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To: Alaska Board of Fisheries members Karl Johnstone, Bill Brown, Vince Webster, John Jensen, Tom Kluberton, Sue Jeffery and Orville Huntington

From: Marvin, Mary Ann, Adam and Angeline Ebnet
9400 Springhill Drive
Anchorage AK 99507

Subject: Stacking Setnet permits in Bristol Bay to be revisited at Area M meetings

Our family has been setnetting in the Ugashik district of Bristol Bay for 29 years. Our son who is 28 and our daughter, who is 19, have been an integral part of setnet fishing in Ugashik all their lives. We have two permits, one is in my name and one is in my sons.

I have lived in Alaska since 1973, am a retired Prudhoe Bay oilfield employee and now have a small sole proprietorship construction business. I have setnet fished in the Ugashik District of Bristol Bay for 29 years.

My wife was born and raised in Ugashik Village in Bristol Bay. She has worked in Prudhoe Bay for one of the major oilfield companies for over 30 years. She has been involved with setnet fishing her entire life.

Our son works full time on a regular shift schedule in Prudhoe Bay and has been fortunate most years to arrange some additional time off to fish BUT there are no guarantees that he can get the needed four to five weeks off each and every year. Time off is highly dependent upon Prudhoe Bay workload.

Our daughter is in her second year at Browns University in Providence Rhode Island and so far has been able to fish during the summer. Since our daughter intends to go to medical school, there are no guarantees that she will be able to get time off to fish the needed four to five weeks either when all the college/medical school requirements are taken into consideration.

Our fishing operation is and has been a family run business and we hire only one crew hand. Since I have my own business, I am the only one in the family who is guaranteed to be on the fishing grounds for the entire season.

We as a family support stacking permits for setnetters as it allows us the option to put both permits in one name and operate/fish both permits for the entire season (not just when our son is able to be there). In addition, the day will come when my age will preclude me and/or my wife from fishing and it is desirable to have the option for both or one of our children to own and operate both permits. If stacking is not allowed, the only other option we would have is to put one permit in a crew hands name (which is risky and not a decision I would not take likely nor am willing to do). OR sell the second permit.

Allowing stacking in our case actually increases the likelihood that the permits would stay in Alaska and in the family, therefore our family supports stacking and urge you as a Alaska Board of Fisheries member vote to reinstitute stacking, if not bay wide at the very least in the Ugashik and Eggiik district where it is strongly supported.

Marvin Ebnet – (907) 346-1966 (907)440-5199
Mary Ann Enright-Ebnet – (907) 346-1966
Adam Ebnet – (907) 242-8003
Angeline Ebnet



THE POPSIE FISH COMPANY

Gwen M. Neal
Tony Neal
Sirish A. Neal
Sarah J. O'Neill
Jeffery L. Neal

P.O. Box 3368
Homer, AK 99603-3368
(907)299-2351
tonyneal@popsiefishco.com

12Jan2013

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



Regarding: Alaska Peninsula Meeting, 26Feb

Proposal #250, dual set net permits allowed, Egegik and Ugashik,

Hello Board of Fish,

We are licensed Direct Marketers in Egegik District. We contract custom processing in Naknek and at Big Creek in Egegik, Bristol Bay. We sell frozen fresh vacuum packed sockeye fillet portions and smoked sockeye and coho fillet portions in several states. Our business is rapidly expanding. Please see our website: www.popsiefishco.com.

Our business is good for Alaska and the Bristol Bay region, promoting the economic development that we need in the Bristol Bay fishery. We are Alaska owned and operated. We are expanding to buying fish to supplement our catch.

As a family we own 3 set net permits and sites. Two of our permits are dual. We have strict standards for handling our fish. We buy fish from selected permit holders.

Our company success depends on early and late fish. We work closely with larger processors and we don't want to butt heads for the same fish, so we work the shoulder seasons for our own fish. We stay late for coho.

The dual permit system for set netters has been a Godsend to us, we urge you to pass if for the Egegik District. This has allowed dual permit holder families to be able to afford to fish for us. It is just economically not feasible to fish one permit for 100 or 200 pounds a day in the shoulder season, but a dual permit holder can double the catch with the same equipment and crew.

