

Gear Specifications and Operations; Vessel Specifications and Operations (15 proposals)

PROPOSAL 33

5 AAC 06.331. Gillnet specifications and operations.

Increase maximum offshore operation distance for set gillnets in Ugashik District, as follows:

We propose that the maximum offshore distance be increased from 600 feet from the 18-foot high tide mark to 800 feet from the 18-foot high tide mark. Increasing the offshore distance allowed will enable the set gillnets in this area to effectively fish their historic fishing time as determined by the tides of the day. The eleven sites currently fishing in this area would all have the ability to fish farther offshore negating any allocative effects potentially arising from this solution. At the time of the submittal of this proposal ten out of the eleven sites concur that the maximum offshore distance should be amended by the board to 800 feet from the 18-foot high tide mark.

Draft language:

5AAC 06.331(m) (8) in the Ugashik District, in that portion of the east bank of the UGashik River from a point at 57° 32.27' N. lat., 157° 24.36' W. long., no part of a set gillnet may be more than (600) **800** feet from the 18-foot high tide mark.

What is the issue you would like the board to address and why? During the last four seasons an extensive mudbank has developed along the inshore end of our area in which we fish our set gillnets. This impedes us from fishing as effectively as we have in the past (decrease in functional fishing time). The current offshore distance limitation of 600 feet from the 18-foot high tide mark precludes us from fishing the full extent of our allowable gear and denies us the efficient use of the fishing time allowed. We have lost an estimated 20% of our opportunity due to fewer hours of available fishing time because our nets are not in the water.

In 2016 the BOF adopted the “Criteria for Board Deliberations on Commercial Set Gillnet Proposals Impacted by Coastal Erosion” (2016-238-FB) which outlines the criteria that the board will consider and weigh when deliberating on a proposal related to set gillnet sites impacted by coastal erosion. The case stated above clearly fits Criteria #1 which states that issues that arise from land that has either eroded or accreted through natural or artificial causes contiguous to the leasehold.

PROPOSED BY: Ugashik Village Set Netters (HQ-F22-017)

PROPOSAL 34

5 AAC 06.335. Minimum distance between units of gear.

Increase minimum distance between units of drift and set gillnet gear in the Ugashik District, as follows:

The following regulation would become 5 AAC 06.335 (d)

(d)In the Ugashik Bay district, no drift gillnet may be operated within 1000 ft of the 18 ft high tide line on all waters south of a line from Cape Greig at 57° 43.54' N. lat., 157° 41.82' W. long., to a

point approximately one mile offshore at 57° 43.54' N. lat., 157° 43.80' W. long., then east of a line from 57° 43.54' N. lat., 157° 43.80' W. long. to Cape Menshikof at 57° 28.34' N. lat., 157° 55.84' W. long. during the regulatory season.

The following regulation would become 5 AAC 06.335 (e).

(e) No part of a drift gillnet may block navigable waters for other boats underway in or out of Dago Creek, on all waters north of a line from approximately 57° 36.70' N. lat., 157° 36.75' W. long., to 57° 36.53' N. lat., 157° 36.75' W. long. during the regular

What is the issue you would like the board to address and why?

- (a) I would like to address the safety and protection of set-gillnetters persons & gear. Many drift gillnetters have no concern for how close they fish to set gillnets in the Ugashik district because of limited law enforcement protection. In a frenzy, many drift gillnets ignore the 300' from side and 100' from offshore end of set gillnet minimum distance requirements (5 AAC 06.335b), and run over with boats or drift over setnet nets running lines and buoys and anchors, sometimes destroying setnet gear and/or causing great danger to setnetters trying to operate their gear along the beaches out to the regulatory 1000 ft. boundary for setnetters.
- (b) Setnetters pay annual leases to the State of Alaska and must remain within 1000' of the 18' high tide mark (5 AAC 06.331m), and cannot fish outside of 1000' of the beach while drifters pay no fees wherever they fish.
- (c) There is limited or minimum law enforcement protection in the Ugashik fishing district. Knowing this, many drifters ignore the minimum distance regulations and fish too close to setnetters.
- (d) Without land references on the seaward side it is difficult for setnetters to produce pictures or videos for enforcement to use in complaints.
- (e) While fishing just outside and inside of Dago Creek fishboats with their nets out completely block all navigable waters to the entrance of Dago Creek. This causes danger and stress of captains trying to navigate in the narrow channel using this waterway to deliver fish to the tenders anchored outside in the main river. It also blocks tender, barge service and emergency personnel trying to go in and out of Dago Creek, the only navigable waters during low tide conditions to reach shore services and the airport facilities for medivacs.

