## Other comments submitted during December 2006 Board of Fisheries relative to restructuring proposals (#15, #21, and #39)

RC 5 RC 9 RC 21 RC 25 RC 26 RC 27 RC 30 RC 31 RC 32 RC 38 RC 48 RC 50 RC 54 RC 56 RC 58 RC 58 RC 58 RC 63 RC 63 RC 63 RC 68	Moses Toyukak Mitch Knik Matt Ryan Gunnar Knapp Jerry Liboff Robert Clark Tommy Olsen John Webb Julius Henry Peter Andrew Harry Wassily Lorianne Rawson Dan Kingsley Fritz Johnson Frank Woods
RC 62	Dan Kingsley
RC 93	Amelia Christensen
RC 97	Nick Lee
RC 98	Bob Waldrop
RC 103 RC 111	
RC 111	Victoria Briggs Eric Rosvold
RC 135	
RC 156	Max Martin
RC 177	City of Dillingham
	Oity of Diminghann

RC5

### State of Alaska

Frank H. Murkowski, Governor

Commercial Fisheries Entry Commission 8800 Glacier Hwy, #109 P.O. Box 110302 Juneau. AK 99811-0302

### **MEMORANDUM**

To: Board of Fisheries

Date: November 28, 2006

Phone: (907) 789-6160 VOICE

(907) 790-6170 FAX

Commercial Fisheries Entry Commission

Frank Homan, Chairman

Peter Froehlich, Commissioner

Bruce Twomley, Commissioner

Subject: Additional Opportunities for

Holders of Two Salmon Limited

Entry Permits.

The Alaska Commercial Fisheries Entry Commission (Commission) supports the Alaska Board of Fisheries (Board) efforts to work with Alaska salmon fishermen to find regulatory methods to help restructure their fisheries in order to reduce harvesting costs and improve economic returns.

Your current regulation, 5 AAC 06.333, allows two Bristol Bay salmon drift gill net permit holders operating from the same vessel to fish an additional 50 fathoms of gear under certain conditions. This regulation has encouraged some consolidation of fishing operations within a season.

In 2003, Alaska's legislature passed HB286 allowing persons to hold up to two permits in a particular salmon fishery for purposes of fleet consolidation. Prior to that time a person could hold only one permit for a given salmon fishery. While the legislation allowed a person to hold an additional permit for purposes of fleet consolidation, it did not allow the person to get additional fishing privileges for that second permit (see AS 16.32.140(c) (5)). Thus there has been little incentive for persons to obtain a second permit for a fishery.

This past legislative session, Alaska's legislature passed SCS CSHB 251(RES) which was enrolled into statute as AS16.05.251 (i). The new law gives the Board the authority to adopt regulations providing an appropriate additional fishing opportunity for a person who holds two salmon permits for a fishery.

There are currently several proposals before the board to amend 5 AAC 06.333 to provide additional fishing privileges in the Bristol Bay salmon drift gill net fishery to a person who holds two permits for

the fishery. The commission believes that this type of regulation would encourage some persons to purchase a second permit and would therefore be a catalyst for fleet consolidation as the number of fishing operations in the fishery would be reduced. This should improve the economic returns of all operations remaining in the fishery, both those with two permits and those with a single permit.

The commission supports the concept of allowing a person with two permits in a fishery some additional fishing privilege. In effect, the Board would be creating additional incentives for a voluntary "market driven" fleet consolidation program that would not require a government-run, fisherman funded permit buy-back program. Fleet consolidation could begin immediately without the need for a "large upfront loan" and without the imposition of buy-back taxes on all permit holders to pay back the loan.

While the commission supports the concept, the commission is not embracing any specific proposal that you are considering. In particular, we would not support proposals that raise significant concerns among Department of Fish and Game managers or Department of Public Safety enforcement officers. However, we are hopeful that a reasonable and acceptable regulation can emerge as the Board deliberates these sundry proposals.

In 2004, the Commission adopted an optimum number range for the Bristol Bay salmon drift gill net fishery of 900 to 1400 permits. There are currently 1857 available entry permits in the fishery. The commission believes that the fishery will not be able to profitably support 1857 fishing operations during most years in the future.

Ex-vessel prices have declined in the Bristol Bay salmon fishery from levels observed in the 1980s and early 1990s. This decline has been in large part due to the dramatic growth in farmed salmon production which competes directly and indirectly with Alaska's wild salmon production. While new Bristol Bay marketing efforts may lead to improvements in ex-vessel prices, it seems clear that stiff price competition from farmed salmon will continue into the future. Thus it is important to find ways to increase economic returns by reducing harvesting costs.

The commission is aware that there are some who are concerned that local permit holders may be more inclined to sell their permits under any type of fleet consolidation scenario than would non-local and nonresident permit holders. At this point, we don't have any good means to accurately forecast who might be more likely to sell a permit. We are hopeful that local leaders and organizations will continue to work to keep permits in the Bristol Bay area so that the local share of the harvest does not decline as the numbers of fishing operations are reduced.

RC9

Enriching Our Native Way of Life

111 W. 16th Avenue, Suite 400 / Anchorage, Alaska 99501-5109 / (907) 278-3602 / fax (907) 276-3924

December 1, 2006

State of Alaska Board of Fisheries PO Box 115526 Juneau, AK 99811

Re: Bristol Bay Regulatory Finfish Proposal Comments

State of Alaska Board of Fisheries:

Bristol Bay Native Corporation (BBNC) respectfully submits the following comments. Our comments are based on our commitment to the local fisheries that have been the mainstay of the Bristol Bay economy for generations.

The socio-economic impact to the Bristol Bay region and the change in fisheries management practices that would be required by implementation of the following four proposals is so significant that BBNC believes that they rise to restructuring proposals. The communities, governmental bodies and agencies affected by these changes must therefore be given ample opportunity to study and comment on the costs to the region, individuals and the agencies themselves.

It is worth noting that the Governor's recently released document titled "State of Alaska - Seafood Economic Strategies" begins with this premise:

"The challenge is how to accomplish both a healthy industry and healthy communities. The answer, in simplest terms, is for the state to be as explicit as possible about what it expects in return for access to its resources and to work closely with industry and communities to obtain those returns as efficiently as possible. This is not fundamentally different from what currently occurs, but for two significant factors:

- The state has not clearly defined what "maximum benefit" entails, and
- Lack of socioeconomic analysis capacity significantly impedes the state's ability to undertake productive partnerships with communities and industry and to advocate for Alaskans.
- 1) BBNC supports retaining the 32-foot vessel limit. The current vessel length limit works. The Bristol Bay fleet already is capable of catching more than 100% of the harvestable return.

Additionally, several unintended consequences could result from expanding the vessel size. First and foremost local people would be pushed out of the fisheries. The Bristol Bay region is economically depressed. Most local fishermen will be unable to capitalize sufficient funds to allow them to purchase either a larger boat or an additional boat. Fishermen from outside the region with larger boats and larger crews will come in and dominate the local harvest. The adverse costs to individuals, to families and to the local communities will be severe.

This action is a one-way street requiring careful deliberation. Expanding vessel size creates such a significant competitive advantage for the larger boat owners, that it will effectively create two classes of fisherman. The direct cost to the individual will be a steady devaluation of the smaller boat as larger boats increasingly occupy the field with the concomitant inability of the smaller fisherman to obtain bank financing because the value of their collateral has been reduced.

This, coupled with a staggering and unrelenting high cost of living for our residents and communities will prove to push many into untenable and irreversible positions of poverty and destitution. A gallon of milk in Dillingham today costs \$6.50. A gallon of gasoline costs \$4.62 and a gallon of heating oil costs \$3.68. Unemployment in many of our communities is as high as 80%. And, on top of all of these telling numbers, one more worth mentioning is that of an initial pool of some 630 local drift permits issued in 1976, we have seen over 240 leave our region to date with an economic impact estimated at \$176 million dollars.

It is important to keep in mind that the 32-foot boat is a multi-use vessel with attributes beyond the singular purpose of commercial fishing. Not only is it ideal for family fishing operations, it has the capability to haul people, supplies and fuel upriver. Larger vessels are not as versatile and therefore not as practical for the local fisherman economically dependent on the fishing industry.

Proponents of the proposal change argue that there will be a marked improvement in fish quality. Market prices are doing an effective job of pushing every fisherman to focus on quality and the slush ice bag and RSW systems are doing an effective job to achieve that end.

2) BBNC requests that the Board of Fisheries retain the present permit stacking rule without modification. Expanding this requirement will disenfranchise many local fishermen, who do not have boats large enough to carry more gear. Expanding the requirements will shift poundage away from the smaller boats to the larger aggressive boats with more people.



The current system is equitable. As already mentioned with respect to another proposal, the fleet is capable of harvesting more than 100% of the allowable catch each year without permit stacking. The limited permit stacking that is allowed enables fishermen with insufficient capital an opportunity to raise capital.

Unlimited permit stacking does not reduce the number of permits. It is more realistically a devise to allocate resources away from the small and poorer fishermen, thereby creating severe economic impacts on the local communities. And, when conditions improve, each and every one of the consolidated permits will reenter the fishery seeking their full taking rights of gear and vessels. Thus, multiple permit ownership by wealthier, more affluent fishermen becomes another round of overcapitalization within the fishery.

Permit stacking should not be used as a purported means to achieve permit reductions. BBNC suggests that permit reduction goals for the Bristol Bay region should be considered in the light of AS 16.43.290(3), the third optimum number standard which states that the optimal number of permits issued for each fishery be considered in light of:

The number of entry permits sufficient to avoid serious economic hardship to those currently engaged in the fishery, considering other economic opportunities reasonably available to them.

And, notwithstanding the recently enacted AS 16.05.251 which provides this Board the authority to "allow a person who holds two entry permits...ADDITIONAL FISHING OPPORTUNITY, careful consideration should be undertaken by the Board before using our Bristol Bay Salmon fishery as a model attempt to overcome certain hurdles inherent in our State constitution and defined recently by the State Supreme Court in State v Grunert when it wrote that: "we have never stated that the board may divide what has historically been a single commercial fishery and allocate fish between fishers who have traditionally been treated as a single user group." That is exactly what these proposals and this debate before us now in Bristol Bay is seeking to do.

- 3) BBNC requests that the Board of Fisheries retain the 48-hour transfer period waiting time. If the 48 hour transfer period is eliminated many local fishermen, both drift and set netters, would suffer substantial economic hardship. As previously stated, BBNC argues that the effect of eliminating the 48-hour transfer waiting period amounts to a restructuring proposal adversely affecting the Bristol Bay fisheries.
  - Eliminating the 48-hour transfer rule would not promote an increased net economic benefit to the participants in the fishery. To the contrary it would virtually eliminate the set net fishery and would reallocate from the

PC 21

#### Salmon Restructuring?

# Fish Board May Need To Buck the Tide To Do What's Right for Alaska

by Fritz Johnson

At a time when fuel prices already have some rural Alaskans shivering in the dark, the Alaska Board of Fisheries is about to debate Bristol Bay salmon issues with similar life-or-death implications for coastal communities.

Fish Board members need to look closely at the big picture to assess how regulatory changes will play out over time and how their decisions will impact Alaska's future.

Proposals to allow bigger boats to fish more than one limited entry salmon permit with more gear for longer periods will ultimately produce a class of super-gillnetters capable of million-pound salmon seasons. One only need look at the evolution of the Bristol Bay powerboat – from the early wood Bryants and Commercials to today's 900 horsepower jet-driven vessels, some of which have already put in 400,000 pound seasons – to see that, unconstrained by regulations, spending on vessel technology is limited only by the owner's ability to make money.

A hundred super-gillnetters employing two crews 24-hours-a-day, camped on the outside district boundary lines in any weather, could easily harvest a run of 25 million sockeye without the help of single-permit 32-foot boats. Traditional one-permit 32-foot boat operators would soon be bankrupt.

As the beneficiary of savings on tenders and other costs associated with servicing today's fleet, the processing industry isn't likely to complain. Efficiency would be maximized and profits increased for the few fishers left in the game. But as the captains and crews of the now-obsolete fleet of 32-footers haul their boats for the last time, coastal towns and villages will disappear in their wake.

Even assuming that Bristol Bay watershed residents owned half or more of the new super-fleet — an unlikely result, given the socio-economic realities of life in rural Alaska -- coastal communities will die as the majority of residents lose their connection to the economic engine that has sustained their lives. As countless American workers whose jobs have moved overseas have learned — like Alaska crab boat captains and crews since crab "rationalization" -- what is good for business is not necessarily good for human beings. Enacting regulations that will ultimately put Alaska's coastal residents ashore while distant water fishermen reap the bounty off our coasts would be short-sighted indeed.

What's the alternative for Bristol Bay? Rather than attempt to maximize economic efficiency in ways that encourage fewer people to harvest Alaska's fish faster, let's structure the fishery to maximize the benefit to our coastal communities and the State of Alaska. Rather than speeding up the fishery, let's slow it down -- and concentrate on maximizing the quality of our salmon.

The optimum-numbers study completed last year by the Commercial Fisheries Entry Commission concluded that the ideal number of limited entry drift permits for Bristol Bay was perhaps 800 fewer than now permitted. That study was initiated on the heels of real economic disasters in 1997 and 1998, when low salmon returns and low prices due to competition from farmed salmon hit Bristol Bay fishers hard.

(Cont'd. On Back)

#### Fish Board May Need To Buck the Tide To Do What's Right for Alaska Page 2 of 2

Since then, however, consumers in the Lower 48 and abroad are waking up to the fact that Alaska salmon are the real thing, and they are willing to pay more for wild salmon that's properly cared for. Recently I took a few pounds of Bristol Bay reds to peddle at farmers markets on the East Coast. I've been home a week and my phone is still ringing with calls from customers who want more.

Those who claim bigger boats are needed to improve fish quality ignore the fact that Bristol Bay's existing fleet can catch all the harvestable salmon surplus, particularly if fisheries managers have the tools to expand upstream fishing boundaries if needed. Using slush, ice, the existing fleet can deliver the higher-quality product world markets demand. The cost to outfit a 32-foot Rawson with slush bags for chilling salmon is negligible compared to that of rigging a bigger boat with mechanical refrigeration costing more than \$30,000 per installation.

There's much to be done to provide the infrastructure needed to bring Bristol Bay salmon standards up to the highest levels of quality. Doing so will boost ex-vessel prices, increase opportunities for onshore value-added industries, and keep more of the wealth of our fishery in Alaska.

But none of that will happen if regulations are enacted that in time put Alaska's year-round resident fishermen out of business. Salmon regulatory changes that chiefly benefit distant water fishermen are bad for the quality of our fish, bad for Alaska's coastal residents, and bad for the State of Alaska.

Dillingham resident Fritz Johnson has crewed or captained Bristol Bay salmon boats for more than 25 years.

## Nels Johnson Board of Fish Testimony

Dillingham, Alaska December 4 – 12, 2006

For the record my name is Nels Johnson and I reside in Aleknagik, Alaska. I am gill-net fisherman with 35 years of experience in Bristol Bay. I've seen many changes in this fishery and I hope you consider proposals for the betterment of the fisheries and communities.

## I oppose proposals 31 through 34 which is any removal of the 48 hour waiting period.

The bigger and faster boats want this 48 hour waiting period removed so that they can chase the fish and rape the land. These outside fisherman don't have the same costs that we have by making the choice to live in the communities around these fisheries.

#### I oppose proposals 39 through 42, that removes the 32 foot vessel limit.

Large vessels could potentially fish the district and big boats cost big money. Only people with money could afford to purchase big boats.

#### I oppose proposals 21-29 regarding permit-stacking.

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The permit stacking was a test. By the Board allowing fisherman to permit stack they created more problems. Permit stackers want their own fishing area, their own gear. Permit stacking has created a class fishery. Only those who could afford it are in this fishery. The Board should consider removing permit stacking.

Finally, I would like to raise awareness on the draggers fishing for yellowfin sole is impacting us halibut fisherman. These draggers need to be stopped because their by-catch is almost our community quota.

Thank you, I am happy to answer any questions.

Fish Board Testimony Dec. 4-12, 2006

For the record my name is Moses Toyukak and I reside in Manokotak, Alaska.

I oppose the proposals 31, 32, 33, and 34. I am a gillnet fisherman with 42 years of experience in Bristol Bay and mostly in the Nushagak District. I am opposed to any removal of the 48 hour waiting period.

To me, the 48 hour waiting period works as a management tool. Fish and Game knows how many fishermen are registered in a district. By their having this knowledge, they have a clear idea of what the fishing effort will be in a district. If you remove this waiting period it will be bad for the harvest because there will be a race for fish in a district where the fish show up. It will be bad for delivery too. More effort in a district will have more fishermen delivering. If the 48 hour waiting period is removed it would potentially allow for less scrutinize control over fisherman. It could potentially allow a fisherman to fish in the Nushagak District close in the district and with a fast boat move into the Kvichak District to deliver and fish within a couple of hours. Plus a fisherman could fish in one district and if the cannery is plugged with a fast boat potentially deliver in another district.

I oppose the proposals 39, 40, 41 and 42 that impact the 32 foot vessel limit.