We clearly have increased employment opportunities for local workers by being able to fish and process the shoulder seasons and for coho because dual permit



fishers have been able to stay fishing in the Bay. All of our fish have come from dual permit holders.

If the Board allows the sunset clause to end dual permits in Egegik, we worry it will ruin our growing little family business because our fishers won't be able to stay for half the catch.

We have been told that there is opposition to the dual permits because some say it will cause "outsiders" to buy up permits, raising the prices and taking permits from local residents. We do not agree. We know many dual permit holders in the Egegik District and work with most. We have not worked with any dual permit holder who bought any permit. All "Duals" we are acquainted with have become dual by transfers with families.

Thank you,

A handwritten signature in blue ink that reads "Gwen M. Neal".

Gwen M. Neal, President



Gwen M. Neal Attorney at Law LLC
Aurora Gwen Neal
190 East Pioneer Ave., Homer, AK 99603
Phone (907)235-8228~Fax (866)961-6317
agnLaw@AuroraNeal.com

January 13, 2013

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



Dear Board of Fish,

I am writing about the Alaska Peninsula Meeting, Feb. 26, 2013 and Proposal #250, dual set net permits allowed, Egegik and Ugashik.

I have been a set net permit holder in Bristol Bay for many years: SO4T 60302A. My children grew up fishing in the Bay, and now my grandchildren. I used my fishing earnings to finance (along with student loans) my education, graduated from law school in 2006, and now have a practice in Homer. I continue to fish Bristol Bay and run my practice from our fish camp.

With our children we have an organized family fishing business and have been very successfully direct marketing and are now adding buying and processing to our business.

The dual permit change was so good for our family. It allowed us to fish two permits early before most of us could get over to the Bay, and of course it is not financially feasible to have a bunch of us over there during scratch fishing. We have been staying late into Coho season and again it is so much better to have the dual permits so we can fish economically.

Our family has three permits. While we have never bought or sold, we have transferred dozens of times back and forth, and it is so inconvenient and costly. To become dual, we just used our own permits; we didn't buy anything. I am acquainted with perhaps all the dual holders in our area. I cannot name one who bought a permit to become dual. It has been a very good thing for family fishing units. I cannot think of any good argument against dual ownership for set netters in Egegik.

I feel very strongly about this. Dual permits have been a blessing for our family unit. Please support the proposal for dual permits in Egegik.

Thank you,

Gwen M. Neal



Paul (Tony) Neal III

P.O. Box 3368

Homer, AK 99603-3368

(907) 299-2351

tonyneal@popsiefishco.com



14Jan13

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Alaska Peninsula Meeting, 26Feb

Proposal #250, dual set net permits allowed, Egegik and Ugashik,

Dear Board of Fish,

I am a dual permit holder in Egegik: SO4T 60377W and 60274L. I was one of the proposers at the Bristol Bay meeting for retention of the dual permits for set netters. I was totally surprised that there was any opposition to that proposal and that the Board voted to sunset the regulation.

Owning a single set net site and permit with equipment is barely financially viable. I'm sure that's why there are so many family combines set netting. But even with families, it isn't financially viable to have a bunch of permit holders hanging on the hook taking turns fishing 500 pounds a day at scratch fishing. But, scratch fishing makes a season and helps the processors spread out their catch. This results in better quality and more income for families and processors. The dual permits have allowed fewer fishers to use their equipment and time efficiently to work the early and late seasons and finally make some money set netting. This has been very valuable to our family and our neighbors in the Egegik District.

I researched what I understand is the opposition to dual permits. I believe there was no opposition from east side fishers. It appears to me that the opposition has a flavor of personal self-interest that is not in line with the mission and goals of the Board of Fish.

I located the CFEC report that apparently was done for the Board. I object to the lateness of publication. It would seem that worked to prevent opposition to the report being heard at the Meeting. The author, CFEC's Mr. Gho, used statistical analysis to make conclusions I believe are flawed. I would say that a statistician



from Juneau is not necessarily qualified to make expert opinions on the nuances of permits and local fishing without outside input from fishers and processors in the areas. That report should have been tested before being published.