PROPOSED BY: Gust Sonny Griechen

(HQ-F22-074)

PROPOSAL 35

5 AAC 06.335 - Minimum distance between units of gear.

Increase minimum distance between units set and drift gillnet gear, as follows:

- (a) In the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts, no part of a set gillnet may be set or operated within 300 feet of any part of another set gillnet. In the Nushagak District, no part of a set gillnet may be set or operated within 450 feet of any part of another set gillnet. The provisions of this subsection do not prohibit a CFEC permit holder from operating a set gillnet seaward of another set gillnet operated under the authority of the same CFEC permit.

(b) No part of a drift gillnet may be operated within 300 feet of the side of a set gillnet and within **300** [100] feet of the offshore end of a set gillnet. The **300-foot** [100-foot] restriction does not apply seaward of the offshore setnet distance restrictions set out in 5 AAC 06.331(m) and (n).

(c) In the Nushagak District, no part of a drift gillnet may be operated within 100 feet of the inshore end of a set gillnet, except that in the locations described in 5 AAC 06.331(n), no part of a drift gillnet may be operated inshore of a set gillnet.

What is the issue you would like the board to address and why? The current regulation: “No part of a drift gillnet may be operated within 100 feet of the offshore end of a set gillnet...” is no longer adequate. With the advent of D permits and a higher percentage of shallow draft drift boats this distance is too small.

Drift nets repeatedly come into contact with the outside of set gillnets resulting in consequences listed below. Increasing the distance to 300 feet is a more realistic regulation for the drift fleet to adhere to and more realistic for enforcement to gain the documentation they need and for attaining the goal of keeping nets and gear from colliding.

a) Safety.

When a drift gillnet drifts onto set gillnet gear / nets, the drift boat skipper often tows on their net attempting to separate the gear. This creates a great amount of tension on the set net lines. Many times, set net skiffs are under the net lines picking fish or attached to lines at the time of this high-power tow creating a dangerous situation which can be compounded by strong current, darkness and wind. There is no communication between the drift boat and set net skiffs when this happens. Many driftnet skippers have never set net and may not be thinking about the danger they are putting the skiff fishermen in.

This situation has become worse with more D permits fishing the Bay because D-permit boats have 33% more net to handle, and a third more pull from current. A D-permit drift skipper may be over 1200' away from the entangled end of their net with little visual awareness or understanding of people working the setnet site.

The Bristol Bay fishery now has more high-horsepower jet boats than in the past who are working the shallows and maneuvering in and amongst set net sites increasing this problem.

Having a 300' buffer instead of 100' will give everyone more time to rectify the situation of getting too close. Drift boat won't have to determine so closely if they are legal, and from the set net side of things it allows skiff workers more time to determine if they will indeed get wrapped.

b) Changing fishery.

Fisheries are constantly changing. The Board of Fish helps us keep our fishery orderly and productive by allowing changes in regulations to meet these changes to technology and other areas. The current trend in boats is more power, jets, and a greater ability to fish in the shallows. This has increased the number of gear interferences as well as the severity of consequences from these

interferences with set nets. This is a particularly unsafe and serious situation in our fishery. It is time to address this situation and make changes before the changes are forced to be made by injuries or death.

c) Enforcement

In order to enforce the “100’ minimum distance off the seaward end of a set net” regulation, enforcement officers have to see it themselves (odds aren’t good they will be there), or Enforcement officers advise set netters to gather very specific photos or videos to document these violations. Oftentimes the only chance to document an interaction is after the fact as the whole incident may last only 10 min. Without these specific proofs set netters are advised that prosecution is extremely unlikely.

