; it is now down to about 30.

Enrollment here fell below 10 last year, but the Aleutian Region School District stretched its budget and kept the school open. To run the school with 10 students for one year costs \$400,000 to \$500,000. By last spring, enrollment had fallen further but there was new optimism: Yuki and Maria Iaulualu, natives of American Samoa, agreed to move here from Seattle with their five school-age children.

Joe Beckford, the district superintendent, arranged for the district to pay several thousand dollars for the Iaulualus' airfare. Yet Mr. Iaulualu soon lost his job working for the village, and it became clear that even his family's arrival would not raise enrollment to 10.

Now, Mr. Iaulualu said, "we're out of here."

Grace Oomittuk, the village health aide, and her two school-aged children came from the state's north coast two years ago. Consulting with Mr. Beckford, she timed their initial visit to coincide with the student coming period. Now, Ms. Oomittuk said, her family will most likely move to her mother's home in Palmer, about 40 miles northeast of Anchorage.

Another student, Ivan Krukoff, 18, whose father lives in Nikolski, has moved back in with his mother on a neighboring island. If only his cousin, Darin Krukoff, 17, had been open to Mr. Beckford's efforts to "entice him," as the superintendent put it, to move to Nikolski. That would have made 10.

But Darin likes the neighboring island, where the school has a basketball team and other attractions, including girls his age.

"You have to live your life," Darin said.

That gets to Eric Willhite.

He is 13. Nobody had to ask him to prop up ancient Alaska. He is from here, a descendant of generations of seal hunters and salmon fishermen. The Black Eyed Peas thump through his iPod. His hoodie helps cut the wind that roars across the Bering Sea. He longs for middle school cool at the edge of America.

"I don't want to leave," he said.

After moving to Missouri with his parents several years ago, Eric decided he preferred life in the village and returned after a year to live with his aunt and uncle.

He has heard the stories of how his grandfather was punished in school for speaking Unangan. He says he understands that he is now the only child left in Nikolski with a direct connection to the native bones and artifacts anthropologists have taken from its tundra.

While he says this is home, flight is his obsession. He simulates takeoffs on a computer and makes jets out of Legos. His goal is to follow his older brother, Daniel, 19, to a vocational boarding school in interior Alaska.

“He could fly pilot,” Eric said, “and I’ll fly co-pilot.”

First he needs to pass the eighth grade. After spending several weeks this fall uncertain whether the Nikolski School would remain open, he is now in a home-school program.

“This is a crucial year for Eric, and things aren’t going well,” said Scott Kerr, Eric’s uncle and legal guardian.

Mr. Kerr is not native, but he is largely responsible for perpetuating native traditions in Eric’s life, from hunting and fishing for food to finding peace in Umnak’s isolation.

“I’ve told him, ‘If you have nothing else in this world, you are Unangan, you are Aleut,’” Mr. Kerr said. “That’s something to be proud of.”

A few people who remain here still gather in the evening on the rocky beach of Nikolski Bay to fish for dinner or something to salt for winter. Volcanoes loom, one dormant, one not. Eagles coast. Sea otters float. Cattle wander the hills, wild descendants of a long-ago ranch and, now, a particularly good meal. Foxes poke through the small landfill.

At one end of the village, elders recently reburied bones of their ancestors, reclaimed from various collections. At the other, the shell of an old Reeve Aleutian airliner sits beside the gravel runway, wreckage from a 1965 flight caught in crosswinds. The school is in the middle, the newest relic.

“That school,” said Arnold Dushkin, president of the Nikolski village council, “is our major reason for the village to be going.”

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12-2-09 INFORMATION ON PROPOSAL #5, SID NELSON

Sept. 2009

RC 41

Dear BB Spawn on kelp permit owner,

Somebody in the Alaska Dept. of Fish and Game has decided to eliminate our fishery.

You probably noticed that your BB spawn on kelp permit was not listed on your renewal form for 2009 (mailed in December of 2008).

The permits need to be renewed or you lose them, so I sent them a check for the kelp permit and other permits. They took the money but did not send me the plastic card. The herring fishery came and went. I suspect that none of you got a plastic card either.

I did get a refund check dated 5-28-09. Our fishery is open by regulation until 6-30-09.

The Seattle canneries completely control the herring seine and gillnet fisheries at Togiak. They only buy from their pet fishermen and a few CDQ insiders. They set the price at a rock bottom \$125 per ton (about). This works out great for them and the cannery pets can make a good payday on huge volumes, because they have no competition. The rest of us, who used to fish herring, have been eliminated.

Regulations give 50% of our 1,500 ton spawn on kelp quota to the seiners and gillnetters if no buyers show up. The big canneries really want that quota to transfer to the seine and gillnet fleet (that they control). They are unlikely to ever buy spawn on kelp as long as that regulation to transfer our quota is in the rulebook.

There is always the chance that some small kelp buyer will risk the wrath of the big canneries and show up to buy kelp. The canneries want to be sure that never happens. Their goal is to completely control every piling and every pound of quota in Alaska.

They could buy our permits or lease our quota, but it's cheaper to just pay off someone in ADF&G.

Their scheme for 2009 was to not send out the plastic cards. With no cards there could be no fishery and our quota would transfer for sure to their seine and gillnet fleet.

I called the Entry Commission in May 2009 and they told me somebody in ADF&G had told them to cancel our fishery. I called Tim Sands before the fishery started and he claimed to have no idea that we were not being issued cards.

I called Jeff Regnart in August 2009 and he claimed he had no idea who canceled our fishery.

\*\*\*\*\*  
PROPOSAL 5 - 5 AAC 27.810 to 27.865 Bristol Bay herring fishery. Eliminate reallocation of spawn on kelp quota as follows:

Regulations that give 50% of our unused spawn on kelp quota to the seiners and gillnetters should be eliminated. If they want our allocation, they can lease it from us, the same way these same canneries lease their crab and Pollock quota from each other. If we do not use the quota and we do not lease it, then we should be able to save those fish for next year.

The spawn on kelp permit holders should also be allowed to use our 1,500 ton allocation for kelp pounding, as has been allowed in Norton Sound.

**ISSUE:** The Seattle canneries completely control the herring seine and gillnet fisheries at Togiak. They only buy fish from their pet fishermen and a few CDQ insiders. They will never buy our spawn on kelp because if there are no buyers, then by regulation our unused allocation will transfer to the seine and gillnet fleet that they control.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Most Alaskan fishermen and kelp permit holders, like myself, will never fish Togiak again.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Pounding would cause less waste compared to seining or gillnetting because no fish die. We would just harvest the eggs and the fish would swim away and return next year.

Pounding would also result in a more valuable product than picking wild kelp does.

**WHO IS LIKELY TO BENEFIT?** Spawn on kelp permit holders would get our allocation back, that was taken from us.

**WHO IS LIKELY TO SUFFER?** Several big canneries might go bankrupt.

**OTHER SOLUTIONS CONSIDERED?** Pay big money for campaign contributions and consulting fees and change the rules that way. Rejected because I have no money and there might be FBI problems.

**PROPOSED BY:** Sidney A. Nelson

(SC-09F-012)

\*\*\*\*\*

Crab and halibut quota is worth at least five times the dockside price paid to the fishermen. Our 1,500 ton quota at a rock bottom price of \$125 per ton should be worth around one million dollars. That is what they are trying to steal from us.

I would advise everyone to renew your permit for 2009 and get a receipt of some kind. Since there was no fishery for us, they should return your money.

I put in a proposal for the Board of Fish to consider during their Dec. 2009 meeting. You could send written comments to the Board of Fish. I am interested in any ideas that might save our fishery.

Thanks,  
Sid Nelson  
Box 564 Homer Ak. 99603  
907-235-4021

P.S. The Togiak seine and gillnet fisheries close June 1. Our spawn on kelp fishery does not close until June 30. How can Tim Sands be sure some kelp buyer won't show up late and want to buy our kelp?

He is just frantic to transfer our quota so he can kill the full 20% of the run every year. What is he worried about? Overescapement? Somebody needs to tell him that herring don't die when they spawn, like salmon do.

As far as I am concerned, if the price is \$125 per ton we should go on strike forever. Most of us also fish for crab, halibut and salmon. I believe our 1,500 ton quota has more value as feedstock for the other more valuable fisheries that we are still allowed to participate in.

When our quota is allowed to transfer, we have lost our right to go on strike.

I had to buy my kelp permit. When Tim Sands transfers our quota to the canneries and their pets, they get it for free.

This warrant will be administered as unclaimed property under AS 34.48 unless redeemed within six months after the date of issue.

STATE OF ALASKA  
TREASURY WARRANT  
GENERAL FUND

CHIT No. 28516692

WARRANT NO.  
23435362

89-52/1252

DATE OF ISSUE MAY 28, 2009

PAY

SEVENTY-FIVE AND NO/100 DOLLARS

TO THE ORDER OF

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11900 23435362

SIDNEY A. NELSON

BOX 564  
HOMER AK 99603



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REMITTANCE ADVICE - STATE OF ALASKA TREASURY WARRANT - NOT NEGOTIABLE						STOCK NO. 28516692
WARRANT NO. 23435362	MO DAY YR 05 28 09	VENDOR SIDNEY A. NELSON			VENDOR ID. CFE99999	
STATE OFFICE MELEHOKO MAAKE		PHONE 907 790-6934	DOCUMENT AA22101980008	AMOUNT PAID \$75.00		
TYPE CUS	REFERENCE NUMBER SIDNEY NELSON	DATE 05 28 09	COMMENTS L12T FISHERY CLOSED 2009		AMOUNT 75.00	
<p>5 AAC 27.810. FISHING SEASONS AND PERIODS FOR BRISTOL BAY AREA.</p> <p>(a) In the Togiak and Bay Districts, herring may be taken by purse seines and hand purse seines from April 15 through June 1.</p> <p>(b) In the Togiak and Bay Districts, herring may be taken by gillnets from April 15 through June 1.</p> <p>52</p> <p style="text-align: center;"><b>HERRING FISHERY</b></p> <p>(c) In the Togiak and Bay Districts, herring spawn on kelp may be taken from April 15 through June 30.</p> <p>(d) In the Togiak and Bay Districts, herring and herring spawn on kelp may be taken only during periods established by emergency order.</p> <p>(e) The seasons in (a) - (c) of this section may be modified in accordance with 5 AAC 27.865.</p>						
MAKE INQUIRIES ABOUT PAYMENT TO OFFICE LISTED ABOVE						



Good \_\_\_\_\_ Mr. Chairman and members of the Board

RC 42

My name is Richard Alto. I am a lifelong resident of Egegik.

I have been fishing since I was ten years old. I have been a drift gill net fisherman for twenty five years. I am here testifying on my own behalf.

I oppose changing the 32 foot boat limit. For example, if you want a forty footer just because of refrigeration – A 32 footer can get refrigeration on too – I also hear that these new compact refrigeration units can fit in any 32 foot boat and they work real well.

We are learning new ways to get a better quality fish into the market without changing the boat length. Quality is gradually changing now. Now is NOT the time to do away with the 32 foot boat limit.

Changing the 32 foot boat limit will harm my community. It will make it harder for the local fisherman to make a living – and for no good reason.

I oppose all of the stacking proposals – Proposals 16 through 21.

Stacking set net permits would be impossible to keep track of simply because they are mobile and can move anywhere there is not enough enforcement to keep track of them.

I am also opposed to proposals 20 and 21 that ask for 200 or 300 fathoms of drift gear for holding two permits. Again, this proposal will hurt my community and disadvantage local residents.

\*\*\*

I oppose proposal 31 that would allow fishing in the General District. If we extend the boundary further out we definitely intercept fish going to other districts.

That concludes my comments.

Thank you for the opportunity to speak to you today.

xxx

**Ralph Zimin**  
P.O. Box 242  
King Salmon, AK 99613

December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Chairman and Members of the Board,

**I OPPOSE PROPOSAL 15 – Repealing the 32' Limit**

I am a third generation fisherman of over 40 years. I oppose elimination of the 32' length justified by improving quality and safety! Most processors have limits of the 12,000 pounds or less, as low as 4,000 to 5,000 pounds during the main run. Present 32' vessels can handle this.

There will not be enough funds, capital, loans, etc. to accomplish a fleet-wide change over! There are not enough builders and shipwrights to even attempt this task in Bristol Bay. The cost to ship vessels out and back would add an even greater burden that our fishermen cannot afford.

Moreover, the depressed economy – no jobs during the off season, no other industry prevents the average fisherman or fisherwoman from being able to accomplish an upgrade. The cost of a larger vessel would be in excess of \$500,000.00

Local residents already are challenged with higher costs of living and inflation. This would be unbearable burden. Most simply would not be able to attempt it. Thus they and their future generations would literally be outsourced.

**I OPPOSE PROPOSALS 16, 17, 18, 20, 21, and 24**

I oppose permit stacking, an unfair disadvantage which affects local residents of villages and Bay watershed communities. Once again limited entry which was designed to give an equal opportunity to all is altered to benefit those of a geographical area where the economies are healthier. Quite frankly where there is a greater abundance of jobs which enable greater investments.

Most of Bristol Bay and southwest communities depend solely on the commercial fisheries for their income. Either directly or indirectly from companies that support the fishery. As well as the proceeds of the fishery help to support the local economies and governments, including schools. Thus we see that loss of permits and involvement in the fishery produces a huge impact.

RC 43

This stacking plan was conceived with the idea to lessen gear. D permit = 50 fathoms.

Yet we see ultimately the reality, the direction, and movement allowing an individual to own and operate two permits which some desire to be at full capacity, 150 fathoms for each permit.

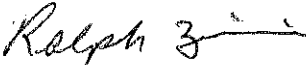
We have already lived the tragedy of a parallel – The Togiak Herring Fishery. I am convinced with the 32' limit and keeping the majority of it a gillnet fishery – I would have resulted in a healthier local economy and created more employment.

**I OPPOSE PROPOSAL 31 – General District Salmon Management Plan**

I oppose the general district salmon management plan for the simple reason it could seriously affect the spawn of the early June run. I know that the early harvest of inbound salmon can be critical to reaching adequate spawning goals. At this crucial time of returning salmon, harvesting in a large open district does not allow for separation of stocks and their final destination.

There is just not enough data to ensure true run strength at the early point of return. There are changes always from year to year. As we have seen in the past, the front part of the run makes up a large portion of the total run.

Thank you,



Ralph Zimin

December 1 2009

Alaska Independent Fishermens Marketing Association

RC44

Hello Board of Fish Members,

My name is David Harsila and I am the President of our association registered in Alaska which represents permit holders who fish in Bristol Bay. We have a nine member board two of which reside in Alaska. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon fishers.

Our comments on all the proposals can be found in the Public Comments # 106. I would like to take this opportunity to comment on proposals #15 and #20.

We think that the vessel overall length issue is a factor of harvest capacity. I remember discussing this issue in 1980 when we had a good argument to increase harvest capacity. We had large fish runs and unlimited process capacity. Our vessels were on average 11 feet of beam, about 8 net tons and had 200 HP or less. Over time fishermen and boat builders invested in new ideas and brought new classes of vessels to Bristol Bay. Now today we can see that the beam, tonnage and horsepower has changed significantly since then to accommodate our needs. We have increased our vessel harvest capacity and increased gear efficiencies, which is also a capacity factor.

We have reached the point of over harvest capacity determined by the CFEC optimum number study. We have heard testimony depicting symptoms of an ailing fishery and we have been working on ways to correct this situation. Our goal is to reduce harvest capacity to help make all remaining drift gillnet operations more profitable. We do not simply want to consolidate the catch on fewer larger vessels. The vessels that we have today are well capable of producing an excellent quality salmon. We oppose proposal 15.

The second issue is reducing the overall number of vessels on the water and gear in the water. This again is a capacity problem that can be mitigated with the permit stacking concept. The goal is to reduce capacity and help increase profitability for fishers. Proposal #20 would allow one person to own and use two permits on one vessel with an additional 50 fathoms of gear. While at the same time still allow two permit holders on one vessel to fish an additional 50 fathoms of gear. This proposal will help accelerate the effectiveness of this concept and achieve individual profitability sooner.

I am available for committee work.

Respectfully submitted

David Harsila

December 1 2009

RC45

Alaska Independent Fishermens Marketing Association

Mr. Chairman and members of the board, my name is Fred Marinkovich, I have a seat on the board of AIFMA and am representing AIFMA. I have been drift gillnetting in Bristol Bay for 22 years and also own a set net permit. We have submitted our comments on all of the proposals and can be found in Public Comment #106.

I would like to touch on proposals # 25, 32, 34.

On proposal # 25 we support a concept that would relax the 48 hour transfer rule at the start of the season in order to increase harvest opportunities for the early part of the season. I would like to work on this issue in committee B.

On proposal #32 we oppose because this is an allocation issue and has the potential to significantly change catch numbers between set and drift in the NRSHA.

On proposal #34 we support returning to the Naknek Kvichak allocation plan that would apply to the NRSHA.

I am available to serve on committees B and C.

Thank you

Fred Marinkovich

**Daniel Kingsley**  
P.O. Box 449  
Pilot Point, AK 99649

December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

RC 46

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Chairman and Members of the Board,

Good morning chairman and members of the Board. I'm Daniel Kingsley from Pilot Point, Alaska located in the Ugashik District, I'm here today representing myself, my second generation commercial fishing family, and my crew. This morning I would like to comment on several of the most controversial proposals before the Board. These proposals are Proposal 15, eliminating the 32 foot limit, and Proposal 20 (permit stacking).

**I SUPPORT PROPOSALS 15 and 20**

Proposals 15 & 20 were brought to the table during the last Board cycle meeting held in Dillingham. These were proposals introduced as controversial alternatives to status quo. It became apparent when the ex-vessel price of our sockeye bottomed out five years ago that Bristol Bay fishermen and processors had to make some drastic changes in the way we handled, marketed, chilled, processed and transported our fish. All of these aforementioned objectives have one common goal. To improve the quality of our end product or as an independent fisherman it would not be economically feasible to participate in this fishery.

There has been a lot of public testimony concerning the adverse economic effect the adoption of these proposals would have on the local watershed fishermen. As a local watershed fisherman myself I would like to offer a little different perspective. First of all, I think it is a tragedy that we are losing local ownership of our permits but I think the real underlying reason is that it makes more economical sense for these local residents to ascertain shore employment (if available) or depend on government welfare than it is to continue fishing in a fishery that one cannot make a reasonable income to support their families. The only way we can reverse this outward migration of locally owned permits is to improve the ex-vessel price of the fish and that can only be achieved with the improvement of the quality of our product. We have demonstrated that status quo will not work in today's world economy.

Yes, a lot of the permits are being purchased by out-of-watershed fisherman because most of these individuals participate in a number of other fisheries to economically survive. These fishermen own other, larger vessels, up and down the west coast and Alaska. Fishing Bristol Bay for these fishermen makes economic sense because of the short, intense, nature of the fishery. Local residents that own the older, small, un-refrigerated boats are stuck in Bristol Bay with very few market opportunities. These vessels are basically useless for any other fisheries around the State.

So are we asking our local fishermen to purchase larger boats and fish in other fisheries around the State? The answer is no. With the adoption of proposal 15 we are offering the local fishermen the opportunity to lengthen their vessels to accommodate some form of on-board processing so they can participate in the early king and late coho and sockeye fisheries. Since we already live in the Bay area this is no real hardship and would drastically elevate our financial bottom line. The writing is on the wall - if you want to fish and live in the Bristol Bay region one needs a larger vessel to accommodate some form of quality improvement technology or equipment. I strongly believe that the residents of Bristol Bay and our local governing entities have the financial resources, integrity, expertise and motivation to offer the local fishermen some form of assistance programs to make this up-grade of our local fleet a financial reality.

I would like to make a few comments regarding Proposal 20. Per the recommendations of the Restructuring Committee the fishermen of Bristol Bay were asked to adopt regulatory measures to reduce the amount of gill net gear currently fishing in Bristol Bay, This directive was not only to improve our financial bottom line but to also assist with the improvement of the quality of our fish. We were asked to accomplish this without any financial assistance from State and Federal governments. As you Board members are well aware, most gear reduction or consolidation programs within a commercial fishery are financed in-part by a government entity. We as Bristol Bay fishermen were never offered such assistance, hence, Bristol Bay fishermen and this very Board temporarily adopted the permit stacking concept. Permit stacking is working. We have reduced the amount gear fishing, improved the quality of our fish and at the same time created the opportunity for fishermen to justify the large capital expense of purchasing a refrigeration system.

#### **I SUPPORT PROPOSALS 29 and 30**

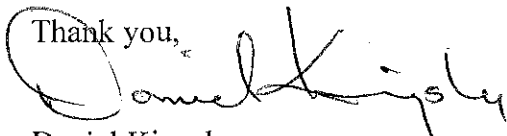
I would like to go on record in support of Proposals 29 & 30.

#### **I OPPOSE PROPOSALS 17, 18, and 19**

In addition, I would like to urge the Board not to adopt Proposals 17, 18 & 19. I cannot envision a set netter having 100 fatoms of gear permanently fixed to the bottom in-front other fishermen's 50 fatoms. In addition, this proposal is not consistent with the Board's directive to reduce the amount of gill net gear fishing in the Bay.

In closing, this fishery is no longer "Just Barely Hanging On" we are working together with our processors to improve our quality and are moving forward to supply the world market with a world class product. If we go back to status quo we might as well adopt this "hanging on" clique for many years to come. I will be available for committee participation.

Thank you,



Daniel Kingsley

**Robert Heyano**  
P.O. Box 1409  
Dillingham, AK 99576

December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

RC 47

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Chairman Webster and members of the Board of Fish,

For the record my name is Robert Heyano. I'm a life long resident of the Bristol Bay region. I participate in the Bristol Bay subsistence fishery, sport fishery, commercial salmon drift gill net fishery and the Togiak herring purse seine fishery. I've organized my comments on the proposals before you today in the same order as they appear by Committee.

### **COMMITTEE A**

#### **SUBSISTENCE**

#### **I OPPOSE PROPOSALS 1-2-3**

I'm opposed to these proposals. I believe that current regulation of 7 day a week fishery without any harvest limits provides for more than a reasonable opportunity for subsistence users to harvest kings.

In reviewing the Department's report on Subsistence Fisheries of the Bristol Bay Management Area pertaining to the Nushagak District, I noted that the average number of permits issued from 1998 to 2007 was 522 permits with an average harvest of 12,495 kings, averaging 24 kings per permit.

Average number of permits issued from 1988 to 2007 was 502 permits with an average harvest of 12,372 kings, averaging 26.6 kings per permit.

Average number of permits issued from 1987 to 1996 was 465 permits with an average harvest of 13,047 kings, averaging 26 kings per permit.

Average number of permits issued from 1997 to 2006 was 527 permits with an average harvest of 13,408 kings, averaging 25.4 kings per permit.

This information shows no noticeable decline in the average number of kings harvested per permit or in the average total harvest of kings in the Nushagak District.

Allowing drift gillnetting to take place during the king salmon sport fishery will create serious conflicts between the two user groups.



## **HERRING**

**I SUPPORT PROPOSAL 4** I view this as house keeping.

**I OPPOSE PROPOSAL 5** I oppose eliminating the ability of the Department to allow 50% of unused spawn on kelp harvest to be utilized in the Togiak herring sac roe fishery. In a region where there are only a limited amount of fishery opportunities we should maximize opportunities. I have no comment on allowing a pound fishery.

**I OPPOSE PROPOSAL 6** If additional harvest of the unused spawn on kelp fishery quota can be harvested by other gear groups it should be within the Togiak District.

**I SUPPORT PROPOSAL 7** House keeping.

## **COMMITTEE B**

**I OPPOSE PROPOSAL 14** This proposal if adapted would cause unreasonable hardship on those set netters that need to have a large minus tide in order to place their anchoring device.

**I OPPOSE PROPOSAL 15 THROUGH 20** Restructuring Proposals

I'm opposed to all of the Restructuring Proposals. These proposals seek to restructure only the harvesting sector of the industry. I'm hoping that all the Board members have had the time to review and become familiar with the restructuring guidelines. The independent research that was funded by BBEDC clearly shows that only those fishermen that have access to additional capital will be able to pass. The researcher further shows that currently it will be those fishermen that are currently receiving the largest share of the economic wealth from the fishery. These Restructuring Proposals will do little if any to increase the over all value of the fishery. What they are designed to do is to further shift the existing revenue in the fishery to those that have access to capital from those who do not.

I support the existing permit stacking regulations for both the set net and drift gill net fishery. I believe they provide the correct balance of opportunity without requiring a large amount of additional capital investment. The existing regulations provide opportunity for new entries into the fishery under the existing limited entry program. Opportunities for new entries do not exist in very many other commercial fisheries.

The problem in the Bay, for producing a higher quality product there by increasing value, is that there has not been sufficient management changes of the fishery to responded according to the changed market demands for a consistent, higher quality product in fresh or frozen product form. We still manage the fishery for the 1 pound tall canned product. I.E. large harvests over a short period of time. Larger vessels will do little to change this situation. What we need to do is focus our attention and energy on what we can do to increase the quality of product, be able to produce the correct product mix into the market and reduce the amount of foregone harvest that takes place in the Bay. The solutions to these problems would increase the value to all fishermen.

**I OPPOSE PROPOSAL 21** Opposed in favor of the existing regulation of 200 fathoms. I don't understand the explanation under WHAT WILL HAPPEN IF NOTHING IS DONE.

**I OPPOSE PROPOSAL 22** This proposal would place an unnecessary economic hardship on those fishermen that secure a second permit before the season through an emergency transfer or hire a second permit holder as a crewman. These arrangements usually require up front monies or a larger crew share. The vessel owner and first permit holder should be provided a reasonable opportunity to capitalize on the second permit.