Keep the 32 foot limit in place since it works for my family. I couldn't afford a larger boat which requires more money to operate. All of my take home pay from fishing for any given season is used to meet the household expenses of electricity, food and gas. An outside fisherman doesn't pay the same cost of for fuel, groceries or electricity. They only pay for a plane ticket to come into the region to participate in the fishery. A 32 foot limit works just fine. Plus by the elimination of the 32 foot rule would mean fisherman would buy bigger boats and fish on the Southline of a district would mean larger bumping and my small Rawson would not be able to compete.

Finally, I am opposed to permit-stacking and proposals 21 through 28. Permit stacking is not fair to a fisherman who uses one permit and the equality is not there.

Thank you. I'm happy to answer any questions.

Alaska Dept of Fish & Game Board Support Section

Re: Bristol Bay Meeting

Mr. Chairman, Members of the Board of Fish,

My name is Mitch Kink. I started my career in the fishing industry in 1937 at the age of 15. For those of you doing the math that is 70 years ago. I worked on Purse Seiners from 1938 to 1942. In 1942 I joined the U.S. Navy and serviced for three years. In 1946 I started fishing in Alaska, with the first six years working on Purse Seiners in Area M. In 1952 I move up to Bristol Bay. At present I have a vested interest in the Bristol Bay fishery. I have represented fishermen for over 40 years. I served as a negotiator for fish prices and later as President and General Manager of AFIMA. In that capacity, I have testified before the ADF&G Board, State Task Forces, International Halibut Commission and U.S. Congress.

I am stating my history in the industry to illustrate the fact than I have a life time of knowledge in regards to fishing issues.

In that time, I have come to a conclusion that there are two types of fishermen. One type wants to catch every thing today and to hell with tomorrow. The other type wants to have fish to catch now and in the future.

Proposals # 39 through #47 are the type of selfish proposal that would come from the first type of fisherman. These proposals want to change the historical profile of the fisheries. This profile has worked from the beginning of the Bristol Bay Fishery. If any of these proposals were to pass the result would be a \$20,000 to \$36,000 loss in value per boat. The result of lowering the value by 20,000 dollars per boat is a reduction in fleet value of 36,780,000 dollars.

Fishermen would be left with the decision of buying a larger boat or modifying their present vessel. The fishermen that are pushing these proposals are in the position to benefit now. The hardship placed on the rest of the fleet, in the name of safety, quality or what ever, is of no concern to them.

The addition of 6 feet to every boat in the fleet would result in an addition 11,034 feet to the fleet. This would be the equitant of adding 344 boats to the fleet. Put another way, it would amount to doubling the fleet size in any give district.

#### I AM OPPOSED TO PROPOSALS #39 THROUGH #47

I Believe that Proposal 121 is the most important Proposal in your 2006-07 Alaska Board of Fisheries Proposals book.

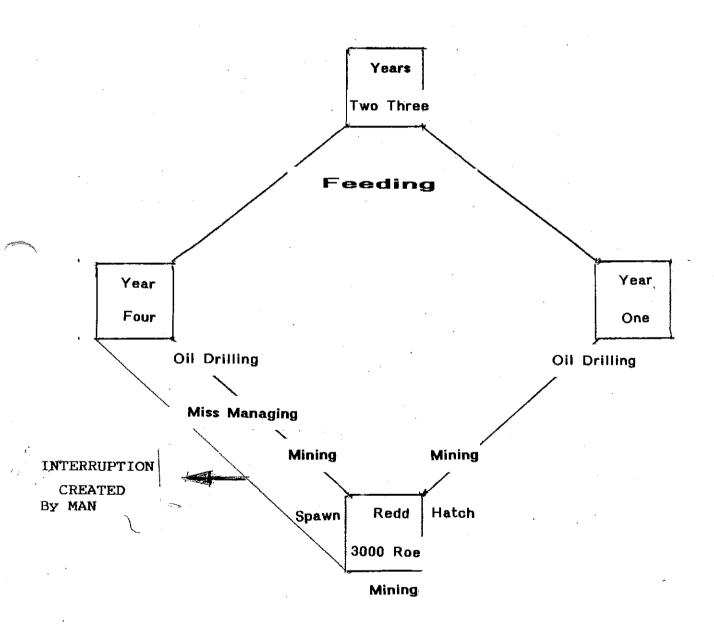
#### I AM FOR PROPOSAL 121

I hope this Board will accept Prop. 121 and see it to completion of all the decisions you as Boardmembers will make, Prop. 121 will be one of the most important!!!
YES VOTE MEANS CONTINUATION OF COMMERICAL FISHING IN BRISTOL BAY
NO VOTE MEANS THE END OF COMMERICAL FISHING IN BRISTOL BAY

Yours in good fishing

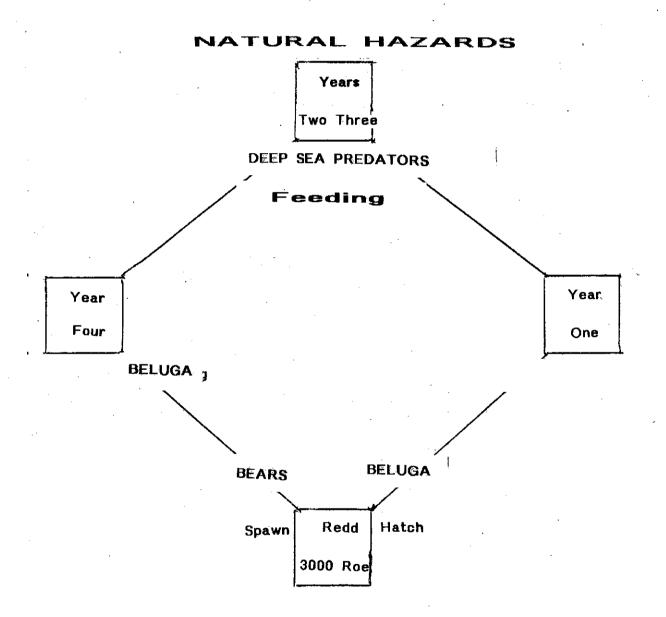
Mitch Kink F/V Wild Goose II

### **REDD CYCLE**



OF THE REDD's 3000 ROE ONLY 4 to 6 ADULTS RETURNS.

## **REDD CYCLE**



RC 30

#### 12/03/2006

#### Board Members,

I would like to address two of the issues before the Board.

#### 1. The first is permit stacking

- At this point I time there are not enough boats to fish all permits.
- If permits were not stacked, these permits would not be fished, so the reasoning of taking 100 fathoms of gear out of the water is false.
- Permit stacking does nothing to improve the quality of fish which is the main problem with getting more money for fish in Bristol Bay.
- Unless stacked permits cannot be un-stacked this is only a holding pattern for permits that would not be fished.
- If you look at the proposals this year, the Board will be creating two classes of fishermen. This has already started with boats with 2 permits transferring one permit while continuing to fish the other. This enables them to circumvent the 48 hr. waiting period.

#### 2. The second is the 32 ft limit

• A 40 ft boat with a price tag of \$300,000 to \$500,000 – Is this the direction an already over capitalized fishery should take?

Matt Ryan 5145 Graveline Rd Bellingham, Wa 98226 F/V Wigeon

Re 31

#### Comments Prepared for the Alaska Board of Fisheries Dillingham Meeting, December 2006

by

#### Gunnar Knapp Professor of Economics University of Alaska Anchorage

- 1. The future market outlook for Bristol Bay sockeye salmon is highly uncertain. This inherent uncertainty should be taken into account in making any decisions based on future salmon price projections, including my own. Sockeye salmon markets have been changing very rapidly in the past few years and it is very difficult for anyone to say what prices will be decades in the future. In 2004 I prepared market projections for the Commercial Fisheries Entry Commission. I believe that those projections were reasonable given available data and the Commission's need for specific price forecasts supported by statistical analysis of historical data. My best judgment continues to be that we will not see significantly stronger market conditions for Bristol Bay sockeye over the longer term. However, I emphasize that this is only a judgment and is based on limited information. A reasonable case can also be made that future Bristol Bay market conditions will be stronger.
- 2. I hope you will carefully consider how proposals to change the management of the Bristol Bay fishery would affect the participation of Bristol Bay region residents in the fishery and the extent to which they are able to benefit from the Bristol Bay fishery. I believe that it is important to find ways to lower costs, improve quality and increase value in the Bristol Bay salmon fishery. But those are not the only goals that are important. As an Alaskan, I believe it is important for Alaskans to benefit from harvesting Alaska's fishery resources. In particular, I believe it is important for Alaskans living in areas where fisheries resources are harvested to participate in the fisheries and to benefit from those resources.
- 3. I am concerned that there has not been careful analysis of the long run implications of some of the management changes which have been proposed for Bristol Bay, and in particular how these might affect permit ownership over time. Some proposed management changes may benefit permit holders who make significant new investments in larger boats or additional permits. This could create economic advantages for non-local residents who may have better access to capital, resulting in their catching a higher share of the Bristol Bay fish and over time acquiring a larger share of permits over time--unless effective mechanisms are in place that provide local residents comparable access to capital. I am not claiming that this would necessarily be the case. But I am not aware of any careful and thorough analyses of this important issue.
- 4. I hope you will be very careful about making significant irreversible long-term management changes for the Bristol Bay fishery without thinking very carefully about what their long-term implications may be. For some kinds of changes, it is possible to "experiment" for several years and then end the experiment if it does not appear to be working as intended. But other kinds of changes are, for all practical purposes, very difficult to reverse. In particular, it would be very difficult to reverse an increase in the boat length limit, or major changes in rules about how many permits an individual can own and how one can fish with multiple permits. I am not saying that these changes may not be good ideas. I am saying that because they would be very hard to reverse, you should be sure to think about them very carefully before making them.

I apologize that due to a prior commitment I will not be able to attend the Board's Dillingham meeting and make these comments in person. If you have any questions, please feel free to contact me at 907-786-7717 or Gunnar.Knapp@uaa.alaska.edu.

RC32

#### JERRY LIBOFF BOARD OF FISH TESTIMONY

#### My background is:

- 1. live in BB, and have lived here since 1969.
- 2. fished for over 30 years for salmon in BB
- 3. tax preparer in BB. I travel to, and do taxes for over 300 customers scattered in over 14 BB villages including Togiak, Twin Hills, Manokotak, Dillingham, Aleknagik, Clarks Point, Ekwok, Stuyahok, Koliganek, Naknek, Igiugig, Kokhanok, Newhalen, Illiamna, Nondalton. I am one of 3 BB resident tax preparers. I also teach tax classes for U. of Alaska.
- 4. I manage 2 small ANSCA village corporations... Koliganek and Igiugig.
- 5. I have helped numerous local residents on their boat and permit loans, both in getting the loans and in keeping the loans current.

#### I WOULD LIKE TO OPPOSE all the restructuring proposal changes including:

- 1. Changes in the 32' boat limit.
- 2. Permit stacking proposals
- 3. Eliminating 48 hour waiting period.
- 4. Quota shares for permit holders

The reasons for my opposition to these restructuring proposals are:

- 1. FISHERS IN THE BB LOCAL COMMUNITIES DO NOT HAVE ACCESS TO FINANCING, nor the ability to service the debt of purchasing or upgrading their 32' boats to longer boats. Nor do they have the financing to purchase additional permits. There are few opportunities for employment in the BB villages, and fishing is the main source of income for many of the local families. Most of their fishing income is used to pay their living expenses in the villages during the winter. There is little extra disposable income. THE RESULTS OF THESE PROPOSALS WILL PUT THE LOCALS AT A GREATER DISADVANTAGE AT CATCHING SALMON, and tend to make fishing even more marginal for them, and perhaps accelerate the outflow of permits from the region.
- 2. Changes like the elimination of the 32' limit, and permit stacking are ONE WAY STREETS. Once you make the changes, and let fishers do these things, YOU CANT GO BACK at a later date and easily reinstiture the original rules. Therefore, I URGE YOU to tread slowly and carefully with these changes, taking plenty of time to study the implications of the changes, especially in light of possible harm to local economies. There will be, without a doubt, unintended consequences of changes like these, and we must study them carefully before enacting them.
- 3. I believe that we have seen the worst of our salmon prices in BB, and that conditions are, and will continue to improve on price, perhaps

significantly, in the near future. Quality of our salmon has continued to improve with the use of ice machines in BB, slush ice bags, increased use of RSW water systems, reduced brailer bag weights, and better handling of the fish by the fishers. Many fishers are selling some or all of their fish directly to consumers, as well as to markets, getting a much higher price for their fish, than they have got from the canneries. The canneries are also increasing their higher end markets in the US and Europe, getting better prices for quality salmon, and passing it along to fishers. The BB drift fleet recently passed the RSDA, taxing themselves to improve salmon quality, marketing, and price. I BELIEVE ALL OF THE ABOVE CHANGES ALREADY BEING TAKEN AND EXPANDED, WORK TOWARD BETTER QUALITY, MARKETING, AND EVENTUALLY PRICES FOR OUR SALMON. WE NEED TO SEE HOW THEY PLAY OUT BEFORE WE TAKE RADICAL RESTRUCTURING CHANGES, THAT MAY OR MAY NOT ENHANCE THE DIRECTION WE ARE ALREADY GOING.

- 4. I believe the Salmon Restructuring Report, which the board has approved, calls for the board to give ample opportunity for review and comment by potentially affected fishery participants. Particularly, I think the board should hold information gathering public hearings within the region. I believe the information gathering has not been done, and needs to be done, given the import of the proposed changes. The board would be remiss if it didn't take these steps.
- 5. If the board adopts the permit stacking proposals, the same reasons can be made to let one person own and fish 3, 4, or more permits. By opening the door to multiple permit ownership, there is the potential for continued consolidation in this manner. Over time, We will wind up with a few hundred permit holders, some getting million pound catches. Very few, if any will be resident fishers.

In summary, I BELIEVE THAT THE ECONOMICS OF THE BB SALMON INDUSTRY IS, AND WILL CONTINUE TO IMPROVE. We fishers will see improved quality, marketing, and prices for our salmon, and it is happening without any major restructuring of the fishery. The restructuring proposals before the board will work to the great disadvantage of local fishers and village economies, since the locals do not have the means nor the ability to purchase the extra capital, boats, and permits necessary to compete if the proposals pass. These proposals will make the local fishers less competitive, generating less money for them, and eventually driving them from the fishery. I URGE THE BOARD TO VOTE NO on these proposals at this time, and let the changes in the industry that are happening now play out. I believe these changes will lead to improved incomes for all fishers presently in the fishery, and do not require the restructuring proposals to accomplish this.

JERRY LIBORF BOX 646 DILLINGHAM, ALASKA 99776

Re38

December 3, 2006

State of Alaska Board of Fisheries P.O. Box 11526 Juneau, Alaska 99811

RE: Bristol Bay Regulatory Finfish Proposal Comments

State of Alaska Board of Fisheries:

I submit these comments for your consideration at your Dillingham meeting....

First of all thank you for coming to Dillingham in Bristol Bay for this meeting. It is important to hear from those most directly impacted by proposals impacting their lives. I understand you will be looking at some 116 proposals to change the Alaska regulations for Bristol Bay Fin Fish.

Bristol Bay is my home. I was born at the Kanakanak Hospital to the south of Dillingham almost 58 years ago, and grew up in Clarks Point. I graduated from college in 1972 and moved to Dillingham for work opportunities. I began fishing in a doubed ended sailboat conversion when I was six year old. Later I progressed to a commercial square sterned power boat, fishing with my father and brothers. I later got my own boats and currently own a 32' Rawson, as I was lucky enough to have the points to get a drift permit. I don't know if I would have been able to purchase one at the time since fishing was poor and prices were worse than they are today. They had come up to a decent price, then dropped back down to what we get today.

It used to be that we could live off our fishing with a little spring and fall work at the cannery. These days are gone. We must have a year round job and fish during our summer "vacation". The cost of living here is more than double that of Anchorage, which is greater than prices for Seattle and other places "outside". Check out our prices for gasoline, heating fuel, electricity, food and you know what your ticket cost to get here. A dollar does not get far here, but it does circulate through several businesses several times, contrary to that same fishing dollar earned by many "outsider" who have bought into our fishery. Through a series of unfortunate events many of our locals sold out just to survive, pay the bills, etc.

The socioeconomic impact in all of rural Alaska and Bristol Bay is no exception; one difficult for us, we who live here year round spend way more of our limited dollar for basic necessities. Yet the resources come from the rural areas, where we have smaller populations, less competition, higher prices, few choices, higher energy costs, inadequate sized airports without lights in many villages, and inadequate infrastructure in many cases to make life out here more affordable and better able to compete. If the State invested in bigger and better airports in and near fishing communities, we could have a better opportunity to fly fresh fish to the lower 48 markets so that we can get better prices for our fish. This would provide more opportunities for more local businessmen and additional work for locals. This might help us stem the tide of folks moving to

the bigger local villages and into Anchorage. This could be a win win. We do not have roads, so why not build better airports to support the planes that can fly fish loads to Seattle and other locations, as well as to bring workers and fishermen up here directly. More 5/6000 foot airports can help in many ways. The State can help with energy costs (gas, oil, electricity) to allow for similar prices to those in Anchorage or Seattle so that businesses can more easily succeed and realize more pay for product as more ice is provided to help keep the quality of fish up. More freezers could be utilized for flash freezing our great product so it says fresh all the way to our customers in and out of the country as folks get the wild salmon that they desire and enjoy.

I fully support the Bristol Bay Native Corporation letter of 12/01/06 to you for your consideration. It is well thought out and look our for the well being of residents of the Bay. You will, I'm sure, hear a majority of our locals say something very similar with some variations.