It is more difficult to document these occurrences than you might think. Set net skiffs are open boats where everything gets wet and keeping a phone/video camera dry and constantly at the ready is a challenge. To provide the documentation that the Troopers ask for means the set netter needs to quit picking fish, get out from under the net and get multiple angles of photographs with boat numbers, both nets, show distance, buoy numbers at just the right angle all in the same photo. This is an unrealistic burden to put on the setnetter. To prove this point...In the last 5 years only 8 incidents have been documented well enough to result in a citation in the entire Bristol Bay. Adding 200’ onto this regulation, will give everyone a bit more breathing room and time to avoid problems. And if interference occurs, a better chance to document it.

d) Economic loss

Interference and damage to fishing gear often results when drift nets come into contact with stationary / anchored set net. The cost of damage to gear is one thing....but loss of fishing time can be a large economic loss to the set netter. If critical anchoring devices are drug or broken off in an interference incident, many times a set netter may have to wait for a certain low tide to fix it. There is so little recourse to be reimbursed due to the hardship of documenting the incidents. We are all out there fishing hard for a productive fishery. We need to minimize situations where negligence with no consequences results in economic loss.

If this regulation is not adopted this gear interference situation will continue to grow in our fishery resulting in more dangerous situations, fishermen injuries, more burden on Enforcement with continued conflicts between the set and drift gear groups, and more financial burden landing mainly on the set gillnetter..

PROPOSED BY: Lower Bristol Bay Advisory Committee (HQ-F22-022)

PROPOSAL 36

5 AAC 06.331 Gillnet specifications and operations.

Limit the length of drift gillnet toelines to 100 feet, as follows:

Limit tow line to 100 feet from tow point to beginning of the net. This is more than sufficient for big weather days and to allow you to maneuver if something goes wrong. Easy for Troopers to enforce and measure, it's roughly 3 boat lengths.

What is the issue you would like the board to address and why? No limit on tow lines. The fishery has changed greatly in the last 5 years. Large influx of shallow drafted boats have entered the fishery, along with this we have seen more and more boats going really shallow and setting their net and running out to deeper water with tow lines up to a 1/4 of a mile long, as the tide falls they pull their nets and fish out of the shallows. The long tow lines preempt grounds and are dangerous. Dragging the fish out of the shallows also has a very negative impact on fish quality. Finally its not drift fishing and is Illegal.

PROPOSED BY: Alexis Kwachka (EF-F22-076)

PROPOSAL 37

5 AAC 06.331. Gillnet specifications and operations.

Limit the length of drift gillnet tows to 100 feet, as follows:

The Board of Fish should adopt a maximum towline length limit of 100' from the tow point of a drift gillnet vessel to the beginning of the net in the Bristol Bay drift gillnet fishery.

What is the issue you would like the board to address and why? Currently, the Bristol Bay drift gillnet fishery does not have a maximum towline length limit. Towlines in excess of a full net length (150-200 fathoms or 900-1200 feet) have become common in the Bristol Bay fishery. Long towlines are used to anchor nets in shallow water and allow the vessel to transit to deeper water while still maintaining control of the net. Towlines in excess of 100' pose serious safety concerns for other vessels fishing or traveling around vessels employing the use of excessively long towlines.

PROPOSED BY: Erik Velsko (EF-F22-084)

PROPOSAL 38

5 AAC 06.331. Gillnet specifications and operations.

Limit the length of drift gillnet tows to 25 fathoms, as follows:

Ammend 5 AAC 06.331 to limit the length of a tow line to 25 fathoms overall length.