The CFEC report seemed to conclude that set net permits went up in value as a result of dual permits. We say that is an erroneous conclusion. The report appears to use a comparison with drift permit values, but the author is required to assume (in error) that drift permit values and set net values track the same. They don't. Fuel costs, forecasts up and down in various districts, processor payments, and other factors affect drift permits. It is our conclusion that set net permit values were not affected by dual permits. From our observation, dual permits came from family consolidation, not from purchasing new permits.

Likewise, the report seems to observe "latent" permits came back into use and that was somehow bad and the fault of dual set net permits. In our view, a "latent" permit holder earned and owned that permit and any change in regulations that allowed that person to use their permit is a good one. In our view, the fact that "latent" permits were used points to the fact that the dual permit regulation was good for Bristol Bay and its fishers, and that would be all fishers, not a select few with personal self-interest.

We believe dual permits are a good thing for Bay fishers, processors, labor work force, locals, non-locals, and non-residents alike.

Certainly the dual permits are a big help to our family, helping us be able to fish a full season and make a little money.

Thank you,

A handwritten signature in blue ink that reads "Tony Neal".

Tony Neal



January 22, 2103

Alaska Department Fish and Game
BOARD SUPPORT SECTION
P.O. Box 115526
Juneau, AK 99811-5526



Alaska Peninsula Meeting, February 25
Proposal #250 Dual Set net Permits allowed, Egegik and Ugashik

Dear Board of Fish,

Hello, my name is Robert "Bob" Johnson and my family has been fishing the **Egegik District** of Bristol Bay dating back the 1950's, well before limited entry program was even thought of. We have seen or share of ups and downs to say the least!

I grew up fishing, as did my children and hopefully grandchildren too someday.

I/We were pleased when the **Board of Fisheries** instilled the **Dual Permit System**. Personally I thought it was long overdue. We all have done what we call "The Permit Shuffle." Wondering whose name you would put a permit in and how long could that person stay on the fishing grounds before going back to college or their regular jobs?

We really believe it's a good idea to **keep (reinstate) the dual permit system**, for us and all the other **Family Based Fishers of Egegik, "IT WORKS"**.

Now that our kids are grown I wasn't as concerned because I, as well as my brother William "Willie" Johnson each have **dual permits**. Now we can both go early in June and stay as late as needed, maybe into September.

This ability helps us to maximize both quantity and quality production of salmon and reduce expenses. We(as did our parents before us) hire several High School or College aged kids every summer but none are able to stay the entire season, so we would have to close down fish camp earlier than we would have liked to. With **dual permits** both of us are able to stay on the fishing grounds longer which can really make or break the season for us.

Since we are non-residents of Alaska our expenses for fishing are greatly increased. Our airfares typically average \$1500 per person and we usually have ten to twelve people.

Being non-resident also means that our permit renewals cost more as do the required crew member licenses. We have to ship everything on barges from Seattle, such as nets, motors,



boats, food etc... This gets expensive very quickly! Being able to fish both early and late greatly help us with these costs. We may not be able to continue this if the Dual Permits aren't reinstated.

Fishing is a way of life for us and all family run fishing businesses in the Egegik District.

I/We don't think that having **dual permits** makes you twice as much money as having just one, but it does help with some of the costs incurred and the stress of not knowing how long you will be able to stay on the fishing grounds and be productive. It really is simple, the more fish we can produce means more dollars for me, the village of **Egegik, the Bristol Bay Bourough** and the State of Alaska.

I/We strongly urge The Board of Fisheries to reconsider their stance on this matter. **Please reinstate the DUAL PERMITS.**

I would also like to make one last comment. I strongly believe that the **Dual Permits** should be limited to two permits per person. Two permits are able to be fished by one person, however any more that that would be *monopolizing and would be bad for the people that fish Egegik District* and the resource itself.

Thank you for your time and consideration.