**I OPPOSE PROPOSAL 23** Allowing 200 fathoms of gear to be fished on a vessel with 2 Bristol Bay drift gill net permits aboard provides a great opportunity for new entries into the fishery without having the additional financial burden associated with the operation of a drift gillnet operation. This is especially important to those new entries that don't have access to a lot of capital. It also provides an alternative, to selling a permit to those individuals who are facing financial difficulties by allowing them to acquire additional income from the fishery as a second permit holder.

**I OPPOSE PROPOSAL 25, 26, and 28** In favor of the existing regulation. The 48 hour transfer regulation has been in effect in the Bay for a long time. Significant changes to the existing 48 hour transfer regulation would be highly allocative. I would ask the Board to allow electronic transfers to take place 24 hours a day. The currently electronic transfers are only allowed during the Department's office hours with are 8:00 AM to 6:00 PM. This would allow the 48 transfer time to be a 48 hours during the time from 6:00 PM to 8:00 AM the following day.

**I SUPPORT PROPOSAL 31** This is a partial solution to reducing the amount of foregone harvest and improving quality. The forecasted 2010 harvest is for 30.5 million sockeye. The Department estimates that any harvest over 25 million will result in limits and suspensions in the Bay. The BBEDC commissioned study by the McDowell Group shows that for the years 2003 through 2008, the loss of revenue to fishermen due to foregone harvest was \$131,000,000.00. The loss of revenue at the first wholesale price was \$360,000,000.00. This averages out to \$21,875,000.00 per year of loss revenue to fishermen and \$60,012,000.00 loss revenue per year at the first wholesale price. The advances made in the Port Moller Test Fish Program now provides the Department with an advanced look at what the sockeye return is compared to forecast. This information should provide the Department with sufficient time to compare run strength to forecast and make the necessary adjustments if necessary. Spreading the harvest out over a longer period of time allows fishermen and processors to produce more quality salmon.

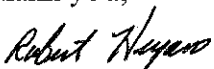
## **COMMITTEE C**

**I OPPOSE PROPOSAL 43** If additional protections are needed for Nushagak king salmon, I would prefer they be made in the Nushagak-Mulchatna Chinook Salmon Management Plan. I don't believe that at this time additional protections are warranted. Since 1966 the escapement has been below the current low end SEG 40,000 kings, just 3 times. Within the last 10 years the escapement has been above the in river goal of 75,000 kings, seven times never below 40,000. Based on these numbers I believe that the current plan has sufficient protection for Nushagak kings.

**I SUPPORT PROPOSAL 44 and 45** Any time we can adjust fishing boundaries without making substantial changes that allow for less lines and points is a better situation for fisherman. The BOF has done this in the past and provides less confusion for the harvesters.

I would like to serve on Committees A, B, and C.

Thank you,



Robert Heyano

**Comments to the Alaska Board of Fisheries on Bristol Bay Finfish Proposal**

**December 2, 2009**

**By**

**Joe Chythlook**

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AC48

**Mr. Chairman and Board Members, first of all I want to thank you for this opportunity to make a few comments on some of the Bristol Bay Finfish proposals which are before you. As in the past, you will be discussing and taking action on them shortly. And you can see and recognize, many of the proposals before you have been submitted time and time again by various people and individuals to fix some perceived problem within the existing regulation book. And in many cases, a lot of time and discussion has already been spent by past Board of Fisheries members, Alaska Department of Fish and Game personal, Fish and Game Advisory Committee members and many members of the public at large on some of the proposals before you again.**

**For the record, I have been involved as a commercial salmon fisherman in Bristol Bay for close to sixty years. I have owned and operated my own Bristol Bay drift net fishing business since the early 1960s. And I recently retired from working for ADF&G, Board Support Section, after 21 seasons last spring. So I have been somewhat involved in all aspects of the Bristol Bay salmon fishery for many years and have also seen many changes. I am also currently Chairman of the Bristol Bay Native Corporation Board of Directors.**

**That being said, I have learned to appreciate the great responsibility that is placed on you as you try to fix perceived problems with the fishery that have been fixed time and time again.**

**My humble observation is this: The best regulations that we have in place are the ones that have passed the test of time. Therefore, I am for maintaining and**

keeping most of the “old” and “tested” regulations that have been in place since the Bristol Bay fishery started many years ago.

This means I support maintaining the 32 foot limit; keeping the 48 hour transfer regulation; and opposing taken any action to further “restructure” the fishery from what it is presently. I favor maintaining the permit stacking regulation as is which is to allow two permit holders to fish one vessel. The only changes that I would recommend would be to 1) not allow permit stacking in any district if the Kvichak River run is in trouble again; and 2) not allow permit stacking in the Togiak Distrist.

Finally, as a lifetime subsistence fisherman, I would support the proposals addressing drifting and lengthening the subsistence nets from 10 fatoms to 25 fatoms for the reasons stated by the proposers.

Thanks again for the privilege of addressing you and I can be available to sit in on any Committee Panels as needed.

December 2, 2009

Val Angasan  
Dillingham, AK

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5226

RC 49

Thank you Mr. Chairman, Mr. Webster, board members, staff, thank you for the opportunity to testify on Bristol Bay Finfish proposals. I especially want to acknowledge John Hilsinger, Jim Fall and others that were here 20 years ago.

My name is Val Angasan. The executive director of the Bristol Bay Housing Authority, Dave McClure believes that some of the proposals are so far reaching that he felt it necessary to send someone here to represent the Housing Authority in a general capacity. The Housing Authority wants its homebuyers to continue making their payments and thrive.

A little bit about my background. Many of us like Heyano, and Samuelson, have been involved in Bristol Bay in some capacity publically ever since the late 1970s.

My first public exposure to the Bristol Bay fishery has been with Alaska Independent Fisherman's and Marketing Association in 1979. Since then, have worked as an economic planner for the Bristol Bay Native Association, General Manager for the Bristol Bay Herring Marketing Co-op in the early 1980's, member of the Alaska Board of Fisheries from 1982 to 1989, a deck hand in a Bering Sea trawler for five years during the winter months of the 1980's, drift permit holder, and a member of a fishing family going back to the early 1900's. Currently am a department director for the Bristol Bay Housing Authority, and finishing a graduate program with a college in Texas.

With that, I want to comment in general on proposals that attempt to change the very face of the Bristol Bay fishery. Specifically, beginning with proposals to eliminate or alter the length restriction on Bristol Bay salmon vessels. These proposals and others including the ones to reduce or eliminate the 48 hour transfer restriction, have been

appearing before this board ever since the Magnuson Steven's Act was passed in the mid 1970's.

I caution those board members who are new to the fisheries board process to take a very conservative approach to revolutionizing our fishery in the Bay. Five of you are new to the public hearing process for Bristol Bay. If I can relate a story:

When Governor Sheffield changed most members of the Fisheries Board, we accommodated by changing many regulations from Kotzebue to the Aleutians, to the Dixon Entrance. We thought we were doing the public a favor by fixing perceived problems. I can sit here and tell you with no uncertainty, that wholesale changes to fisheries changed those respective fisheries forever. Hindsight says I should have never voted to shut down various fisheries or parts thereof in the Alaska Peninsula, or Hawk Inlet in Southeast Alaska. At the time everything seemed perfectly logical and with sound reasoning.

In regards to proposals such as Proposal 15 to eliminate salmon vessel length, Proposal 16 and similar to allow one person to fish more than one permit; and proposals to liberalize Togiak;

Please take the conservative stand and vote no.

Please continue to solve problems with compressed run timing and limited processing capacity. We have a bay wide sharp bell curve and processing capacity that does not allow for peak period harvesting opportunity.

A resolution should be sent to the State Legislature to ask them to help our processors by sharing the risk of adding extra processing equipment, tenders, personnel, and bank notes to pay for expenses that do not pencil out for pay-back benefits for processors.

The problem in Bristol Bay is one not experienced in other areas. We have 25-40M fish entering the Bay in a very short period of time-in about a week. That is the challenge. Look for solutions to meet that challenge. Look outside your pervue.

Please look at the slides from Northern Economics, and recall general comments from Dr. Knapp. They tell the truth. Help the companies retool to accommodate fresh frozen markets so prices will allow the local fishers to modify their existing boats.

Final comment:

Togiak has a flat bell curve on the time line. This means they don't have the 5 day peak periods that the eastern and Nushagak districts experience. Relatively speaking, they catch small amounts of fish for weeks at a time. They will be severely impacted by eliminating the 24<sup>th</sup> restriction.

Thank you Mr. Chairman and good luck.

Val Angasan

RENE O'CONNOR  
DILLINGHAM, ALASKA

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December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5226

RC 50

**I OPPOSE Proposal # 14 Gear Removal**

This is impossible for me to do as a set netter on the Ekuk beach. Ekuk beach is different than many of the other beaches in the Bristol Bay. We fish with a pulley system using pegs, ropes and trucks( not skiff's). We put our pegs out at a minus 3 tide to be able to put our pegs out and this only happens a couple times during our season. We can not use anchors because of the make up of our beach, our openness to heavy weather and swift current makes this impossible. There are only a handfull of Ekuk fishermen that own a skiff because it is impossible to effectively and more importantly, safely run a skiff fishery from our beach.

**I OPPOSE Proposal # 15 32' limit removal**

I oppose the removal of the 32' limit, according the Department of Fish and Game they do not see a direct cost to the private person to participate in the



fishery, however it will cause direct cause for a private person to compete. If I have an older style 32' fiberglass boat, in order to compete with a newer larger boat I would have to buy a new larger boat. How is this no cost the private person? Larger boats would run the smaller fishermen out of business and it would become an exclusive fisheries. They will be the boats stacking the permits if allowed, they will be running a full set of gear, originally the D-Permit was designed to help the guy that had a permit but no boat. Now, we have guys who are using this for the sole purpose of getting bigger faster boats. They buy a second permit for a family member who is essentially a crew member working for a percentage so that the Captain/Permit owner can get richer.

With the addition to the larger boats comes other problems monetary cost aside.

The smaller boat would be subject to being ran over by the larger boat while drifting. There is already a "Bullying" issue which would become worse. There is already a problem with ramming and grabbing on to ones gear and pulling it out of an area going on out on the water, with a larger discrepancy of size in boats, it would only make it so that the smaller boat can not hold

his own ground and would not be able to follow the fish competing in the market with out being “ran out”

There is already a shortage of processing power, larger boats scoping up larger amounts of fish at a time, would not help our processing problem, it would simply the local watershed resident out of business, and turn this fishery into a super exclusive fishery for out of state residents with high income winter jobs, who can afford these larger boats.

We also do not have the infrastructure to support this change which is another cost to consider. For those local residents to be able to pull there boats out and store them, there will need to be larger trucks, trailers and cranes.

### **I OPPOSE Proposal # 16-21 Permit stacking**

I believe this proposal goes hand and hand with proposal #15. Originally permit stacking was implemented to help remove gear form the water, but now I feel this is designed is used to make an exclusive fishery out of the Bristol Bay for out of state fishermen who have other economic opportunities, a classic case of the big guy with all the big toys bullying the little guy. Larger boats and more gear per boat will only run out the little guy and make it impossible for those who depend on the fisheries for there

yearly income to be able to feed there families for the winter. Do we really want to tell the family in the rural village in Alaska that we don't care if they can feed there family while some guy in a large city gets a bigger house, nicer car and can go out to eat twice a week at there expense?

**I OPPOSE Proposal # 31 General District**

This "General District" should be called an Interceptor District! This is all it can do, all of these fish are designated somewhere and by catching them ahead, it is taking away from allocation for a specific area and giving it to an exclusive group of fisherman.

**Earling Krause**

P.O. Box 75  
Manakotak, AK 99628

RCS1

December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Chairman and Members of the Board,

Hello my name is Earling Krause; I am a resident of Manakotak and here representing our community. My travel and lodging here is being funded by BBEDC and other members of the Bristol Bay partnership. I am a set netter in the Igushik section of the Nushagak District. I have fished commercially for over 30 years, the majority of which have been a set netter.

**MANAKOTAK SUPPORTS PROPOSALS 1-4 and OPPOSES PROPOSALS 14, 15 and 31**

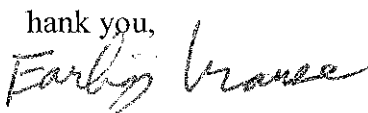
Approximately 85% of the set netters that fish at Igushik are from Manakotak. The set netters that fish at Igushik are from Manakotak. The set netters are strongly opposed to proposal 14; passage of this proposal would make the set net fishery more dangerous due to the necessity of repeatedly setting and pulling anchors. This is also impractical because some anchors must be set at very minus tides, and need to be screw anchors because of the current, a regular anchor would drag. There are only a few of these minus tides each year. There would definitely be a loss of production due to nets dragging and the added danger of going back and forth through the surf on the beach.

Proposal 31, the general district, is detrimental to Igushik and possibly could be responsible for the poor 2004 season. Not only the general district but also the West Channel of the Nushagak District, is an intercept fishery for the Igushik River fish. When the boundaries for the Igushik Section were established years ago, the channel of the Igushik River ran in a more southerly direction. Now it runs in a more easterly direction towards the Nushagak's West Channel.

Therefore, many times when the Nushagak drift fleet is targeting the West Channel, our fish production slows down and increases again when they stop fishing that channel. It happens too many times to be coincidence. Genetic testing of the fish in the West Channel could be used to see exactly which river those fish belong to.

Another issue is the size of the Igushik Channel on the low tides. It is so small at low tide and it takes only a couple of boats to cork it off which prevents set netters from getting any fish in their nets.

Genetic testing correlated with weather and wind conditions, water temperature, and water silt conditions would give a better understanding of how fish travel.

Thank you,  
  
Earling Krause

EDDIE CLARK  
NAKNEK, ALASKA

I HAVE FISHED THE EGEGIK DIST. FOR 57 YEARS.

~~PROP 38~~

RC 52

WHEN THE ALLOCATION STARTED-

THE EGEGIK DIST. HAD—920-1080 BOATS  
TODAY WE AVERAGE -- 300-350 BOATS

THERE IS APPROX. 1830 DRIFT PERMITS IN BRISTOL BAY  
ONLY 1420 DRIFT PERMITS FISHED IN 2009.  
OF THE 1420 -----250 WERE DOUBLE STACKED-

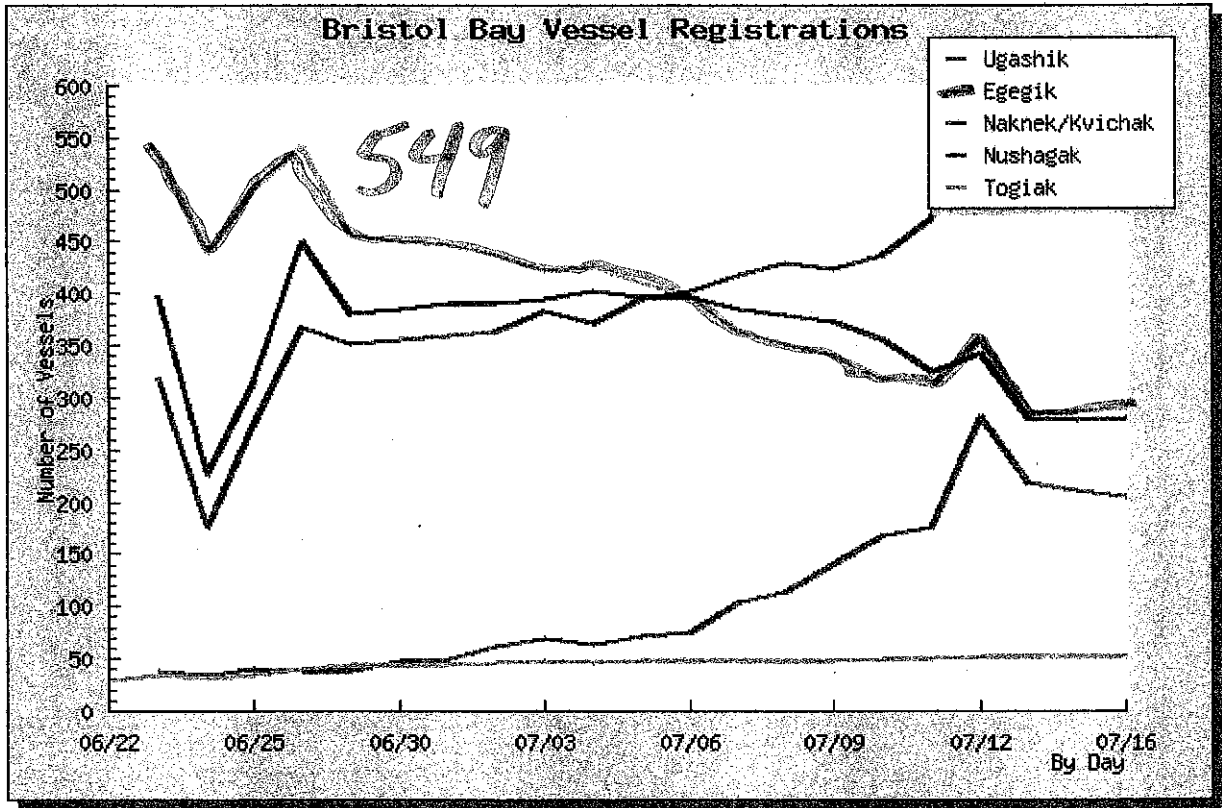
1420-MINUS 125 (HALF OF THE 250 DOUBLE STACKED )

1420  
MINUS -125  
DRIFT PERMITS USED IN 2009 ---1295

1295 OF THE 1830—SO APPROX. 535 DRIFT PERMITS WERE NOT USED.

SO APPROX. 30% WERE NOT USED-

AND YET WE DO NOT TAKE THIS INTO CONSIDERATION-  
THE ALLOCATION IS WAY OUT OF WACK IN THE EGEGIK DIST.  
PLEASE LOOK AT DATA-AND HELP US—MY FAMILY NEEDS TO MAKE  
A LIVING ALSO...



2009

AVERAGE - 418



ADF&G - Division of  
**Commercial Fisheries**

[www.cf.adfg.state.ak.us](http://www.cf.adfg.state.ak.us)

## Bristol Bay Inseason Report

### Vessel Registration

# Bristol Bay Inseason Vessel Registration Report:

Vessel Registration Report (Below) - Daily Run Summary - Sockeye Catch Per Boat - Port Moller Indices

### Bristol Bay Vessel Registrations

Preliminary Data

Report as of:	14-JUL-09	16-JUL-09
Ugashik	206	206
Egegik	<del>291</del>	291
Naknek-Kvichak	502	514
Nushagak	279	281
Togiak	52	52
<b>Total</b>	<b>1,330</b>	<b>1,344</b>

Table 8.—Daily district registration of drift gillnet permit holders by district, Bristol Bay, 2008.

Date	Naknek-Kvichak	Egegik	Ugashik	Nushagak	Togiak	Total
6/22	138	226	31	160	32	587
6/23	150	251	43	185	32	661
6/24	159	270	67	261	35	792
6/25	178	293	74	300	37	882
6/26	287	299	91	314	38	1,029
6/27	351	319	91	441	38	1,240
6/28	362	326	94	468	40	1,290
6/29	373	328	101	469	40	1,311
6/30	382	329	101	467	40	1,319
7/01	382	328	103	470	41	1,324
7/02	382	325	105	468	41	1,321
7/03	395	325	107	437	44	1,308
7/04	410	323	111	389	48	1,281
7/05	430	320	121	362	48	1,281
7/06	459	320	134	360	49	1,322
7/07	484	316	143	361	49	1,353
7/08	483	308	150	361	49	1,351
7/09	490	295	154	359	51	1,349
7/10	491	285	162	358	51	1,347
7/11	495	265	174	348	51	1,333
7/12	492	165	181	323	52	1,213
7/13	498	222	197	309	52	1,278
7/14	529	212	202	294	52	1,289
7/15	543	207	179	289	52	1,270
7/16	608	204	178	289	52	1,331
Average	398	282	124	354	45	1,202



**Table 8.**—Daily district registration of drift gillnet permit holders by district, Bristol Bay, 2007.

Date	Naknek-Kvichak	Egegik	Ugashik	Nushagak	Togiak	Total
6/19	117	140	36	292	16	601
6/20	136	190	33	292	18	669
6/21	154	255	29	292	23	753
6/22	167	367	17	294	25	870
6/23	178	389	306	13	28	914
6/24	197	374	25	400	28	1,024
6/25	264	376	26	484	28	1,178
6/26	281	361	33	613	33	1,321
6/27 <sup>a</sup>						
6/28	291	364	46	714	40	1,455
6/29	303	368	68	721	40	1,500
6/30	324	366	75	741	41	1,547
7/01	327	355	88	741	41	1,552
7/02	327	357	93	739	41	1,557
7/03	331	354	107	712	44	1,548
7/04	329	357	118	692	46	1,542
7/05	335	359	142	652	46	1,534
7/06	337	361	162	615	47	1,522
7/07	353	362	189	554	50	1,508
7/08	383	353	200	516	50	1,502
7/09	415	357	217	495	50	1,534
7/10	441	354	232	257	50	1,334
7/11	459	388	238	436	51	1,572
7/12	490	364	284	384	51	1,573
7/13	497	322	317	368	51	1,555
7/14	539	264	340	331	51	1,525
7/15	568	241	388	317	51	1,565
7/16	599	222	428	314	51	1,614
7/17	597	220	440	313	51	1,621
<b>Average</b>	<b>348</b>	<b>326</b>	<b>167</b>	<b>475</b>	<b>41</b>	<b>1,357</b>

<sup>a</sup> Registration information not available.

**Table 9.**—Daily district registration of drift gillnet permit holders by district, Bristol Bay, 2006.

Date	Naknek-Kvichak	Egegik	Ugashik	Nushagak	Togiak	Total
6/19	32	106	51	346	11	546
6/20	41	110	68	348	14	581
6/21	54	178	65	369	17	683
6/22	72	255	49	394	24	794
6/23	87	290	11	414	24	826
6/24	113	323	11	451	25	923
6/25	156	349	9	581	26	1,121
6/26 <sup>a</sup>						
6/27	256	387	8	627	37	1,315
6/28	345	372	8	647	40	1,412
6/29	362	373	10	655	41	1,441
6/30	371	364	13	669	42	1,459
7/01	378	362	21	670	42	1,473
7/02	373	355	29	673	43	1,473
7/03	344	345	37	681	44	1,451
7/04	344	337	60	687	44	1,472
7/05	335	353	77	686	44	1,495
7/06	329	350	93	685	47	1,504
7/07	325	343	103	658	47	1,476
7/08	326	331	121	662	48	1,488
7/09	329	331	157	660	48	1,525
7/10	333	320	164	617	48	1,482
7/11	340	317	153	608	48	1,466
7/12	557	285	148	513	52	1,555
7/13	635	258	147	465	54	1,559
7/14	640	259	152	462	54	1,567
7/15 <sup>a</sup>						
7/16	638	294	133	440	54	1,559
7/17 <sup>a</sup>						
<b>Average</b>	<b>312</b>	<b>306</b>	<b>73</b>	<b>564</b>	<b>39</b>	<b>1,294</b>

<sup>a</sup> Registration information not available.

**Table 9.**--Daily district registration of drift gillnet permit holders by district, Bristol Bay, 2005.

<b>Date</b>	<b>Naknek-Kvichak</b>	<b>Egegik</b>	<b>Ugashik</b>	<b>Nushagak</b>	<b>Togiak</b>	<b>Total</b>
6/20	47	249	61	349	25	731
6/21	74	382	53	394	26	929
6/22	81	361	53	443	27	965
6/23	99	371	25	560	33	1,088
6/24	110	365	25	645	38	1,183
6/25	138	366	25	678	42	1,249
6/26 <sup>a</sup>						-
6/27	199	433	27	616	43	1,318
6/28	206	453	30	601	45	1,335
6/29	220	512	33	598	45	1,408
6/30	222	522	43	599	46	1,432
7/01	232	515	46	599	50	1,442
7/02	234	490	58	592	50	1,424
7/03	238	467	66	594	51	1,416
7/04	240	451	107	555	51	1,404
7/05	243	373	135	525	51	1,327
7/06	246	345	192	516	52	1,351
7/07	256	316	294	514	52	1,432
7/08	270	310	313	507	53	1,453
7/09	286	295	324	496	54	1,455
7/10	297	262	323	483	54	1,419
7/11	311	251	326	500	54	1,442
7/12 <sup>a</sup>						-
7/13	469	250	282	451	55	1,507
7/14	593	195	248	423	58	1,517
7/15	652	197	215	401	60	1,525
7/16 <sup>a</sup>						-
7/17 <sup>a</sup>						-
<b>Average</b>	<b>248</b>	<b>364</b>	<b>138</b>	<b>527</b>	<b>46</b>	<b>1,134</b>

<sup>a</sup> Registration information not available.