The Compass piece in the Anchorage Daily News, Saturday, 12/02/06 by Fritz Johnson of Dillingham, is also an article I believe that a lot of locals will in their own way will say that it too, represents their feelings.

Each year the quality of the Bristol Bay fish has gotten better. And we can do more with the 32 foot boats we have under the rules we currently have if you agree with us to not drastically change our fishery as some of the 116 proposals seek to do.

As a part of the State, your recommendations to the Governor, Legislature, Federal Government and Congress can go a long way toward improving our fishery as it is, without changing it so radically as proposed by several of the proposals brought before you. Seek funding to beef up our infrastructure; seek lower energy for those of us who live year round here; and for businesses to invest in our region; seek more grants or more favorable in-state loans for locals to keep their boats and gear up; get bigger airports for our rural villages ,(these are our roads to the urban areas and beyond, and get us off our "island"/villages year round, versus being so isolated and keeping costs high). When the few canneries/processors can't or won't buy the fish our 32 foot boats bring in, allow for foreign processors to come in for limited periods of time so no over escapement takes place. Seek tax incentive for those who invest in rural Alaska and Bristol Bay to further stimulate the economy and provide for more local jobs, hopefully year round. Good fishing keeps our villages thriving; our people stay here; our schools stay open; our clinics stay open; the Post Office stays open; regularly scheduled travel (vs. charter only) is available; jobs are available; the funds we have are utilized, by everyone locally (vs. elsewhere).

Please do not make life more difficult than it is already. Make it better so we can live in our home country a little easier as we help supply the world with Bristol Bay's wild salmon. Diversity has its place here as elsewhere, but you must strive to help us protect our fishery so that it continues to produce in a safely regulated way. Every effort must be given for proper escapement, fish reproduction, good water and predator protection as we do our part to provide a quality product to the producers and those seeking to purchase our fish.

Alaska Board of Fisheries Page 3

That is your fiduciary responsibility to we the residents of this great State of Alaska.

Thank you for listening to my comments. I will be in Dillingham during the time you will be deliberating and can, if requested, with 15-30 minutes notice, be available to discuss any of my comments as I will be at work (842-5201 or 439-6288).

Good luck in your meetings and enjoy Dillingham, and as time permits take a ride to visit Alegnagik too.

Sincerely,

Robert J. Clark P. O. Box 822

Dillingham Alaska 99576

(home) 907-842-5331

51st consecutive year fisherman of Bristol Bay

attachments: 'Super Boats Will Destroy Bristol Bay', Fritz Johnson, ADL 12/02/06 Bristol Bay Native Corporation Letter of 12/01/06

December 5, 2006

Board of Fish Public Testimony

Tommy Olsen PO Box 856 Dillingham, Alaska

Mr. Chairman, thank you for the opportunity to submit public testimony. I am lifelong resident of Dillingham and have a 27 year history of participating in the Bristol Bay Salmon fishery since I was a little boy fishing with my father. I currently take out my 2 young daughters and my young son to learn this family tradition.

I oppose any proposal that exceeds the 32 foot boat limit. I am currently \$80,000 in debt to participate in this fishery. It would be very difficult for me to purchase another boat so that I could compete with other fisherman. The boat that I currently operate is a small Rawson, which is much smaller than the current jet-boats that exist in our fishery today. With this Rawson, I can still produce quality fish just like any other fisherman. My fear is that larger boats will devastate our fishery and we will not have a fishery that my children and their children can participate in.

I oppose any proposal that continues to allow fisherman to stack permits and allow for more than the 150 fathoms of gill-nets on a drift boat and in the fleet. It would be unfair to me and many other Bristol Bay resident fisherman who have small boats who cannot use the permit stacking option.

I am opposed to proposal 30 that makes the Ugashik a super exclusion fishery. I am a fall fisherman in the Ugashik district but I mainly participate in the Nushagak and Togiak districts. If you support proposal 30 then you should consider making the Nushagak district a super exclusive fishery.

I support proposal 121 that establishes a refuge that protects the spawning grounds for our fish. We need to make sure that we have clean water and habitat for our fish to live.

Thank you for the opportunity to submit this testimony.

RC 50

Mr. Chairman and Members of the Board:

My name is John Webb and I am a permit holder, and vessel owner, in the Bristol Bay Salmon fishery. I wrote proposal #45, and I strongly support either amending the 32' vessel length limit, or eliminating it altogether. There are many good reasons to do so, but improving the quality of our fish is at the top of the list. Everyone who fishes in Bristol Bay, can agree that the price of fish is too low, and one of the few ways to get a better price, is to produce a much higher quality product than we do now. Larger vessels fishing the Bay would give fishermen options, such as, RSW flooded fishholds, gil and gut processing capabilities to better utilize Coho and King salmon, for direct marketing, and larger numbers, of smaller brailers, thereby minimizing the crushing effect of stacking fish too deep. Options such as these, would enable Bay fishermen to compete not only with farmed fish producers, but with other Alaskan salmon fishermen who aren't shackled with a vessel limit, as restrictive as the one in Bristol Bay.

Recently, our fishery has been given a lot of assistance by the State and Federal governments through various task forces, agencies, and direct subsidies. Although this aid has been very helpful, it probably is not as effective as allowing fishermen, the best tools possible, to harvest Bristol Bay salmon, in a manner, that will produce a premium product, able to compete without government assistance.

I believe this fleet is past due for some modernization, and let's face facts, all the marketing brochures in the world aren't going to mean much to a customer, that's just eaten a Bristol Bay salmon of poor quality. A little pro-action is very much in order. I do realize that some of the Bay's fishermen would not be able to take advantage of the benefits of larger vessels, and that's a real shame, but if we fishermen of Bristol Bay want

to prosper, and remain economically, viable we are going to have to evolve. That means some change is in order, otherwise we will go the way of the dinosaur, and become extinct. This fishery does not compete in a world market under a vacuum, and it shouldn't operate with vessels in one either!

RESY

#### Board of Fish Hearing Testimony of Julius Henry

05 December 2006

Hello, Mr. Chairman and Board Members,

My name is Julius Henry, I am from Twin Hills, Alaska. I have been a commercial fisherman in Bristol Bay since 1964.

I oppose proposals 39-47. History has shown that 32' vessels are adequate to meet the needs of the fishery. By allowing a larger vessel to participate in the fishery, a situation of unfair competition would occur as many of the local fishermen could not afford to upgrade to a larger vessel.

I urge the Board to keep the vessel size to 32'.

Thank you.

Fish Board Testimony of Peter Andrew F/V Lucky Bear P.O. Box 1074 Dillingham, AK 99576 907-842-4392

12-5-06

Mr. Chairman, Board of Fish Members

I am unable to testify in person due to previous travel arrangements, but I do have testimony I wish to enter in to the official record.

I am a drift fisher of thirty plus years, born at Kankanak and raised up river in New Stuyahok. I now live here in Dillingham, work at Bristol Bay Native Association, and serve of the boards of the Bristol Bay Native Corporation and Nushagak Cooperatives. I believe my comments and concerns reflect the views of most local watershed residents.

My comments concern just a few proposals which if enacted will affect our economy in extremely adverse ways. If you notice, proposals that hurt our region are not submitted by watershed residents. Salmon fishing is not only central to our economy, it is our economy.

#### Oppose Proposals 39 – 42

The 32' limit needs to say in place. I know in my heart the most local watershed residents are already over-capitalized, and will be unable to afford to buy bigger boats or modify their existing 32' boats. In all the years of fishing in Bristol Bay, 'safety' has never been an issue held up as a hindrance to operating 32' vessels. Safety is ultimately the responsibility of the captain.

Thirty-two foot boats are sufficient to prosecute this fishery. And with our existing vessels, we are improving quality, which was demonstrated in the 2006 king season. With our slush ice bags and bleeding practices, we have more than tripled the value of our king salmon, from \$.50 per pound to and average of \$1.60 per pound.

#### Oppose Proposals 21 - 27

The original and true intent of permit stacking was to help those fishers that were in financial trouble during times of low fish prices and weak runs. There are still significant numbers of watershed residents that have lost boats or engines and are unable to recapitalize back into the fishery. We saw permit stacking as a tool to help get those financially strapped permit owners back into the fishery. Unfortunate it back fired on us is now encouraging the out migration of permits from the region. Please keep permit stacking status quo so as to let it fulfill its original intent..

#### Oppose Proposals 31 – 34

Keep the 48 hour transfer in place. Doing away with the 48 transfer rule would create a separate the class of fishers, those who can afford bigger, faster boats, and disadvantage especially local setnetters who are unable to move between districts.

#### Oppose Proposals 107-109

There is no biological evidence to support moving the Nushagak District south line, and no genetic information to back up claims if interception of other district stocks.

I support the current set net allocation.

I do not support opening the General District to fishing.

Thank you for coming to Dillingham.

Sincerely

Peter Andrew F/V Lucky Bear

RCST

Harry Wassily

Clarks Point, AK

Fish Board Testimony

Dec. 4-12, 2006

For the record my name is Harry Wassily, Sr. and I reside in Clark's Point, Alaska, 14 miles south of Dillingham. I am speaking now for myself as a drift fisherman.

I oppose Proposals 29 to 38, which would eliminate the 48 our transfer rule, because this would affect the districts by bringing too many boats into one area. This would also impact setnetters who are unable to move their sites.

I also oppose Proposals 39 to 47 to eliminate the 32'boat limit in Bristol Bay. This would be a tremendous hardship on our local communities and people for whom fishing is their only source of income. Local people cannot afford to buy bigger boats.

I oppose Proposals 51 and 52 that would allow fishing in the General District. This will have unpredictable impacts on fish runs to every district and will also disadvantage setnetters who sites do not move.

I am opposed to proposals 107 to 109 or any proposal that would radically change the Nushagak District boundary lines. Doing so would have serious impacts on both Nushagak setnetters and driftnetters.

I would like to add additional testimony on behalf of the Clarks Point Village Council, of which I am President. The Council has directed me to speak on behalf of the village, expressing our community's opposition to Proposals 39 to 47 to eliminate the 32'boat limit in Bristol Bay. This would be a tremendous hardship on our local communities and people for whom fishing is their only source of income. Local people cannot afford to buy bigger boats.

The Village of Clarks Point is also opposed to Proposals 29 to 38, which would eliminate the 48 our transfer rule. This change would bring too many boats into one area. And would have serious negative impacts on local setnetters who are unable to move their sites.

Thank you. I'm happy to answer any questions.

R C 59

### Lorianne Rawson Board of Fish Testimony

South Naknek, Alaska December 4 – 12, 2006

Hello Mr. Chairman and Board Members, my name is Lorianne Rawson and I am a year round resident of South Naknek, Alaska. I am a set-net fisherman; I was a drift-net fisherman at eight years old and have fished both drift and set-net all my life. I represent myself.

## I oppose proposals 39 - 47, which removes or amends the 32 foot vessel limit.

We do not need bigger boats; any vessel over 32 feet will squeeze the local fisherman out of this fishery. Those who live in the Bristol Bay region year-round do not have the financial ability to upgrade their boats to compete with any fisherman using a vessel more than 32 feet who is most likely to not be from our region with a secondary income.

Keeping the 32 foot limit on vessels will also ensure quality of fish which is what the industry must strive for.

I do not support the removal or amendment of the 32 foot limit and ask that you please do the same.

#### I support proposal 65 allowing fixed set-gear in the NRSHA.

As we now have to remove our gear after each set-net opening in the NRSHA, we no longer have the security of using our running-lines to protect our skiffs from the drift-net fishermen during their openings.

Our skiffs equipped with outboard motors and hydraulic rollers have a value of up to \$20,000.00 and more.

Prior to the required gear removal, we had tied our skiffs to our running lines to keep them secure in addition for easier access during any time of the tide to set our nets in the middle of the flood.

The drifters have become increasingly hostile by towing and ramming our skiffs. We have witnessed them towing our skiffs around by our anchor lines during their entire set. When they are done, our skiffs are towed sometimes hundreds of feet away from anchorage or simply set adrift. In some cases, anchor lines are cut.

Porianne Pauser

## Lorianne Rawson Board of Fish Testimony

South Naknek, Alaska December 4 – 12, 2006

Fish and Wildlife Protection does not have the manpower to police this problem or issue citations. They have advised us to contact the Bristol Bay Borough Police when this happens; but they also do not have the man power and are limited to taking a report over the phone with nothing else being done.

This has caused us lost fishing time and has created an economic hardship by not being able to fish because we have to look for or buy new skiffs and outboard motors when our skiffs cannot be found. In some cases outboard motors need to be replaced do to blatant vandalism from the drifters who purposely ram them as they try to fish as close to the beach as possible.

Some of us have lost the opportunity to fish openings because drift boats go dry on set-net sites (which would not happen if a running line is in place).

If the drift fishermen want to fish as close to the beach as possible and stay there on the same set by towing to stay in the same spot as we have witnessed, then they should invest in a set-net permit.

By having the set-netters remove fixed gear in the NRSHA after each opening and allowing the drift fleet to do as they wish such as destruction of property and theft; this is not managing the fishery properly.

#### I support proposals 87 and 88, eliminating allocation for the NRSHA.

We have sat out many tides at a time, many days at a time during the peak of the season waiting for the drifters to catch up on their allocation; by the time we get an opportunity to fish, the processors are too full to take our fish.

This is patently unfair.

The drifters cannot catch-up on their allocation when many only fish a few sets or not fish at all. We see this time and time again and that's unfair.

Thank you, I am happy to answer any questions.



Chairman and members of the Board. My name is Daniel Kingsley and I'm here today representing myself as a concerned commercial fisherman and Bristol Bay resident form Pilot Point, AK. I've been commercial fishing in Alaska since 1971 and I've owned a drift permit and boat in Bristol Bay since 1985. I'm a certified fisheries biologist with 24 years of professional experience dealing with various environmental and fisheries related issues in Alaska, most of the Western States and the Midwest. I currently serve as a member on the Lower Bristol Bay Advisory Committee, Pilot Point City Council and National Sea Grant Law Review Board based in Bethesda, Maryland.

I adamantly oppose proposals 14, 21 through 28. I support staying status-quo on the current policy that any fisher-person who operates 200 fathoms of gear to have two permit holders on-board. Here is why:

Allowing one fisherperson to hold two permits and fish 200 fathoms will only continue the trend of the loss of local participation in the Bristol Bay drift fishery. Outside fishermen will continue to capitalize the drift fishery.

Voluntary consolidation of the fishery puts too much economic pressure on the local fisherpersons who do not have the economic means to purchase additional permits and associated equipment.

House Bill 251 is just an example of capitalization of the fishery when it promotes "additional fishing privileges" to persons holding two drift permits.

The only viable means of consolidation of the fleet to the "optimal" number of 800-1200 vessels is for a governmental buyout with the remaining fleet being responsible for the debt over time. Yes, complete governmental rationalization not voluntary capitalization. Voluntary capitalization is too detrimental to the indigenous fisherpersons of Bristol Bay.

The State of Alaska and the Federal government where more than willing to financially assist the off-shore fisheries such as bottom-fish and crab in their buy-out efforts but have put there heads in the sand when dealing with the optimal number of economically viable drift permits in Bristol Bay. This absolutely disturbs me.

If one of these proposals is adopted by this Board and allows an individual to own and operate two drift permits then they have to be blocked. Much like halibut and black cod IFQ shares. If not blocked where is the reduction in total permits when the

price of sockeye becomes more lucrative or the price of permits increase? If the price of sockeye was \$1.00/lb would it not make more sense to fish 300 fathoms versus 200 fathoms?

These blocked shares can be temporarily unblocked if a run in the excessive of 55 million is expected for Bristol Bay. Of course when this occurs where is the processing capacity going to come from anyway?

I strongly support proposal 43, 44 and 45 to remove the 32 feet vessel limit.

Bristol Bay is the only drift salmon fishery in the state that places a limit on the length limit on our salmon drift fishing vessels. This is an obsolete law, from the sailboat days, and has no useful purpose.

The price of fuel, initial investment capital and shallow water nature of the Bristol Bay sockeye fishery will physically and economically limit the overall size of the drift vessels. The notion that limit 'seiner' size vessels will be the norm in Bristol Bay is absurd. If, as an industry, we want to improve the quality of our product then it would not be too difficult or expensive to extend the length of some of the smaller vessels "i.e. small fiberglass *Rawson*" at the same time RSW units are installed.

The reasons I support the elimination of the 32 feet limit are as follows:

- I participate in the Bristol Bay 4E halibut fishery and need additional space for gear storage, crew members and pulling & deploying of my gear.
   Fishing considerable distances off-shore is also very dangerous in 32 feet shallow draft vessels.
- 2. There are several salmon fisheries that I used to participate in but cannot today because of lack of market and/or undependable tender service. With the larger vessel I would be able to install a small on-board freezer operation and be able to continue participating in these fisheries. To put it in perspective, this past frozen "at sea" coho were fetching \$3.00 pound; subsequently I was offered 35 cents per pound for my coho. This price included the RSW incentive bonuses.
- 3. With a larger vessel I would be able to install a separate generator to operate my RSW system. Operating the large hydraulic pumps necessary to operate a RSW system off the main engine is non-economical and problematic.

I strongly support proposal 30.