What is the issue you would like the board to address and why? Some vessels are using net tow lines in the range of 1000' in length. A combination of a 1000' towline and 1200' of net is a total gear length of 2200' off of the towpoint. This configuration of gear can create problems with safety, fairness, and grounded nets.

With increasing presence of shallow water boats it can create navigation hazard to have that much gear trailing a vessel.

This gear style lends itself to fishing with a grounded net.

I don't feel that this style of fishing is in the intent of drift gillnet operation.

PROPOSED BY: Timothy Gervais (EF-F22-091)

PROPOSAL 39

5 AAC 06.331. Gillnet specifications and operations.

Prohibit placement of set gillnet gear on the shore fishery lease site of another set gillnet permit holder, as follows:

When a commercial fisher has a shore lease, and is fishing in the waters of said shore lease, then no other fisher shall install an anchor, running line or net within the boundaries of said shore lease. Because the Egegik District is a competitive fishery, commercial fishers should be fined for complaining to the Troopers, if the Troopers determine the commercial fishers are just trying to gain advantage of other commercial fishers for competitive reasons.

What is the issue you would like the board to address and why? I would like the board to address two concerns. First, other set netters should not be allowed to install their gear on my shore lease. The regulation in the Egegik District states that a set net must be relatively straight out from the shore, when a commercial fisher is in the act of fishing. Other commercial fishers have been complaining to the Troopers that my set net is not relatively straight. The Troopers have been letting me know about these complaints for the past four years and this has cost me fishing time at my shore lease. The problem is that one of the commercial fishers has a screw anchor that is installed 75 feet onto my shore lease. This allows him an advantage of making his set net more relatively straight out as compared to my set net. Second, the AF&G biologist said that the Egegik District is a competitive fishery. For commercial fishers to complain to the Troopers to gain an advantage and for another commercial fisher to have his screw anchor on my lease should not be allowed.

PROPOSED BY: Christopher John Erpelding (EF-F21-004)

PROPOSAL 40

5 AAC 06.331. Gillnet specifications and operations.

Increase area available to set gillnet fishermen in the Graveyard Point area, as follows:

Within section (m)(5) replace the coordinates and reference to the unnamed creek as follows. alternate text is underlined and italicized:

(5) in the Kvichak Section of the Naknek-Kvichak District from Libbyville Dock to a point near Graveyard Point at 58° 52.07' N. lat., 157° 00.80' W. long. and from the point on the northwest shore of Kvichak Bay at 58°51.74' N. lat., 157°08.19' W. long. north to a point on the northwest

shore of Kvichak Bay at 58° 53.37' N. lat., 157° 04.26' W. long., the maximum distance that a set gillnet may be operated offshore is as follows:

What is the issue you would like the board to address and why? Presently set net fishing is allowed in the majority of the Kvichak district according to section 5 AAC 06.331(m)(5) parts A or B which require nets to be no further than 1,000 feet from the 18' high tide mark OR the shoreward end must go dry at the time of the opening.

I propose making this "OR" allowance applicable either to include an additional mile further west from the unnamed creek referenced in (m)(5). This section of the district has developed a massive mudflat extending from the 18-foot high water-mark out to about the 12' water-mark of over 1,000 feet which makes this area virtually unfishable. Changing this arbitrary reference point would enable fishing opportunities for fishermen looking for alternate fishing grounds when the fish are running on the west side channel.