## May - Nushagak Bay

Date	Day	Time	Height	Time	Height	Time	Height	Time	Height	Time	Height
05/01/2010	Sat	06:40AM	LDT 22.2 H	12:53PM	LDT 5.1 L	06:13PM	LDT 15.1 H				
05/02/2010	Sun	12:36AM	LDT -1.6 L	07:31AM	LDT 21.9 H	01:47PM	LDT 5.1 L	07:07PM	LDT 14.6 H		
05/03/2010	Mon	01:26AM	LDT -0.8 L	08:20AM	LDT 21.4 H	02:38PM	LDT 5.0 L	08:01PM	LDT 14.3 H		
05/04/2010	Tue	02:16AM	LDT 0.2 L	09:07AM	LDT 20.8 H	03:27PM	LDT 4.9 L	08:54PM	LDT 14.1 H		
05/05/2010	Wed	03:05AM	LDT 1.2 L	09:50AM	LDT 20.1 H	04:14PM	LDT 4.7 L	09:47PM	LDT 14.0 H		
05/06/2010	Thu	03:54AM	LDT 2.2 L	10:32AM	LDT 19.3 H	04:58PM	LDT 4.3 L	10:42PM	LDT 14.2 H		
05/07/2010	Fri	04:44AM	LDT 3.3 L	11:11AM	LDT 18.5 H	05:41PM	LDT 3.8 L	11:36PM	LDT 14.5 H		
05/08/2010	Sat	05:35AM	LDT 4.4 L	11:49AM	LDT 17.7 H	06:22PM	LDT 3.2 L				
05/09/2010	Sun	12:31AM	LDT 15.1 H	06:27AM	LDT 5.3 L	12:26PM	LDT 16.9 H	07:03PM	LDT 2.6 L		
05/10/2010	Mon	01:25AM	LDT 15.9 H	07:21AM	LDT 6.2 L	01:03PM	LDT 16.1 H	07:43PM	LDT 1.9 L		
05/11/2010	Tue	02:16AM	LDT 16.7 H	08:15AM	LDT 6.8 L	01:41PM	LDT 15.3 H	08:23PM	LDT 1.3 L		
05/12/2010	Wed	03:06AM	LDT 17.7 H	09:09AM	LDT 7.3 L	02:19PM	LDT 14.7 H	09:03PM	LDT 0.7 L		
05/13/2010	Thu	03:53AM	LDT 18.6 H	10:02AM	LDT 7.5 L	02:59PM	LDT 14.2 H	09:44PM	LDT 0.2 L		
05/14/2010	Fri	04:40AM	LDT 19.5 H	10:54AM	LDT 7.5 L	03:41PM	LDT 13.8 H	10:26PM	LDT -0.3 L		
05/15/2010	Sat	05:25AM	LDT 20.3 H	11:44AM	LDT 7.4 L	04:27PM	LDT 13.7 H	11:10PM	LDT -0.7 L		
05/16/2010	Sun	06:10AM	LDT 21.0 H	12:32PM	LDT 7.1 L	05:16PM	LDT 13.7 H	11:56PM	LDT -1.0 L		
05/17/2010	Mon	06:55AM	LDT 21.5 H	01:20PM	LDT 6.5 L	06:11PM	LDT 13.9 H				
05/18/2010	Tue	12:46AM	LDT -1.1 L	07:40AM	LDT 21.8 H	02:08PM	LDT 5.6 L	07:10PM	LDT 14.3 H		
05/19/2010	Wed	01:38AM	LDT -0.8 L	08:26AM	LDT 22.0 H	02:56PM	LDT 4.5 L	08:13PM	LDT 14.9 H		
05/20/2010	Thu	02:33AM	LDT -0.2 L	09:12AM	LDT 21.9 H	03:45PM	LDT 3.1 L	09:18PM	LDT 15.6 H		
05/21/2010	Fri	03:31AM	LDT 0.7 L	09:59AM	LDT 21.5 H	04:35PM	LDT 1.6 L	10:26PM	LDT 16.5 H		
05/22/2010	Sat	04:32AM	LDT 1.9 L	10:47AM	LDT 20.9 H	05:25PM	LDT 0.1 L	11:34PM	LDT 17.6 H		
05/23/2010	Sun	05:34AM	LDT 3.1 L	11:35AM	LDT 20.1 H	06:15PM	LDT -1.3 L				
05/24/2010	Mon	12:40AM	LDT 18.8 H	06:38AM	LDT 4.2 L	12:25PM	LDT 19.2 H	07:06PM	LDT -2.4 L		
05/25/2010	Tue	01:45AM	LDT 20.0 H	07:42AM	LDT 5.1 L	01:17PM	LDT 18.1 H	07:57PM	LDT -3.0 L		
05/26/2010	Wed	02:46AM	LDT 20.9 H	08:45AM	LDT 5.7 L	02:10PM	LDT 17.1 H	08:49PM	LDT -3.2 L		
05/27/2010	Thu	03:45AM	LDT 21.6 H	09:47AM	LDT 6.0 L	03:03PM	LDT 16.1 H	09:40PM	LDT -3.0 L		
05/28/2010	Fri	04:41AM	LDT 22.0 H	10:47AM	LDT 6.2 L	03:58PM	LDT 15.3 H	10:30PM	LDT -2.5 L		
05/29/2010	Sat	05:33AM	LDT 22.0 H	11:43AM	LDT 6.1 L	04:52PM	LDT 14.5 H	11:19PM	LDT -1.7 L		
05/30/2010	Sun	06:23AM	LDT 21.8 H	12:37PM	LDT 6.0 L	05:45PM	LDT 13.9 H				
05/31/2010	Mon	12:08AM	LDT -0.8 L	07:09AM	LDT 21.4 H	01:27PM	LDT 5.8 L	06:38PM	LDT 13.5 H		

All times are listed in Local Standard Time(LST) or, Local Daylight Time (LDT) (when applicable). All heights are in feet referenced to Mean Lower Low Water (MLLW).

## June - Nushagak Bay

Date	Day	Time	Height	Time	Height	Time	Height	Time	Height	Time	Height
06/01/2010	Tue	12:55AM LDT	0.2 L	07:52AM LDT	20.9 H	02:15PM LDT	5.5 L	07:31PM LDT	13.3 H		
06/02/2010	Wed	01:42AM LDT	1.3 L	08:32AM LDT	20.2 H	02:59PM LDT	5.0 L	08:24PM LDT	13.2 H		
06/03/2010	Thu	02:29AM LDT	2.4 L	09:10AM LDT	19.6 H	03:41PM LDT	4.4 L	09:18PM LDT	13.5 H		
06/04/2010	Fri	03:17AM LDT	3.6 L	09:46AM LDT	18.8 H	04:22PM LDT	3.7 L	10:13PM LDT	13.9 H		
06/05/2010	Sat	04:06AM LDT	4.7 L	10:21AM LDT	18.1 H	05:02PM LDT	2.9 L	11:08PM LDT	14.6 H		
06/06/2010	Sun	04:58AM LDT	5.7 L	10:55AM LDT	17.4 H	05:41PM LDT	2.1 L				
06/07/2010	Mon	12:02AM LDT	15.5 H	05:51AM LDT	6.6 L	11:31AM LDT	16.6 H	06:20PM LDT	1.3 L		
06/08/2010	Tue	12:54AM LDT	16.5 H	06:46AM LDT	7.4 L	12:07PM LDT	15.9 H	07:00PM LDT	0.6 L		
06/09/2010	Wed	01:45AM LDT	17.5 H	07:41AM LDT	7.9 L	12:45PM LDT	15.3 H	07:41PM LDT	-0.1 L		
06/10/2010	Thu	02:34AM LDT	18.5 H	08:35AM LDT	8.2 L	01:26PM LDT	14.9 H	08:23PM LDT	-0.8 L		
06/11/2010	Fri	03:22AM LDT	19.5 H	09:29AM LDT	8.2 L	02:11PM LDT	14.5 H	09:06PM LDT	-1.4 L		
06/12/2010	Sat	04:09AM LDT	20.4 H	10:21AM LDT	8.0 L	02:59PM LDT	14.4 H	09:52PM LDT	-1.8 L		
06/13/2010	Sun	04:55AM LDT	21.2 H	11:12AM LDT	7.6 L	03:53PM LDT	14.4 H	10:41PM LDT	-2.1 L		
06/14/2010	Mon	05:42AM LDT	21.8 H	12:02PM LDT	6.8 L	04:51PM LDT	14.5 H	11:31PM LDT	-2.0 L		
06/15/2010	Tue	06:28AM LDT	22.2 H	12:52PM LDT	5.7 L	05:54PM LDT	14.8 H				
06/16/2010	Wed	12:25AM LDT	-1.6 L	07:14AM LDT	22.4 H	01:42PM LDT	4.3 L	07:00PM LDT	15.2 H		
06/17/2010	Thu	01:21AM LDT	-0.7 L	08:00AM LDT	22.3 H	02:32PM LDT	2.7 L	08:08PM LDT	15.9 H		
06/18/2010	Fri	02:19AM LDT	0.5 L	08:46AM LDT	21.9 H	03:22PM LDT	1.0 L	09:17PM LDT	16.8 H		
06/19/2010	Sat	03:19AM LDT	1.8 L	09:34AM LDT	21.3 H	04:13PM LDT	-0.6 L	10:25PM LDT	17.8 H		
06/20/2010	Sun	04:21AM LDT	3.2 L	10:22AM LDT	20.5 H	05:04PM LDT	-2.0 L	11:32PM LDT	18.9 H		
06/21/2010	Mon	05:25AM LDT	4.5 L	11:12AM LDT	19.5 H	05:55PM LDT	-2.9 L				
06/22/2010	Tue	12:37AM LDT	19.9 H	06:28AM LDT	5.5 L	12:03PM LDT	18.5 H	06:47PM LDT	-3.4 L		
06/23/2010	Wed	01:39AM LDT	20.7 H	07:31AM LDT	6.2 L	12:56PM LDT	17.4 H	07:38PM LDT	-3.5 L		
06/24/2010	Thu	02:38AM LDT	21.2 H	08:33AM LDT	6.6 L	01:49PM LDT	16.4 H	08:29PM LDT	-3.1 L		
06/25/2010	Fri	03:34AM LDT	21.4 H	09:32AM LDT	6.8 L	02:43PM LDT	15.4 H	09:20PM LDT	-2.5 L		
06/26/2010	Sat	04:26AM LDT	21.4 H	10:30AM LDT	6.8 L	03:36PM LDT	14.6 H	10:08PM LDT	-1.7 L		
06/27/2010	Sun	05:16AM LDT	21.2 H	11:24AM LDT	6.7 L	04:28PM LDT	13.9 H	10:56PM LDT	-0.7 L		
06/28/2010	Mon	06:01AM LDT	20.8 H	12:14PM LDT	6.5 L	05:20PM LDT	13.4 H	11:42PM LDT	0.3 L		
06/29/2010	Tue	06:43AM LDT	20.4 H	01:01PM LDT	6.1 L	06:12PM LDT	13.1 H				
06/30/2010	Wed	12:27AM LDT	1.4 L	07:21AM LDT	19.8 H	01:44PM LDT	5.6 L	07:04PM LDT	13.0 H		

All times are listed in Local Standard Time (LST) or, Local Daylight Time (LDT) (when applicable). All heights are in feet referenced to Mean Lower Low Water (MLLW).

## July - Nushagak Bay

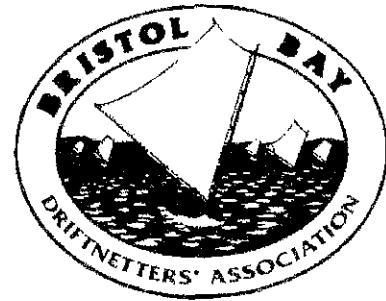
Date	Day	Time	Height	Time	Height	Time	Height	Time	Height	Time	Height
07/01/2010	Thu	01:12AM LDT	2.5 L	07:55AM LDT	19.2 H	02:25PM LDT	5.0 L	07:57PM LDT	13.2 H		
07/02/2010	Fri	01:58AM LDT	3.6 L	08:28AM LDT	18.6 H	03:04PM LDT	4.2 L	08:50PM LDT	13.7 H		
07/03/2010	Sat	02:45AM LDT	4.7 L	09:01AM LDT	18.0 H	03:42PM LDT	3.3 L	09:43PM LDT	14.3 H		
07/04/2010	Sun	03:35AM LDT	5.7 L	09:33AM LDT	17.4 H	04:20PM LDT	2.4 L	10:35PM LDT	15.2 H		
07/05/2010	Mon	04:25AM LDT	6.6 L	10:07AM LDT	16.8 H	04:58PM LDT	1.5 L	11:27PM LDT	16.1 H		
07/06/2010	Tue	05:18AM LDT	7.3 L	10:42AM LDT	16.3 H	05:38PM LDT	0.6 L				
07/07/2010	Wed	12:17AM LDT	17.1 H	06:11AM LDT	7.9 L	11:20AM LDT	15.9 H	06:19PM LDT	-0.2 L		
07/08/2010	Thu	01:07AM LDT	18.1 H	07:05AM LDT	8.2 L	12:01PM LDT	15.6 H	07:01PM LDT	-1.0 L		
07/09/2010	Fri	01:57AM LDT	19.1 H	07:58AM LDT	8.4 L	12:46PM LDT	15.4 H	07:47PM LDT	-1.8 L		
07/10/2010	Sat	02:46AM LDT	20.0 H	08:51AM LDT	8.2 L	01:36PM LDT	15.4 H	08:34PM LDT	-2.3 L		
07/11/2010	Sun	03:34AM LDT	20.8 H	09:44AM LDT	7.7 L	02:32PM LDT	15.4 H	09:25PM LDT	-2.6 L		
07/12/2010	Mon	04:22AM LDT	21.4 H	10:36AM LDT	6.9 L	03:33PM LDT	15.5 H	10:17PM LDT	-2.5 L		
07/13/2010	Tue	05:10AM LDT	21.9 H	11:28AM LDT	5.6 L	04:38PM LDT	15.8 H	11:12PM LDT	-2.0 L		
07/14/2010	Wed	05:57AM LDT	22.1 H	12:20PM LDT	4.1 L	05:45PM LDT	16.3 H				
07/15/2010	Thu	12:09AM LDT	-1.1 L	06:44AM LDT	22.0 H	01:12PM LDT	2.4 L	06:54PM LDT	16.9 H		
07/16/2010	Fri	01:08AM LDT	0.1 L	07:32AM LDT	21.7 H	02:03PM LDT	0.6 L	08:03PM LDT	17.7 H		
07/17/2010	Sat	02:08AM LDT	1.4 L	08:20AM LDT	21.2 H	02:56PM LDT	-1.0 L	09:10PM LDT	18.6 H		
07/18/2010	Sun	03:10AM LDT	2.8 L	09:10AM LDT	20.5 H	03:48PM LDT	-2.2 L	10:17PM LDT	19.4 H		
07/19/2010	Mon	04:12AM LDT	4.0 L	10:01AM LDT	19.7 H	04:41PM LDT	-3.0 L	11:21PM LDT	20.1 H		
07/20/2010	Tue	05:14AM LDT	5.0 L	10:53AM LDT	18.7 H	05:34PM LDT	-3.4 L				
07/21/2010	Wed	12:23AM LDT	20.6 H	06:15AM LDT	5.8 L	11:46AM LDT	17.8 H	06:26PM LDT	-3.3 L		
07/22/2010	Thu	01:23AM LDT	20.8 H	07:16AM LDT	6.3 L	12:39PM LDT	16.9 H	07:19PM LDT	-2.9 L		
07/23/2010	Fri	02:20AM LDT	20.8 H	08:14AM LDT	6.6 L	01:33PM LDT	16.0 H	08:10PM LDT	-2.2 L		
07/24/2010	Sat	03:14AM LDT	20.6 H	09:11AM LDT	6.8 L	02:26PM LDT	15.2 H	08:59PM LDT	-1.3 L		
07/25/2010	Sun	04:04AM LDT	20.3 H	10:05AM LDT	6.8 L	03:19PM LDT	14.5 H	09:47PM LDT	-0.4 L		
07/26/2010	Mon	04:50AM LDT	19.9 H	10:56AM LDT	6.7 L	04:10PM LDT	13.9 H	10:34PM LDT	0.7 L		
07/27/2010	Tue	05:32AM LDT	19.4 H	11:42AM LDT	6.4 L	05:01PM LDT	13.6 H	11:19PM LDT	1.7 L		
07/28/2010	Wed	06:10AM LDT	18.8 H	12:25PM LDT	5.9 L	05:52PM LDT	13.5 H				
07/29/2010	Thu	12:04AM LDT	2.8 L	06:44AM LDT	18.3 H	01:05PM LDT	5.3 L	06:43PM LDT	13.7 H		
07/30/2010	Fri	12:49AM LDT	3.8 L	07:15AM LDT	17.7 H	01:44PM LDT	4.6 L	07:33PM LDT	14.1 H		
07/31/2010	Sat	01:35AM LDT	4.7 L	07:47AM LDT	17.2 H	02:21PM LDT	3.8 L	08:22PM LDT	14.7 H		

All times are listed in Local Standard Time(LST) or, Local Daylight Time (LDT) (when applicable). All heights are in feet referenced to Mean Lower Low Water (MLLW).

RC 53

**Bristol Bay Driftnetters Association**

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Vince Webster, Chair  
& Members of the Board of Fish  
Alaska Boards Section: Board of Fish  
PO Box 115526  
Juneau, AK 99811-5526

Nov 30<sup>th</sup> 2009

Re: All Bristol Bay proposals.

We just recently noticed that the Board support staff had compiled a ledger of the Comment letters submitted by stakeholders. BBDA only submitted comments on 4 proposals and we now see the importance of submitting comments for and against on all of the proposals.

Proposal 1 **Against**: Because this proposal excludes drift vessels from participating without reason and increased the net length to 25 fathoms. This is allocative.

Proposal 2 **Against**

Proposal 3 **Against**

Proposal 4 **Neutral**. Would support if supported by ADF&G

Proposal 5 **Against**

Proposal 6 **Neutral**. Would support if supported by ADF&G

Proposal 7 **For**

Proposal 8 **Neutral**. Would support if supported by ADF&G

Proposal 9 **For**

Proposal 10 **Neutral**. Would support if supported by ADF&G

Proposal 11 **For**

Proposal 12 **For**

Proposal 13 **For**. Mining interests are attempting to permit a mine in a very sensitive and valuable area. This extra protection is needed to ensure that the mine(s) do not harm the habitat for the fishery

Proposal 14 **Neutral**. We feel that removal of running lines during times that the driftnet fleet is behind would be sufficient.

Proposal 15 **Neutral**

Proposal 16 Neutral. It is very difficult to understand what the unintended consequences of this proposal if passed.

Proposal 17 Against

Proposal 18 Against unless modified so that it only be accepted in areas where the allocation plan is specified by percentages points to each gear group.

Proposal 19 Against unless modified so that it only be accepted in areas where the allocation plan is specified by percentages points to each gear group.

Proposal 20 Neutral

Proposal 21 Neutral

Proposal 22 Neutral

Proposal 23 Neutral

Proposal 24 Against

Proposal 25 Against It would be harmful to the driftnet gear group to disallow driftnet fish

Proposal 26 Against

Proposal 27 Against

Proposal 28 Neutral. This seems superfluous since the SHAs are within Districts.

Proposal 29 For

Proposal 30 For

Proposal 31 For

Proposal 32 Against

Proposal 33 For

Proposal 34 For

Proposal 35 For

Proposal 36 For

Proposal 37 Against.

Proposal 38 Against



Proposal 39 Neutral

Proposal 40 For

Proposal 41 For

Proposal 42 Neutral

Proposal 43 Neutral

Proposal 44 For

Proposal 45 Neutral

Proposal 46 For

Proposal 47 For

Proposal 48 Against, Unless the restriction that vessels can not transfer into the Ugashik District within the same week is removed.

Sincerely,



Dan Barr  
President,  
Bristol Bay Driftnetters Association



Barney Johnson  
Vice President,  
Bristol Bay Driftnetters Association

LC 54

Board of Fish Board Members:

Attached are two letters, one our village tribe received from our CDQ group, BBEDC, claiming to represent the residents of Bristol Bay. I also included a letter from BBEDC that was sent to my borough assembly asking for not only monies but also to have Robin, the CEO, do the choosing of who would attend the BOF meetings using these monies. He is claiming to represent 17 villages and upwards of 6000 residents but seems to only be looking for one point of view to send to the BOF.

One needs to understand the structure of BBEDC to realize that the claims of representing all these villages and/or 6000 residents do not really ring true.

Board members of BBEDC, as set up in their own by-laws, state that board members are appointed by the Traditional Native Councils in each village. Some of the traditional councils have members voting who do not live in the region OR even the state. As in our village the majority of our Traditional Council is made of up out of state members who in turn choose our BBEDC board member.

As it stands now if you are NOT a member of the resident tribe you have no direct representation, no matter your heritage. I cannot understand how BBEDC can claim that they represent all residents of Bristol Bay when they don't stand for election by all members of Bristol Bay nor are they accountable to all residents of the member villages.

I realize it is expensive for stakeholders to travel to Anchorage for the meeting but this looks like a blatant attempt by BBEDC to hand pick and coach testimony for the Board of Fish, as seems to be the case with CDQs and other fish regulatory meetings lately.

One must remember that BBEDC is a 50% owner of Ocean Beauty, one of the largest Alaskan salmon processors and highly tied in with other bay processors due to their Bering Sea Quota. They stand to lose a lot if the salmon market becomes fragmented. (Fragmented where as the fishermen no longer have to rely on the larger processors as their only buyer. Making for more competition on buying fish, as is the case in other parts of Alaska.)

This is not to say the BBEDC is a bad organization. They are mandated to do local economic development by the federal regulation and their by-laws. They now seem to have morphed into big business leaving their mandates behind and lobbying to protect those interests. See the attached two letters from BBEDC.

The Lower Bristol Bay Advisory Committee structure has at least some members that stand for elections by all stake holders regardless of heritage, thus representing a more realistic view of the stakeholders and their opinions.

The LBBAC has continually looked at issues differently than BBEDC and has supported such progressive measures such as lifting the 32 ft limit and permit stacking for a number

of years. The LBBAC includes the three most southern villages in Bristol Bay, Egegik, Ugashik, Pilot Point and Port Heiden.

We, in the Ugashik Fishing District, also are the only major river system without a major processor, a sponsored BBEDC ice barge and a secure buyer for up to one third of our permit holders.

I ask the board to review these letters and to feel free to ask people who testify who is paying for their travel expenses.

To allow for a CDQ, or any, group to abuse the public input process goes a long way towards the downfall of an industry.

Respectfully submitted,  
Roland Briggs  
Ugashik Village  
King Salmon, AK 99613

A handwritten signature in black ink, appearing to read "Roland Briggs". The signature is written in a cursive, flowing style with a large initial "R".

# Bristol Bay Economic Development Corporation

P.O. Box 1464 • Dillingham, Alaska 99576 • (907) 842-4370 • Fax (907) 842-4336 • 1-800-478-4370



October 26, 2009

Dear City Councils, Boroughs, Tribal and Village Governments, State of Alaska BB  
Advisory Committees and fishermen of Bristol Bay.

The Alaska Board of Fish is holding its Bristol Bay Regulatory meeting in Anchorage December 1, 2009 to December 8, 2009 at the Anchorage Hilton. These meetings are of great importance to the watershed resident fishermen, communities and businesses of Bristol Bay. We must get people into these meeting to give testimony and sit on Board of Fish committees as well as speak to the Board of Fish members about the fish proposals that would affect Bristol Bay.

BBEDC has worked real hard since the end of the fishing season to raise funds to ship watershed residents to Anchorage to participate in these meetings and we thank the organizations who gave money so we could ship fishermen into Anchorage. We have hired folks to help us develop responses to the many proposals that would have a negative impact on our fishermen, such as doing away with the 32 foot limit of our fishing vessels. These reports will be given to the Board of Fish in December.

Please submit to me, one or two names of fishermen from your community that would go into Anchorage and work at the Board of Fish meeting. The Bristol Bay Native Association will pay air fare, hotels and \$75.00 a day for meals for the fishermen with the money we received from our organizations in Bristol Bay. We would like for them to stay for the entire meeting if possible. We also need some elders to attend this meeting to give testimony, so please provide some elder names also.

I know a lot of you will be attending the BIA Providers Conference on November 30th to December 4th and the Bristol Bay Native Corporation Village Leadership Workshop on

December 7-8, 2009. If you are attending these meetings and want to attend the Board of Fish meeting we can pay your additional hotel bill and meals, please let us know.

On November 13 the Board of Fish will ship Board members out to Dillingham to hold a hearing on the Bristol Bay finfish proposals, then again in King Salmon/Naknek on the 14<sup>th</sup>. Please attend these meeting, speak to the regular and restructuring proposals. The restructuring proposals are:

#15- Repeal 32-foot vessel length limit for Bristol Bay fishery.

#16- Allow use of multiple permit in set and drift gillnet fisheries in Bristol Bay.

#17-Allow use of two permits in set and drift gillnet fisheries in Bristol Bay.

#18-Allow use of multiple permits in Bristol Bay set gillnet fishery.


#19-Allow multiple permit use in Bristol Bay.

#20-Allow use of multiple permit in Bristol Bay drift gillnet fishery.

You can see what these proposals do in the Board of Fish Bristol Bay proposal book or look them up under the Alaska Board of Fish web site.

We will have a "war room" at the Hilton to write testimony and discuss strategy for the meeting. If you have any questions you call me or Fritz Johnson at BBEDC 1-800-478-4370.

Thank You,

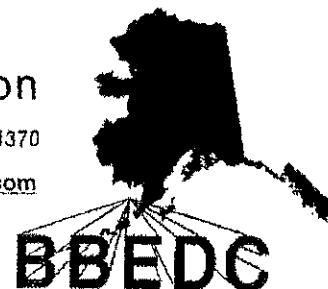


Robin Samuelsen  
President/CEO

# Bristol Bay Economic Development Corporation

P.O. Box 1464 • Dillingham, Alaska 99576 • (907) 842-4370 • Fax (907) 842-4336 • 1-800-478-4370

[www.bbcdc.com](http://www.bbcdc.com)



25 Sept. 2009

Mayor Glenn Alsworth Sr. & Assembly Members  
Lake & Peninsula Borough  
P.O. Box 495, King Salmon, Alaska 99613

Dear Mayor Alsworth,

I'm writing to ask for your help in making sure Bristol Bay voices are heard at the Alaska Board of Fisheries meeting Dec. 1-8 in Anchorage.

Proposals to be decided there have the potential to negatively affect the livelihoods of Bristol Bay residents profoundly, to the permanent detriment of our people and our region's economy.

Specifically we are concerned about proposals to eliminate the 32-foot length limit on Bristol Bay salmon boats, and to allow individuals to own and operate two limited entry salmon permits. The people who can afford bigger boats and multiple fishing permits are not the Bristol Bay's watershed residents, and the goal of those pushing these proposals is to take a larger share of the catch from local people who cannot compete economically.

As a former Fish Board member, I can assure you that in-person testimony, and active participation in the ad-hoc committee process, weighs far more heavily on the Board's decisions than written comments. It is vital that we send as many local residents as possible to the Anchorage meeting to testify before the Board if we have any expectation that our positions will be heard.