For the record, this proposal was written by several Lower Bristol Bay Advisory Committee members and was not fully endorsed by the Advisory Committee prior to submittal to the Department. This proposal, as amended below, was later approved by the Lower Bristol Bay Advisory Committee.

Due to Departmental concerns I would like to amend proposal 30 to read that the super-exclusive status for the Ugashik District will only occur if total harvest has an ADF&G re-season predicted harvest of 2.5 million or less.

The Department has expressed concern that since the Ugashik run is traditionally a large push or pulse migration up-river that without sufficient drift effort on-ground over-escapement would be possible. The intent of this proposal was not to make ADF&G managers jobs more difficult but rather to protect the economies and continued viability of the communities of Lower Bristol Bay on low harvest years.

Several Lower Bristol Bay Advisory Board members raised concerns that inadequate markets would show-up on-ground if the fishery went super-exclusive in the Ugashik District. However, history has shown that because of the overall size and quality of Ugashik harvested sockeye there will be adequate processing interest to service both the set-netters and eligible drift fleet. In addition, several large, highly efficient, groups of boats representing some on Bristol Bay's larger processors prefer fishing the Ugashik District and hence will have their respective processing capacity services on-ground.

I oppose proposals 77 through 80 which mandate moving the outside Ugashik line in-shore prior to June 23<sup>rd</sup>. The Ugashik River and surrounding tributaries do support an early sockeye run that has built in recent years and these fish have a tendency to mill outside this proposed in-shore line prior to June 23<sup>rd</sup>. In addition, there is no ADF&G stock separation data that supports this line adjustment due to excessive interception of north-bound sockeye.

There are too many allocative proposals to mention here but it is my opinion that all set net/drift allocations remain status quo. I strongly oppose proposals 15 and 19.

Proposal 19 calls for the removal of all fixed set-net gear after each opening. This scenario should only be an issue in the designated "special harvest areas". I feel

requiring the removal of all fixed set-net gear, bay wide, after a District opening is too cumbersome and in certain areas physically impossible because of tidal constraints.

Thank you for you time and I would be happy to entertain any questions the Board might have.

RC63

**Fritz Johnson**Dillingham Alaska
907-842-2674

Bristol Bay Salmon Fish Board Testimony Dec. 4-12, 2006

Mr. Chairman, Board Members – thank you for coming to Dillingham. My name is Fritz Johnson. I landed in Clarks Point, 14 miles south of here, in 1978, bought a boat and I've been fishing here ever since. I've fished salmon, Togiak herring and some halibut, but the salmon fishery has been what's kept me in the business.

I oppose any repeal of the 32-foot vessel limitation (Proposals 39 to 47); I oppose those changes to the permit stacking regulations addressed in Proposals 21-25, 27 and 28, and I oppose the elimination of the 48-hour district transfer rule (Proposals 31-35) – because I believe to do so will ultimately result in concentrating Bristol Bay salmon harvesting power in the hands of a very few, and strip local watershed residents of any economically viable participation in the fishery on our doorstep.

Consider the cumulative effect of allowing bigger vessels, expanded fishing rights for multiple permit holders, and unregulated transferability between Bristol Bay fishing districts:

In the early years of the Togiak herring fishery, the presence of a hundred or more purse seiners home-ported from around the Gulf of Alaska proved that Bristol Bay is not too far to travel if there's money to be made.

Provide that transient fleet of bigger boats extra fishing time and longer nets, by virtue of the privileges proposed for owners of multiple fishing permits, and Bristol Bay's traditional single-permit 32' boat operators will be marginalized in the same way 32-foot seiners have always been marginal participants in the Togiak herring fishery.

Those who don't believe that, I'd suggest, have never tried to squeeze a 32' Bristol Bay boat through a pack of Kodiak seiners to make a herring set in Togiak.

Removing the 48-hour district transfer rule would be one more nail in the coffin the Board would be building for Bristol Bay communities by allowing bigger boats to fish more gear for extra time. Faster, less constrained by weather, and transferring freely between districts, a transient fleet of bigger non-resident boats will grab the lion's share of fish from Ugashik, Egegik, the Kvichak or the Nushagak, wherever they appear, and leave nothing but crumbs for local fishermen.

Those who suggest there's nothing to prevent Bristol Bay watershed residents from upgrading to bigger boats, or buying additional fishing permits, obviously don't live here. In contrast to fishers from Washington, Oregon, California or other parts of Alaska, no one in the United States pays more for fuel and food than the people of Southwest Alaska. And no one has fewer alternative economic opportunities. Our salmon, herring and halibut are an incredible natural resource, but they are the *only* renewable natural resource that provides us a living. To structure fishing regulations in ways that will ultimately bankrupt resident watershed fishermen will be the death of several dozen towns and villages that are barely surviving today.

The argument that bigger boats are needed to improve fish quality doesn't hold water. Bristol Bay's existing fleet of 32-footers can catch all the harvestable salmon available – particularly if fisheries managers have the tools to expand upstream fishing boundaries if needed – and with slush ice – use of which is increasing every year – the existing fleet can deliver the higher quality salmon world markets demand. I realize the use of ice is not the purview of the Board, but consider this: providing slush ice to Bristol Bay's existing fleet would *spread the wealth* of the fishery, rather than concentrating it in the hands of a few, since every boat's carrying capacity would be reduced by the weight of the ice and water on board. Slush ice and smaller loads both improve fish quality – and a smaller load for me invariably means a bigger load for my neighbor – or vice versa.

Such an approach runs counter to prevailing fishery 'rationalization' schemes that view improved economic viability in terms of giving bigger shares of the pie to fewer participants. The tragedy of such an approach is that it will sacrifice the well-being of Alaska's coastal communities for the interests of the already well-capitalized. Most respectfully, I'd urge the Alaska Board of Fisheries do what's right for Alaska and the residents of Alaska's coastal communities.

In that regard, I support Proposal 121, as modified by the Nushagak Advisory Coommittee, to add another layer of protection to Bristol Bay salmon waters.

Speaking of local economic opportunities: I'd like to very briefly address
Proposal 101, which I submitted, the so-called Nushagak Dude-fishing proposal,
based on the \$30 'dude fishing' commercial license approved two years ago by
the State Legislature. I hope the proposal is self-explanatory. It would provide at
very little cost a small business opportunity to a coastal community where
alternative economic opportunities are few. I'd be happy to answer any questions
regarding Prop 101, or any others, if the Board is interested.

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## ALASKA BOARD OF FISH

# **Public Testimony**

## **DECEMBER 5, 2006**

TO: ALASKA BOARD OF FISH

FROM: FRANK WOODS / COMMERCIAL FISHERMAN / LOCAL

SUBJECT: PROPOSALS BRISTOL BAY FINFISH

**DATE:** 12/5/2006

#### MR. CHAIRMAN AND MEMBERS OF THE BOARD OF FISH

As you all are aware we as Alaskan fisherman are a dying breed. 80% of permits fished in Bristol Bay are non-local or outside owned. The cost of doing business as a <u>local</u> fisherman and the cost of living has increased while the price of ex-vessel price has not. The cost of living locally is one of the highest in the country.

Therefore Ι regulatory opposed am very to proposals (14,15,21,22,23,24,25,27,35) that benefit few fisherman (132 dual) of 1500 registered permits last year. I would like to see the Alaska Department of Fish and Game and the Board of Fish Address this by figuring out how many outside permits are stacked verses Alaskan registered dual into consideration. It's in the Alaskan Constitution to benefit all Alaskans. I agree with the Nushagak Advisory Committee in saying the dual permit system in place is benefiting the select few. My questions to the Board are these changes benefiting Alaskans verses outside fisherman or those that can afford to buy into this new fishery

The Managers are trying to create the optimum number of 900 –1400 operating vessels tough job! How to do this and allow Alaskans to benefit I don't know the answer? But we need to come up with something that is going to benefit Alaskan fisherman and keep the money in state. I know in the past gear reduction to the Togiak herring fishery hasn't hurt production

or quality to both seine and gillnet. In the permit stacking you are adding gear length per vessel? While the additional permit stacking hasn't even come close to the optimum number it is a start. No more additional provisions for the dual permit holders. The old saying you can't beat them join them many locals are at that point but can't afford too.

The 32-foot limit will always come up along with quality. I am speaking against proposals 39-47.

RSW, Slush Ice, Bleeding or better handling is a big part of every fisherman's agenda today. Someone mentioned globalization and quality earlier; we are the salmon capital of the world. Lets keep it that way!!! With profits benefiting Alaskan Fisherman.

Thanks to BBEDC and their efforts on quality and helping our local fleets on the harvesting end. It is improving our global market share. Keep the 32-foot limit

I support any proposal that benefits the local economy specifically proposal # 10 to increase the herring quota for gill-netters. Look at the numbers for herring allocation/ harvest 2006. 140-ton average (gillnet) 550-ton average (purse seine). In the ADF&G 2006 Togiak herring report it out lines the current allocations and processors co-op purse seine membership getting 15,000.00 tons that is a lot of fish.

I support 121 and any action to protect our fisheries.

IN CLOSING I KNOW THIS BOARD WORKS HARD TO FIND THE BEST WAY TO BENEFIT OUR BOTTOM LINE IN THE FISHERIES. THANK YOU FOR YOUR TIME

SINCERELY;

Frank Woods

RC 80

#### TESTIMONY TO THE ALASKA BOARD OF FISH

#### BY

# H. ROBIN SAMUELSEN JR. Fisher

Thank you, Alaska Board of Fish for having your meeting here in the Bristol Bay Region. I would hope that three years from now you can return to Naknek to hold your next Bristol Bay regulatory meeting.

**Proposal 8- Oppose**, this proposal is poorly written and not clear.

**Proposal 9- Oppose**, the issue is processing capacity in the herring fishery and if this proposal passes the seiners will plug the processors shutting down the herring gillnet fishermen.

**Proposal 10- Oppose,** when is the madness going to stop, the market in Japan is drying up, processors are pulling out of the Togiak herring fishery. The allocations between the gill-netters and seiners should remain as is, this is not healthy fishery with the fishermen losing herring markets.

Proposal 11- Support.

Proposal 12- Support.

**Proposal 14- Oppose**, as the proposer states, the Bristol Bay salmon fishery produces low profits. If this proposal passes then you the ABF will create two classes of fishermen, the have's and have not's, the have not's will be the regions residents. The cost of living within the Bristol Bay Region has gone up 53% in the last three years. Two years ago we received .40 cents a pound for sockeye, today we are receiving .60 cents a pound. With the high cost of fuel, nets, food our local fishermen are barely holding on to their permits. Proposals such as these will put the final nail in many locals coffin.

Proposal 16- Support.

**Proposal 17- Oppose,** Night lights are very much needed in this congested fishery. Because a few do not use them is not a reason to do away with them. This is a safety issue.

**Proposal 18- Oppose,** The marketing of our gillnets is good and not a big thing or hardship for fishermen. This makes it easy for protection to nab the folks who break the law.

**Proposal 19- Oppose,** Some setnet sites the anchors are put in at the lowest tide possible. Making the setnetters remove the anchoring devices will create a great deal of hardship and for some put them out of business.

# Proposal 20- Support

Proposal 22- Oppose, permit stacking was never supported by the Bristol Bay F&G advisory committees and the majority of local fishermen. Now the permit stackers want "additional fishing privileges the board deems appropriate". Processors already give double permit holders a higher fish limit, this should be good enough. Please keep the local fishermen and communities in mind when dealing with these types of proposals. Proposal 23,24,27,28,29- Oppose, This Board already debated and voted down the "Special Harvest areas. Special harvest area's intercept fish going to natal streams and can have a profound effect on escapement.

Proposal 30-Oppose, We are all permit holders here in Bristol Bay. These super-exclusive proposals will do nothing but divide Bristol Bay. If you are going to develop super exclusive proposals then do it for the whole bay, so when a person drops his green/blue card he or she has to stay within that fishing district the whole season. Proposal 31,32,3334,35,36,37,38,39,40,41,42,43,44,45,46,47,-Oppose, the 32 foot limit has been in place by the BOF for many years. Your own finding support the 32 foot limit. By allowing bigger boats, you will not achieve greater quality or safety, we currently are improving our quality, but with 1800 drift fishermen and 1000 setnet fishermen and the lack of overall support from the current processors, improvement of fish quality is going to take time and a lot of dollars. Most local fishermen do not have the means to extend or buy new boats. The non-local fishermen who have jobs will be able to do what these proposals want and then again you will be hurting the regions residents. I would advise the Board to review the Boards findings #81-92-FB dealing with the 32 foot limit and findings 86-115-fB dealing with the 48 hour transfer, those finding still reflect the feeling of the vast majority of Bristol Bay fishermen.

## Proposal 49,50-Oppose.

Proposal 51,52-Oppose, General fishing districts intercept fish heading to natal streams, salmon stocks may be selectively overharvested. This only benefits drift fishermen and puts the escapement goals at risk. These general districts will also have a negative impact on the taxing entities of Bristol Bay. This is not a quality issue. If more time is needed then have the department open the fishing periods within districts earlier and more often. Better yet, instead of the processors pulling out of Bristol Bay on or before July 20 if they want more quality fish, simple stay longer, all fishermen would support that. Many years the processor completely pull out of Bristol Bay fishery leaving fishermen with no markets at all.

### Proposal 99,100-Support.

**Proposal 102,107,108,109-Oppose,** Any and all studies have shown that the Nushagak fishermen are not intercepting Naknek-Kvichak fish stocks. One study showed that two fish were caught in the middle of flounder flat and the department believed that these fish were of Kvichak fish origin. Nushagak District is not the problem. Studies by the department have shown that Naknek fishermen intercept a large majority of Kvichak bound stocks. Maybe the proposer should look at his/her own back yard and clean that up before making false statements about other fishing districts.

# Proposal 113-Support.

**Proposal 121-Support,** in concept. I believe the precautionary approach should be taken in this area because it has been deemed a mining district, these are our head waters of Bristol Bay. I support clean water for our people, fisheries both fresh and salt water fish. I do not know if the added protections are in proposal 121 and would recommend to the Board that they flush this concept out by a committee of the Board and then bring it back for public input and action.

The Bristol Bay fishery is not a economic healthy fishery, we have a long way to go, our quality is improving, but here again we have a long way to go their also. Our communities and residents have been suffering because of low salmon prices, high cost of living and limited markets. No one wants to move away from home, many in Bristol Bay have had to move out of their communities, school closed and the core fabric of social well being has been taxed to it maximum.

Enclosed are resolutions from fifteen communities in Bristol Bay representing roughly 5974 residents supporting the retention of the 32 foot limit and the 48 hour transfer regulations.

Thank you.

**Curyung Tribal – 2400 people** 

Koliganek Village – 167 people

Twin Hills Village – 71 people

Manokotak Village – 437 people

Naknek Village - 577 people

Pilot Point Village - 73 people

Port Heiden Village – 89 people

South Naknek Village – 76 people

Togiak – 779 people

Aleknagik - 241 people

Egegik - 81 people

Portage Creek – 37 people

Clarks Point – 65 people

King Salmon – 420 people

New Stuyahok – 461 people

TOTAL = 5,974 people

Information from:

http://www.commerce.state.ak.us/dca/commdb/CF\_BLOCK.cfm\_

## New Stuyahok Resolution 2006- 2

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the

West Symmet Tenentary Council we request and strongly urge the Alaska Board of Sigh to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to sow the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 4th day of December, 2006.

Lucy A. Wegdman President

ATTEST:

for sacry bunlickpyk

Sally Gumlickpuk Secretary

# **Curyung Tribal Council**

## Resolution 2006-27 Community of Dillingham

## A Resolution to Retain the Current 48 hours Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370

- WHEREAS; Curyung Tribal Council is a federally recognized Alaska Native tribe serving its Tribal members and the community of Dillingham, and
- WHEREAS; Curyung Tribal Council, acting as the duly elected governing body pursuant to the Constitution of Curyung, has the authority to established relationships and enter into contracts; and
- WHEREAS; the fisherman in our community have been fishing in Bristol Bay for generations, and
- WHEREAS; the fisherman and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and
- WHEREAS; our community fisherman are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.
- WHEREAS; our community fisherman traditionally pick a river system to fish and stay in that river system for the season.
- WHEREAS; non-local Bristol Bay fisherman tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as set netters.
- WHEREAS; amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fisherman to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the Curyung Tribal Council we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December, 2006 concerning 5 AAC 06.370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fisherman, communities and business in the Bristol Bay region.

ADOPTED and approved this 29 day of November 2006.

ATTEST:

Kimberly Williams, 3rd Chief

2 Tom Tilden



RESOLUTION 2006-

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in the Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53 % in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will be increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, bye the Traditional Council of Togiak we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminated or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.370. We do not support the elimination, alteration or amending the current regulation.

**BE IT FURTHER RESOLVED,** that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

WE HEREBY CERTIFY, that the Transdopted the above resolution on		
for, against and	abstaining, at a	duly called meeting at
which a quorum of the Tribal Council members was present.		
President, Traditional Council of Tog	Ĩak Î	Date
ATTEST:	•	
= Golfen Jana	-	
Secretary, Traditional Council of Tog	lak	

Egegik Tribal Council



289 Airport Rd.
P.O.Box 29
Egegik, Alaska 99579
(907) 233-2211, Fax (907) 233-2312
E-mail egegiktribal@starband.net

## Resolution 06-09 Community Egegik Village

A Resolution to Retain the Current 48 Hour Registration Requirements in the Bristol Bay Salmon Fisheries as Described in 5 AAC 06.370

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in river systems for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

#### NOW THEREFORE BE IT RESOLVED, by the

Egegik Tribal Council, we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.370. We do not support the elimination, alternation or amending the current regulation.