PROPOSED BY: Joe Echo-Hawk, Nathan Rispler, Reid Ten Kley, Alec Capps (EF-F21-005)

PROPOSAL 41

5 AAC 06.331. Gillnet specifications and operations.

Adjust seaward boundary for set gillnet gear near in the Nushagak District, as follows:

1. To address the cumulative erosion loss, add 100 feet to the outer limit for setnet sites on Ekuk Beach as follows:

(2) from the cannery dock at Clark's Point to First Creek at 58° 47.15' N. lat., 158° 30.57' W. long., 600 feet from the 18-foot tide mark under normal weather conditions, except that from 58° 50.10' N. lat., 158° 33.52' W. long. to 58° 49.29' N. lat., 158° 33.10' W. long., 750 feet from the mean high tide mark, whichever location is closer to the mean high tide mark;

(3) from First Creek at 58° 47.15' N. lat., 158° 30.57' W. long. to Third Creek at 58° 46.81' N. lat., 158° 28.10' W. long., 800 feet from the mean high tide mark;

(4) from Third Creek at 58° 46.81' N. lat., 158° 28.10' W. long. to Etolin Point at 58° 39.37' N. lat., 158° 19.31' W. long., 1,100 feet from the mean high tide mark.

2. To solve the problem of uncertainty and variability of outer boundaries, eliminate the minus 3-foot tide line as an outer boundary. Instead, establish the outer boundaries by surveying the mean high-water mark from downstream of the Range Marker on Ekuk Beach, based on NOAA tidal benchmarks as of August, 2022. The survey will provide a plot line based on way points which represent the outer limits defined in this proposal. This would allow both setnet fishermen and enforcement to identify a consistent outer boundary. It would also allow drift vessels to easily identify the outer limits of setnet sites to avoid entanglement with setnets, anchor equipment, and marker buoys.

The outer boundary survey would be conducted by a professional land surveyor, registered in the State of Alaska, using established benchmarks. The survey will be based upon the NOAA tidal benchmark at Clarks Point, designation 946 5621 B, set 1.399 meters above mean high water.

What is the issue you would like the board to address and why? Ekuk Beach is experiencing uncertain boundaries for setnet sites for two reasons: 1) Western Alaska is known to have significant beach erosion, which is affecting historic setnet sites on Ekuk Beach, and 2) the current regulations defining the outer limit of setnet sites create unpredictable boundaries.

Ekuk Beach is experiencing significant erosion. Portions of Ekuk Beach were surveyed in 1983 and then again in 2021 and there has been a loss of 146 feet or more in many places since 1983. The erosion is accruing from downstream from the Range Marker on Ekuk Beach. This erosion may cause historic/traditional setnet sites to be outside the boundaries defined in current regulations. Those regulations set boundaries for setnet sites based on distance limits measured from the mean high tide line, to a maximum outer limit of the minus 3-foot tide line. So as erosion moves the tidal lines, the boundaries for set net sites are being altered.

The current system of setting setnet boundaries, using the mean high tide line and minus 3-foot tide line as outer limits, introduces unnecessary uncertainty and variability. The mean high tide line can change significantly with every wind storm. The wind greatly affects the gravel berm that usually accumulates at the high tide line, which can build or be depleted depending on the direction and strength of the wind, affecting where the mean high tide line is seasonally, and even daily. So, it is possible, depending on weather, that a setnet site could fish within regulation one tide, but outside limits on the next, as wind and storms affect the mean high tide line.

The variability of tidal lines makes it very difficult to identify the outer limit of a setnet site under the current regulations. A minus 3-foot tide is affected by weather and ocean conditions. So, a minus 3-foot tide line on one day can be different the next day. This proposal would eliminate this variability by setting a consistent outer limit.

This proposal is not allocative, it addresses these two problems which imperil the current setnet fleet on Ekuk Beach. Addressing erosion and the uncertainty of the current tidal boundaries in regulation will maintain these traditional setnet locations, which have been consistently fished in these locations for decades. Disregarding the effects of erosion and variability of tidal boundaries could disrupt harvest on these historic setnet sites. Applying the tidal boundaries currently in regulation, and/or the effects of erosion, could require relocation of the outer anchoring devices of some setnet sites, which is a major endeavor, is not commonly attempted, and is often not possible during a season. Changing these outer anchoring devices is very difficult, dependent on tidal and weather conditions, and expensive. Many times, these outer anchoring devices can take years to change and are location dependent (many areas have very large rocks, clay and outer anchoring devices' stability are variable depending on conditions). Most outer anchoring devices are weak in their first year after being put in, as the substrate has been heavily disturbed, so an entire season could be lost if the outer anchoring device cannot be relocated. If an outer anchoring device were found out of compliance due to erosion or variable measurements of tidal lines and could not be moved due to tide or other conditions, that site would be eliminated from harvest, or have greatly reduced capacity. The cumulative result would be reduced capacity of the setnet fleet on Ekuk Beach.