I'm writing today to ask the Lake & Peninsula Borough join with other regional entities in pledging \$20,000 to help pay for transportation, food and lodging to make sure Fish Board members will hear local Bristol Bay voices. BBEDC is working with The Bristol Bay Native Association to coordinate travel and lodging, and both are donating additional funds, staff time and technical assistance to help watershed residents prepare Fish Board testimony.

Your \$20,000 contribution will help to make sure the people most dependent on the Bristol Bay fishery don't become marginal participants in the engine that drives our economy. Any money left over will be refunded.

I'm happy to answer any questions you have. Thank you, sincerely,

A handwritten signature in black ink, appearing to read 'H. Robin Samuelsen Jr.'.

H. Robin Samuelsen Jr.  
President/CEO

Board of Fisheries Bristol Bay Finfish meeting of December 1 - 8, 2009 at the Anchorage Hilton Hotel  
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RC 55

Log #	Submitted by	Topic
1	ADF&G Boards Support	BOF Workbook
2	ADF&G	Department Comments
3	ADF&G	Department reports
4	Togiak Seafoods	Prop 15, 23 & 26 comments
5	Matt O'Connell	Prop 13 comments
6	Dennis Albert	Permit stacking
7	Larry Christensen	Prop 39
8	Nushagak AC	AC minutes
9	Lower Bristol Bay AC	AC minutes
10	City of Kenai	Request to change BOF meeting location
11	Howard Delo	Summary from Bristol Bay hearings
12	Michael Friccero	Prop 15 & 20
13	Fred Ball	Removal of Gear
14	Albert Ball, Sr	Removal of setnet gear
15	Eileen Ball	Eluk beach setnet gear removal
16	Hans Nicholson for Carl Flensburg	Proposal comments
17	Richard Clark	Petition of support, proposal comments
18	Robin Samuelsen	Proposal comments
19	Virgene Hanna - BBEDC	Restructuring proposal comments
20	Mark Palmer	32 ft limit opposition
21	Togiak AC	AC minutes
22	John Webb	Public testimony
23	Peter Christopher	Proposal comments
24	Marcus Hartley	BBEDC Report
25	Lawrence Olson	Clarks Point comment on proposals
26	Dan Veerhusen	Prop 6 support
27	Steve Shade	Proposal comments
28	Nancy Morris Lyon for Brian Kraft	Prop 13 amended language
29	Fritz Johnson	Prop 40-41
30	Fritz Johnson	Public testimony
31	Tim Troll	1950 BOF annual report re: Bristol Bay
32	CFEC	Harvest by horsepower
33	CFEC	Report on two-permit use
34	Warren Johnson	BBDA
35	Douglas Shade	Proposal comments
36	Myra Olsen	Public testimony
37	Nushagak AC	Summary of comments
38	Jonathan Forsling	Togiak Seafood / Togiak RC testimony
39	Kogliganek Fishermen	Proposal comments
40	Warren Gibbons	NY Time article
41	Sid Nelson	BB spawn on kelp
42	Richard Alto	Public testimony

**Board of Fisheries Bristol Bay Finfish meeting of December 1 - 8, 2009 at the Anchorage**

**Hilton Hotel**

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**RC**

<b>Log #</b>	<b>Submitted by</b>	<b>Topic</b>
43	Ralph Zimin	Oppose Prop 15 – 18, 20-21, 24
44	David Harsila	Public testimony
45	Fred Marinkovich	Public testimony
46	Daniel Kingsley	Public testimony
47	Robert Heyano	Public testimony
48	Joe Chythlook	Public testimony
49	Val Angasan	Public testimony
50	Rene O'Connor	Public testimony
51	Earling Krause	Public testimony
52	Eddie Clark	Egegik statistics
53	Howard Knutsen	BBDA comments
54	Roland Briggs	Ugashik Fishing District
55	ADF&G / Boards Support	RC Index
56	Carolyn Carlos	Oppose Prop 26



RC56

Carolyn M. Carlos  
PO Box 195  
Togiak, AK 99678

Telephone No: (907) 493-5120  
Facsimile: (907) 493-5156

December 2, 2009

Alaska Board of Fisheries

Re: **Opposition to Proposal 26-5 AAC 06.37.370(k)(1)(2)**, Eliminating  
the super-exclusive status of the Togiak District

Board members:

Good Morning. My name is Carolyn M. Carlos and I am opposed to proposal 26 which seeks to eliminate the super exclusive status of the Togiak District. I am a life long resident of Bristol Bay and have fished for many years in Togiak Bay. I currently am a permit holder for a set net site in Bristol Bay, and all of my family fish as well. I am opposed to proposal 26 for the following reasons:

1. The original reason this regulation was passed is because the run in Togiak is much later than other districts, as much as 2 to 3 weeks later.
2. Due to the difficulty in enforcing the boundaries, outside boats often push the boundaries and choke off Togiak Bay, resulting in not many fish actually getting into the bay where they can be harvested by fishermen fishing legally in the Bay. Fish have a difficult time building up inside the district when outside boats take the fish outside the boundaries.
3. If proposal 26 is enacted, it will allow outside boats to transfer into the district much sooner and thus have a negative impact on the resident fishermen in the Togiak Bay. Most employment opportunities in Togiak Bay are related to fisheries, and this proposal will seriously impact jobs in Togiak Bay.
4. Togiak is one of the largest districts in Bristol Bay, but it is also very shallow and requires small, shallow draft boats. Because of this, Togiak fishermen have a difficult time competing in other districts and are more dependent on the fish they catch in the Togiak District.

Also because of this, enacting Proposal 26 will have more of an impact on local fisherman.

5. Finally, the current regulation is not a "super exclusive fishery," rather it is an "exclusive fishery." It does not prohibit anyone from fishing in Togiak Bay, rather it requires fishermen to choose to fish there from the start or wait until the exclusive period ends. There is no valid reason for changing the regulation. It will not improve the quality of the catch in any way.
6. Not only do I oppose proposal 26, but I would support the board extending the existing exclusive period by an additional week. This would allow the fishermen that chose to fish this area to fish an additional week during the peak.

I encourage you to consider my testimony and to reject Proposal 26. Thank you for you time.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Carolyn M. Carlos', written in a cursive style.

Carolyn M. Carlos

Frank Woods III  
Box 713  
Dillingham, AK  
99576

Alaska Board of Fisheries

Finfish Bristol Bay

Anchorage, AK

December 1, 2009

RC 57

Mr. Chairman and Members of the Board, my name is Frank G Woods III. I'm a 44 years old resident of Dillingham. I'm a Bristol Bay salmon drift fisherman, having fished for 35 years. I'm here to testify in behave of myself to proposals that will and are affecting my ability provide for me and my family.

**I SUPPORT PROPOSALS 1, 2, 3:** Subsistence DRIFT fishing is an ongoing practice. Amending the law will make it legal as it is in other parts of Bristol Bay the BOF in 2006 passed regulation to legalize it in Togiak. Drift fishing is an effective way to not waste the resource. Limiting boat length will stop chances of illegal activity and area will stop chances of illegal activity.

**I SUPPORT PROPOSAL 9** for the conservation issues. As the use increases for these sport fish increase so will the need to regulate in a proactive management approach.

**I SUPPORT PROPOSAL 24** this proposal is a reversal of the existing regulation that should be challenged in the court system on the grounds of unfair allocation, discrimination of one gear type and unmanageability and intractability through out the districts. My limited entry permit should be worth 150 fathoms. Not 150 plus 50, with a D. WITH Extra Allocation when limits are imposed added to extra poundage bonuses at the end.

On Proposals 15 (32 or longer boat) 16-21 you feel the need for change and we are recovered from the economic down turn and the stimulus to all this is going to help me. In the early 80's permit Prices soared the State of Alaska, we were having record and healthy return of sockeye to the Bay, All bays were hitting there mark for escapement. Money was flowing in Bristol Bay. The State Alaska loan program and CAFB were supplying hundreds of new shiny Rawson's and Modutech's. I remember because Jimmy Carter the peanut farmer became president. Then we had an oil glut and oil prices

dropped to its lowest in history and a salmon was worth more than a barrel of OIL. Recession hit and interest rates hit 18-20% and no body in their right mind could have predicted what was to happen next. In 1989 the Exxon Valdez hit what for the state was an economic boom. But for fisherman prices dropped and continued to fall out of sight. People in the local region couldn't keep up and the high valued permits were the only thing that was worth as collateral and attracted to this short lived boom. So the state and CAFB ended up taking the very heart of what makes us sustainable in the region and Alaska. Now we see the result of what looked like a good thing is the worst thing to happen in recent memory. You think we as a whole are recovering from the recent economic downturn. Show me the loan program and guarantee for that dual permit and longer boat and sign me up. Until then.....

**I OPPOSE PROPOSALS** 15, 16-21.

Money would be better spent for net gain in the market and quality than to have this body spend any more time on longer boats and nets or rationalization of this fishery. We need more boats not less to spread that message of quality to the processors.

**I SUPPORT PROPOSALS** 24 and 23 in that order I think with permit stacking is in the same restructuring mentality. The can of worms can't be closed well can them again. Permit prices will soar and exit this state again if you legalize and don't do away with this monster that was created a couple board cycles ago.

**I SUPPORT PROPOSALS** 40 -41 every dollar that stays in the region is worth 7 times as much and opportunity is there.

I believe the real work is to begin in committees and the lobbying has begun already so with that I will close.

Thank you for your time,



Frank Woods III

RC 58

Port Alsworth, Nondalton, Newhalen, Iliamna, Pedro Bay, Pope-Vanoy Landing, Kokhanok, Igiugig

Lake Iliamna Fish & Game Advisory Committee  
P.O.Box 4012  
Igiugig, Alaska 99613

Testimony to BOF Bristol Bay finfish meeting Dec. 1-8, 2009

Alaska Board of Fisheries members, thank you for this opportunity to testify on behalf of our advisory committee. My name is Randy Alvarez I serve as chairman of the Lake Iliamna Fish & Game Advisory committee. We are 9 members from 8 villages around Iliamna Lake and Lake Clark, the Kvichak drainage.

We had a meeting at Igiugig on October 29, 2009 to review and comment on some of the proposals before you.

Proposal # 10 Sport fishing, Alagnak drainage, The vote was 0-8 We oppose this  
There would not be that many fisherman who would be there as most Lodges don't open till the season opens in June.

Proposal # 13 Fish Refuge, The vote was 0-8 We oppose this proposal  
We don't support a fish refuge that would dictate what we can or can't do in all state lands around us. We already have the Katmai National Park and Preserve just to the south of us and the Lake Clark National Park and Preserve in our north. Only part of the residents in the lake region can hunt in the Lake Clark National Park, in the Katmai Preserve we found out that it is illegal to take shed antlers or even pick plants or berries. If the Legislature were to set a fish refuge in place who knows what would be in it. Back in 1997 & 1998 we opposed a similar proposal dealing with a fish & game refuge. The joint boards decided not to take action since all parties were not in support. Our committee feels that a fish refuge and the proposed Pebble mine are two separate issues, because we live and use the land that the refuge would regulate. We unanimously opposed this proposal even though some of our committee members oppose the mine  
Along with those that are neutral on the mine

Proposal # 14 Minimum Distance Between Gear, The vote was 0-8 We oppose this  
This is unreasonable

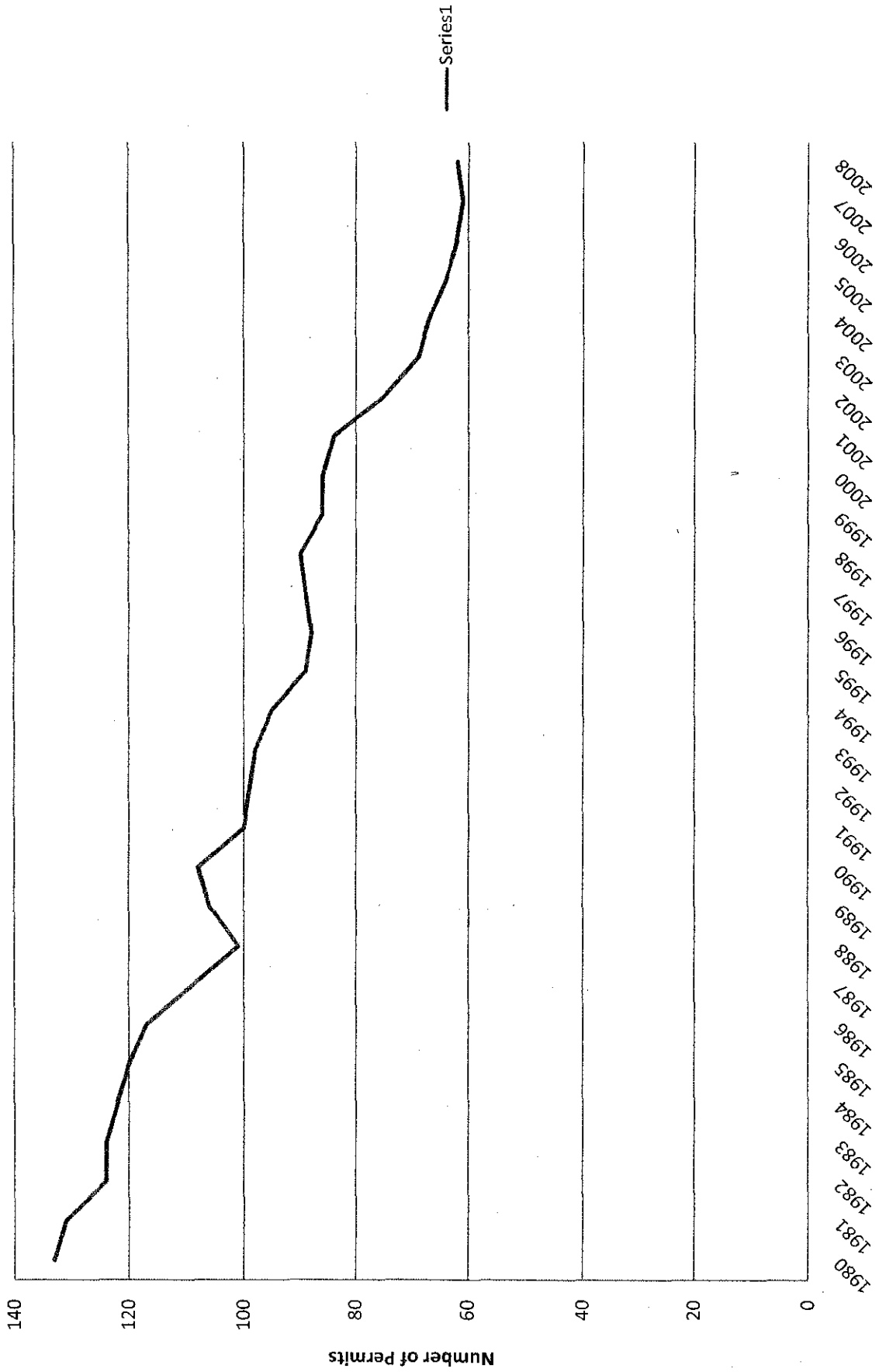
Proposal # 15 Eliminate 32 foot limit, The vote was 0-8 We oppose this proposal  
The major reason for extending the 32 foot limit is for quality. Equipment for refrigeration is more compact. More and more 32 footers are equipped with refrigeration or other equipment to boost quality. One processor requires crewmembers to watch a video on quality handling and the operation videoed is in Cordova on a 31 foot bowpicker. By lifting the limit for Bristol Bay, it is making it increasingly more difficult for local residents of Bristol Bay to stay in the fishery. For instance the Lake Iliamna region has about one half the permits

Port Alsworth, Nondalton, Newhalen, Iliamna, Pedro Bay, Pope-Vanoy Landing, Kokhanok, Igiugig

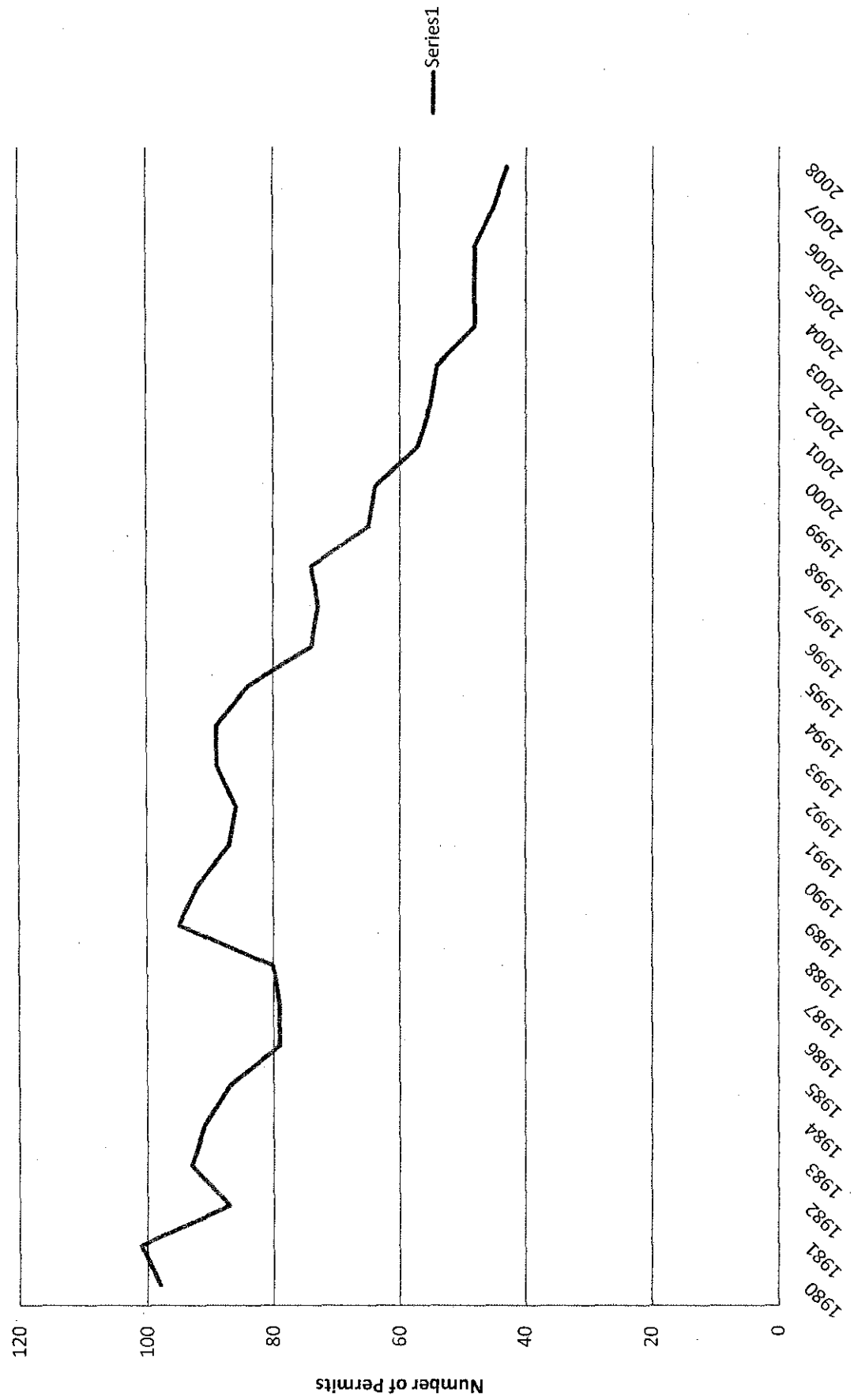
that were originally issued. That was the regions primary source of income. Now some people that used to fish are turning to the Pebble mine for income. What else do we have besides commercial fishing. If more of our residents are forced out of fishing they have no place to turn except, the only other alternative, mining.

- Proposal # 16 Gillnet operations, The vote was 0-8 We oppose this proposal  
Proposal # 21 200 fathoms drift gillnet, The vote was 0-8 We oppose this proposal  
Proposal # 22 200 fathoms drift gillnet. The vote was 0-8 We oppose this proposal  
Proposal # 23 200 fathoms drift gillnet Togiak district. The vote was 0-8 We oppose this  
Proposal # 24 200 fathoms drift gillnet, The vote was 0-8 We oppose this  
From #16- 24, We oppose one person operating two permits drifting or  
Settning, or expanding the amount of gear when two permit holders use 200  
fathoms, or eliminating the use of 200 fathoms with two permittees
- Proposal # 25 Registration The vote was 0-8 We oppose this  
Proposal # 26 Registration The vote was 0-8 We oppose this  
Proposal # 27 Registration The vote was 1-7 We oppose this  
Proposal # 28 Registration The vote was 1-7 We oppose this  
We support keeping the 48 hour transfer in effect, and we support Togiak's super  
exclusive status
- Proposal # 29 Registration The vote was 7-1 We support this  
Proposal # 31 General District, The vote was 0-8 We oppose this  
Fishing in a mixing area is not good management, as those fish stocks could be  
headed to a river that can't afford any harvest. Its unfair to the settneters since  
they cannot fish in this area, It reallocates fish taxes. The fish harvested in the  
general district will be in one of the regular fishing districts in 12 or 24 hours.  
This is not going to make any difference in processing capacity
- Proposal # 32 Naknek River Special Harvest Area, The vote was 8-0 We support this  
We feel this would help eliminate the over escapement that's been happening  
when inriver
- Proposal # 33 Naknek River Special Harvest Area. The vote was 0-8 We oppose this  
Proposal # 34 Naknek River Special Harvest Area. The vote was 0-8 We oppose this  
We support the existing inriver plan with the addition of #32
- Proposal # 35 Alagnak River Special Harvest Area. The vote was 0-8 We oppose this  
Proposal # 38 Egegik Management Plan. The vote was 0-8 We oppose this  
If you change alocation in one district you would need to change it in the other  
districts to compensate for the fleet moving around
- Proposal # 44 Fishing District Boundary. The vote was 8-0 We support with amendment  
to redefine to ADF&G recommendations
- Proposal # 48 Fishing Periods. The was 0-8 We oppose this  
We oppose having Ugashik and Cinder Rivers superexclusive

# Drift Permits Held by Lake and Peninsula Borough Residents



# Number of Set Net Permits Held by Lake and Peninsula Borough Residents





In each fishery, the number and percentage of permits held by Local Alaskans has declined. Drift gillnet permits held by local residents dropped from 38% of the total at initial issuance to 21% by year-end 2008. In the set net fishery, the percentage of locally-held permits was reduced from 63.5% at initial issuance to 37.1% in 2008. The drop in permits held by locals is reflected by a net gain of permits held by both Nonlocal Alaskans and Nonresidents, with Nonresidents showing the largest percentage gain in both the drift and set net fisheries.

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types; permit holders can move from one locale to another (migration); or permits can be cancelled. Table 2 indicates the extent to which these factors have contributed to changes in Bristol Bay permit holdings. In each fishery, the net effect of transfers has been the most important reason, but migration has also resulted in significant changes, especially in the gain of permits held by Nonresidents.

Figure 1.  
Bristol Bay Salmon Drift Gillnet Permits

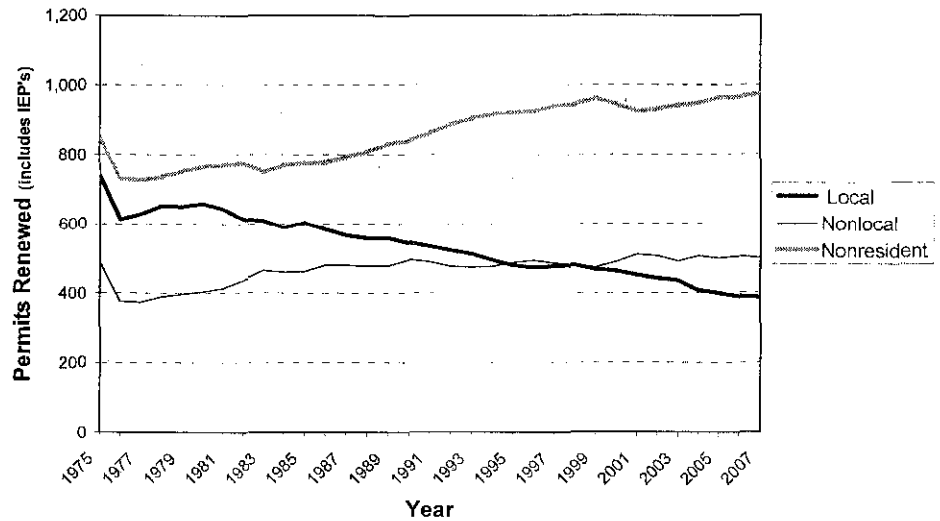
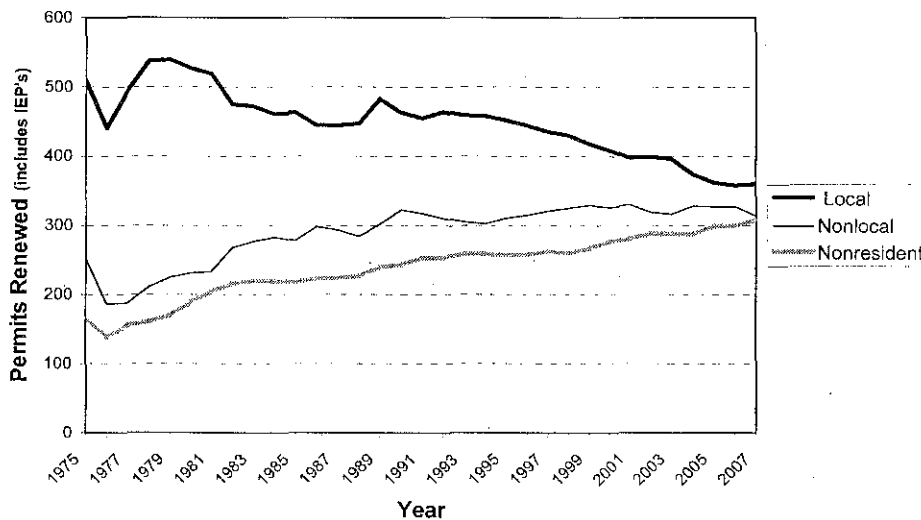


Figure 2.  
Bristol Bay Salmon Set Gillnet Permits



BC59

**Bristol Bay Permit Stacking Proposal #20**

We the undersigned Bristol Bay Permit Holders based out of Kodiak, AK fully support Prop 20 and would encourage passage of the permit stacking proposal.