BE IT FUTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

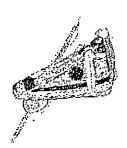
ADOPTED and approved this 2 day of December, 2006

SIGNED: 75 X

evin Deigh, Acting Chief

ATTESTED

Melvin Strom, Treasurer



Native Council of Port Heiden PO Box 49007 Port Heiden, Alaska 99549 907-837-2296 907-837-2297 (fax)

#### Resolution 06-160

A resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet, thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the Native Council of Port Heiden we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.370. We do not support the elimination, alternation or amending the current regulation.

BE IT FURTHER RESOLVED, that is the Board of Fish considers any restructuring proposals that full soci-economic hupact, study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 22<sup>nd</sup> day of November, 2006.

ATTEST:

Annie Christensen

President

#### Community of South Naknek Resolution 2006 – 02

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years, and

WHEREAS, our community has lost two-thirds of its population over the past few years and our school has been closed.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to fransfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the South Naknek Community, strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 27th day of November, 2006.

maco Mile

ATTEST:

الشمينين أرازا والولوا المتار

PAGE 02

VICTOR SEYBERT 2004/004

Community Pilot Point

Resolution 2006-18

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as semetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

#### NOW THEREFORE BE IT RESOLVED, by the

Village Council of Pilat Printwe request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06. 370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 24 day of November, 2006

ATTEST: President Pibt Point Village Council

Community Natrut Native Village
Resolution 2005\_22

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the

Make the Village Counce two request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory findish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06. 370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 22 day of November, 2006

ATTEST:

Nokrek Native Village. President

**☑**1004/004

- LOUIE ALAYAKAK

Community Manoxotal Village Resolution 2006 199

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHICREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as semetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the

Manorotale Village Council we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham. Alaska in December 2006 concerning 5 AAC 06, 370. We do not support the elimination. alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restricturing proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 22 day of November, 2006

Lorene Seelent - Jemp Tribal Clark

\* LOUIE ALAYAKAK

11/22/2008 15:08 FAX -

**₩**004/004

KMO City (ouncil

Community WanoKatak Resolution 2006- 123

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the Cry Council of Manketak we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06, 370. We do not support the elimination. alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this  $34^{4}$  day of November, 2006

ATTEST: Licie Ret

#### Twin Hills Village Council Resolution 06-18

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fisherman in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of fishery because it just makes the fishery non-economical for locals.

Commence of the Commence of th

NOW THEREFORE BE IT RESOLVED, that the Twin Hills Village Council request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 ACC 06,370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 27 day of November, 2006.

President, John W. Sharp

Attest: Debbie Hoseth, Secretary

Community Koliganell
Resolution 2006-

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

#### NOW THEREFORE BE IT RESOLVED, by the

we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06, 370. We do not support the elimination, alteration or amending the current regulation.

**BE IT FURTHER RESOLVED**, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 14 day of November, 2006

ATTEST: Jong Liboff

Community KING Salmon Resolution 2006-22

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06,370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts. impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the Ling Salmon Unlage Council we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06. 370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 25 day of November, 2006

ATTEST, laru & angasan-Secti

Community Clarks Port Mgc Corwell
Resolution 2006-03

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06.370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the

Cloude from the council we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06. 370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this and day of November, 2006

ATTEST:

Community Aleknasik Traditional Course!

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06,370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are sauggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and other in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setneters:

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the Aleska Board of Alekon Land Council we request and strongly urge the Aleska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06, 370. We do not support the elimination, afteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and offers to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 29 day of Novemi a 2 106

Massillie Statist. President

Margie Aloysius, Secretary

Community Portage Creek Village Cource Resolution 2006-03

A Resolution to Retain the Current 48 hour Registration Requirements in the Bristol Bay Salmon Fishery as Described in 5 AAC 06,370.

WHEREAS, the fishermen in our community have been fishing in Bristol Bay for generations, and

WHEREAS, the fishermen and their families in our community have been dependent on the Bristol Bay salmon fishery for income and support for decades, and

WHEREAS, our community fishermen are struggling to remain in the Bristol Bay fishery because of severe economic hardships as a result of low fish prices and the increasing cost of living in the Bristol Bay regions, which has increased 53% in the last three years.

WHEREAS, our community fishermen traditionally pick a river system to fish and stay in that river system for the season.

WHEREAS, non-local Bristol Bay fishermen tend to transfer to other fishing districts, impacting the taxing ability of local governments and impacting the allocations between drifters as well as setnetters.

WHEREAS, amending or eliminating the 48 hour transfer rules will increase competition with a roving fleet; thus, it will cause the local fishermen to sell out of the fishery because it just makes the fishery non-economical for locals.

NOW THEREFORE BE IT RESOLVED, by the

Portace Creek V. Mare Council we request and strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the 48 hour transfer regulation at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06, 370. We do not support the elimination, alteration or amending the current regulation.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 4th day of December, 2006

ATTEST: CO O J. J. C., Presidant

12/04/2006 16:34 FAX

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by

the Portage Creek Village Council, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this \_\_\_\_\_day of December, 2006

ATTEST:

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## New Stuyahok Resolution 2006- 20

A Resolution is Support of Retaining the Thirty-Two (32) fool Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for may residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with a non-local's who have the means to access financial capital. For every local Bristol Bay drift permit lost, the loss is three local very important jobs.

WHEREAS, the Alaska Board of Fish should be prompting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and loser and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processor today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by

The New Sturber Transform Council, and its community members, strongly urges the Alaska Board of Fish vote down and proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

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Lucy Weedman, President

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Sally Gumlickpuk, Secretary

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Community Portage Creek Village Couved Resolution 2006-02

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with a non-local's who have the means to access financial capital. For every local Bristol Bay drift permit lost, the loss is three local very important jobs.

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WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by

MaryAnn K. Johnson

the Portage Creek Village Council, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 4th day of December, 2006

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with a non-local's who have the means to access financial capital. For every local Bristol Bay drift permit lost, the loss is three local very important jobs.

11/22/2006 15:19 FAX

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by the King Salmon Ullage Council, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 25 day of November, 2006

Clara E. Lingasan - Sect.

ATTEST:

#### Community of South Nakuek Resolution 2006 – 01

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in the 1980's because of a loop-hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessel in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, less than 400 drift permits are held by residents of Alaska and the fishermen who are seeking larger drift boats have backing from out-of state processors; who are wanting quantity instead of quality fish.

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with non-local's who have the means to access financial capital. For every local Bristol Bay drift permit lost, the loss is three local very important jobs.

WHEREAS, the State Constitution guarantees residents access to the natural resources and the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downtum in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving but with the high cost of fuel, insurance and inflation and fishermen are getting 1960's salmon prices in the Bristol Bay salmon fishery.

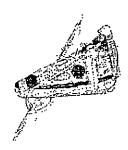
NOW THEREFORE BE IT RESOLVED, by the South Naknek Community, strongly urge the Alaska Board of Fish to vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 27th day of November, 2006.

ATTEST:

agrace Milen



Native Council of Port Heiden PO Box 49007 Port Heiden, Alaska 99549 907-837-2296 907-837-2297 (fax)

#### Resolution 06-155

A Resolution is Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two feet in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing in the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with a non-local's who have the means to access financial capital. For every local Bristol Bay drift permit lost, the loss is three local very important jobs.

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WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by the Native Council of Port Heiden, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fisherment, communities and business in the Bristol Bay region.

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**ADOPTED** and approved this 22<sup>nd</sup> day of November, 2006.

Annie Christensen

President

Community Polo to Pourt
Resolution 2006 - 19

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

the <u>Vage Council of Prist</u>, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

**ADOPTED** and approved this 24 day of November, 2006

ATTEST:

Council

fresident, Pilot Point Village

Community Nakret Wative Village Resolution 2006-21

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's recommunities and income from fishing is the only source of income for many residents,

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by
the Native Village, and its community members, strongly
urges the Alaska Board of Fish vote down any proposals that amends, eliminates or
modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in
Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

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ADOPTED and approved this 22 day of November, 2006 of the concentration of the second section from

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→ LOUIE ALAYAKAK

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KMO City Council

Resolution 2006-64

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06,341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

**№**003/004

11/22/2006 15:06 FAX

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by the City Council of Manakard ala, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

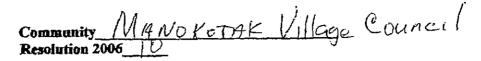
ADOPTED and approved this 24 day of November, 2006

ATTEST:

ers etc

→ LOUIE ALAYAKAK

Ø1002/004



A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

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D 003/004

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

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BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

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ADOPTED and approved this 22 day of November, 2006

ATTEST:

Your Julit - Temp Trubol Clark

### Twin Hills Village Council Resolution 06-16

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 ACC 06.341.

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participation in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHERAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program started.

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity. from twenty five processors down to about eight processors today.

WHEREAS, the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by the Twin Hills Village Council, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, climinates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 27 day of November, 2006.

## **Curyung Tribal Council**

### Resolution 2006-26 Community of Dillingham

### A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

	Distoi Day Samion Y esseis as Described in S AAC 00.371
WHEREAS;	Curyung Tribal Council is a federally recognized Alaska Native tribe serving its Tribal members and the community of Dillingham, and
WHEREAS;	Curyung Tribal Council, acting as the duly elected governing body pursuant to the Constitution of Curyung, has the authority to established relationships and enter into contracts; and
WHEREAS;	the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.
WHEREAS;	in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.
WHEREAS;	these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fisherman and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.
WHEREAS;	the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.
WHEREAS;	hundreds of local Bristol Bay salmon fisherman cannot afford the additional cost of upgrading vessels to another length and fisherman in our communities have no means to obtain financing to upgrade their fishing vessels.
WHEREAS;	the unemployment rate is about 70 to 80% in the Bristol Bay region's community and income from fishing is the only source of income for many residents.
WHEREAS;	the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run, if not retained by ADF&G these vessels have proven to be safe, so safety is not a factor.
WHEREAS;	the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fisherman and their thirty foot vessels.
WHEREAS;	over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.
WHEREAS;	additional locally held Bristol Bay drift permits will likely be sold because of the

local's inability to compete with a non-local's who have the means to access

financial capital. For every local Bristol Bay permit lost, the loss is three local very important jobs.

WHEREAS;

the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities, and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS:

the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

WHEREAS:

the Bristol Bay salmon fishery has just experienced it's worst economic downturn in the history of the Bristol Bay salmon fishery history, with prices going from \$2.40 a pound for sockeye to a low of \$.40 cents for a pound of sockeye. Today those prices paid for a pound of sockeye are \$.60 cents, improving, but with the high cost of fuel, insurance and inflation fisherman are getting 1960 salmon prices in the Bristol Bay salmon fishery.

NOW THEREFORE BE IT RESOLVED, by the Curyung Tribal Council, and its community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fisherman, communities and business in the Bristol Bay region.

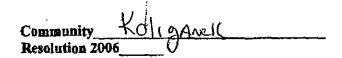
Adopted and approved this  $\mathcal{J}_{9}$ 

day of November, 2006.

Attest:

bomas Tilden 1st Chief

Kimberly Williams, 3rd Chief



A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two foot in length.

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors down to about eight processors today.

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NOW THEREFORE B	E IT RESOLVED, by
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	of Fish vote down any proposals that amends, eliminates or pot limit at the Bristol Bay regulatory finfish meeting in
Dillingham, Alaska in De	ecember 2006 concerning 5 AAC 06,341.
proposals that a full socio	OLVED, that if the Board of Fish considers any restructuring op-economic impact study be done to show the cause and effect to attest and business in the Bristol Bay region.
ADOPTED and approve	d this 4 day of November, 2006
ATTEST:	
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RESOLUTION 2006-\_\_\_\_

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood,

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WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source if income for many residents.

WHEREAS, the current thirty-tow foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fishermen and their thirty foot vessels.

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started.

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing aspects, from twenty five processors down to about eight processors today.

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NOW THEREFORE BE IT RESOLVED, bye the Traditional Council of Togiak, and its community members, strongly urges the Alaska Board of FISH vote down any proposals that amend, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

aditional Council	of Togiak at its regular of	eeling
th day of	, 20by a	VOLE OF
	z, at a duly called meeting	\$ <i>E</i> 3
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<del>,</del> ,		
µak.	Date	
	th day of abstaining	abstaining, at a duly called meeting I mombors was present.

ATTEST:

Secretary, Traditional Council of Togiak

Egegik Tribal Council



289 Airport Rd.
P.O.Box 29
Egegik, Alaska 99579
(907) 233-2211, Fax (907) 233-2312
E-mail egegiktribal@starband.net

# Resolution 2006-08 Community of Egegik Village

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two (32) foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

WHEREAS, in 1990 because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty six (36) foot in overall length.

WHEREAS, these boats with the bolt on bows were now ramming the thirty-two (32) foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for Vessels that were of thirty-two (32) foot in length.

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two (32) foot boat length for the Bristol Bay salmon fishery and adopt a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed Thirty-two (32) foot in length

WHEREAS, hundreds of local Bristol Bay salmon fisherman cannot afford the additional cost of upgrading vessels to another length and fisherman in our communities have no means to obtain financing to upgrade their fishing vessels.

WHEREAS, the unemployment rate is about 70 to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents.

Egegik Tribal Council
Resolution 06-07
Retaining the Thirty-Two Foot length Vessel

WHEREAS, the current thirty-two (32) foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&F and these vessels have proven to be safe, so safety is not a factor.

WHEREAS, the current thirty-two (32) foot fishing vessels have demonstrated time and time again that quality salmon can be produced aboard a thirty-two foot fishing vessels in Bristol Bay, just like the Cordova fisherman and their thirty (30) foot vessels.

WHEREAS, over 50% of the watershed drift permits have excited the Bristol Bay region since the limited entry program was started

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local's inability to compete with non-local's who have means to access financial capital, For every local Bristol Bay drift permit lost, the loss is three local very important iobs

WHEREAS, the Alaska Board of Fish should be promoting sustainable fisheries as well as sustainable Alaskan communities and not capital stuffing fisheries that produce big winners and losers and favor those with the most capital to stuff.

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity. from twenty-five (25) processors down to eight (8) processors today.

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#### NOW THEREFORE BE IT RESOLVED, by

The Egegik Tribal Council, and it community members, strongly urges the Alaska Board of Fish vote down any proposals that amends, eliminates or modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 AAC 06.341

BE IT FUTHER RESLOVED, that if the Board of Fish considers any restructuring Proposals that a full socio-economic impact study be done to show the cause and effect to local fisherman, communities and business in the Bristol Bay region.

ADOPTED and approved this 2 day of December, 2006

K. vin Deigh,

Acting Chief

Egegik Tribal Council Resolution 06-07 Retaining the Thirty-Two Foot length Vessel Community Clark Powt Villac Canell Resolution 2006-02

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

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ADOPTED and approved this \_\_\_\_\_ day of November, 2006

ATTEST:

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Community Aleknay ! Inditional Council

A Resolution in Support of Retaining the Thirty-Two (32) foot Overall Length of Commercial Bristol Bay Salmon Vessels as Described in 5 AAC 06.341

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood.

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NOW THEREFORE BE IT RESOLVED, by
the Alekanic Traditional Council, and its community members, strongly
urges the Alaska Board of Fish vote down any proposals that amends, eliminates or
modifies the thirty-two foot limit at the Bristol Bay regulatory finfish meeting in
Dillingham, Alaska in December 2006 concerning 5 AAC 06,341.

BE IT FURTHER RESOLVED, that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities and business in the Bristol Bay region.

ADOPTED and approved this 29 day of November, 2006

ATTEST:

Wassillie Ilytik, Acsident

ingle Aloysius, Secretary

# ALASKA BOARD OF FISHERIES FINDINGS OF FACT

Bristol Bay 32 Foot Vessel Length 5 AAC 06.341 #81-92-FB

After hearing a report on the Findings of the Governor's Bristol Bay Task Force, conducting a public hearing on 5 AAC 06.341 in accordance with the Administrative Procdure Act, and discussing the subject, the Board of Fisheries on April 4, 1981 by unanimous action, adopted a regulation to continue the 32 foot vessel length for the Bristol Bay salmon fishery. The Board considered this action to be consistent with its responsibilities to conserve and develop the salmon resources of Bristol Bay, promote the orderly harvesting and marketing of quality fishery products and to maximize the public interest.

The action of the Board in 1979 to repeal the 32 foot length limit by 1982 had been based in part on the premise that larger vessels would permit the use of ice to improve quality. However, Bristol Bay processors who imposed 12 hour delivery requirements on fishermen in 1980 showed that more frequent deliveries by existing vessels can adequately improve quality. An increased vessel length that allows the use of ice, chilled brine or special insulation is not necessary to achieve the desired quality improvements at this time.