Robert "Bob" Johnson

On Behalf of:

Robert Johnson: Dual Permit Holder SO4T 58039 & SO4T 60962

Annette Johnson: Permit Holder SO4T 57354

Krista Johnson: Former Permit Holder/Worker

Jeremiah Johnson: Former Permit Holder/Worker

Samantha Johnson: Future Permit Holder/Worker

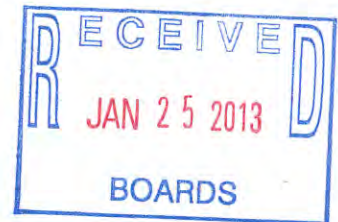
Feel free to contact me anytime on this matter:

181 Windy Ridge DR.

Longview, WA 98632

360-636-0884 * home

A_johnson2@hotmail.com





BIG CREEK
FISHERIES, LLC

3900 Railway Avenue
Everett, WA 98201
PH: 425.742.8609
FAX: 425.742.8699

January 7, 2013



RE: This is in reference to proposal #250 Dealing with dual set nets permits at the upcoming Alaska Peninsula Meetings in Anchorage Ak. Feb. 26 –March 4.

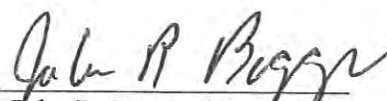
To:  ALASKA DEPT. OF FISH + GAME

We are a small freezing plant located at Big Creek Ak. We are about 5 miles north of the city Egegik Ak.

About 85 percent of the fish we freeze is from Set net Fishers. So the dual permits really matter to us. It allows a person to fish 2 sites before their whole family arrives to the site as some of them are still in school or working there regular jobs, and then again at the end of the season when they return to school or their jobs as there is no way to make enough set netting to last throughout the year. This allows us the opportunity to get a few more fish early and late in the season.

The more fish we are able to buy is an income to the Burrow and the city of Egegik and Ugashik also. We need to get a minimum amount of fish to keep the doors open as well. As Fishers we are used as a tool for ADFG to manage the fisheries. All of the productive sites in the district are taken so there will not be any new permits coming in it will just allow families to keep their permits in the family and not in a crew person's name.

Taking a close look at the CFEC figures there were less permits transferred out of the watershed after permit were able to be stacked and as to the values of the permits that is controlled by the amount of fish available and what the price per pound .We are attaching the 87 signatures and permit numbers we submitted at the last board meeting in Naknek last December.


John R. Boggs (Owner)


Dale L. Weese (Beach manager)

Be permitted
Scribed



PC 06
2 of 5

BIG CREEK
FISHERIES, LLC

3900 Railway Avenue
Everett, WA 98201
PH: 425.742.8609
FAX: 425.742.8699



November 14, 2012

Alaska Board of Fisheries
Bristol Bay Finfish
Bristol Bay Borough School
2 School Road
Naknek, AK

RE: Proposal 48 - Repeal sunset clause for a dual set gillnet permits for single permit holder.

Big Creek Fisheries along with the undersigned set & drift gillnet permit fishermen are in favor of repealing the sunset clause allowing the regulation to continue as written.

The regulation as it is currently written has benefitted the fisheries industry and the family fishing businesses. Allowing the sunset clause to go into effect would eliminate the dual permit holding and would negatively affect the family fishing businesses.

Sincerely,


John R. Boggs, Plant Manager


Dale Lee Weese, Beach Manger

PS: Additional fishermen signatures will be presented at the meeting.



Big C Fisheries, LLC

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3900 Railway Avenue
Everett, WA 98201
PH: 425.742.8609
FAX: 425.742.8699

Evelyn Clark S04T 60892
 Alan Clark S04T 57870 + S04T 59953
 Michael J Clark S03T 68978
 Peggy Clark 60565 + 64743
 Cheryl Backman S04T 60767
 Gary Backman S03T 615830 46019
 Alan C West S04T 56899K
 Veryle M. West S04T 64879V

Dafna Weiss S04T-59962-A - 425-210-7456 - 11-14-12
 Jami Kay Weiss S04T-59963-R 425-252-5533 11-18-12
 Hal Weiss S04T 609476 425 244 6943 11/28/2012
 Amy Weiss S04T 604334 425 374 8028 11/28/2012
 Michael L U S04T 69202 425 244 6945 11-28-12
 7 Michael Sut 02 S04T 59959P - S04T 60134M 206-718-7650
 John moen S04T 61895 - 425-259-4325 - 11-28-12
 John Doe S04T 64897 425-334 2498 - 11-29-12
 CATHY THOMPSON S04T 65622 425-334-2498 11-29-12
 Edjabaly Courtney S04T 41294 425 259 1873 11-29-12
 Dennis Courtney S03T 516 49A 425-259-1873 11-29-12
 Marshall Courtney S03T 530 49W 425 259 1873 11 29 12