<u>Name</u>	<u>Address</u>	<u>Telephone #</u>
<u>PETER THOMPSON</u>	<u>PO-Box 3037 Kodiak</u>	<u>907 539-5591</u>
<u>JOHN C. GREE</u>	<u>1324 ISMA-VEL Kodiak</u>	<u>907 486 3638</u>
<u>Thomas Miller</u>	<u>Box 1931 Kodiak AK</u>	<u>907-486-1721</u>
<u>John Plyman</u>	<u>510 Mission Kodiak AK</u>	<u>907.486-8217</u>
<u>George Kiril</u>	<u>Box 2796 Kodiak</u>	<u>907 486-2781</u>
<u>TY ROUSE</u>	<u>PO. BOX 2725 KODIAK</u>	<u>907 486-8560</u>
<u>Rebecca Nelson</u> (pending 503TG/569)	<u>Po Box 3086 Kodiak, AK</u>	<u>(907) 486-2527</u>
<u>Leroy Cossette</u>	<u>Po Box Kodiak, AK</u>	<u>907-539-6439</u>
<u>Joshua Yang</u>	<u>Po Box 806</u>	<u>907-539-6664</u>
<u>Tony Jond</u>	<u>P.O Box 402</u>	<u>907-486-4941</u>
<u>Michael J Friccero</u>	<u>Po Box 2187</u>	<u>907-539-1320</u>
<u>STEVEN AMES</u>	<u>PO BOX 7724</u>	<u>907-539-1214</u>
<u>DAVID F. JANI</u>	<u>Box 349</u>	<u>907-486-7057</u>
<u>Devin Ode</u>	<u>Box 1950</u>	<u>907-486-3844</u>

PETER THOMPSON



**Desmond A.T. Hurley**

P.O. Box 198  
Dillingham, AK 99576

December 2, 2009

Re: Bristol Bay Finfish Meeting  
December 1-8, 2009

Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Chairman Webster and members of the Board of Fisheries,

My name is Desmond Hurley, I'm 20 year's old, a lifelong Bristol Bay resident and subsistence user; I'm here representing my family also as a fourth-generation set-netter in my hometown of Clark's Point. My family has been set netting in Bristol Bay since the birth of the commercial fishery, 125 years ago.

**I SUPPORT Proposals 1, 2, 3** because if this were allowed it would enable our people, who heavily depend on our subsistence lifestyle, to efficiently meet our subsistence needs. It would also address the congestion on Kakanak beach and competition for subsistence sites. These proposals wouldn't significantly effect the amount of fish taken but would rather enable our people to catch the fish we need in a more timely, cost-effective manner.

**I OPPOSE Proposal 14** very, very strongly because I have been set-netting for over 13 years now, and in my experience it would be virtually impossible to remove all set-net gear during a drift gillnet opening. For example I use screw anchors while set-netting, which can only be safely put out during a negative 1 out-going tide. I use these screw anchors instead of anchor fishing due to extremely strong currents and to ensure the safety of not only myself but my employees. To remove these screw anchors every time there was a drift opening would not only be impossible to do, but very, very dangerous! Also the site I fish I must lease out from the State of Alaska every summer for \$300 dollars. It would be ridiculous to allow someone else to fish on the site that I lease, and why would I have to pull my gear so drifters can infringe on the site that I pay money for.

**I OPPOSE Proposal 15**, because as a Clarks Point set-netter I am already forced to be in an unfair competition with 32-foot vessels to deliver my fish even though my skiff is a 24 footer with 5 foot walls. Every time I go to deliver fish, even if I don't have a large load, I not only put my life on the line, but my crew members as well. For example, when delivering fish to a processor you must tie your boat up to the next boat in line, which many times is a drifter. If there are rough seas, which if any of you have fished Bristol Bay know that it's usually rough, you can bet that there are lines snapping, boats colliding, and sometimes the result can be deadly. We're like a pop can being tied behind a big oil drum, in rough seas. Bottom line, by increasing the boat size you are also increasing the danger in the bay, which I'm positive nobody wants.

**I OPPOSE Proposals 16 through 21** (Allow multiple permit use) I don't think these proposals would benefit us as locals, because we can hardly afford one permit, let alone another one. Especially with the cost of living in our communities and the scarcity of year-round jobs, the majority of us don't have the luxury of a year-round income; we **DEPEND** on fishing to survive in a cash economy. The majority of fishermen, who can afford multiple permits, are not people who are living in Bristol Bay and if these proposals get passed those non-residents will be the sole beneficiaries. I myself have never had any other job but commercial fishing in the summers and I depend on my fisheries income to get me through the rest of the year. Jobs are scarce, especially when the only trade I was really taught throughout my life is commercial fishing.

I commercial fish because it is something that has been passed down to me from my family, it's more than a paycheck; it's my way of life. I consider myself extremely fortunate in that I've been able to learn my traditional indigenous subsistence lifestyle through the fishery and at the same time been able to support myself in a cash economy. As a young man I want to pass this sustainable lifestyle to my future children, I ask you to not pass these proposals that will compound the struggle for the survival of our local fishermen in our own region's fishery, don't add to the heavy load we are already struggling to carry.

Please use your important position to empower our region's fishermen.

Thank you,

  
Desmond Hurley

RC 60

RC61

**Moses Kritz**  
**P.O. Box 83**  
**Togiak, AK 99678**

December 2, 2009

RE: Bristol Bay Finfish Meeting

December 1-8, 2009

Alaska Board of Fish

P.O. Box 115526

Juneau, AK 99811-5526

Attached: Three letters  
from Togiak Seafoods in  
opposition of Proposal  
15, 23 and 26.

My name is Moses Kritz and I am the President of the Traditional Council of Togiak, Thank you Mr. Chairman and Board members for allowing me to testify on behalf of my community of Togiak. You have heard testimony from Bristol Bay folks and I agree with their concerns on the fishery. I also agree that there should not be any permit stacking, opening up a General District, extending boats beyond the 32 foot limit, doing away with the 48 hour transfer. All of us in rural Alaska have been giving away our resources for many years.

Mr. Chairman, I was born and have lived in Togiak all of my life. I have fished in Togiak since I was 10 years old and have seen many changes.

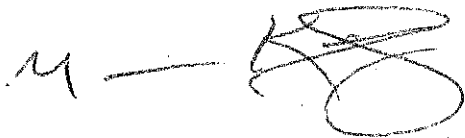
Our fishery in Togiak is small and very vulnerable. That is why we have worked with ADF&G to develop a management plan. It was never intended to be super exclusive but was part of the management plan. This management plan also eliminates us from using a web size no greater than 5 1/2" and does not allows us to harvest our king salmon commercially and gives them all to the sport fishery.

I oppose permit stacking and the general district proposals because it will kill off our resources. This would displace our community residents and they will move out of the community to move to larger towns were they have trouble adapting.

In conclusion, I would like to request that you review the three letters written from our newly created fish processing facility, Togiak Seafoods.

Thank you Mr. Chairman and Board members for this time and I would welcome any questions that you may have.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'M' followed by a horizontal line and a large, circular flourish.

Moses Kritz



November 17, 2009

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

via fax # 907-465-6094

Re: Bristol Bay Proposal # 15  
"Eliminate 32' limit on vessels in Bristol Bay"

To Whom It May Concern:

Please accept this letter in opposition to the above proposal. Our fishing fleet in Togiak is local watershed residents with limited access to the capital to purchase a new vessel or do a major upgrade on existing vessels. In many cases, simple maintenance to existing vessels is challenging.

We do understand the rationale of allowing larger vessels from a quality standpoint. Our view is that smaller vessels can be quality oriented, which we proved in the 2009 season. Our local fleet bled and iced most of their catch with no major issues.

We respectfully request your support in retaining the 32' limit. Please let us know if you have any questions or would like to discuss this matter further. Thank you for your consideration.

Regards,  
TOGIAK SEAFOODS

Moses Kritz  
Shareholder / Fisherman



November 17, 2009

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

via fax # 907-465-6094

Re: Bristol Bay Proposal # 23  
"Eliminate use of 200 fathom gillnets / dual permits in Togiak District"

To Whom It May Concern:

Please accept this letter in support of the above proposal. We feel the use of 200 fathom nets is excessive for the geographic size of the Togiak district. In addition, the run size in the Togiak district does not warrant more gear in the water. We feel it would increase the possibility of over-fishing and the potential for lost nets. It also creates an unfair benefit to those fishermen who have a second permit fishing on their boat, as that is an expenditure that not all fishermen are capable of.

The salmon run in Togiak must continue to be managed for the protection of the stock and to maximize the economic benefit. The use of a 200 fathom net is simply not necessary in this area.

Please let us know if you have any questions or would like to discuss this matter further. Thank you for your consideration.

Regards,  
TOGIAK SEAFOODS

Moses Kritz  
Shareholder / Fisherman

Togiak Seafoods  
1400 E. 1st Avenue  
Anchorage, Alaska 99501



November 17, 2009

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

via fax # 907-465-6094

Re: Bristol Bay Proposal # 26  
"Eliminate super exclusive status of Togiak District"

To Whom It May Concern:

Please accept this letter in opposition to the above proposal. The Togiak District super-exclusive status was put in place for several good reasons:

- Traditionally this is a smaller run than other areas of Bristol Bay and as such is more susceptible to over-fishing, particularly if a large number of boats were allowed to transfer in at the peak of the run
- The fishing district is a considerable distance from the rest of Bristol Bay and the travel can be challenging for the local residents
- This run is normally fished by local residents who do not wish to travel to other areas of Bristol Bay to fish and who are very dependent upon this economic base
- The Togiak run historically peaks later than the rest of Bristol Bay. The current status prevents a massive influx of boats and gear into one area and allows prudent management of the fishery.
- Limiting by access the number of permits in any one district at any one time has proven to be a workable management strategy; this is simply a refinement specific to a smaller run and unique geographic status

We believe the current management works and should not be changed without valid reasons. This proposal simply states that it should be changed to match the rest of Bristol Bay. We don't feel this is a satisfactory reason to change a regulation that seems to be working fine.

Please let us know if you have any questions or would like to discuss this matter further. Thank you for your consideration.

Regards,  
TOGIK SEAFOODS

  
Moses Kritz  
Shareholder / Fisherman

Jaclyn Christensen  
P.O. Box 49026  
Port Heiden, AK 99549

RC62

December 2, 2009

RE: Bristol Bay Fin Fishing Meeting December 1-8, 2009

Alaska Board of Fish

PO Box 115526

Juneau, AK 99811-5526

Honorable Chairman and Respectable Members of the Board,

This serves as my personal written testimony.

**I OPPOSE PROPOSAL 14** -5 AAC 06.335 Minimum distance between units of gear. Require removal of all set net gear during drift gillnets openings.

I oppose on behalf of myself because of the common sense contradiction that it implies, most set net fisherman do not wish to intentionally obstruct their gear to drifters and if their intention is to due harm or "cork off" the other fisherman than 1) it should be illegal to set snags for other fisherman because it endangers their gear and 2) the set net fisherman compared to drift fisherman have harsher regulations throughout the Bristol Bay districts, and I am biased on set gill net fisherman growing up as one. In my personal experience I feel like the set net site is the one area we are given to fish without the interference of other fisherman and that should apply to both drift and set net fisherman both men are equal and treat each fishery as such.

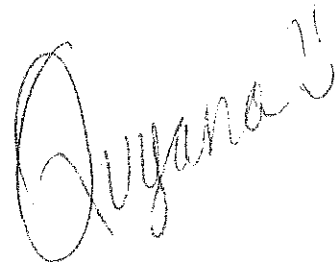
**I OPPOSE PROPOSAL 15** -AAC 06.341 Vessel specification and operations. I oppose on behalf of myself and I took my husband's advice as a drift gill net fisherman because he feels that this proposal if brought to regulation status will inflict unnecessary costs to commercial fisherman.

**I SUPPORT PROPOSAL 16** -5 AAC 06.341 Gillnet specifications and operations. I support this proposal because I think that set gill net fisherman should have the same rights as drift gill net fisherman and with the same limitations.

**I SUPPORT PROPOSAL 20** -5 AAC 06.333 200 fathoms of drift gill net in the Bristol Bay. I support the amount of net in the water to be shortened to 200 fathoms and allow the ability to stack permits limited to two per vessel. The stacking of permits reduces the amount of boats in the water and are economically feasible.

Regards,

  
Jaclyn Christensen



**Alaska Board of Fisheries  
Anchorage, AK  
December 2009**

RC

63

12/2/2009

Supplemental Tables and Figures

Committee A

Proposals 1, 2, and 3

Prepared by:

Division of Subsistence  
Alaska Department of Fish and Game

Data source: Alaska Subsistence Fisheries Database, ADF&G, Division of Subsistence.

**Amount necessary for subsistence (ANS) findings for Bristol Bay salmon:**

**5 AAC 01.336.**

**(b). 157,000 to 172,171 salmon, including 55,000 – 65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.**

**Table 1.—Estimated subsistence salmon harvests by district and location fished, Bristol Bay area, 2008.**

Area and River System	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
NAKNEK-KVICHAK DISTRICT	481	719	69,823	1,437	404	801	73,184
Naknek River Subdistrict	271	684	20,260	1,397	345	769	23,456
Kvichak River/Iliamna Lake Subdistrict:	215	35	49,563	40	59	31	49,728
Igiugig	10	5	1,595	0	29	0	1,629
Iliamna Lake-General	35	0	6,638	0	0	0	6,638
Kijik	1	0	300	0	0	0	300
Kokhanok	25	26	14,142	10	10	6	14,194
Kvichak River	10	0	405	0	0	0	405
Lake Clark	47	0	4,027	0	0	0	4,027
Levelock	1	4	30	30	20	25	109
Newhalen River	58	0	10,984	0	0	0	10,984
Pedro Bay	20	0	5,388	0	0	0	5,388
Six Mile Lake	18	0	6,054	0	0	0	6,054
EGEGIK DISTRICT	37	91	1,502	295	35	4	1,928
UGASHIK DISTRICT	14	47	1,660	222	17	9	1,955
NUSHAGAK DISTRICT	571	12,960	26,828	5,133	4,552	1,923	51,395
Wood River	163	2,726	6,780	816	468	260	11,051
Nushagak River	109	4,564	6,209	804	2,547	211	14,334
Nushagak Bay Noncommercial	232	4,469	8,119	2,294	1,259	801	16,942
Nushagak Bay Commercial	42	346	1,435	761	164	582	3,288
Igushik/Snake River	63	855	4,285	458	114	69	5,780
TOGLAK DISTRICT	91	1,337	3,770	541	701	114	6,463
<b>Total</b>	<b>1,178</b>	<b>15,153</b>	<b>103,583</b>	<b>7,627</b>	<b>5,710</b>	<b>2,851</b>	<b>134,924</b>

Source ADF&G Division of Subsistence, ASFDB 2009 (ADF&G 2009).

Note Harvests are extrapolated for all permits issued, based on those returned and on the area fished as recorded on the permit. Due to rounding, the sum of columns and rows may not equal the estimated total. Of 1,178 permits issued for the management area, 1,083 were returned (91.9%).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

Figure 1. Estimated subsistence harvests of salmon in the Nushagak District, 1982 - 2008

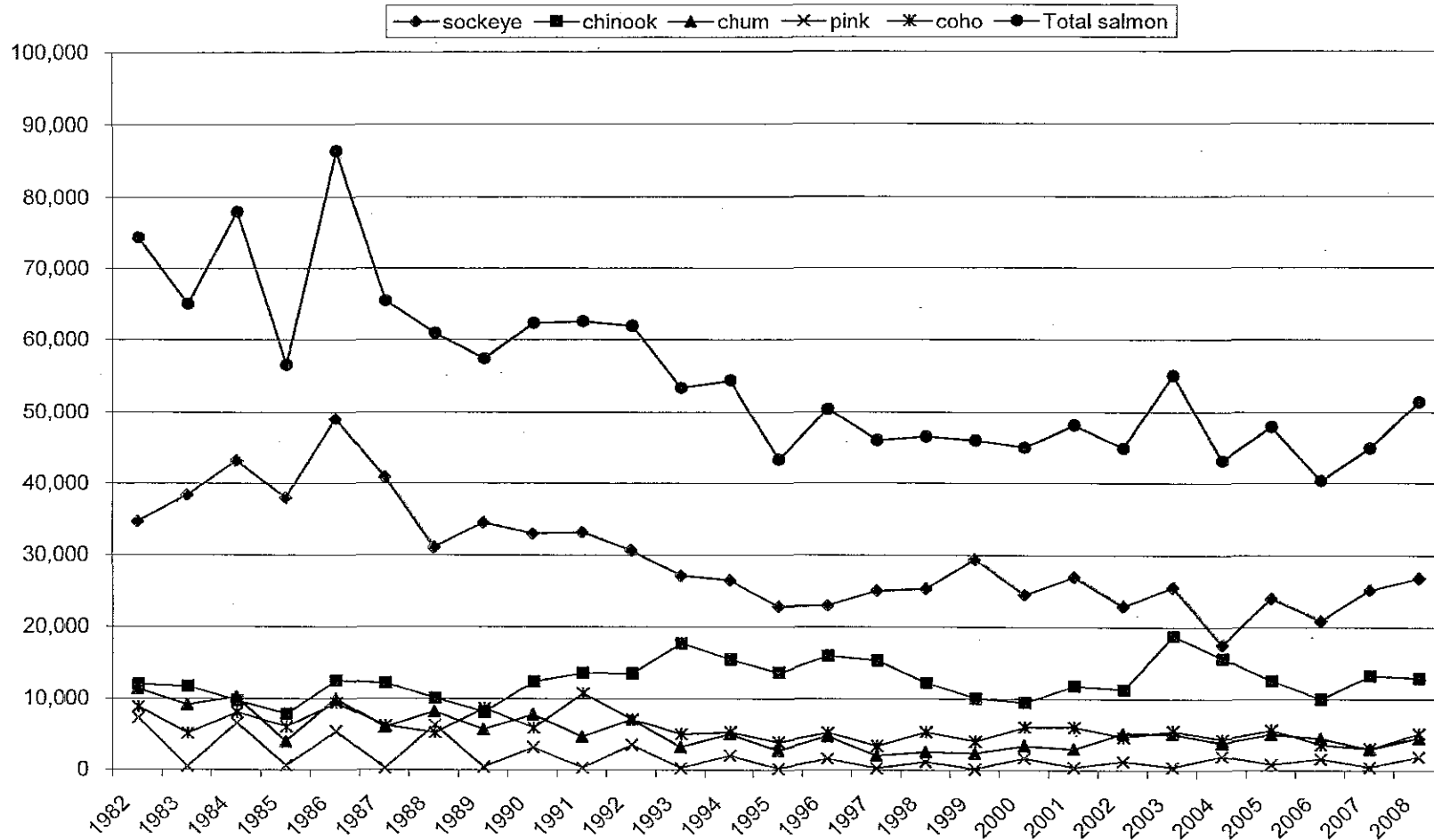


Figure 2. Estimated Subsistence Harvests of Chinook Salmon, Nushagak District and Nushagak River, 1997 - 2008

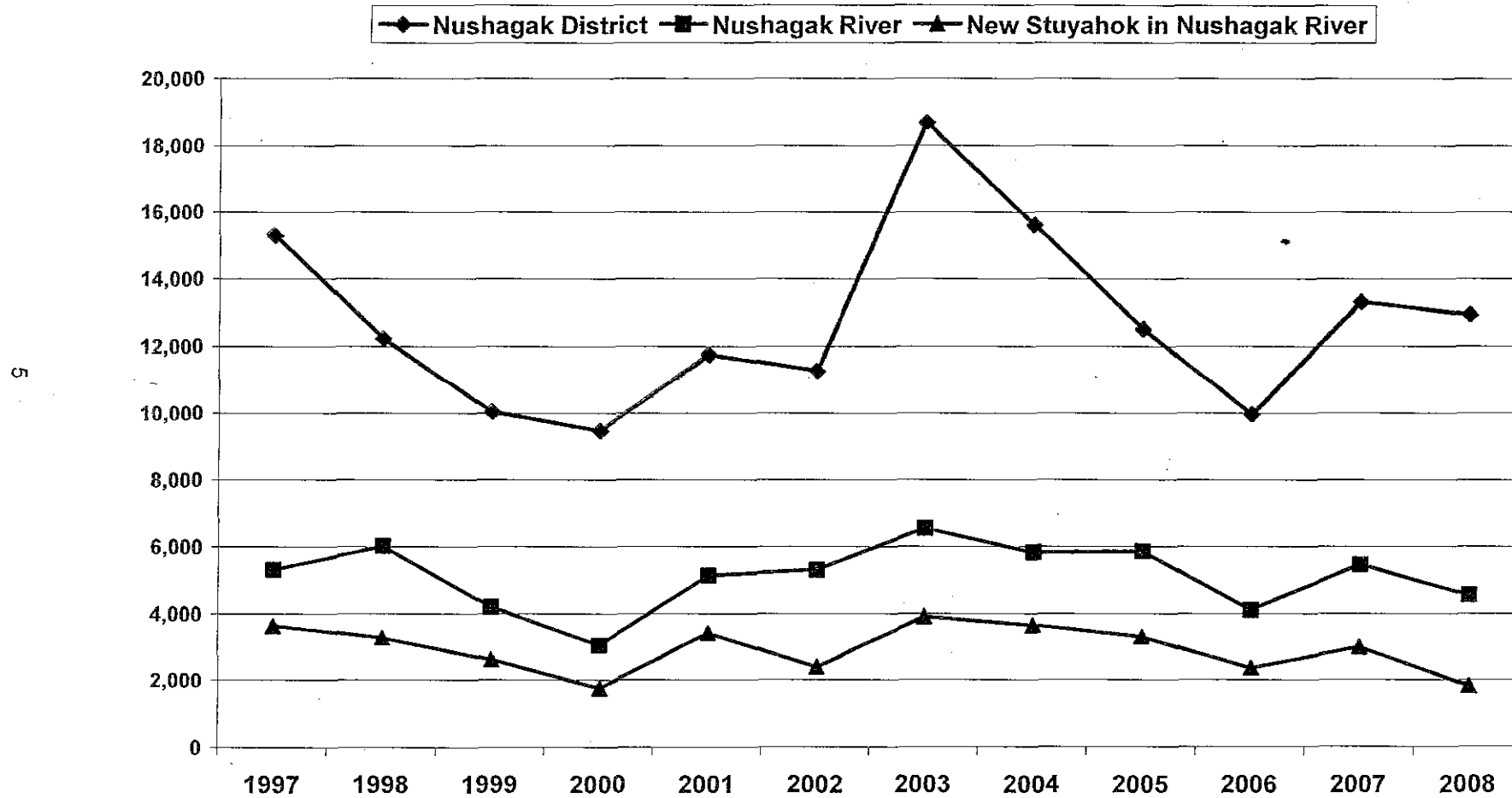


Figure 3. Estimated Subsistence Harvests of Chinook Salmon per Permit, Nushagak District and Nushagak River, 1997 - 2008