The Board also reviewed testimony indicating that until recent years
the average costs of the Bristol Bay gillnet vessels were in the \$5,000
to \$20,000 range. In recent years 32 foot vessels costing as much as
\$150,000 are being constructed to participate in the fishery. The use
of these larger capacity, more expensive boats has, in some cases, resulted
in over capitalization by fishermen and is believed to have contributed to
lengthy price disputes and threats of violence prior to the 1980 price settlement

Page 2062 #81-52-FB

Repeal of the 32 foot limit will interfere with production economies of scale associated with construction of standard size vessel. Unlimited size will therefore exacerbate the problem of overcapitalization in the Bay area.

During the public hearing, Representative Joe Chuckwuk testified that repealing the 32 foot limit in 1982 would work a hardship on the Bristol Bay fishermen who had already invested in newer, larger-capacity 32 foot boats. In addition the Board also received the results of a January 1981 mail survey of all setnet and drift gillnet limited entry card holder and interim use permittees in the Bristol Bay salmon fishery. Of the 2,668 ballots mailed out, 81% of the 2,003 ballots returned favored reestablishment of the 32 foot length.

The conduct of the Bristol Bay fishery has been based upon the 32 foot length vessel for more than 30 years. Continuation of the length restriction will promote stability and predictability in the fishery.

ADOPTED: Anchorage, Alaska

April 7, 1981

VOTE: 5-0

Nick Szabo, Chairman

Findings of the Alaska Board of Fisheries Regarding the 48-Hour Waiting Period in Bristol Bay Commercial Salmon Fisheries

- A. In January 1986, the Alaska Board of Fisheries amended 5 AAC 06.370 to reimpose the 48-hour waiting period in Bristol Bay commercial salmon fisheries. The regulation as amended requires that fishermen must register with the Alaska Department of Fish and Game 48-hours before each transfer to a Bristol Bay district, and that fishermen cease fishing during that 48-hour period. Before adopting the amendment, the board received extensive public comment, both written and oral.
- B. In March 1986, the board further amended 5 AAC 06.370, following the recommendations of the Alaska Department of Law. The amendments were technical in nature, and were designed to make the 48-hour waiting period more enforceable. Because the legal notice for the March meeting left open the possibility that the 48-hour waiting period could be repealed, there was public testimony and presentations by the Nushagak, Lower Bristol Bay, Naknek-Kvichak, and Lake Illiamna advisory committees reiterating support of the reinstating of the 48-hour transfer requirement with no fishing.
- C. Between the January and March board meeting, a lawsuit was filed challenging the 48-hour waiting period. Meier v. State, 1JU-86-415 civil. It may, the board believes, be desirable to articulate the conservation and development purposes served by the 48-hour waiting period.
- D. Based upon the information presented to the board before it amended 5 AAC 06.370 in January and again before it further amended 5 AAC 06.370 in March, the board finds:
  - 1. There are two commercial salmon fisheries in Bristol Bay, the set net and the drift gillnet fisheries. Participants in these fisheries must register for whichever Bristol Bay district they fish, and must reregister before transferring to a new district. For at least 24 years before 1985, fishermen had to cease fishing for a period of 48-hours after reregistering and before transferring to the new district. For the 1985 season, the 48-hour period was repealed and a 24-hour notice adopted. Fishermen were allowed to continue fishing before transferring.
  - 2. The 48-hour had an impact on fishing patterns, although it was not easy to enforce as written at that time. Before 1985, the set net fishery harvest annually had an average of 12 percent of the commercial salmon

harvest of Bristol Bay. When the 48-hour waiting period was repealed, the set net harvest dropped to 9 percent. Of concern was the 6 percent set net harvest in the Egegik District, and the drop to 3 percent in the Ugashik District which experienced an historic high return in 1985. Reallocation of salmon from the set net fishery to the drift gillnet fishery was becoming evident.

- 3. Because of the historic high return, the Ugashik District was fished during the peak harvest period by more than 600 drift gillnetters, when normally that District has been fished by approximately 200 drift gillnetters.
- 4. Reimposing and improving the enforceability of the 48-hour waiting period will assist in maintaining the historic harvest percentages between the set net and drift gillnet fisheries. The drift gillnet fishery in Bristol Bay is composed of mobile vessels with highly refined fishing skills and efficient gear. The set net fishery, although skilled, is less mobile because of limited set net sites and is hampered by fishing time because of tides.
- 5. Public testimony and ADF&G staff reports did indicate that among the drift gillnet fleet itself there seemed to be more success by one component than another. While this was a concern of some board members, it was not as important to the board as a whole, as was the reallocation stated above.
- 6. Reimposing and improving the enforceability of the 48-hour waiting period will assist in slowing down the movement of the more mobile component of the drift gillnet fishery which will spread out the harvest more evenly among all participants promoting a more orderly fishery and enhancing economic stability as a whole.
- Additionally, reimposing and improving the 7. enforceability of the 48-hour waiting period will have some conservation benefits in that it will prevent an unpredictable influx of fishing gear into a district Several Bristol experiencing a marginal run of salmon. Bay districts open during large portions of the season by emergency order issued by ADF&G rather than a schedule set out in regulations. One factor considered by the department before opening a district is the amount of effort and Although normally a 100 percent exploitation rate is expected when a Bristol Bay district is open, in some more unusual situations (minimal stock run), the department could determine that one gear type could fish without jeopardizing escapement goals, but allowing both types could jeopardize conservation. 5 AAC 06.320(f) gives the



department authority to allow only one type to operate. Similarly, it set and drift gillnet present at a particular time could be allowed to fish without jeopardizing the escapement, the 48-hour waiting period will prevent a sudden influx of effort and gear which could raise the total amount of gear to a level to jeopardize a stock.

Ron Jolin, Chatrman

Alaska Board of Fisheries

Page 3 of 3

# December 5, 2006

Amelia Christinsen

Hello and welcome to Dillingham. Holding the meeting here is very much appreciated, and allows the local Bristol Bay Residents to participate.

I am born and raised here and fished for more than forty years, most of which I have set netted in Igushik, where my mother was born. My parents both set netted, and mom is retired and let us carry on the tradition. Me and my sister Lorna and our children now operate the five sites my parents passed onto us. I am married and my husband participates in the drift fishery, I have fished with him so I do have some experience doing both types of the fishery.

I am a member of the Nushagak Advisory Committee, but am testifying on behalf of myself.

Most of you by now have gone to the local grocery store and seen for yourself the prices we pay for groceries, not mentioning the price we pay for fuel and electricity.

PROPOSAL 14: I oppose, not everyone can afford to purchase a second permit. There is nothing wrong with fishing one permit, all set netters fish one permit.

PROPOSAL 19: I oppose, it is unreal that we would be able to pick up the type of anchors we use. The first minus tide me and my family take a run down to camp just to get those set up permanently for the season, not every out going tide is a minus. So this proposal doesn't make sense to me. We set up five sites and this takes sometime more than one minus to complete the task. We usually set out the large screw anchors or set a dead man out as dad called it, and then we know our outer end of the net will never drag.

PROPOSAL 33 AND 34: I oppose, I would like to see the 48 hour remain the way it is. If changed there would be a lot of chaos with deliveries, more limits from the processors and longer waiting times for deliveries.

PROPOSALS 39, 40, 41, 42: I oppose these proposals it seems you would be allowing the rich to get richer and push the poor completely out of the business. The 32 foot limit seems to work just fine for the Bristol Bay residents. The region is having a difficult time paying for the basic needs we need just to survive without adding another burden to them. Most fisherman now barely make enough profit to purchase their winter supplies because the cost of insurance and necessities they need to prepare for the season are very costly. Again we ask that you consider these proposals very seriously and let the 32 foot remain the way it is.

Again thank you for this opportunity for allowing us to participate in the meeting.

Mick Lee Flu Elusive

RC97

### #1 problem facing the Bristol Bay fishery is Quality.

We are still in this race for fish and this is at odds with putting up the best quality product.

We are not getting the most economic value from this amazing resource

Last year one of the processors paid \$.82/lb to his all refrigerated fleet which was \$.22/lb over the average \$.60/lb base price paid out to the average non-refrigerated boats. If you take the average catch in 2005 of 93,000 lbs you end up with over \$20,000 difference in gross revenues for an individual fisherman.

We are nearing the year 2007 and still approximately 80% of the Bristol Bay fleet is non refrigerated. According to a publication put out by the State of Alaska Department of Commerce, Community and Economic Development. In 2001, Bristol Bay had 84% of its fishing operations that were not chilling their fish. This is a sharp contrast when compared to the Prince William Sound fisheries where only 3 % of the fishing operations were not chilling their fish. I know change can be scary and unsettling. However, there are other gillnet fisheries around the state that have already been very successful in putting up high quality products and demanding high prices for their efforts.

I am for proposals that that make the Bristol Bay fishery sustainable for the fisherman. I am for proposals that improve quality, add value, consolidate the fleet, and conserve our water sheds for generatons to come.

I am for Proposal 22 to allow an individual owning 2 permits to fish an additional 50 fathoms of gear or such other privileges the board deems appropriate. Other proposals that are similar include 14, 15, 21, 23, 25, 28 and 33

I am for proposals that remove the 32 foot limit so we can use boats in our fishery that have more deck an hold space to handle our fish better and chill them faster. These proposals include 39, 40, 41, 42, 43, 44, 45, 46, and 47.

I am for Proposal #51 that allows for fishing the early season in the general district to increase processing capacity, improve quality and take advantage of the lucrative fresh market.

I am for proposal 121 because if we do not protect all of the rivers and lakes in the Bristol Bay water sheds all these other proposals could be a mute point. Bristol Bay is the biggest sockeye run in the world, how could we put it at risk? Even if we lose one river out of our fish stock portfolio, it would be disaster on many levels.

### Permit stacking

I would like to thank the board for allowing permit stacking for the last 3 years. It has been a huge success.

The CFEC's optimum # study concluded that the Bristol Bay Gillnet fishery should have 900-1400 permits. Right now we still have 1857 permits in the fishery.

If we do not create additional incentives for an individual to own 2 permits, the approximate 300 latent permits could return in the form of additional vessels which would lead to the competitive race for fish that compromises the quality and value of our resource.

\*\*Only 1184 of the 1857 permits were fished in 2002. 2002 was a year where the low price coupled with a weak run created a disastrous season, even with the reduced effort. This alone tells us that this fishery is not profitable @ 1857 boats. In 2002 we lost money with under 1200 participants. In 1998 with a price of \$1.21 the average economic profit according to the CFEC's Opt # Study was a negative \$4,790. We need to get down to a number of participants where fishers can remain solvent for the majority of the price and run size scenarios

Removing the 32 foot limit.

Besides the benefits of safety and fuel efficiency, the biggest benefit of removing the 32 foot limit has to do with improved quality which increases the economic value of the fishery as a whole.

\*\*\*\*\*\*Over capitalized" described the fishery of ten years ago but not today. There has been very little investment over the past ten years. No one can remember the last time a new boat was built. Our current fleet is wearing out year by year. The investment that has been occurring has been a steady investment in refrigeration systems. For BB to improve its quality new investment is unavoidable. Jamming small RSW systems into small boats is NOT the best way to proceed. Since new investment is required to produce higher quality products- isn't it logical to allow that investment to be in longer boats that can actually produce more of the high quality fish the world market demands?

It is true, from the early 80's to the mid 90's, the money put into the fishery was to build boats so an individual could catch a bigger % of the pie. The capital that we would use now would be to build boats that are designed to put up a higher quality product. You would have the deck space to handle your fish better and have enough personnel to bleed every fish. We would have more fish holds so we can spread the fish out, instead of cramming stacking them on top of each other. We could but bigger refer units in that could bring the fish down to temperature faster. You could actually make more money with catching less fish if you take better care of them.

There are no other gillnet fisheries in the state that have length restrictions. And there are no other gillnet fisheries that have the quality issues that we have. If you talk to European buyers they will tell you they have avoided the Bristol Bay product in the past because of quality issues. The Euro today is the new Yen and the size of the market is only limited to the supply of high quality product that meets there rigorous standards. I

don't know where the markets of tomorrow will be could be Europe, Japan, China, or even the US. One thing for sure is, that the better our quality, the more options we will have in marketing our fish and reflected in what the fishermen are paid.

The risk of sitting on our laurels is to high and the reward for taking it to the next level is just too much to ignore. Please save us from ourselves.

(Continued)

merit higher prices. This will improve the profitability and success of the Alaska salmon industry.

### **Department Considerations**

Chilling salmon at the point of capture is widely acknowledged as the single most important step that can be taken to improve the overall quality and value of Alaska salmon. In 2003, the Quality Sub-Committee of the Legislative Salmon Task Force reported that

"In order for Alaska to be competitive in this global market, we must improve the quality of our salmon. Survey after survey has shown that the quality of the product is one of the most important, if not the most, important factor consumer's use when choosing which product to buy. The subcommittee heard presentations from experts in the field and the common theme among them was that chilling is by far the most important factor in improving the quality of our salmon."

Worldwide, the importance of quickly chilling fish has long been acknowledged. A UN Food and Agriculture Organization (FAO) technical paper notes that "(t)here are three important ways of preventing fish going bad...care, cleanliness and cooling. Care in handling is essential (and)...cleanliness is important...but most important of all...fish must be chilled quickly and kept chilled."

Despite these wide acknowledgements an expert on quality control in Alaska fisheries noted that "(m)any fishermen believe that holding salmon from 12 to 24 hours at ambient temperature does little damage. *This is sheer nonsense!*"

A 2002 survey by ASMI indicated that progress toward achieving chilling at point of capture as standard practice across the State was clearly insufficient. While some regions and gear types made important gains – most notably seiners in Prince William Sound, Kodiak and Chignik – huge problems remain. They are most severe among gillnet fisheries in Cook Inlet, Western Alaska and Bristol Bay, but *all* fisheries and gear types remain significantly deficient.

PERCENT OF FISHING OPERATIONS NOT EMPLOYING ANY CHILLING - BY REGION

REGION	1991	1996	2001
Southeast	14%	7%	10%
Yakutat	14%	25%	7%
Prince William Sound	33%	11%	3%
Cook Inlet	66%	67%	51%

<sup>&</sup>lt;sup>1</sup> John P. Doyle <u>Care and Handling of Salmon: The Key to Quality</u> Marine Advisory Bulletin No. 45 Univ. of Alaska Marine Advisory Program, 1995.

Kodiak	60%	33%	11%
Alaska Peninsula	74%	29% ,	37%
Chignik	83%	no data	10%
Bristol Bay	92%	81%	84%
Western Alaska	89%	89%	58%

#### PERCENT OF FISHING OPERATIONS NOT EMPLOYING ANY CHILLING - BY GEAR TYPE

GEAR TYPE	1991	1996	2001
Drift Gillnet	70%	60%	53%
Set Gillnet	75%	65%	64%
Seine	38%	10%	11%
Troll	19%	6%	14%

In January 2003, the University of Alaska-Fairbank's Marine Advisory Program and several key contributors convened the <u>Enhancing the Quality and Markets for Alaska Salmon</u> conference. The goal of the conference was to address quality and marketing improvements that are both short and long term. At the Quality conference, presenter Larry Andrews, Alaska Seafood Marketing Institute's Retail Program Director, demonstrated today's retailers are looking for product consistency, reduced shrink, longer shelf life, and consistent delivery times.

The Alaska Seafood Marketing Institute, long a proponent of improving the quality of Alaska seafood, publishes quality standards for Alaska salmon. To qualify as Premium and Grade A, salmon must be chilled at the point of capture and involves many other important features, including bleeding, visual guides, reduced scarring and scale loss.

The Institute took further measures in 2003 by approving through a vote of the board to support the Legislative Salmon Task Force's bill making chilling mandatory at the point of capture. While the bill did not move past the House Resources Committee, its presence acknowledges the need for improved quality of Alaska salmon. With ASMI's support, it further acknowledged what Alaska seafood's marketers long believed true – quality is critical to success in the market.

Measures taken to improve quality often lead to higher prices for fishermen. Seafood processors routinely pay a premium for fish that is iced or has been kept in refrigerated sea water (RSW) systems.

### Finding

For these reasons the Department finds that substantially improving the quality handling practices and infrastructure of the Alaska salmon harvest and tender fleet can significantly and quickly help alleviate economic distress in the fishery. However, there

RC98

### **Testimony of Bob Waldrop**

On behalf of BBNC Alaska Board of Fish Dillingham, AK 12/05/2006

My name is Bob Waldrop. I am testifying on behalf of BBNC to express their broad and deep concern about potential impacts on local communities of restructuring proposals currently being considered by the Board. These proposals are generally those numbered 14-47.

BBNC is open-minded about restructuring the Bristol Bay salmon fishery – but only if those proposals are based on considerable discussion and on full analysis of possible impacts on the region's communities and people.

We believe that, on the surface, all restructuring proposals before us negatively affect the region. They appear to raise operating costs, bestow institutionalized privileges on more affluent permit holders and do very little to address fundamental inefficiencies keeping incomes down for the fleet.

That is our current opinion. We have reasons for our opinion, just as proposal advocates do for their opinion. But opinions are not analysis. No one can say with confidence what the impacts, intended or unintended, of these proposals will be on the fleet or on local communities.

For people of the region theses are not academic details, they are facts of rural life that must be included in complete analysis of these or any restructuring ideas.

Of greatest concern to BBNC and others in the region is the potential impact of restructuring on local participation in the fishery. Commercial fishing is the region's economic foundation, its largest economic activity. Every single permit has a measurable effect on the region's \$225 million per year commercial fishing economy<sup>1</sup>.

