



THE STATE  
of ALASKA  
GOVERNOR SEAN PARNELL

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109  
PO Box 110302  
Juneau, Alaska 99811-0302  
Main: 907.789.6160  
Licensing: 907.789.6150  
Fax: 907.789.6170

To: Monica Wellard, Executive Director  
Alaska Board of Fisheries  
Alaska Department of Fish & Game

Date: November 9, 2012

From: Commercial Fisheries Entry Commission  
Bruce Twomley, Chairman  
Benjamin Brown, Commissioner

Subject: Proposals 32 through 35:  
2012/2013 Bristol Bay Finfish meeting.

A handwritten signature in black ink, appearing to be "Benjamin Brown", with a long, sweeping underline.

This memorandum provides comments by the Commercial Fisheries Entry Commission (CFEC) on Proposals 32 through 35 that the Alaska Board of Fisheries (Board) will consider at their December, 2012 meeting in Naknek. Each of these proposals seeks to increase, in various fashions, the maximum allowable vessel length in the Bristol Bay drift gillnet fishery.

At this time, we oppose these proposals. This is consistent with our position on similar proposals for vessel length increases in this and other fisheries.

We acknowledge some of the arguments that can be made for larger vessels, such as possible improvements that might be made to the quality of the harvest, and for the possible increase in opportunities for Bristol Bay gillnet boats to participate in other fisheries where a larger boat may be an advantage.

However, our greatest concern, and the main reason for our opposition, lies with the increase in fishing capacity that would occur if vessels are allowed to increase in length. As you know, Alaska's limited entry program is a license-type program that, in the salmon fisheries, controls only the number of participants. These types of programs work best with "input controls" on effort, and the economic and resource conservation intentions of licensed-based programs can be undermined when participants can easily increase their fishing capacity.

Previous CFEC analyses have corroborated common knowledge that although Bristol Bay drift gillnet vessels are quite uniform in length, there is a wide range of fishing capacity within the fleet. Over time, vessels with greater horsepower, hold capacity, speed, and maneuverability have entered the fishery. With this increase in capacity, the total cost of harvesting has also increased, without a commensurate increase in ex-vessel values. We are convinced that increasing the allowable length of vessels will amplify these changes and cause even greater concerns, at the detriment of limited entry.

To help the Board in their deliberations, we are also attaching a report prepared for the Board's Restructuring Committee in 2008. It provides details on vessel lengths of drift gillnet vessels by fishery statewide. It also contains information on the diversity of fishing that is done by the fleets. We would also like to refer the Board to CFEC Report No. 12-04N (*CFEC Permit Holdings, Harvests, and Estimated Gross Earnings by Resident Type in the Bristol Bay Salmon Gillnet Fisheries*), which we have already submitted for the 2013 meeting in Naknek. This report may help the Board by providing details on permit holdings, ex-vessel earnings, and participation in the drift and set gillnet fisheries.

Attachment