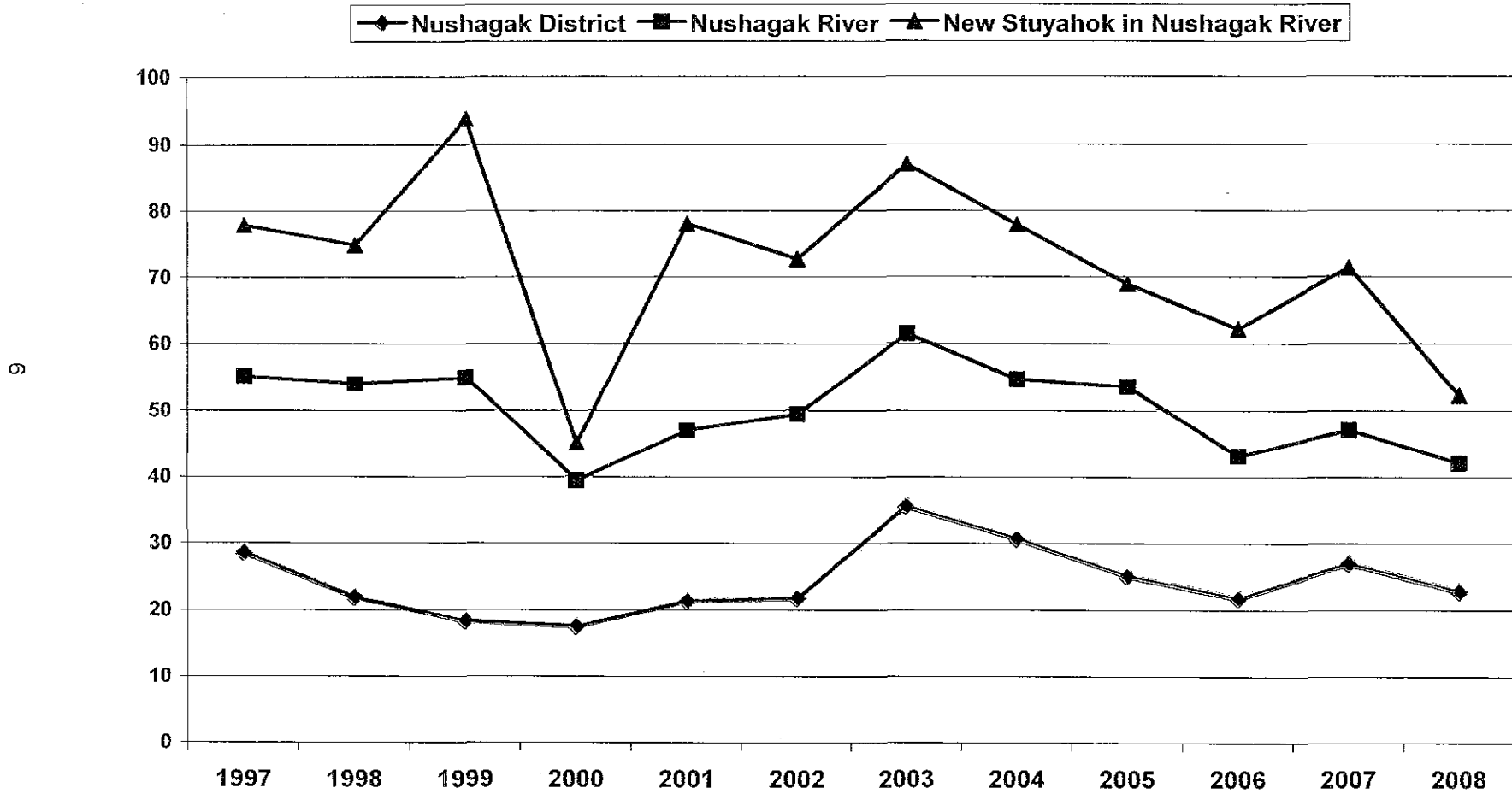
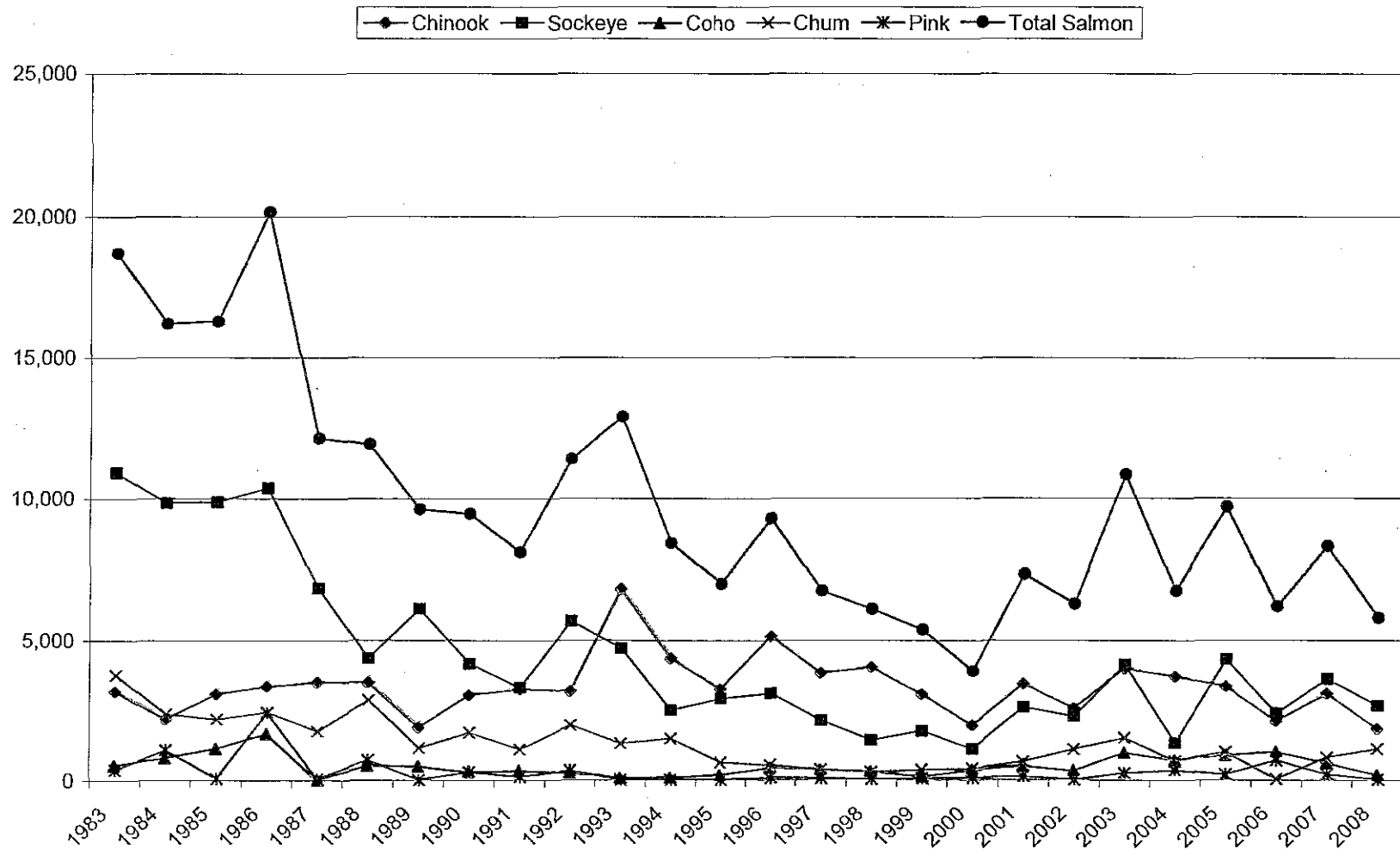




Figure 4. Subsistence salmon harvests, New Stuyahok, 1983 - 2008



**Figure 5. Estimated subsistence harvests of Chinook salmon, Nushagak River by fishing location, 1997 - 2008**

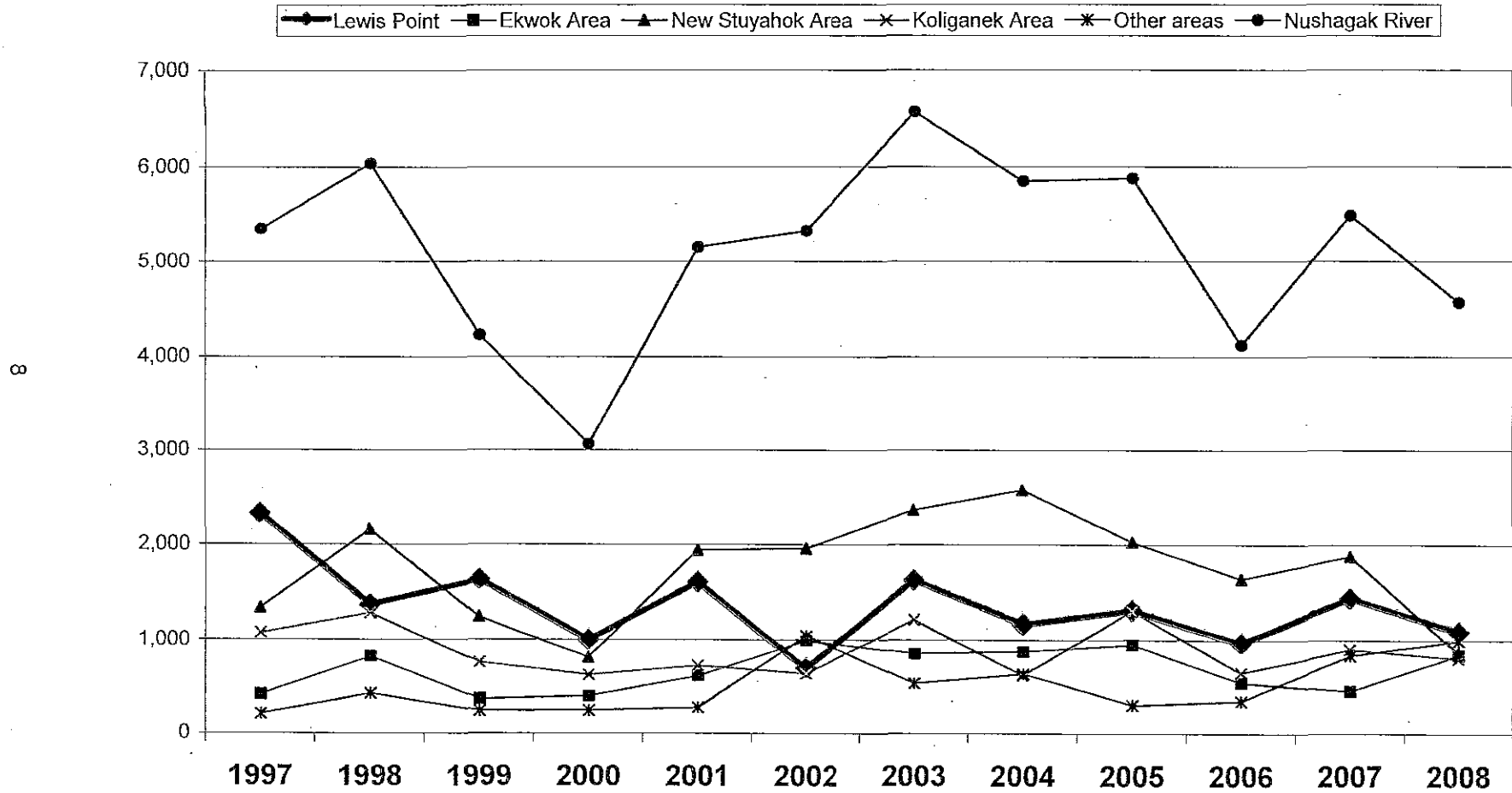


Table 2. Estimated subsistence Chinook salmon harvest, Nushagak River by location, 1997 - 2008

Nushagak River Subareas	Estimated Chinook Harvest												12-year average
	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	
Black Point	15	167	111	90	164	432	421	244	54	109	552	860	268
Ekwok Area	412	819	362	396	610	989	848	868	943	534	445	834	672
Grassy Island	24	75	4	31	6	89	71	13	39	29	79	44	42
Iowithla River	56	0	0	0	0	0	0	0	0	0	0	20	6
Klutuk River	1	0	0	0	0	0	0	5	0	0	77	0	7
Kokwok River	0	18	9	0	0	180	0	138	0	0	0	10	30
Koliganek Area	1,070	1,274	751	614	715	631	1,202	607	1,298	636	891	793	874
Lewis Point	2,326	1,365	1,632	1,001	1,607	696	1,628	1,161	1,309	965	1,437	1,088	1,351
Mulchatna River	0	0	0	0	0	0	0	53	0	0	0	0	4
New Stuyahok Area	1,334	2,159	1,243	814	1,942	1,962	2,364	2,577	2,028	1,640	1,879	861	1,734
Portage Creek Area	108	159	112	117	105	341	33	174	202	202	118	53	144
<b>Total</b>	<b>5,347</b>	<b>6,036</b>	<b>4,224</b>	<b>3,064</b>	<b>5,149</b>	<b>5,321</b>	<b>6,568</b>	<b>5,840</b>	<b>5,873</b>	<b>4,115</b>	<b>5,479</b>	<b>4,564</b>	<b>5,132</b>

Nushagak River Subareas	Permits Issued <sup>a</sup>												12-year average
	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	
Black Point	1	7	6	5	7	16	13	14	8	10	20	22	11
Ekwok Area	15	14	9	11	20	21	20	22	23	16	17	25	18
Grassy Island	9	11	6	3	7	8	8	3	3	3	6	8	6
Iowithla River	1	0	0	0	0	0	0	0	0	1	2	1	0
Klutuk River	1	0	0	0	0	0	0	1	0	0	1	0	0
Kokwok River	0	3	2	0	0	4	0	2	0	0	1	1	1
Koliganek Area	15	17	15	10	11	10	20	14	19	11	13	13	14
Lewis Point	19	20	21	20	15	15	15	15	18	19	17	18	18
Mulchatna River	0	1	0	0	0	1	2	3	0	0	1	1	1
New Stuyahok Area	29	31	11	24	31	27	35	37	34	28	38	23	29
Portage Creek Area	7	8	7	5	5	11	3	8	5	11	9	4	7
<b>Total</b>	<b>97</b>	<b>112</b>	<b>77</b>	<b>78</b>	<b>110</b>	<b>108</b>	<b>107</b>	<b>107</b>	<b>110</b>	<b>96</b>	<b>117</b>	<b>109</b>	<b>102</b>

a. Sum of sites may exceed subarea total because permittees may use more than one site.

Nushagak River Subareas	harvest per permit												12-year average
	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	
Black Point	15	24	19	18	23	27	32	17	7	11	28	39	25
Ekwok Area	27	59	40	36	30	47	42	39	41	33	26	33	38
Grassy Island	3	7	1	10	1	11	9	4	13	10	13	6	7
Iowithla River	56									0	0	20	15
Klutuk River	1							5				77	28
Kokwok River		6	5			45		69			0	10	27
Koliganek Area	71	75	50	61	65	63	60	43	68	58	69	61	62
Lewis Point	122	68	78	50	107	46	109	77	73	51	85	60	76
Mulchatna River		0				0	0	18			0	0	6
New Stuyahok Area	46	70	113	34	63	73	68	70	60	59	49	37	60
Portage Creek Area	15	20	16	23	21	31	11	22	40	18	13	13	21
<b>Total</b>	<b>55</b>	<b>54</b>	<b>55</b>	<b>39</b>	<b>47</b>	<b>49</b>	<b>61</b>	<b>55</b>	<b>53</b>	<b>43</b>	<b>47</b>	<b>42</b>	<b>50</b>

**Table 3. Estimated subsistence salmon harvests within the Nushagak District by location fished , Bristol Bay area, 1997.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	114	3,279	3,852	870	339	13	8,352
Nushagak River	97	5,347	5,659	433	777	56	12,273
Nushagak Bay Noncommercial	221	5,371	9,267	1,600	774	92	17,105
Nushagak Bay Commercial	56	548	1,905	246	57	4	2,760
Igushik/Snake River	31	613	3,440	156	34	46	4,289
Site Unknown	19	165	907	90	70	11	1,243
<b>Total</b>	<b>538</b>	<b>15,323</b>	<b>25,030</b>	<b>3,395</b>	<b>2,052</b>	<b>221</b>	<b>46,022</b>

Source ADF&G Division of Subsistence, ASFDB 1998 (ADF&G 1998).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 4. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 1998.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	99	1,332	3,832	1,328	305	166	6,962
Nushagak River	112	6,041	6,644	446	1,013	66	14,209
Nushagak Bay Noncommercial	243	3,579	8,833	2,631	1,008	748	16,799
Nushagak Bay Commercial	68	799	2,607	630	180	128	4,346
Igushik/Snake River	34	491	3,374	266	35	26	4,192
Site Unknown	6	9	18	0	0	0	27
<b>Total</b>	<b>562</b>	<b>12,250</b>	<b>25,308</b>	<b>5,301</b>	<b>2,540</b>	<b>1,134</b>	<b>46,534</b>

Source ADF&G Division of Subsistence, ASFDB 1999 (ADF&G 1999).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 5. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 1999.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	115	1,768	4,820	660	269	7	7,524
Nushagak River	77	4,224	3,937	299	825	26	9,312
Nushagak Bay Noncommercial	258	2,416	14,031	2,062	1,038	36	19,584
Nushagak Bay Commercial	75	927	3,579	937	253	41	5,738
Igushik/Snake River	22	721	3,020	34	23	13	3,811
<b>Total</b>	<b>548</b>	<b>10,057</b>	<b>29,387</b>	<b>3,993</b>	<b>2,409</b>	<b>124</b>	<b>45,969</b>

Source ADF&G Division of Subsistence, ASFDB 2000 (ADF&G 2000).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 6. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2000.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	110	1,938	4,351	1,229	321	201	8,039
Nushagak River	78	3,064	3,461	985	1,641	196	9,348
Nushagak Bay Noncommercial	238	2,872	10,747	2,933	934	1,030	18,516
Nushagak Bay Commercial	75	1,052	2,402	445	357	180	4,435
Igushik/Snake River	24	333	2,871	176	26	10	3,416
Site Unknown	13	211	619	216	184	45	1,275
<b>Total</b>	<b>541</b>	<b>9,470</b>	<b>24,451</b>	<b>5,983</b>	<b>3,463</b>	<b>1,662</b>	<b>45,029</b>

Source ADF&G Division of Subsistence, ASFDB 2001 (ADF&G 2001).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 7. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2001.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	115	1,184	3,960	530	206	14	5,894
Nushagak River	110	5,149	4,919	976	1,340	130	12,513
Nushagak Bay Noncommercial	256	3,715	10,283	3,097	1,074	108	18,276
Nushagak Bay Commercial	73	1,078	3,533	1,185	311	121	6,228
Igushik/Snake River	40	492	3,626	149	46	5	4,318
Site Unknown	15	142	618	56	34	0	850
<b>Total</b>	<b>554</b>	<b>11,760</b>	<b>26,939</b>	<b>5,993</b>	<b>3,011</b>	<b>378</b>	<b>48,080</b>

Source ADF&G Division of Subsistence, ASFDB 2002 (ADF&G 2002).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 8. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2002.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	117	1,411	4,377	612	370	188	6,957
Nushagak River	108	5,321	4,631	646	2,922	88	13,608
Nushagak Bay Noncommercial	232	3,598	7,963	2,671	1,505	785	16,522
Nushagak Bay Commercial	66	717	2,556	496	260	93	4,121
Igushik/Snake River	30	213	3,028	129	29	2	3,402
Site Unknown	5	22	221	12	9	23	287
<b>Total</b>	<b>520</b>	<b>11,281</b>	<b>22,777</b>	<b>4,565</b>	<b>5,096</b>	<b>1,179</b>	<b>44,897</b>

Source ADF&G Division of Subsistence, ASFDB 2003 (ADF&G 2003).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 9. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2003.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					
		Chinook	Sockeye	Coho	Chum	Pink	Total
Wood River	138	3,311	3,979	463	268	5	8,025
Nushagak River	107	6,568	7,338	1,431	3,553	237	19,127
Nushagak Bay Noncommercial	244	7,778	8,451	2,956	987	84	20,255
Nushagak Bay Commercial	56	672	1,665	539	210	68	3,155
Igushik/Snake River	30	357	3,882	44	45	9	4,337
Site Unknown	2	0	176	0	0	0	176
<b>Total</b>	<b>527</b>	<b>18,686</b>	<b>25,491</b>	<b>5,432</b>	<b>5,064</b>	<b>403</b>	<b>55,076</b>

Source ADF&G Division of Subsistence, ASFDB 2004 (ADF&G 2004).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 10. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2004.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					
		Chinook	Sockeye	Coho	Chum	Pink	Total
Wood River	120	2,449	4,094	648	562	148	7,901
Nushagak River	107	5,840	3,630	1,157	2,006	520	13,153
Nushagak Bay Noncommercial	236	6,413	6,875	1,815	1,173	1,087	17,363
Nushagak Bay Commercial	45	440	913	323	65	174	1,915
Igushik/Snake River	27	314	1,919	266	41	12	2,552
Site Unknown	3	153	60	32	23	2	270
<b>Total</b>	<b>511</b>	<b>15,609</b>	<b>17,491</b>	<b>4,240</b>	<b>3,869</b>	<b>1,944</b>	<b>43,154</b>

Source ADF&G Division of Subsistence, ASFDB 2005 (ADF&G 2005).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 11. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2005.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					
		Chinook	Sockeye	Coho	Chum	Pink	Total
Wood River	112	1,718	3,845	720	220	28	6,531
Nushagak River	110	5,873	8,531	1,494	3,639	544	20,081
Nushagak Bay Noncommercial	210	4,202	7,647	2,657	872	158	15,536
Nushagak Bay Commercial	43	599	1,909	442	255	62	3,267
Igushik/Snake River	24	137	1,545	194	13	0	1,888
Site Unknown	3	0	440	89	7	1	537
<b>Total</b>	<b>502</b>	<b>12,529</b>	<b>23,916</b>	<b>5,596</b>	<b>5,006</b>	<b>793</b>	<b>47,841</b>

Source ADF&G Division of Subsistence, ASFDB 2006 (ADF&G 2006).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 12. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2006.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	111	1,454	5,445	502	310	253	7,964
Nushagak River	96	4,115	4,545	1,061	2,395	265	12,381
Nushagak Bay Noncommercial	205	3,541	7,948	1,687	1,460	878	15,513
Nushagak Bay Commercial	39	514	1,056	264	103	167	2,103
Igushik/Snake River	28	230	1,670	65	48	11	2,024
Site Unknown	5	118	110	11	132	17	388
<b>Total</b>	<b>461</b>	<b>9,971</b>	<b>20,773</b>	<b>3,590</b>	<b>4,448</b>	<b>1,591</b>	<b>40,373</b>

Source ADF&G Division of Subsistence, ASFDB 2007 (ADF&G 2007).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

**Table 13. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2007.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	135	1,793	6,813	293	249	36	9,184
Nushagak River	117	5,479	5,879	1,127	1,572	213	14,270
Nushagak Bay Noncommercial	228	5,138	9,545	1,467	1,009	163	17,322
Nushagak Bay Commercial	33	418	887	113	119	12	1,550
Igushik/Snake River	25	500	2,000	36	57	6	2,599
Site Unknown	1	1	3	15	0	0	19
<b>Total</b>	<b>496</b>	<b>13,330</b>	<b>25,127</b>	<b>3,050</b>	<b>3,006</b>	<b>430</b>	<b>44,944</b>

Source ADF&G Division of Subsistence, ASFDB 2008 (ADF&G 2008).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.

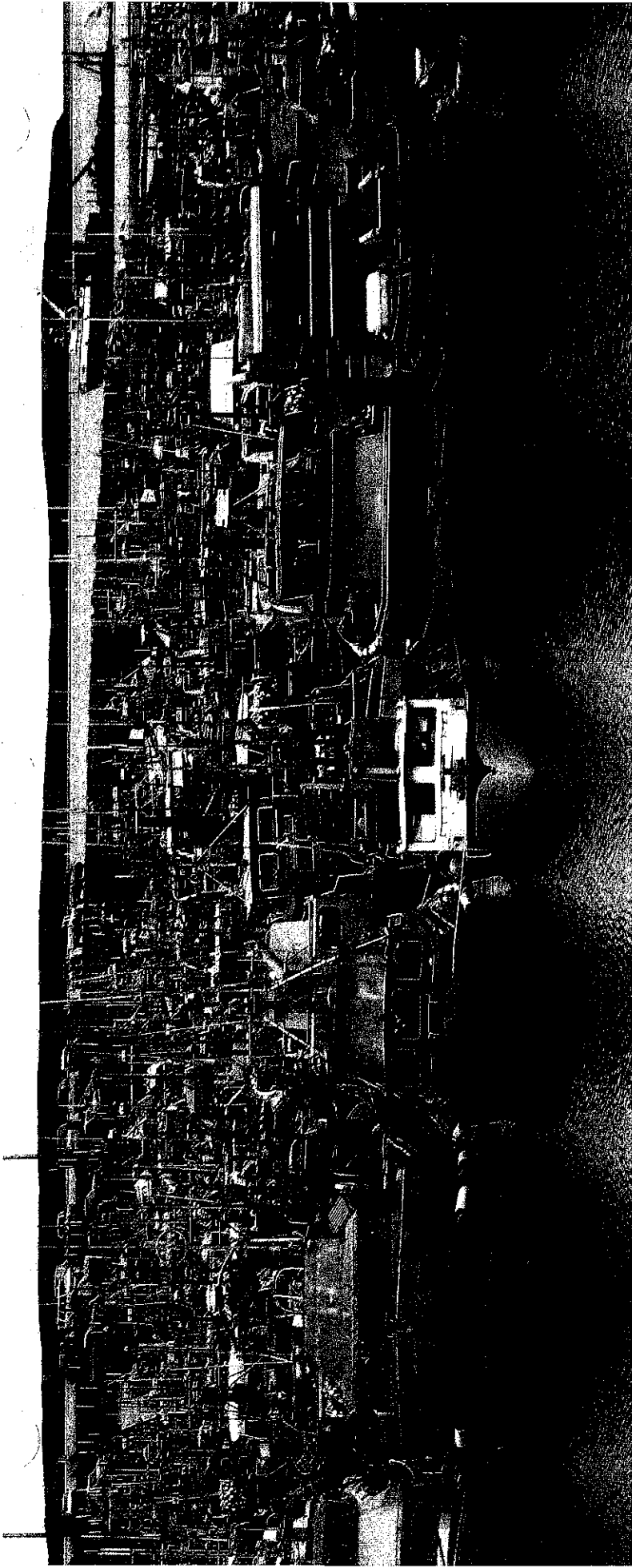
**Table 14. Estimated subsistence salmon harvests within the Nushagak District by location fished, Bristol Bay area, 2008.**

River System Fished Community of Residence	Number of Permits Issued <sup>a</sup>	Estimated Salmon Harvest					Total
		Chinook	Sockeye	Coho	Chum	Pink	
Wood River	163	2,726	6,780	816	468	260	11,051
Nushagak River	109	4,564	6,209	804	2,547	211	14,334
Nushagak Bay Noncommercial	232	4,469	8,119	2,294	1,259	801	16,942
Nushagak Bay Commercial	42	346	1,435	761	164	582	3,288
Igushik/Snake River	63	855	4,285	458	114	69	5,780
<b>Total</b>	<b>571</b>	<b>12,960</b>	<b>26,828</b>	<b>5,133</b>	<b>4,552</b>	<b>1,923</b>	<b>#REF!</b>

Source ADF&G Division of Subsistence, ASFDB 2009 (ADF&G 2009).

a. Sum of sites may exceed district totals, and sum of districts may exceed area total, because permittees may use more than one site.