Since 1980, 34% or 412 limited entry permits left the region; 36% (243) of drift and 31% (169) of setnet permits. Fishing revenue lost

<sup>&</sup>lt;sup>1</sup> ISER UAA; Economics of Wild Salmon Watersheds; Bristol Bay, Alaska.

to the community by that out-migration of permits is over \$231 million – not including the multiplier effect of that money working its way through the local economy<sup>2</sup>.

That loss averages over \$11 million per year – more than the combined 2006 budgets for the Bristol Bay Borough plus Dillingham, the region's largest municipality.

Accordingly, BBNC cannot support any restructuring option that does not fully assess its impact on local resident access to the fishery and its effect on community socio economic factors.

Fortunately BOF procedures require that restructuring proposals receive thorough consideration – in large part, due to the pervasive impact that fishery restructuring can have on local communities. Two years ago the BOF appointed a special panel to recommend a process for evaluating restructuring proposals. After considerable work, the BOF accepted the panel's recommendations and transmitted them to the Legislature saying that;

"The Board agreed that proposals which seek to significantly change how salmon fisheries operate should be reviewed with <u>extra scrutiny</u> and an examination of the possible benefits and impacts to the stakeholders, communities, regions and the state as a whole".

People familiar with restructuring impacts in other Alaska regions also urge caution and an objective analysis of potential impacts when considering restructuring actions for the Bay.

BBNC respectfully encourages the Board to follow these procedures.

BBNC feels that the Board is obliged to look deeper than the rhetoric accompanying the proposals (including this statement) and take no approving action until an objective assessment is given to their likely biological, social and economic impacts.

Thank you for promoting a full discussion of this matter

XXX

<sup>&</sup>lt;sup>2</sup> CFEC data with personal analysis - verified by UAA.

#### John Lowrance Testimony

By increasing the quality of the harvest we can increase the value of the Bristol Bay Fishery. The fresh markets and the developing market for frozen sockeye fillets have created an opportunity for economic prosperity but these premium markets demand a high quality product. We need to improve our handling practices to produce fish that will meet these market demands.

Economic value

Value of 2006 salmon: 155

155 million # Salmon

All frozen H&G(\$1.55/#) = \$180 Million

All frozen FILLETS(\$4.00/#) = \$310 Million

Hindrances to quality in the Bristol Bay Fishery

1. 32 limit – Not enough space to properly handle fish for the high quality fillet market. Not enough RSW capacity.

Solution: Lift the 32' limit

2. Too Many Boats – intense competition because of too many vessels works counter to the production of high quality fish

Solution: Reduce fleet size through permit stacking, Allow additional benefits for boats with two permits

3. Short Seasons – Training crews to produce high quality fillets is difficult as best. Lengthening the season through early season fishing would increase the quality of the product by allowing increased training of crews before the peak of fishing. Additionally early fish are generally in better condition than later season fish because of watermarking

Solution: Allow General District fishing

RC111

Victoria Briggs – Ugashik RC-

#### We do support the lengthening of 32 foot limit on boats.

We are in a fishery that is located at the southern end of the Bristol Bay fisheries. As set netters we have no tenders the last three years, despite a written letter by at least one processor, near the 11 set net village sites. Thus we must travel 20 miles one direction to deliver our fish to a tender.

If you are a drifter and want to fish more than the peak 15 days of the season, for us around the 10<sup>th</sup> of the July, you must either tender your fish 50 miles to the nearest cannery or travel/fish another district altogether. We are also, currently, the only district NOT supported by an icing system, meaning we must not only supply but haul our own ice for great periods of time. (BBEDC supplies all other fisheries in the bay with icing capabilities)

We are an exposed river system and have to deal with tough conditions on a regular basis. (We lost two boats this year, fishing in our river system. These were experienced, very successful fishermen.)

Many fishermen are attempting to fish the longer season and other fisheries such as herring and halibut. We find we can not do this with the limited 32 foot current size. An easing of the limit to provide a safer boat, ability to put additional equipment on that allows for on board processing and better chilling, would be a start.

Much has been said about the lack of ability to compete by the local fishermen, lack of resources available to them versus 'outside' fishermen, and the strain of the economy of the villages.

There are a number of various *in state only programs* offered by a number of different agencies in the state that offer low cost loans, grants and flat gifts to assist local fishermen with boat upgrades, buying permits and upgrading gear and equipment. These resources will continue to be available, as a number of already long terms and currently do have funding.

The added income to the local economy with the added work on upgrading boats would help those villages already struggling and give a much needed off season income. We are asking the board to seriously consider an easing of the 32 foot limit to give us the continued opportunity to compete in this 'worldwide economy'.

We are opposed to any ability to open a general harvest area. Given the lack of research on destination of the fish in this area, the nature of this mixed fishery and the lack of need for the fishing we see this could be disaster.

This would be creating a mixed stock fishery which the board in the past has been very much against.

No change on the 48 hour transfer rules. Without these safeguards we could well find ourselves without the needed tenders, who must travel 8-12 hours to reach us. Our ability as set netters would be drastically impacted if the fleet we able to move in with no notice. Our fishery is the last of the season in Bristol Bay and we have in the past seen an influx of up to 600 boats to take advantage of that.

Eric Rosvold 711 Rambler Petersburg, Alaska 99833

ADF&G Boards Support Services PO Box 115526 Juneau, Alaska 99811

November 17, 2006

Re: Proposals related to vessel lengths in Bristol Bay and Multiple permit ownership

Dear Mr. Chairman and Board of Fish Members,

I am writing in support of proposals suggesting we change the current 32' length limit in Bristol Bay. I am a life long resident of Alaska, whom began fishing Bristol Bay during the 1979 season. In 1981 I was one of the early adopters of hydraulically driven refrigeration technology. These systems were crammed into spaces that were usually considered void area for stability and flotation purposes. It was always a compromise with available space and the packing capacity on those early boats. In 1991 I designed and built as large a boat as one could safely fit with in the length parameters given in regulation. With the 3' bow section off, it measures 32'X 15' and packs 24,000 lbs in refrigerated sea water spray. In 2006 I doubled the capacity of the refrigeration system, which further decreased the space available below decks for floatation considerations. Building equipment to do this job, given the length requirements, is an expensive proposition given the \$380,000 I have invested in the vessel. The point being, relaxation of the length limitation could allow refrigeration systems of much larger capacity to be used, or added to existing, lengthened hulls. Most any 32' fishing vessel could be easily refrigerated if one could add a 4' section to the stern to handle the necessary equipment. Relaxing the length limit for quality concerns doesn't mean we have to go build new boats, but will allow those whom wish to improve quality the option of lengthing their existing hulls to accommodate the equipment that they cannot safely use currently. I also own property in Naknek that is used as boat storage, and in conversation with the operator of the boat moving equipment, have been told that bigger boats aren't a problem for storage as one might have thought.

In any case, improving the quality of the fish in Bristol Bay is going to be a very expensive proposition, and I feel that the Board can do much to ease this burden by allowing the length limit to go away.

Regarding the issues of multiple permit ownership. I firmly believe that we fishers can do the most to improve our efficiencies by having less vessels fishing Bristol Bay. There are of course social situations to consider, but the recent study does suggest that less permits are better for those that live there, and here. Currently the added shackle of gear for the extra permit has attracted a fair number of persons. However, the permits, in order to be granted the extra gear, need to be in the names of two operators on board the

vessel. It is then a simple step to activate another boat, and units of gear, when the other permit walks away. There is no certainty that a permit is removed from the fishery. Allowing the same shackle of gear to an individual with two permits in their name eliminates that possibility and insures the subtraction of that other vessel. I would like to hear a discussion in that eventuality that the owner perhaps ties the two permits together in perpetuity, making a super permit that needs to be transferred as such. In that case I might suggest a further incentive, perhaps half the transfer time needed normally, or?

Or, in the case of a "Super Three" permit, the owner is granted the extra gear, and a 12 hour transfer period. I suspect once the discussion is begun, many ideas may come forth, but the end result should look like less boats on the water, making it possible for all to profit from the fishery.

Thanks for listening

End Paseol

Sincerely Yours

Eric Rosvold



# Vision for the Alaska Salmon Industry

Consensus Statements From Salmon Forum 1 - January 1997

#### VISION STATEMENT

To recapture world leadership in the salmon market with a healthy, sustainable, and expanding Alaskan salmon industry.

#### STRATEGIC GOALS

- We will collectively move the salmon industry from a production-driven fish industry to a
  market driven food industry.
- Consistent with sustained yield, the state should manage fish resources and regulate the industry to maximize the intrinsic value of the salmon resource to Alaska.
- We must develop a salmon grading system to build in predictability and consistency for the buyers of Alaska salmon.

Alaska

Commerce and Economic Development

DIVISION OF TRADE

AND DEVELOPMENT

PO Box 110804 Juneau, Alaska 99811-0804 GOBMITTED WARRESONS WARRESONS BULK RATE U.S. POSTAGE PAID PERMIT #63 JUNEAU, ALASKA





May 1998



Commercial fishing is a big business, but you would never know it in Juneau. Can you imagine the clout if Alaska's biggest industry actualized its potential? You have the power...learn to exercise it.

Lt. Governor Fran Ulmer



### Overview

aska Salmon Forum II, sponsored Jy Governor Knowles' Salmon Cabinet, was held February 27-28, 1998 in Anchorage. Over 200 individuals attended, including harvesters representing every gear type and region, large and small processors, and state agency officials. The Forum featured presentations by industry experts and extensive discussion focused on quality, cost efficiency, and industry relations. A special working group termed the Sounding Board (see list) facilitated discussion during the Forum. The Sounding Board, with review from the Salmon Cabinet, prepared the Forum Issue Summary and Action Plan. The Issue Summary is a reflection of the Forum dialogue and consensus. The Action Plan builds on the Issue Summary and should be viewed as an outgrowth of the Forum.

The Salmon Cabinet is committed to a third Salmon Forum to ensure continued dialogue and progress on these action items. A date will be announced later.

# **Issues and Solutions from Salmon Forum II Discussions**

The following statements reflect the discussion by panelists, breakout groups, and the open forum. There was much agreement among forum participants on many issues. These recommendations and concerns were seriously advanced by one or more of the breakout groups or panels. They should be viewed as a starting point for further discussion and development of solutions to address the problems faced by the industry.

# QUALITY AND QUALITY STANDARDS



- 1. Salmon quality grades and handling standards are strongly needed.
  - All parties have a responsibility to ensure the quality of the salmon that goes to the consumer.

- Salmon quality and grades are a function of handling and intrinsic qualities of the salmon. Both handling standards and intrinsic fish quality go into grading.
- It is unclear who should enforce these handling standards or grades, or how.
- Opinion differs on whether standards should be mandatory or voluntary, but most Forum participants leaned towards voluntary handling standards.
- Distributors and retailers need to be involved in developing standards and grades.
- Consider phasing in voluntary handling standards over several years before making them mandatory.

Continued on Page 2.

### **Sounding Board Members**

Alec Brindle
Andy Golia
Gunnar Knapp
Sandro Lane
Scott McAllister
Jerry McCune
Bob Waldrop
Fran Ulmer

Ward Cove Packing Co. BB Driftnetter, Bristol Bay Native Association Salmon Market Information Service Taku Smokeries

SE and Kodiak Seiner, United Salmon Association PWS Gillnetter, United Fishermen of Alaska NorQuest Seafoods, former ASMI Board Chair

Lieutenant Governor

- Handling standards should be tied to any use of a seal of approval program.
- Handling standards should be appropriate to the end use of the product. A single handling standard is not suitable for all product forms.
- 2. Salmon handling standards need to recognize regional/gear type/species differences
  - One statewide method of fish handling is not feasible.
  - This dilemma may be resolved by splitting quality issues into two solutions: (1) generating one or a limited number of specifications for fish quality or appearance (e.g. ASMI chart); and (2) developing multiple protocols for fish handling.
  - Development of protocols for fish handling should be pushed down to the local level of the region, gear type, harvesting method, or species.
- 3. Do we need an "Alaska" quality seal program?
  - This may be our strongest means of marketing quality, if we use it well.
  - A seal program only works if it consistently meets quality expectations. The ASMI Seal of Approval pilot project is designed for premium quality fish, not all fish.

We're in the midst of a revolution. The days of supremacy of Alaska salmon are over.

John Sevier, North Pacific Processors



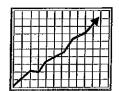
- The quality of salmon that receives the seal is only as good as the worst salmon.
   We need consistency in quality, handling, and delivery, and a seal that does not lump all Alaska salmon as one in the buyer's mind.
- Investigate other marketing or quality inspection programs for ideas on how to generate an effective seal program
- 4. Informing and training salmon harvesters, processors, and consumers about salmon handling and quality is critical
  - Harvesters, plant workers, and processors need to be trained in the best handling protocols to deliver the highest quality product
  - Industry needs knowledge about world salmon markets, competition, and the importance of their work on the quality of the end product.
  - Consumers need to be educated about the varieties of salmon, how to judge quality, and how to discriminate between wild vs. farmed. ASMI is most able to do this.
  - ASMI should intensify its efforts to distribute and update training videos (for harvesters/processors) and marketing videos (for educating consumers). ASMI needs greater financial support.
- 5. Alaska fisheries and the industry must be managed for quality
  - ADF&G should work with Board of Fisheries and industry to reorient seasons, openings, boat restrictions,

- etc. to remove quality impediments and manage harvest to maximize intrinsic quality.
- The Salmon Cabinet and industry organizations should communicate with the Board of Fisheries about the role of their decisions in salmon quality.
- The existing system often forces low quality fish into the marketplace. Alaska's wanton waste regulations need to be reviewed for their impact on quality and operating costs.

# 6. We need to plug the "leaks" in the quality pipeline

- Identify quality problems at each step of the harvest and production chain, and develop incentives to plug the quality leaks in these problem areas. Loss of quality should be paid for at the point of leakage. Development of a pilot program for quality control is a first step.
- For quality to improve, there
  must be an incentive to
  change harvesting and
  processing methods to
  maximize quality. When the
  market rewards quality,
  economic incentives impose
  discipline on those who do
  not meet quality standards.
- Vertical integration of harvesting and processing may allow greater quality control.
- On-site or early processing toward a final consumer product form would improve salmon quality. This should be stimulated by tax credits and loans through AIDEA or legislative action.

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#### **COST EFFICIENCY**

- 1. Harvesters continue to take actions that add cost and lower value
  - Investments in new gear or boats to catch fish more quickly add cost without adding value.
  - Unhealthy competition in derby-style fisheries like Bristol Bay increases harvester costs and reduces salmon quality. Perhaps begin with even/odd number permits fishing in Bristol Bay every other day, and then phase in other permit/ gear reduction programs.
  - State loan programs continue to support larger boats and harvester overcapitalization.
     The State should reorient loan programs to shrink, not expand, fishing effort.
- 2. Permit buybacks and gear reductions are needed
  - Limited entry statute gave little attention to buybacks buybacks may "cross the line" to excessively infringe on common use clause, creating a constitutional problem.
  - Optimum number studies need to be completed results are ambiguous at best.
  - The industry needs to look for alternatives (e.g., buyback of permits by gear groups or cooperatives).

- Any permit buyback program should be goal-driven, based on a strategy for improving the value and quality of the resource or reducing allocation conflicts in a region.
- A cooperative buyback program gradually implemented and funded largely by harvesters with a smaller contribution by processors could be economically attractive for both parties in the long term. Processors stand to gain by gear and permit consolidation.
- We need free market incentives for operational upgrades (e.g. drum prohibition, area registration).
   Options to consolidate or stack permits could provide such an incentive.
- 3. Increase on-site or rapid processing of salmon to a more consumer-ready form
  - Unusable portions of salmon accounting for 25% of the weight of a salmon are usually chilled, cold-stored, shipped, and processed, and then discarded either in second-stage processing or by the end consumer. Further research into waste recovery methods (e.g. fish meal/oil) and development of markets for usable byproducts is needed.
  - Moving processing technology closer to point of harvest may eliminate much of this waste by creating consumerready products at an earlier stage in the chain.
  - Development of a fillet or pinbone-pulling machine is essential. More financial resources should be directed toward technological innovations and practices that lower cost.

- 4. Infrastructure costs in Alaska are a major challenge to cost efficiency
  - The industry should bargain for an area-wide fuel contract, which could reduce costs substantially.
  - The state should stimulate development of transportation infrastructure, upgrades in electrical generation, increased access to low cost air transportation, etc. to bring down high costs.

## INDUSTRY RELATIONS



- 1. Greater and better quality information will improve relations in the industry.
  - Quality and accuracy of "first wholesale" price information is essential to building trust.
     The state or a third party could help by providing a history of ex-vessel prices and current average wholesale prices.



The way we fish, we add cost and lower value at the same time. We lose fish from the net in our picking frenzy. Quality takes time and space—I have neither. This is no way to run a business.