Reducing the capacity on Ekuk Beach would immediately harm the fishermen whose sites were made less efficient and insecure due to disruption of their anchoring devices. It would also have a broader impact by reducing overall fishing efficiency of the Ekuk Beach setnet fleet. This disruption would further hinder overall catch efforts by the setnet fleet in the Nushagak, causing a deviation from district goals for optimal harvest, as well as further skewing the allocation by forcing the setnet fleet to fall further behind in allocation, which could ultimately restrict the drift fleet at a higher level..

PROPOSED BY: Nicholas Dowie, John O'Connor, Christine O'Connor (HQ-F22-031)

PROPOSAL 42

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard, as follows:

5 AAC 06.333 Requirements and specifications for the use of 200 fathoms of drift gillnet in Bristol Bay. REPEALED, 2021.

Repeal the dual drift permit regulation in Bristol Bay.

What is the issue you would like the board to address and why? Proposal/proposer requests that the Board of Fish repeal the regulation that allows two permit holders to jointly operate up to 200 fathoms of drift gillnet gear from the same vessel. If adopted only 150 fathoms of drift gillnet gear would allowed to be operate from any drift gillnet vessel regardless of how many drift gillnet permit holders are on board the vessel.

Having part of the BB drift fleet fishing 200 fathoms of gear and another part of the fleet restricted to 150 fathoms of gear has and will continue to create a significant economic disparity. Dual permit vessels are earning substantially more revenue than single permit vessels. This additional revenue leads to overcapitalization of the fishery by the dual permit vessels. An additional problem created by the economic disparity is the trend of Bristol Bay drift limited entry permit ownership outmigrating from the Bristol Bay watershed, rural Alaska, and Alaska to out of state permit holders.

Having all drift vessels fishing the same length of net ensures more parity among permit holders in the same spirit of requiring all drift vessels to be no longer than 32' in length. When the dual permit regulation was originally adopted sockeye ex-vessel prices were approximately \$0.35-0.40/lb. Now ex-vessel prices are higher such that a single permit vessel can earn a reasonable income with 150 fathoms of gllnet gear.

It is not prudent nor acceptable to manage and operate state fisheries in a manner that places local and resident fishermen at a disadvantage to non resident fishermen.

PROPOSED BY: Timothy Gervais

(EF-F21-012)

PROPOSAL 43

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard, as follows:

Not a new regulation. I am asking the Board of Fish to repeal the regulation allowing dual permits from the same vessel, Repeal the entire 5AAC 06.333 , "Requirements and Specifications for the use of 200 fathoms of drift gillnet in Bristol Bay."

What is the issue you would like the board to address and why? Prohibit the use 200 fathoms of gillnet by dual permit holders.

1) The economics of the BB drift gillnet fishery have improved beyond the point where it is necessary to have two permit holders operating from from the same vessel. The ex vessel price for sockeye salmon has increased enough that a drift permit holder can make good revenue from operating the original 150 fathom of drift gillnet gear. Historically the regulations of the Bristol Bay drift fishery have tried to maintain equity in harvesting potential of the drift boat operators. The dual permit system has separated the fleet into two economic classes. Dual permit operators generally have a substantially higher income than the single permit holders. This has led to overcapitalization of the drift fishery.

2) A dual permit vessel can effectively cork off a single permit vessel with the extra 50 fathoms of net. Prior to the dual permit system the corked vessel could tow to one side and continue to harvest salmon without having to haul their net and reset in a different location.