Variations in existing 32-foot Bristol Bay salmon gillnetters

Image provided by the Bristol Bay Economic Development Corporation

RC64

*Tris Johnson*

# Alaska Ex-Vessel Salmon Prices

source: ADF&G

## Statewide Average

	2003	2004	2005	2006	2007	2008
Chinook	\$1.31	\$1.93	\$2.27	\$3.03	\$3.07	\$4.54
Sockeye	\$0.62	\$0.60	\$0.73	\$0.76	\$0.80	\$0.84
Coho	\$0.50	\$0.70	\$0.76	\$1.04	\$0.96	\$1.28
Pink	\$0.09	\$0.10	\$0.12	\$0.16	\$0.19	\$0.35
Chum	\$0.19	\$0.21	\$0.27	\$0.32	\$0.34	\$0.59

RC 65

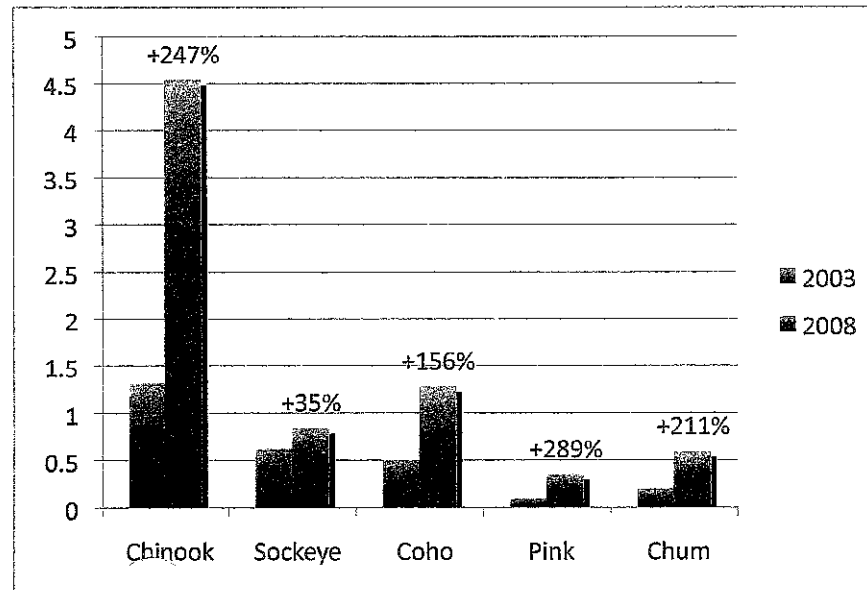
cumulative percentage ch:	2004	2005	2006	2007	2008
Chinook	47%	73%	131%	134%	247%
Sockeye	-3%	18%	23%	29%	35%
Coho	40%	52%	108%	92%	156%
Pink	11%	33%	78%	111%	289%
Chum	11%	42%	68%	79%	211%

source: ADF&G

	2003	2008	change from 08
Chinook	\$1.31	\$4.54	247%
Sockeye	\$0.62	\$0.84	35%
Coho	\$0.50	\$1.28	156%
Pink	\$0.09	\$0.35	289%
Chum	\$0.19	\$0.59	211%

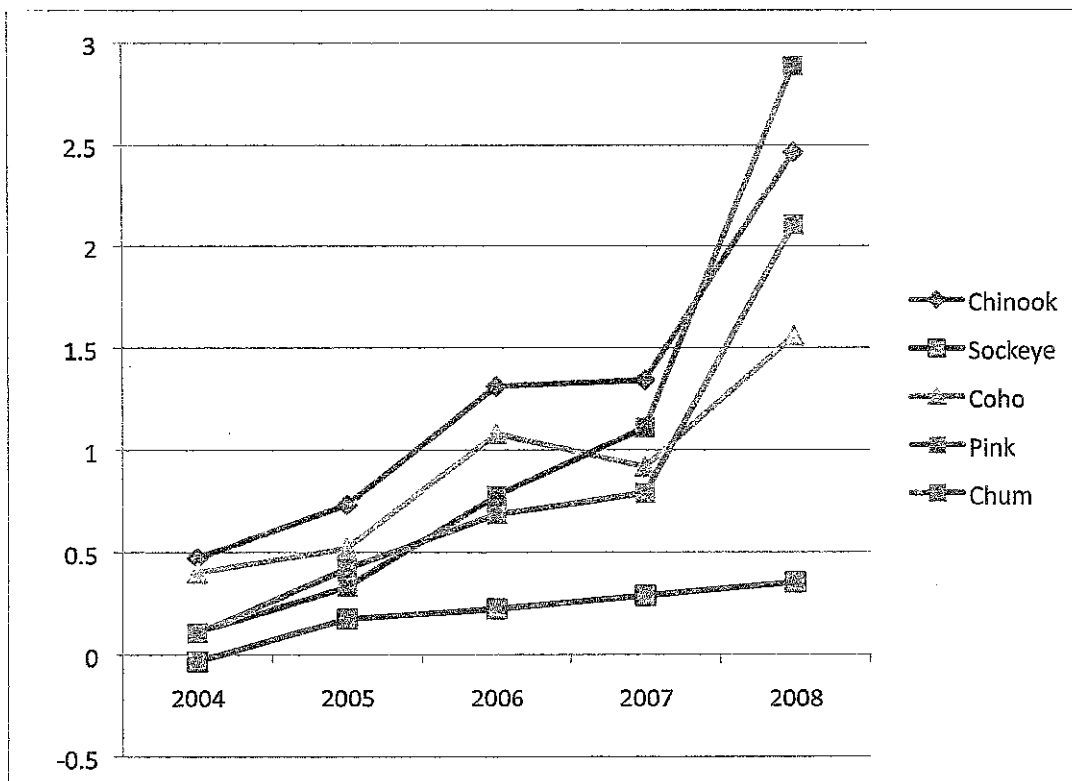
Distributed by  
Chris Knight

1 of 2



	<u>total sockeye</u>	<u>Bbay sockeye</u>	<u>% Bbay</u>
2004	44,704	26,265	59%
2005	43,387	24,525	57%
2006	41,649	28,493	68%
2007	47,468	29,773	63%
2008	39,090	27,678	71%
	216,298	136,734	63%

Alaska ex-vessel salmon price growth: cumulative, basis 2003



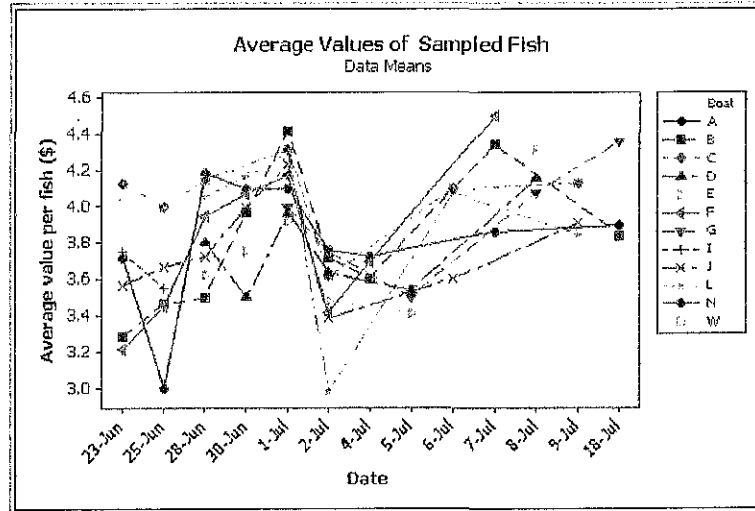
2 of 2

# 2008 BB QUALITY STUDY

12 DRIFT  
BOATS  
FISHING IN  
EGEGIK

FILLETS  
GRADED IN  
SHORE PLANT  
PER ASMI  
STANDARDS

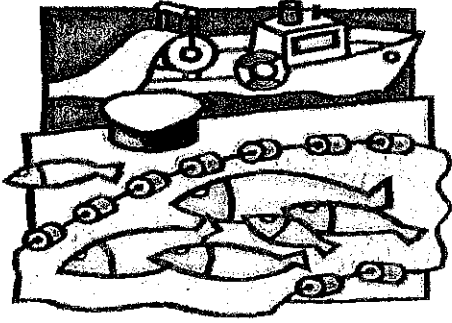
VALUES  
AVERAGED  
FOR  
PERCENT #1,  
#2 AND #3  
QUALITY



**Bristol Bay Salmon Product Development  
Credit investments 2007-2008**

<u>2007</u>		
<b>Claimed Costs</b>	<b>Description</b>	
\$ 1,526,426	Blast freezers	
\$ 511,517	Fillet lines	
\$ 652,140	Fillet machines	
\$ 273,240	Pin bone machines	
\$ 149,040	Vacuum packaging machines	
\$ 354,458	Ikura lines	
\$ 20,652	Other	
\$ 3,487,473	<b>TOTAL</b>	

<u>2008</u>		
<b>Claimed Costs</b>	<b>Description</b>	
\$ 1,173,392	Fillet lines	
\$ 767,545	Vacuum packaging machines	
\$ 10,125	Glazing machines	
\$ 1,951,062	<b>TOTAL</b>	



# BBEDC Permit Loan program

## Key Points

Under the new **Permit Loan Program**, BBEDC will work cooperatively with CFAB to guarantee appropriate loans to qualified Bristol Bay drainage residents to purchase drift or set permits. Additionally, the program will provide financial assistance in the form of interest subsidy and "sweat equity" as well as business counseling and educational opportunities to enhance the permit holder's ability to manage their fisheries business successfully.

### **Trail Breaking**

This is a new program for participants as well as administrators. Patience is appreciated.

**Important:** the first step is to apply for a loan with CFAB. If the loan is denied, the resident is eligible to apply for the BBEDC Permit Loan Program

### **Who qualifies for the BBEDC Permit Loan Program?**

- Residents of the 25 Bristol Bay watershed communities.
- Watershed communities are: Aleknagik, Clarks Point, Dillingham, Egegik, Ekuk, Ekwook, Igiugig, Iliamna, King Salmon, Kokhanok, Koliganek, Levelock, Manokotak, Naknek, Newhalen, New Stuyahok, Nondalton, Pedro Bay, Pile Bay, Pilot Point, Pope Vanoy, Port Alsworth, Port Heiden, Portage Creek, South Naknek, Togiak, Twin Hills, Ugashik
- 18 years of age or older.
- Properly filed Loan Application with CFAB has been denied within 45 days prior to application to BBEDC
- No overdue child support payments, or delinquent IRS tax obligations
- Demonstrate active participation for three years previously in the Bristol Bay drift or set net fishery for which the permit is being acquired.
- Approval by BBEDC is based on credit worthiness that can be addressed via permit loan program

### **What are the benefits of the BBEDC Permit Loan Program?**

- Loan guarantee of 25% to 75%
- 5% rather than 20% down payment
- Loan term not to exceed 15 years
- Reduction of Principal through Sweat Equity. Participation in the Equity Agreement will provide reduction of up to 30% of the principal balance of the CFAB Loan on the anniversary date of this Agreement for the next seven (7) years, released 14.286% annually. Borrower may apply these funds at his/her discretion to loan payments or extra principal payments.
- Interest Subsidy. BBEDC will pay CFAB on behalf of the Borrower up to 4.5% of the original loan amount under the CFAB Loan annually as an interest subsidy for the duration of the loan term, not to exceed 15 years, payable on the anniversary date of this Agreement. It is understood such annual payment shall not exceed \$4,000 or the total amount of the interest due, whichever is less,
- Mandatory Business Counseling and Education including Managing a Fishing Business (provided by BBEDC).

### **How do residents apply?**

- Submit a loan application to the Commercial Fishing and Agriculture Bank.
- If the loan is declined, submit a BBEDC application. The application requires attachments that include a completed Residency form, proof of participation in the fishery for 3 years and proof of a market.
- Applicants may apply for pre-approval.

### **Once approved, what is required to stay in the Program?**

- The recipient must actively fish the permit for at least 3 weeks each year (proof will be required) for the duration of the loan.
- Participation in the program is not transferable.
- Loan must remain in good standing.
- Must maintain residency within the watershed (pursuant to BBEDC program policies).
- Must participate in business counseling (provided by BBEDC).
- Must participate in BBEDC sanctioned training events.

### **What might prevent a resident from participation in the program?**

- Credit flaws not fixable
- Liens or other serious credit issues
- Not a resident under BBEDC program policies
- Failure to fish the permit
- Failure to participate in business counseling or meet training requirements

### **What options are available to applicants not accepted?**

- Participation in other BBEDC programs (CDQ Community residents) such as training opportunities, the Technical Assistance Program and the Interest Rate Assistance Program.
- Services provided via a newly established partnership with the Consumer Credit Counseling Services of Alaska.

### **For additional information, contact any of the following.**

- Community Liaison in any CDQ Community
- BBEDC Economic Development and Brokerage Section



Bristol Bay Economic Development Corporation  
P.O. Box 1464  
Dillingham, Alaska 99576  
Ph: 1-907-842-4370  
Ph: 1-800-478-4370  
[alice@bbedc.com](mailto:alice@bbedc.com)

August Knutsen  
706 Copperbush Ct.  
Anchorage, AK 99518

December 2, 2009

RE: Bristol Bay Finfish Meeting  
December 1-8, 2009

RC 66

Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Chairman Webster and members of the Board of Fisheries,

I grew-up in Dillingham, Alaska. I have run the family fishing business since 1989. I am a second generation drift net fisher. I have fished during seasons that have included 1800 drift fishers. The Bristol Bay Drift Gillnet Optimum Number Study gave an in-depth analysis of the reasons for reducing the number of drift permits. It is a compelling argument to reduce the number of permits. However, the study does not analyze a permit stacking option to reducing gear.

**I SUPPORT Proposals 1, 2, 3** because this would allow people, who heavily depend on subsistence, to efficiently meet subsistence needs. It would also address the congestion on Kanakanak beach and competition for subsistence sites. These proposals wouldn't significantly affect the amount of fish taken but would rather enable people to catch fish needed in a more timely, cost-effective manner.

**I OPPOSE Proposal 14** strongly because it would be virtually impossible to remove and install all set-net gear to accommodate drift gillnet openings. I have helped friends set-up their running lines on Ekuk beach. Not only is it impossible for the Ekuk set-net operators, but would also cause undue danger to set-net fishers to remove their equipment with an onshore wind.

**I OPPOSE Proposal 15** because for the past few fishing seasons the company that I fish for has had its drift fleet on 3500 pound delivery limits. The Optimum Number Study gives a degree of drift fishers based on a quality number of drift fishers. That number is based on the degree of inefficiencies that have been built into the Bristol Bay drift fleet. One of those inefficiencies is the length of the fishing vessels. In order to be competitive in Bristol Bay, a fisher must upgrade and maintain a vessel. Lengthening the vessel limit would require many of us to pay a large price in order to stay competitive. Today, I pay a mechanic \$125 per hour to perform regular maintenance; I also pay a welder \$125 per hour whenever I need to have exhaust work or other maintenance. A larger vessel would require a larger portion of fishing income to maintain.

**I OPPOSE Proposals 16 through 21** (using multiple permits) these proposals are a slippery slope that in the end results in more fishing gear in the water, when we are trying to reduce the amount of gear. The permit stacking program that is in place now works for the most part, pretty well. It has accomplished several things: allowed a younger generation of fisher to still be able to afford to buy into the fishery; It has also helped to reduce gear in the water while allowing permit holders to stack gear. These proposals need to be weighed on the ripeness of the issue—is this the right time to allow one person to stack gear? I would have to say—no, it isn't. I think it is too early to allow stacking without coming up with a permanent plan to eliminate the excess number of drift permits in Bristol Bay. I would hope that the Board would consider other avenues—there are a large number of permits that can justifiably be permanently eliminated without having to create a hybrid user group in Bristol Bay.

Thank you,



August Knutsen



RC67

Alaska Dept of Fish and Game  
Board Support Section: Board of Fish  
PO Box 115526  
Juneau, AK 99811-5526  
Attn: Vince Webster, Chair and members

Re: Proposal 20 – Permit Stacking

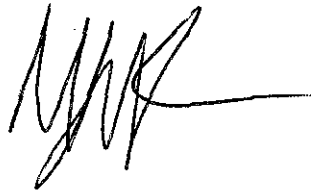
As a 38 yr Kodiak, Alaska resident, I represent a family owned Bristol Bay operation with a 35 year history of harvesting Bristol Bay Sockeye. I have attended BOF cycle meetings and lobbied for changes to the fishery in an effort to maintain some reliable income and return on money invested in vessels, permits and equipment. I am writing this letter in support of Proposal 20 – Permit Stacking

According to the economic studies of this fishery there is a consensus that fleet reduction is essential to future economic improvement. There have been legislative changes made to allow one individual to own two salmon permits and direction to the BOF to create benefits to those who invest in additional permits. There are many of these permits (latent permits) currently going unused, as no opportunities have been created for these double permit owners. Meanwhile the "D" permit rules have allowed increased gear length for those vessels with multiple permit holders on board. There has been a reduction in fleet size due to these changes. Harvesters who have difficulties maintaining a vessel (or do not own one) have been able to join vessel owners and continue to utilize their permits. All fishers have gained opportunity from reduced vessel and gear concentration as a result of these measures.

In the absence of a government financed buyback, implementing the permit stacking is the next logical step in this process. We will then experience the continued vessel reduction and reduced overcrowding in all fishing districts. If this proposal is not approved, the latent permits will be sold and return to the fishery with new owners. Any future economic improvements in the fishery will be offset by (returning) "D" permit holders currently without vessels, who will "gear up". Potential increased profits will be met with an ever increasing vessel count, eventually resulting in 1800 vessels fishing and back to extreme overcrowding, increased intensity and loss of orderly harvest opportunities. We could easily lose our focus on fish quality and market share as we re-intensify the "race for fish" and crowd the perimeters once again. It is obvious we could easily lose what has been gained. All participants benefit as vessel and gear concentrations diminish and the effort to compete can evolve towards an effort to produce quality product in an orderly harvest. Please support proposal 20 and allow permit stacking

Respectfully Submitted:

Michael J Friccero F/V Miss Gina



907 539-1320

ADD ENVIRONMENTAL IMPACT

ANSWER FOR NEW REVISION WATERWAY WASHIP 15

Alaska Dept of Fish and Game  
Board Support Section: Board of Fish  
PO Box 115526  
Juneau, AK 99811-5526  
Attn: Vince Webster, Chair and members

Re: Proposal 15 – Eliminate 32 ft Rule

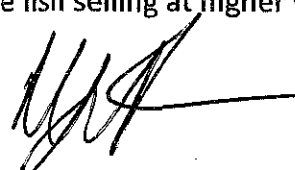
As a 38 yr Kodiak, Alaska resident , I represent a family owned Bristol Bay operation with a 35 year history of harvesting Bristol Bay Sockeye. I have attended BOF cycle meetings and lobbied for changes to the fishery in an effort to maintain some reliable income and return on money invested in vessels, permits and equipment. I am writing this letter in support of Proposal 15 – Eliminate the 32 ft limit

I have owned several Bristol Bay gillnetters and they all have one thing in common – They are too small! On our boat, we are currently refrigerating, bleeding and floating as many of our fish as we can, but this is limited to the early and late season fishing times, because when the run is at full strength, there is not enough space (on most 32 ft boats) to properly manage the fish for quality. It will take more deck space, more fish hold capacity, and another crew member to properly handle premium fish during a peak day of operation. Additionally our vessel has fish holds located aft and loses freeboard rapidly when loaded with fish and RSW water. Additional buoyancy provided by a moderate length increase would be important for added safety on our vessel. Many 32 ft gillnetters do not have the space available for refrigeration equipment. Most would not perform well with a partially flooded RSW fish hold. Those vessels that do are sacrificing draft and freeboard and handle awkwardly, compromising safety in heavy weather. Most Bristol Bay gillnetters would provide safer work platforms and better deck layouts with an increase in length. The additional space would be utilized for quality improvements as well.

We currently are receiving as much as .33/lb more for premium fish (bled, chilled, floated ) from my salmon market. If we try to deliver premium fish during the peak season, we trade off quality and premium prices for decreased production. This negates any financial benefit and limits our increased prices to the “scratch” season. There will continue to be significant “lost dollars” until the quality of our fish becomes paramount. Improving the quality of the fish we catch is the pivotal task that can be accomplished quickly, with the least change to the infrastructure of the region. Increasing the volume of the premium fish is the next level. Increased vessel length is directly relevant to these goals.

We are currently using our vessels differently than in the past, yet we are being restricted by an outdated vessel length limit. Allowing a moderate vessel length increase would allow (physical space) for quality related improvements, increased safety for tanked vessels, and minimal impact to non invested fishers. Quality improvement is the most significant change with the highest return and is also the easiest to attain. Quality fish handling requires increased vessel size. Increased vessel length will result in more fish selling at higher values. Please support Proposal 15

Respectfully Submitted  
Michael J Friccero F/V Miss Gina

 907 539-1320

ADD 3'4" Dist to Stern - Floater/peck  
Part of next ...  
TRR Bins

RC 68

**ALLOW FREE MARKET PRINCIPLES TO WORK  
WHAT I WOULD DO TO THE ETERNITY IF I COULD STRETCH IT.**

Gerold S. Gugel Jr  
F/V Eternity  
12/2/09

The problem:

The major economic issue of Bristol Bay was the lack of response to the introduction of high quality farm fish. Bristol Bay fish has a history of being of poor quality and was not position to meet the high standard of today. I believe that investment and change is necessary to meet todays market so that all of us will profit.

Last year I delivered over 200,000 lbs of red in Bristol Bay. More than 90% of these fish were **BLED, FLOATED, and REFRIGERATED**. These fish have gone into **fresh domestic high end market as well as markets in Europe**. I am in a profit share with my processor and I trust that I will experience 1.05/ lbs for 2009 fish.

I am aware of the desire of the board to take care of the water shed fisher man. I realize that this issue is not one that has an easy answer. I would like to suggest that one of the benefits of an operation like mine is to blaze a trail into producing a higher quality fish. To support a processor who is lifting up the bar in the area of quality and development of new high end markets. The greatest benefit for water shed fisherman is when the word get out and other processors feel the need to raise their quality bar and to increase the amount of pay to their fleet in order to maintain that fleet.

---

The best thing that has happened in the Bay is the result of somebody investing. The processor that I personally fish for has invested millions. I personally have invested thousands, and the good news in the bay is coming from that investment. The satisfaction of knowing that you are part of the solution and producing more valuable fish is profitable and satisfying. I would like the blessing of the Board to follow that God given talent to be the best fisherman that I can be.

Holding back those who would be willing to invest, and risk their own money in improving their gear and push the envelop in the area of quality improvement is not the answer for helping the water shed fisher man.

I have included a copy of my 2009 fish settlement, pictures of my vessel, and a fish tick which shows, Bleeding, Floating and RSW. The reason for doing so is to validate and give an example of a boat on the cutting edge. The fish tick shows three functions; cool water temp, fish that are floating, to stop crushing and create more number 1s., and fish that have been bled. There is a picture of my wife, using the bleeding stick on the deck of the Eternity.

If I had the opportunity, I would extend the eternity for the following reasons. This is a good example of how I would use the option of increasing the length of the Eternity

Increase the hull speed which would be a factor of length of boat.

Give more room to the engine room as it is too crowded.

Allow me to go from three engine to two with the increase in the engine room.

Allow me to install larger more efficient jets that would decrease my fuel consumption. These would not increase my speed.

Change the shape of my bow so that the vessel would not pound so much.  
It is difficult to make a sea kindly bow from a beam of 16 feet on a 32 foot boat. The Eternity pounds hard.

Put in a larger rsw system, the 7.5 RSW I now have is marginal. This would improve quality.

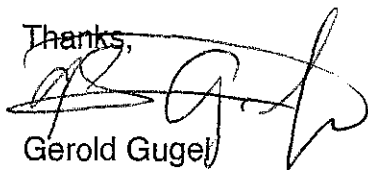
I would not increase my fish hole as I would be adding the length onto the stern.

Improve the balance of the boat as it is stern heavy making it more difficult to get on step and stay on step.

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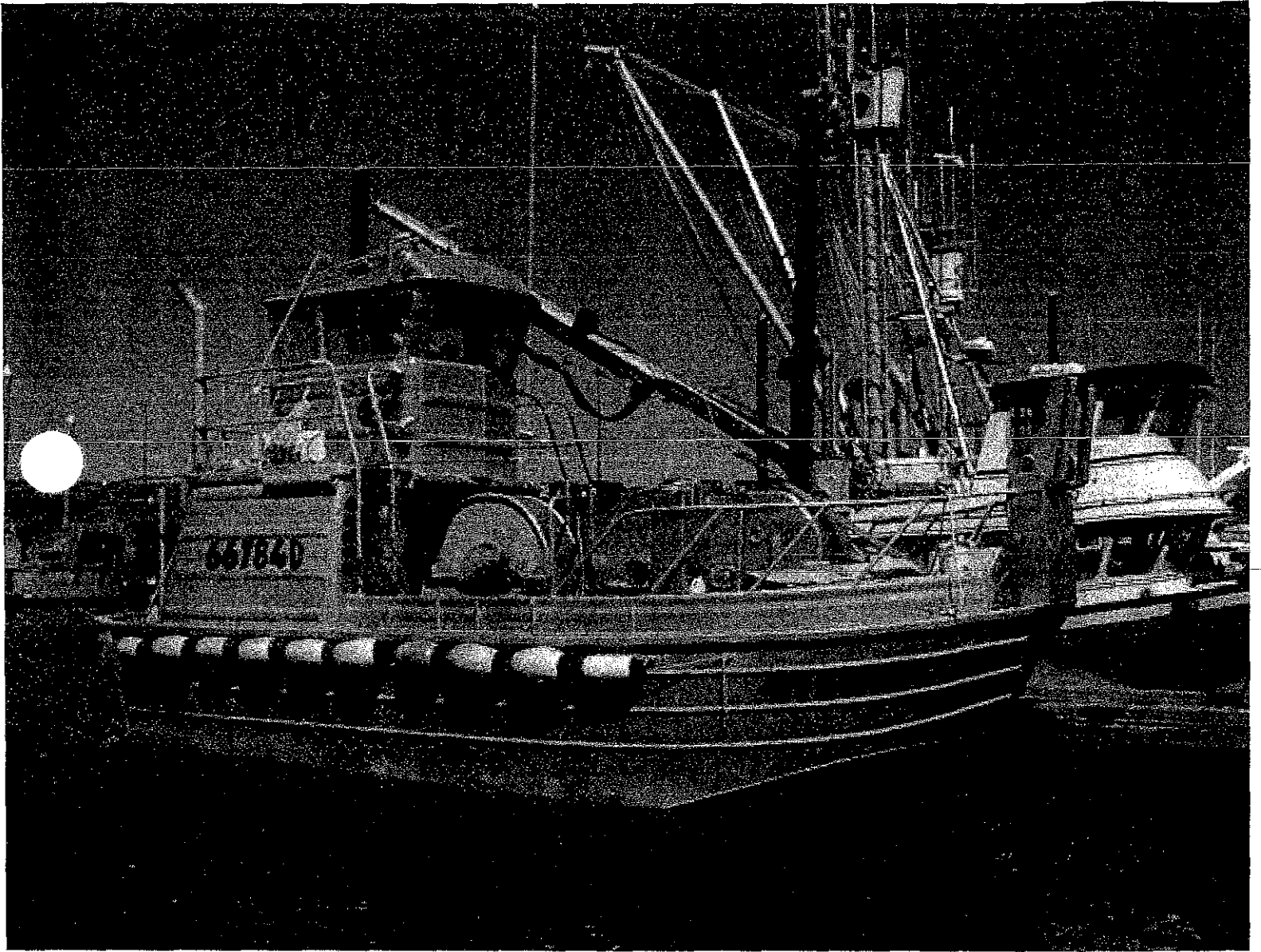
It would make my vessel a better vessel, improve quality and save fuel. If the board were to drop this 32 foot limit, I would immediately start to make these improvement.