Larry VanderLind, Bristol Bay Gillnetter



- All participants need to communicate and share information, in both directions. However the nature of the buyer/seller relationship puts real constraints on that information.
- Processors should educate their harvesters on their specific markets and product pricing. This could be done through regional meetings with harvesters and their marketing associations.
- Better communication of information will help overcome inaccurate and emotional perceptions and bring everyone closer to a common view of reality.
- Reestablish ASMI's "fishermen in the stores" program, perhaps through self-funding. Include processors.
   Consider linking participation to participation in the seal of approval program.
- Responsibility and accountability on all sides will lead to better relationships.
  - Salmon traders and brokers are key players in the chain and need to be involved and accountable.
  - Harvesters should work with processors on local issues (e.g. electricity costs, fuel, freight costs) that affect cost efficiency and quality.
  - Develop a pilot project for price bargaining, contracts, and shared marketing that is exempt from antitrust regulations. Relief from antitrust concerns is needed to stimulate stronger relationships. Senate Bill 533 is a good start.
  - Harvesters need to weed out fishermen and tenders who will not honor quality or contract expectations.

### 3. Both information and risk need to be shared

- Both harvesters and processors need to honor price contracts.
- Harvesters need to accept more of the risk associated with bringing the harvest to an end market. Sharing risk will lead to greater stability among processors, and harvesters will know more about the risks associated with processing.
- Processors should consider profit sharing as a means of compensating harvesters, and linking harvester compensation to received price at the end market.
- Trust will result from continued interaction between
  harvesters and processors,
  such as harvester seats on
  corporate boards, and longterm contractual relationships.
  Those harvesters and processors that build relationships
  based on trust and fairness
  will be more likely to survive
  industry consolidation.
- Trust will also come from processors and harvesters sharing the responsibility and burden to learn more about each other's financial and market constraints.
- 4. The salmon industry needs to build on areas of agreement and develop political influence
  - Commercial fishing is Alaska's largest industry, but you would never know it in Juneau. Competition has limited the industry's influence on policy making. Other industries have gained more power.

- The salmon industry will have little political power until processors and harvesters work together to develop a united voice.
- All parties should look beyond the bottom line and focus on the overall health of the industry.
- There is more agreement than disagreement on key issues affecting the viability of the industry. Build and focus on that commonality.
- Can Board of Fisheries do business differently to encourage less competition and more cooperation?
- 5. An institutional framework is needed to further stimulate industry relationships, take leadership on quality issues, and expand our political influence
  - One option is formation of an Alaska Commercial Salmon Commission. Commission members would come from industry, but be appointed by the state.
  - Another alternative is to develop an industry-wide trade group built upon existing organizations.
  - There is a strong desire to make this an industry-driven and not state-driven activity.
  - This commission or organization could develop into an institutional mechanism to develop and sanction quality grades and standards and encourage their use.
  - The Salmon Forum II Sounding Board can act as a temporary implementation group to push these ideas forward.

# **Salmon Forum II Action Plan**

By the Salmon Forum II "Sounding Board"

There is an old saying that "if you always do what you've always done, you'll always get what you've always got." Staying with the status quo in Alaska's salmon industry is not an economically viable option. Without leadership and real action, the issues and challenges facing the industry will only become more difficult. The time to act is now. We recognize that moving from a production-driven mode to a marketdriven mode can have major and possibly negative effects on some individuals, interests, or industry sectors. Fixing the problems of this industry may require some painful changes. The social impacts of these proposals must be weighed against their benefits on a fishery-by-fishery

Why We Need to Act The market dominance of farmed salmon has irrevocably changed the salmon industry. Substantive change must take place to "recapture world leadership in the salmon market with a healthy, sustainable, and expanding Alaskan salmon industry" (Vision Statement from first Salmon Forum).



We need to learn to work together and quit pointing fingers. Our competitive interests divide us. Our market competitors understand our competitive nature and use this knowledge to our disadvantage.

Ken Sylvester, United Salmon Association



Working in partnership, all sectors of the salmon industry and the state must develop and implement specific strategies to transition from a production driven fish industry to a market driven food industry. As Anton Mever, Consul of Norway said at Salmon Forum II, "For Alaska to regain it's place of prominence in sale of this pristine natural product an initiative by the State of Alaska of major proportion will be necessary."

#### Why We Need Leadership

Resistance to change is natural. Total consensus within our diverse salmon industry is not possible. Nonetheless, as demonstrated by both Salmon Forums, a general sense of desired direction is emerging, and actions based on that direction are achievable. The challenge lies in moving in the desired direction – a challenge that calls for leadership and initiative by both the state and industry. All sectors of in the industry must take responsibility for making these changes. Without the serious commitment from industry, real change will be impossible to achieve.

#### Why We Need Your Input The

Alaska salmon industry is diverse and complex. The more that the people in the industry "buy into" these proposed action items, the more likely they are to turn into reality. The Sounding Board needs your comments on these proposals. When reviewing these proposed action items please keep these points in mind:



These action items distill the cooperative, heart-felt discussion of some 200 industry and state participants into regionally sensitive issues and tasks.



None of these changes will happen overnight. Most of these proposals will take years to implement, and will occur only after regional considerations are met.



Salmon Forum II demonstrated that fishermen and processors have more points of agreement than disagreement. These proposed action items build on these points of agreement.

This plan should be used as the basis of regional and industry-wide discussions on these issues, both to refine these proposals, and to generate a broader consensus on the need for change. As such, we expect this plan to change with your feedback and suggestions. See enclosed response form.

We have split proposed action items into those that require action from state agencies and those that require action from the industry. Some proposals for the state are likely to require additional funding. In the spirit of leadership, we offer the following plan for your consideration.

## Proposed **Action Items** for the State

#### Quality

- Find new sources of state funding to support ASMI's work in market and quality promotion.
- ASMI continues its development of a Seal of Approval pilot project through ASMI committees and interaction with the industry. The project will create an incentive that challenges processors and harvesters to take those actions necessary to deliver a top quality product.
- ASMI sets up regional training and work sessions with

harvesters, processors, plant workers and tender operators to further implement handling guidelines for the various sectors.

- Following regional work sessions, ASMI assists regional groups in implementing handling standards and distributes education material on proper handling and chilling.
- ➤ In concert with these and other regional meetings, ADF&G management biologists continue to review in-season management for potential operational changes, opening timings etc. that would improve quality and reduce costs.
- handling standards for fresh and frozen salmon. After evaluation of a complete trial (boat to consumer) in the 1998 season of the ASMI Seal of Approval pilot project, the next step for grading guidelines and the Seal of Approval will be determined by the ASMI Board of Directors and DEC.
- Department of Commerce and Economic Development issues a proposal request for professional quality certifiers to determine the most practical approach for a quality seal program, i.e. frequency, place and cost of inspection, type of seal to minimize misuse, enforcement program etc.
- Request that Board of Fisheries consider "quality" as an additional criterion – to be discussed at the 1998 fall work session.

#### **Cost Efficiency**

► Initiate a review of the state's long-run goals for the commercial salmon industry and the combined effect of the different state policies which affect the salmon industry, including (but not limited to) constitutional

- standards, the limited entry system (including permit numbers), fisheries management and allocation, vessel and gear regulations, state loan programs, the hatchery program, and marketing. The review should be based within a designated agency or commission (or the Salmon Cabinet) and should seek broad input from different sectors of the industry. The purpose of the review should be to examine whether state policies are consistent with longrun goals and with each other, and what kinds of major policy changes may be needed. Note: This review should not deter timely action on other items; rather it should occur concurrently.
- The Limited Entry Commission should undertake an analysis of options for fleet consolidation. This should include (a) implications of different options for cost efficiency and other goals; (b) review of potential legal and constitutional constraints and ways of overcoming them; (c) administrative or legislative actions needed to implement different options; and d) options to safeguard Alaska's resident small boat fleet wherever possible. Options should be

"

The Fish Board is crucial to us moving forward. But they're still acting under directions from 20 years ago that don't work now. The Fish Board should take a two year time-out and be recharged with a new mission. Instead of allocations, they should start looking at regulations that get in the way of quality.

Don Giles, Icicle Seafoods



- examined on a fishery-byfishery basis.
- Have Board of Fisheries hold a work session on how and why cost efficiency strategies and quality involves them, i.e. share and build on Salmon Forum results. The work session should involve the ASMI Board of Directors.
- Staff from Commercial Fisheries Management and Development identifies regulations that promote inefficiencies, i.e. gear and vessel requirements.
- Change the commercial fishing loan program to encourage loans for gear and vessel upgrades that improve quality, efficiency, and modernization.

#### **Industry Relations**

- Improve and expand timely state collection of salmon wholesale value and harvest information to provide an objective basis for pricing agreements between processors and harvesters.
- ► Institute state reporting requirements for thermally processed salmon to replace the canned salmon pack reporting formerly undertaken by the National Food Processors Association.
- Continue state support of Fisherman's Bargaining Act S. 533
- Salmon Market Information Service develops a regionally distributed Spring Market Update/Port Tour for Alaska salmon fishermen and processors.
- Support the Board of Fisheries keeping to a three-year cycle and minimizing nonemergency, out-of-cycle agenda change requests, as this will allow the industry to work more cooperatively on Salmon Forum issues.



# Proposed Action Items for the Industry

Carry over from Salmon Forum 1

Build legislative support to advance legislation that:

- a) Incorporates the value-added processor's tax credit similar to that proposed in SB 120 and
- Extends the commercial fishing loan program for fishermen engaging in direct marketing similar to that proposed in SB 121.

Organize support and lobby for passage of these bills.

Develop a processor/fishermen trade group that provides fair and equitable representation.

#### Quality

- Industry must work to gain additional funding for ASMI, including increased assessments, lobbying for more state funding, seeking of grants, etc.
- Develop ways of encouraging voluntary use of handling standards for fresh and frozen salmon and use of ASMI's handling guide.
- Build industry consensus around the value and adoption of ASMI's handling standards.

- Encourage participation in regional work sessions set up by ASMI and regional management biologists.
- Urge the Board of Fisheries to consider quality as additional criterion in management decisions.
- Get serious about only delivering and handling quality salmon. Develop incentives for processors and harvesters to deliver higher quality fish, and disincentives for actions that result in lower quality fish. Avoid pumping "money fish" and bleed them on board whenever possible. Limit pumping of pinks and chums.

#### **Cost Efficiency**

- Submit and support a Board of Fisheries proposal to adjust net area registration consistent with regional recommendations.
- Follow up on staff research on inefficient regulations with Board of Fisheries proposals to amend vessel and gear regulations on a fishery-by-fishery, as is. Any proposals allowing fishermen to use bigger boats or more efficient gear should be coupled with improving quality and/or fleet consolidation, subject to regional considerations.
- Give serious consideration to fleet consolidation options including those articulated by the Limited Entry Commission.
- Seek legislation that would allow fishermen groups to initiate a formal process for acting on fleet consolidation options.
- Review existing statutes pertaining to vessel and gear restrictions that might be



Alaska's place in the world is slipping. Efforts to capture the market have been fragmented and insufficient... in 1997, Alaska spent \$800,000 on promoting fish in Japan. Norway spent \$4.5 million. While Alaska's salmon sales declined, Norwegian sales in Japan doubled.

Anton Meyer, Royal Norwegian Consulate



more appropriately determined by Board of Fisheries.

#### Industry Relations

- Replace lawsuits with communication and trust. Develop and employ new ways of sharing information. Develop a united political voice and use the industry's clout in Juneau.
- Support and lobby for passage of Fisherman's Bargaining Act S 533.
- Processors should share marketing and product development plans with their fishermen. Go together to trade shows, fish inspections and/or customer calls.
- Increase the use of long-term contracts, and enforce compliance with these contract incentives for higher quality and cost efficiencies.
- Work together to gain more public and financial support for salmon marketing. Identify ways to boost ASMI's budget.
- Take leadership and participate in industry-driven statewide groups.

RC 156

Max Martin Dillingham Alaska 907-842-3362

Mr. Chairman, Board Members- thank you for coming to Dillingham, and for all the time you spend on the board contributing to Alaskan fisheries when there are so many other activities you would rather be doing. For that reason I will try to make it brief.

My name is Max Martin, I came to Alaska in 1976 as a woodshop teacher in the Village of Togiak, and have spent many years as a Setnetter and a Drift fishman alongside my former students. My students have now become grandparents and the economic fate of this younger generation is what is now being decided here at this board meeting.

This has always been a harsh land, but with the rise in fuel expenses (sometimes to over \$5/gal) and that everything is tied to fuel price up here through transportation costs, ie food, dry goods, housing, etc., much less electricity and heat, it has become much harder to obtain the basic necessities of life. Boat repairs become a luxury when your kids are hungry. This is an Alaska fishery, let us not penalize the participants that live in Alaska by making it more costly to be a competitive fisherman when those who live outside don't have the same cost of living and thus have more money to upgrade.

The fact that this fishery is overcapitalized is an accepted fact by everyone. Any proposal that would increase this overcapitalization (like elimination of 32-foot limit) is going the wrong way. It will not cut down the cost of fish. It will not reduce the number of boats on the water. It serves only to penalizes those with smaller boats; most of those with smaller boats will be the local village-based fisherman who cannot afford larger boats. This proposal will slowly drive the fishery out of reach of most Alaskans, and concentrate the catch within the "large boat" group who can physically crowd out and intimidate smaller boats. This is not the future I want to see for the fishery.

Any proposal that would indirectly increase overcapitalization (larger engines to speedily utilize elimination of 48 hour waiting period) likewise is a step in the wrong direction.

Any proposal that gives D boats additional fishing time or physical prowess beyond the extra 50 fathoms of web they can fish also "raises the bar" of overcapitalization.

In summary, I am against proposals that:

- 1. Increase the size of boats.
- 2. Eliminate a 48 hour waiting period.
- 3. Give D boats extra fishing time or any advantage beyond the extra 50 fathoms.
- 4. Stacking of Permits

I am NOT against proposals that effectively reduce the number of total boats in the fishery. These would include proposals that:

- 1. Allow D boats
- 2. Buy back permits

Sincerely, Max Martin

# CITY OF DILLINGHAM Dillingham, Alaska

### RESOLUTION NO. 2006-47 Support of Retaining Current Fishing Vessel Length in Bristol Bay

A RESOLUTION OF THE COUNCIL OF THE CITY OF DILLINGHAM, ALASKA, IN SUPPORT OF RETAINING THE THRITY-TWO (32) FOOT OVERALL LENGTH OF COMMERCIAL BRISTOL BAY SALMON FISHING VESSELS AS DESCRIBED IN 5 AAC 06.341.

WHEREAS, the thirty-two foot limit has been in effect in the Bristol Bay salmon fishery since statehood; and

WHEREAS, in 1990, because of a loop hole in the regulation, bolt on bows became the norm in the Bristol Bay salmon fishery and some boats were thirty-six foot in overall length; and

WHEREAS, these boats with the bolt on bows were now ramming traditional thirty-two foot boats, intimidating fishermen and damaging vessels, making the fishery unsafe for vessels that were of thirty-two feet in length; and

WHEREAS, the Alaska Board of Fish in the early 1990's revisited the thirty-two foot boat length for the Bristol Bay salmon fishery and adopted a regulation that did away with the bolt on bows as well as reaffirmed that no vessel participating in the Bristol Bay salmon fishery could exceed thirty-two foot in length; and

WHEREAS, hundreds of local Bristol Bay salmon fishermen cannot afford the additional cost of upgrading vessels to another length and fishermen in our communities have no means to obtain financing to upgrade their fishing vessels; and

WHEREAS, the unemployment rate is about 70% to 80% in the Bristol Bay region's communities and income from fishing is the only source of income for many residents; and

WHEREAS, the current thirty-two foot fishing vessels are fully capable of harvesting the entire Bristol Bay salmon run if not restrained by ADF&G and these vessels have proven to be safe, so safety is not a factor; and

WHEREAS, the current thirty-two foot fishing vessels have demonstrated that quality salmon can be produced aboard a thirty-two food fishing vessels in Bristol Bay, similar to the Cordova fishermen fishing thirty-two foot vessels; and

WHEREAS, over 50% of the watershed drift permits have exited the Bristol Bay region since the limited entry program was started; and

Resolution 2006-47 Page 1 of 2

WHEREAS, additional locally held Bristol Bay drift permits will likely be sold because of the local fishermen's inability to compete with non-local fishermen who have the means to access financial capital, for every local Bristol Bay drift permit lost, the loss would be three local very important jobs per fishing vessel; and

WHEREAS, the Alaska Board of Fish should promote sustainable fisheries as well as sustainable Alaska communities and not only favor large capital fisheries that produce big winners and losers; and

WHEREAS, the Bristol Bay salmon fishery has lost most of its processing capacity, from twenty five processors to about eight processors today; and

WHEREAS, the Bristol Bay salmon fishery has experienced its worst economic downturn in the history of the Bristol Bay salon fishery, with prices going from \$2.40 per pound to a low of \$0.40 for a pound of sockeye, the prices paid for a pound of sockeye are \$0.60, improving, but with the high cost of fuel, insurance and inflation, fishermen are getting 1960 salmon prices in the Bristol Bay salmon fishery; now

THEREFORE, BE IT RESOLVED the Dillingham City Council and its community members, strongly urges the Alaska Board of Fish to vote against any proposals that amends, eliminates or modifies the thirty-two foot limit of fishing vessels at the Bristol Bay regulatory finfish meeting in Dillingham, Alaska in December 2006 concerning 5 AAC 06.341; and

BE IT FURTHER RESOLVED that if the Board of Fish considers any restructuring proposals that a full socio-economic impact study be done to show the cause and effect to local fishermen, communities, and business in the Bristol Bay region.

APPROVED AND ADOPTED this 7th day of December, 2006.

SEAL:

Alice Ruby, Mayor

ATTEST:

Ida M. Backford, City Clerk