3) There is a significant amount of fraud in the dual permit system where an established operator is the purchaser of the second permit. The operator makes a side agreement with a deckhand to act as the second permit holder without the second permit holder actually providing financing to purchase and own the second permit. This is against the spirit and potentially a violation of Limited Entry Act regulations. CFEC Commercial Fishing Permit Brochure, "The Alaska Legislature made it illegal to lease permits to ensure that fishermen could maintain control of their own livelihoods and to ensure permits would be controlled by active fishermen with a long-term stake in conservation of fishery resources. Allowing leasing could create a class of permit holders who would be absentee landlords of the fishery who could exploit the actual fishermen forced to lease their permits."

4. The dual permit system has artificially inflated the price of Bristol Bay Drift limited entry permits and emergency transfers..

PROPOSED BY: Timothy Gervais

(EF-F22-079)

PROPOSAL 44

5AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Review provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard, as follows:

The board look at the use and abuse of the D permit issue Beyond its intended use. D permit eliminate it D's has gone beyond the intent and usefulness. Give everyone 200 fathoms. give the d permits their own fishery, gear time and area start a whole new fishery just for D permits? Change CFEC regulations to include only D permits All of the above . Placeholder for further D removal or sunseting this regulation. Solution Sunset the D (go away) 2025

What is the issue you would like the board to address and why? Management of over escapement, allocation and forgone harvest will continue to be an issues of concern for all users. Allowing this regulation to be used goes against the original intent and now outlived its need. We need more gear in the water not less to prevent continued use of forgone harvest. In the beginning of adopting 5ACC 06 .333 the decline of the fishery and low returns the optimum number of boats fishing was a number for less to be a lesser number. Now that is no longer the case. Phasing out 5AAC 06.333 over two years, This provision has caused allocation issues ,legal CFEC and transfer of limited entry permit requirements..

PROPOSED BY: Frank G. Woods III (EF-F22-049)

PROPOSAL 45

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Provide drift gillnet vessels with a single permit holder onboard more fishing opportunity per opening than vessels with two permit holders onboard, as follows:

Let Dual less hours or let single permit fish couple hours earlier than dual.

Example: If it's an 8 hour opener, let dual fish 2 hours after single.

8 hours 12 noon closer > single

Dual 6am till noon

What is the issue you would like the board to address and why? Dual permit – lesser hours than single permits. Dual take more fish than single and dual can cork the net easily. 4 nets can cover the 3 nets and they take more fish.

PROPOSED BY: Norman Gloko (HQ-F22-004)

PROPOSAL 46

5 AAC 06.333. Requirement and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

The regulation would allow an individual to own and operate two permits on one vessel in the Bristol Bay drift fishery. S03T permits

What is the issue you would like the board to address and why? With the ability to fish a "D" permit in Bristol Bay, Ak for the commercial drift fleet, it seems odd that a boat owner cannot own and fish both permits. I feel you should be able to own and fish both permits on one vessel. As a young small business owner it would allow me to grow my business and make a larger profit to share with my crew and local community.

PROPOSED BY: Hayden Linscheid (EF-F21-009)

PROPOSAL 47

5 AAC 06.333. Requirement and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

Allow a permit holder to own and fish two Bristol Bay Drift permits, using the existing structure of the right to fish four 50 fathom shackles of gear with two permits and three shackles using one permit. This is commonly referred to as permit stacking.

What is the issue you would like the board to address and why? Allow a permit holder to own and fish two Bristol Bay Drift permits. I. E. Permit stacking. This action would reduce the number of boats and some of the gear conflicts that occur. Our fishing districts are too small and the fleet has become fast and maneuverable. Turning a chaotic line fishery down right dangerous.

Less boats and less net in the water means less chinook bycatch and less antisocial behavior. Seems like enforcement could use a bit of a break.

PROPOSED BY: Douglas R Elwell (EF-F22-035)