Thanks,



Gerold Gugel  
From Ouzinkie

927 223 0133





DEPARTMENT OF FISH & GAME  
DAY SALMON TICKET

ETERNITY  
SALMON DRIFT BB  
JOSEPH GUGEL  
S03T62039K 66784  
0901P 319178 85

Permit  
Number

DO NOT WRITE  
IN THIS SPACE

DO NOT WRITE IN THIS SPACE

B09 043343

Delivery Code

Sled  Whole

Dual Permit

Proc.  
Code

F4160 7 09 071104  
EADER-CRFFK 0119

Date  
Caught  
Date/Time  
Landed

7 10

Company

GUGEL SPIRIT

District  
Caught

WASH

Star  
Chart  
No

DO NOT WRITE IN THIS SPACE

32530

REDS - 420			CONTINUED REDS - 420			PINKS - 440		
NUMBER	POUNDS	AMOUNT	NUMBER	POUNDS	AMOUNT	NUMBER	POUNDS	AMOUNT
②	1023		②	890				
②	1372							
①	753							
①	458							
②	1066							
①	914							
②	672							
②	1052							
①	502							
①	633							
①	700							
②	1290							
TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL			
	10,626							

OVERLIMIT REDS - 420

NUMBER POUNDS AMOUNT

TOTAL TOTAL TOTAL

NOT SOLD/PERSONAL USE - 95

SPECIES NUMBER

CHUMS - 450			COHOS - 430			KINGS - 410		
NUMBER	POUNDS	AMOUNT	NUMBER	POUNDS	AMOUNT	NUMBER	POUNDS	AMOUNT
TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL	TOTAL

ALL  
FLOATING

Cash Advance

Fish Received by

M.T. Mc...

Permit Holder's Signature

*[Signature]*

I HEREBY ATTEST THAT THESE FISH WERE CAUGHT IN COMPLIANCE WITH ADF&G REGULATIONS.

Optional

Temps

57  
56  
50

Quality  RSW

Ice

## 8-POINT QUALITY PROGRAM

- 1) **Cold Fish - Refrigeration capable of producing 32° - 39° fish is a basic requirement for all fish being in Leader Creek's fleet.**
  - Turn on your refer system and have water down to temp one hour before you start fishing. You need at least a foot or more of chilled water in your holds. Spraying the fish will not get your fish down to temp.
  - You will not receive a profit sharing bonus on non-refrigerated fish. Each vessel will be allowed two deliveries over 39 degrees. If fish are over 39 degrees on any other deliveries, fishers will not receive a profit sharing bonus.
  - If there are reasons for having warmer fish or if there are any discrepancies, they need to be resolved at the tender. For example, if you are delivering shortly after the opener, the tender needs to make a note of this on the fish ticket. When you sign the fish ticket you are agreeing to the temps that are stated on the fish ticket.
  - Breakdowns do occur. Call John Lowrance if you are having refrigeration problems.
- 2) **Float Your Fish** - The #1 cause of #2 fish is pressure on the fish in brailers. The more fish is suspended in water, the better for quality.
- 3) **Brailer Weights** - Fill brailers to 500# when possible. In addition to not crushing your fish, you will chill your fish more effectively if they are completely immersed. Always distribute your fish equally among your brailers. A wide disparity of brailer weights will disqualify the offload for "BEST FISH." Any brailers that weigh over 1000# will be docked 5 cents per pound.
- 4) **Cushion the Blow** - Bruises are visible and they lower the value of our fish. Cushion impact by placing a mat or pad on the deck where the fish are likely to hit and become bruised.
- 5) **Bleed Your Fish** - A bled fish tastes better, bruises less, has a longer shelf life, and commands a higher price. When not overwhelmed with fish, cutting an artery under the gill plate with a knife is the best way to bleed and an easy way to improve quality. This differentiates our pack from the rest. Bleeding your fish is the qualifier for the extra bonus in the "BEST FISH" category.
- 6) **Avoid Roundhauling** - Roundhauling is extremely hard on fish. It dramatically reduces quality through bruising and high temps, resulting in #2 fish.
- 7) **Educate Your Crew** - Take the time at the beginning of the season to educate your crew, especially newcomers, to the fishery. This will instill pride and good habits from the very start.
- 8) **Sanitize Your Brailers and Holds** - A food grade detergent and/or a chlorine sanitizer should be used on your brailers and holds after each day's fishing. A short soak of the brailers in a very dilute chlorine solution will reduce the bacteria and smell.



Leader Creek Fisheries

## 2008 PROFIT SHARING & BEST FISH CRITERIA

To be included in PROFIT SHARING, all your deliveries must meet the following requirements and be noted on your fish ticket:

- ✓ **CHILLED** – Fish temps between 32° - 39°F unless just caught.
- ✓ **FLOATING** – No stacked brailers!
- ✓ **BRAILERS LESS THAN 500#** – In heavy fishing, brailers over 500# will qualify only if all the brailers for that offload weigh approximately the same.

To receive the extra \$.05 BEST FISH bonus, all your deliveries must meet the above criteria and also be:

✓ **BLED**

YOUR responsibilities....

1. Separate bled from not bled fish and identify your "Best Fish" to the tender crew.
2. Make sure your fish ticket shows all four "Best Fish" criteria. Your signature on your fish ticket confirms that it is accurate and complete.

**We will NOT apply the "Best Fish" premium retroactively!!**

**!!! SCAMMERS BEWARE !!!**

**If you present fish as bled and they are not, then you will lose the Best Fish premium on ALL prior fish tickets.**

F4G in KS 246-3309  
Troyers 243-3346

**Settlement**

**Eternity**

For the time period:  
Jun 1, 2008 through Mar 19, 2009

LIVERIES		RSW	Unsorted	Red	Chum	Coho	King	Brailer	Dock/Pad	Best	Extension
Γ Date	FT #	Area	Temp	Red Lbs	Lbs Price	Lbs Price	Lbs Price	Lbs Price	Lbs Deduct	Red	Extension
28/2008	59369B	Nak	32	3,868	3,857 \$0.95	11 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$3,858.65
29/2008	58507	Nak	33	2,128	2,122 \$0.95	6 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$2,016.80
29/2008	59949	Nak	33	2,657	2,645 \$0.95	12 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$2,514.55
30/2008	59370B	Nak	33	3,140	3,119 \$0.95	21 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$3,122.15
30/2008	59714	Nak	36	2,742	2,724 \$0.95	18 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$2,590.50
01/2008	59528	Nak	41	10,386	10,332 \$0.95	54 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$9,823.50
01/2008	59735	Nak	33	4,810	4,806 \$0.95	4 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$4,566.30
02/2008	59302	Nak	36	7,198	7,166 \$0.95	32 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$6,812.50
02/2008	59746	Nak	34	8,021	7,799 \$0.95	222 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$7,442.35
03/2008	59406	Nak	34	6,261	6,236 \$0.95	25 \$0.15	0 \$0.00	19 \$0.25	0 \$0.00	\$0.00	\$5,932.70
04/2008	59974B	Nak	36	11,000	10,969 \$0.95	31 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$10,973.65
05/2008	59980B	Nak	36	9,667	9,569 \$0.95	98 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$9,583.70
05/2008	59991B	Nak	34	473	468 \$0.95	5 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$468.75
06/2008	20704	Nak	36	603	594 \$0.95	9 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$565.65
06/2008	20704B	Nak	36	862	849 \$0.95	13 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$850.95
06/2008	59995	Nak	36	5,807	5,719 \$0.95	88 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$5,446.25
06/2008	59995B	Nak	36	8,728	8,596 \$0.95	132 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$8,615.80
07/2008	20726B	Nak	33	4,891	4,500 \$0.95	391 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$4,558.65
07/2008	59324B	Nak	34	4,641	4,468 \$0.95	173 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$4,493.95
08/2008	20737	Nak	33	3,027	3,009 \$0.95	18 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$2,861.25
08/2008	59336B	Nak	33	6,220	6,166 \$0.95	54 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.05	\$6,174.10
09/2008	20749	Nak	35	962	956 \$0.95	6 \$0.15	0 \$0.00	12 \$0.25	0 \$0.00	\$0.00	\$912.10
09/2008	22634	Nak	36	16,000	15,658 \$0.95	342 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$14,926.40
10/2008	20957	Nak	33	10,333	10,299 \$0.95	34 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$9,789.15
10/2008	59435	Nak	35	1,421	1,413 \$0.95	8 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$1,343.55
12/2008	20973	Nak	34	2,191	2,151 \$0.95	40 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$2,049.45
12/2008	20992	Nak	38	15,468	15,194 \$0.95	274 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$14,475.40
13/2008	41022	Nak	34	11,502	11,164 \$0.95	338 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$10,656.50
15/2008	41066	Nak	38	5,700	5,700 \$0.95	245 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$5,451.75
15/2008	95732	Nak	37	12,888	12,888 \$0.95	1,432 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$12,458.40
16/2008	41077	Nak	44	3,808	3,808 \$0.95	338 \$0.30	0 \$0.00	0 \$0.25	0 \$0.00	\$0.00	\$3,719.00
16/2008	95748	Nak	33	3,004	3,004 \$0.95	266 \$0.30	0 \$0.00	45 \$0.25	0 \$0.00	\$0.00	\$2,944.85
17/2008	4138	Nak	34	3,832	3,832 \$0.95	577 \$0.30	0 \$0.00	23 \$0.25	0 \$0.00	\$0.00	\$3,819.25
18/2008	41090	Nak	34	4,739	4,739 \$0.95	558 \$0.30	0 \$0.00	22 \$0.25	0 \$0.00	\$0.00	\$4,674.95

Delivery Totals:

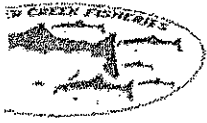
165,007    196,519    5,875    0    121    0

Taxable Amount (Dock/Pad is not taxable): \$190,493.45

	\$190,493.45
	15,708.22 prior
	✓ 33,408.23
Less 3.00% Naknek Tax:	\$-5,714.80
Less 1.00% Regional Tax:	\$-1,904.93
	7,619.73 tot. tax
	✓ -6,283.41 prior
	✓ 1,336.32 this tax

**ADVANCES**

Date	Payee	Check #	Amount
7/20/2008	Eternity, Inc.	9836	\$88,801.17



**Leader Creek Fisheries  
Settlement**

Gugel, Kristine  
Eternity

Printed on: Mar 19, 2009

For the time period:  
Jun 1, 2008 through Mar 19, 2009

ERIES	te	FT #	Area	RSW Temp	Unsorted Red Lbs	Red Lbs Price	Chum Lbs Price	Coho Lbs Price	King Lbs Price	Brailer Lbs Deduct	Dock/ Pad	Best Red	Extension
08	59724		Nak	34	1,587	1,577 \$0.95	10 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00		\$0.00	\$1,499.65
08	41005		Nak	35	4,400	4,357 \$0.95	43 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00		\$0.00	\$4,145.60
08	41033B		Nak	39	802	593 \$0.95	209 \$0.15	0 \$0.00	0 \$0.25	0 \$0.00		\$0.05	\$624.35
Delivery Totals:					<b>6,789</b>	<b>6,527</b>	<b>262</b>	<b>0</b>	<b>0</b>	<b>0</b>			

Taxable Amount (Dock/Pad is not taxable): \$6,269.60

Less 3.00% Naknek Tax: **-\$188.09**

Less 1.00% Regional Tax: **-\$62.70**

Less Advances: **-\$3,878.54**

Less Invoices: **-\$1,075.07**

Balance: **\$1,065.21**

Prior Balance: **\$0.00**

**Final Balance: \$1,065.21**

*Handwritten notes:*  
 - 5160.01 prior this gross  
 ✓ 1109.59  
 250.79 tol  
 - 206.40 prior  
 ✓ 44.39

**ANCES**

Date	Payee	Check #	Amount
0/2008	F/V Eternity, Inc.	9836	\$3,714.27
24/2008	F/V Eternity, Inc.	10438	\$164.27
		<b>Total:</b>	<b>\$3,878.54</b>

**ICES**

Date	Number	Vendor	Amount	Details
1/2008	98336	Naknek Trading	\$612.75	Groceries, PO 9261
1/2008	34504501442	NAC	\$449.72	Freight for Generator ex: AK Diesel Electric
1/2008	261126420	USPS	\$12.60	Express mail postage
<b>Total:</b>			<b>\$1,075.07</b>	

Creek Settlement for: Gugel, Kristine

*Both permits figures for this LCF3 settlement:*

*Handwritten calculations:*  
 Joseph gross 33408.23  
 Kristine gross 1109.59  
 Gross 34517.82 ✓  
 Joseph tax 1336.32  
 Kristine tax 44.39  
 Tax 1380.71 ✓  
 Net p tax 33137.11 ✓  
 (amt. of settlement ct.)

*Vertical handwritten note:* / income

# Anchorage Advisory Committee Meeting Notes November 3, 2009

RC69

Next scheduled meeting - ?

Members Present	Members Excused	Members Unexcused
Bruce Morgan Kevin Sparrowgrove Dave Sealy Joel Donner Jim Stubbs Aaron Bloomquist Wade Willis Liza Sims Art Nelson	Mike McCrary	Don Fredrick Danny Lewis Phil Lincoln Chad Moore James Stegall Zach Stubbs Paul Tony

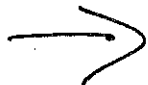
### Public Attendance:

- |                     |  |
|---------------------|--|
| Craig Fleener       | (ADF&G Division of Subsistence)              |
| March Burch         | (ADF&G Division of Wildlife)                 |
| Rick Sinnott        | (ADF&G Division of Wildlife)                 |
| Gino Delfrate       | (ADF&G Division of Wildlife)                 |
| Grant Hildebrand    | (ADF&G Division of Wildlife)                 |
| Brian Kraft         | (Alaska Sportsmen's Lodge)                   |
| Yolanda Delacruz    | Public                                       |
| Nelli Williams      | (Trout Unlimited)                            |
| Lynette Marino-Hinz | Public                                       |
| Val Glooshenko      | Public                                       |
| Brenda Rebne        | (AHTNA / Big Game Commercial Services Board) |

Items that pertain  
to BB meeting  
" → " BOF

### Public Testimony:

Brian Craft



- Requested support for proposal 13 for the December meeting of the Board of Fish.
- Requests the BOG to look at existing regulatory options for protecting Bristol Bay;
- The effects of existing regulations is not known – in particular water rights issues;
- Proposes strengthening the regulations;
- Suggests the establishment of a marine refuge. It won't impact local users and it transfers management of the Bristol Bay region to the ADF&G from the DNR;
- There was discussion between committee members regarding a similar proposal (121) submitted at a previous BOF meeting. Brian stated that this proposal is different than the previous proposal in that it suggests regulatory alternatives – it does not require them as the original proposal did;
- BOF dropped the ball regarding previous proposal. They passed it and then did not act upon it.

Yolanda Delacruz

- Asked that she be respected for her opinions;

# Anchorage Advisory Committee Meeting Notes


## November 3, 2009

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### Yolanda Delacruz (continued)

- Stated that there should be no business interests involved in the management of Alaska's wildlife resources;
- She does not support young moose being killed by the department when a mother moose is killed by cars, train or other "non hunting" related mortality;
- Do not blame the wolves and bears when a for profit industry harvests our states wildlife;
- Recent bear/human conflicts in the Anchorage municipality are not the bears fault. Residents are not doing their part to coexist. Recent mauling's occurred at night and included bike riders approaching bears too fast.

### Nelli Williams

- 
- Supported proposal 13 for the BOF meeting;
  - A very diverse, experienced & knowledgeable group drafted the proposal;
  - Strong support for proposal 13 in the Bristol Bay region.

### Barbara Reilly

- Areas the state is authorizing predator control programs should not allow nonresident hunting;
- Common Usage Laws – All resources are primarily for residents;
- If wildlife resources are limited why should allow nonresidents to compete with residents;
- She opposed a proposal submitted by Aaron Bloomquist to the committee regarding black bear baiting regulations. She stated that an important component of the proposal process was the question "does the proposal improve the resource". She stated this proposal did not improve the resource – it simply benefited the commercial guiding industry.

### Lynnette Marino-Hinz

- Areas the state is authorizing predator control programs should not allow nonresident hunting;
- She is a Native Alaskan that has lived in Alaska her entire life;
- She has submitted formal complaints regarding ex Gov. Palins legal challenges to Native sovereign rights;
- As a taxi cab driver she has witnessed large amounts of wild game arriving at the Anchorage airport in the baggage of ADF&G employees. She wants more control over the ADF&G employees.
- Strongly opposes aerial gunning of wildlife;
- Strongly opposes pesticide use by the Alaska Railroad;
- Some discussion with the committee on pesticide use. What were the alternatives? One committee member suggested a better solution might be to manually suppress plants – more expensive and labor intensive but far less risk of negative impacts. Aerial spraying risks significant application of herbicides in non target areas;
- Wade agreed to put together a "fact sheet" regarding herbicide spraying for the committee to review.

### Val Glooshenko

- Areas the state is authorizing predator control programs should not allow nonresident hunting;
- There is a limited supply of wildlife;

# Anchorage Advisory Committee Meeting Notes

## November 3, 2009

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### Val Glooshenko (continued)

- Guided hunters have an advantage over resident unguided hunters with the infrastructure provided by the guide;
- Rural residents, especially Native villages, are being negatively impacted by commercial guiding;
- Prefers a natural, diverse ecosystem. She does not want a "moose" farm as found in Norway.

### Rick Sinnott

- The city has no funds for a "bear" cop;
- Bear/human conflicts were way down this summer – no maulings occurred;
- Black bear harvest in the Chugach State Park increased significantly this year to roughly 80 black bears harvested. At this time, the department is not worried about sustaining the population but he does not want the harvest to increase much more;
- The departments "bear aware" program seems to be effective. Bear/trash issues are decreasing along the upper hillside and eagle river area;
- Alaska waste is taking significant steps to address bear trash issues;
- More trail users are carrying pepper spray;
- Closed trails are not being honored. Significant vandalism of closed trail signs. Despite heavy use documented by trail cams, negative bear encounters did not occur, fortunately;
- Not sure if the Chester creek fish ladder is going to be a problem. Certainly bears are attracted to fish. One committee member voiced his concerns;
- The department has invested in a total of 9 trail cams to document bear and human activity on local trails, especially in the eagle river area and Rovers Run trail;
- One committee member asked about long range planning for trails and protecting essential wildlife habitat. Rick stated that the city worked with the department 10 years ago to identify important habitat, including migration corridors for bears. Recently Ft. Rich has invested in funding wildlife management studies on the base. When asked by a committee member if the municipality has been effective at addressing wildlife needs in long term planning he said the municipality had not;
- 10 brown bears in the Anchorage bowl have been collared. Migration patterns have been identified. Of note, brown bears seem to avoid crossing the highway at all costs;
- The department is considering collaring moose and black bears as well to identify migration and use patterns;
- Bicentennial Park is heavily used by brown bears all summer long;
- No brown bear hunting harvest despite issuing 25 permits. He does not plan to increase the number of permits due to significant risk of overharvest if high success rate occurs;
- Moose population in Anchorage bowl is roughly 1700 moose, which is down from previous population estimates. He feels this is a sustainable population;
- Approximately 150 moose killed by cars each years in Anchorage bowl;
- Sheep numbers are increasing in Chugach State Park. Ice/weather are the major factors determining sheep population;
- BOG authorized 13% of the sheep harvest to nonresidents in Chugach State Park. For hunts with only 1 permit, nonresident allocation was rotated between hunts;
- No trapping conflicts in the park to speak of. Most abusive trappers are just young kids.

# Anchorage Advisory Committee Meeting Notes

## November 3, 2009

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### Discussion regarding changing the BOG meeting cycle:

- Department representatives noted the extensive staff requirements needed to meet the current two year BOG cycle. A three year cycle would allow biologists more time to focus on managing wildlife – instead of preparing for BOG meetings.
- When the BOF/BOG meeting cycle overlaps significantly – there is an extremely high demand on department resources;
- Craig Fleener noted that the subsistence division has been downsized significantly over the years. It is very difficult for the subsistence division to meet the requirements of the two year cycle.
- The committee discussed the issue but no final recommendations were made regarding the issue;
- Most of the committee seemed apprehensive to the idea. One committee member noted that the real problem in his opinion seemed to be a lack of funding by the legislature. Any extension of the BOG cycle should be tied to and increase in funding for the department by the legislature. Both sides of the equation need to compromise, not just the public in his opinion;
- The committee members all agreed that management reports need to be available to the public and the AC's in a timely manner. Currently management reports often are not available prior to proposal and comment deadlines. Any change in the cycle should prioritize for addressing this issue. One committee member was concerned that having a spring proposal deadline for fall and winter meeting would only increase the problem since yearly management reports are not available until late fall or early winter;
- One committee member asked if the BOG cycle could be moved to a later than March. The department noted the time crunch to get regulatory changes codified by July is significant already with the meetings end in March;
- The committee discussed the July1-June30 regulatory year cycle? If the regulator year was changed to January 1<sup>st</sup> the department would have all summer to codify regulations. A possible scenario - proposals due sometime in December. BOG meetings slightly later, into April or even early May. This would allow Biologists to work in the Field all summer and fall and leave more time for them to prepare comments in the winter.

### Committee Actions:

Votes (For – Against-Abstane)



#### Proposal 13 – Bristol Bay BOF meeting:

- Passed by a vote of 9-0

**Remove the “must be guided” rule for nonresident bear hunting in predator control areas - Proposal submitted by committee member Mike McCrary;**

- Failed by a vote of 1-6-3
- Department noted brown bear harvest has increased in GMU 16. Manage bears based on population estimate, not a harvest rate;

# Anchorage Advisory Committee Meeting Notes

## November 3, 2009

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- Department noted In Unit 9D, managed for trophy status. Wolf predation is working so no need to expand to bears as well.
- Committee member commented that bear predation is a significant mortality source for the southern Alaska Peninsula caribou herd. The state is not addressing that mortality source, preferring to protect the commercial guiding industry instead. GMU 9D brown bear hunts are the most expensive bear hunts in Alaska.
- Committee member noted that Unimak Caribou herd is showing the same population crash and predators are not responsible, weather the most likely reason in his opinion. The department disagreed and predicted an intensive predator control reduction would be needed on Unimak Island soon. The department noted that Unimak Island is all federal lands for the most part so any intensive management occurring there would need to be authorized by the federal government. Gino Delfrate anticipated the department would formally make a request to the BOG in the near future.

### **Restrict nonresident hunting in predator control areas** – Proposal submitted by committee member Wade Wills:

- Passed as amended by a vote of 8-1
- Amended to remove a clause that would restrict nonresident hunting based on resident harvest needs as defined by hunter effort and application for permits;
- Amended to restrict nonresident hunting based on bull/cow ratios in predator control areas;
- Brenda Rebne commented that she supported the proposal and thought it was a move in the right direction by the Anchorage AC to address subsistence needs. She supported keeping the language that was removed which would restrict nonresident hunting based on resident harvest needs as defined by hunter effort and application for permits.

### **Amend Bear Baiting Regulations for the commercial guiding industry** – Proposal submitted by committee member Aaron Bloomquist;

- Passed by a vote of 6-3
- Committee member testified that the regulatory change is needed to make the commercial black bear baiting industry competitive with Canadian black bear hunts;
- Committee member noted that the BOG asked him to draft something for the statewide and to keep the regulation change – uncomplicated and easy to enforce;
- Committee member testified that nothing in the constitution states harvesting Alaska's wildlife resources must be "competitive". A for profit industry has no legal "right" to the black bear resources of Alaska.
- Committee member noted that black bear harvest in much of the state was meeting or possibly exceeding sustainable harvest levels. The most recent BOG meetings have dealt with proposals to decrease black bear harvest, not increase it.
- Committee member noted that liberalized baiting regulations would not be authorized in areas with high black bear harvest already occurring – there was discretionary authority to authorize within the ADF&G.

### **Allow paralyzed veterans to harvest Brown Bears over bait** – Proposal submitted by committee member Aaron Bloomquist;

- Passed by a vote of 9-0



## Anchorage Advisory Committee Meeting Notes November 3, 2009

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- Discussion that the AAC already gave the department authority to issue a permit to a veteran – this proposal may not be needed.

Topics to consider for the upcoming proposal deadline for the Fairbanks BOG meeting:

- Moose hunting season in GMU 12 – too short;
- ORV use in the Upper Yukon Tanana region.