Ken Silbert 56243 907-345-2768
 Sarah Salucci 64753 907-345-8358
 Rene Salucci 60478 907-345-8358
 Pat Salucci 60701
 Edward Eggleston 61897 907-345-7897
 Alanwah Rice 615920 907-783-286
 Peter Rehten 608108 907-277-4068
 Robbie Muir 60894V 907-223-7654
 Connor Muir 69096 907.223-7654
 Sereneiah Jones 61898F
 Tom Huffer Sr. S03T 60248 - 907-696-7445
 Tom Huffer Sr. S04T 604705 - 907-694-2326
 John Paul Huffer S04T 63897E - 907 382-0486
 Joyce Huffer S04T 64730 907-696-7445



Big C Fisheries, LLC

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3900 Railway Avenue
Everett, WA 98201
PH: 425.742.8609
FAX: 425.742.8699

- 1 VICTOR POPA SØ3T 56 234 ~~CL~~
- 2 NICHOLAS POPA SØ4T 60 503 = Nick Popa
- 3 TERRI POPA SØ4T 59949 = Jennifer
- 4 TERRI POPA SØ4T 61540 = Jenni Popa
- 5 CHRISTOPHER POPA SØ3T - 62040 = Chris Popa
- 6 Bob Behr SØ4T 62124 - 60365 ~~OVER~~

Tommy SØ4T 60274L 907 297 2351
60377W

Gwen M. New 60302A (907) 235-8228

Anthony Underwood 589765 (907) 348-6084

George Wicklund 5590 & 65818 907 248-8600

John Wicklund - 57957 11

John Peter SØ4T 63813 B. 907 278 0994

Matthew Underwood 57461A 907 441-4099

Brad Lohr 60085B 907-598-1144

Karen Freeman 62334B 509-464-3608

Todd Pierce 60781A 509-464-3608

Doug Freeman 60413Z 509-464-3608

STACY CLARK 55907 F 907 299 2211
 GEORGE BISHOP 60236 F 56874C DUB 907 299 3371
 STACY BISHOP 61442 907 299 3371
 STEFAN BISHOP 59936B 907 299 3371

Ralph Underwood 60243 A 907-346-3088

Mary A Underwood 61890 907-346-5088



Big C Fisheries, LLC

3900 Railway Avenue
Everett, WA 98201
PH: 425.742.8609
FAX: 425.742.8699

Franklin
504T 59153
504T 64878



Dorey Walsh
June

503T57261W

504T 60891H

Alison King
Mary & William Brown

504T 57783X

504T 59882

Yvonne Polz

504T 64928X

Erika Chaz

504T 59860H

Annette Wilson 2 setnet permits 504T60410/64867N

Dianne Stuenkel

Permit # 504T 59531

504T 64716X

504T 60036M

> dual permit *[Signature]*
503T 60669E - drift permit ↔ *Frank Hoff*

Robert Johnson - Robert Johnson 504T 58039B
504T 60962 Dual

Annette Johnson - Annette Johnson 504T 57354

James Omeight - James Omeight 503T 66351

Nancy Trott - Nancy Trott 65110P # 60578H

James Trott - James Trott: 644170 # 66914E

William Johnson Wilder - 57343-61918 - Dual



January 24, 2013

Dear Board of Fisheries Members,

This letter and associated data is in reference to Proposal #212 – 5AAC65.022 submitted by the Nelson Lagoon Advisory Committee. This proposal recommends the Nelson River be designated as a “catch and release, single hook, artificial lure/fly (no-bait) fishery” for King salmon. This proposal references low escapements as the reasoning for this regulation change.

I, Rodney Schuh, owner of Hoodoo Lodge, located on the Nelson River, strongly support this regulation change; however the reasoning for this regulation change is substantiated for other pertinent reasons. Low impact, run assessment difficulties, economic hardship, and angling preference, are important considerations that are addressed in the following comments and documentation.

These comments provide solid reasoning that with a proper management policy there is no reasonable justification for closing the Nelson River to sport fishing during the King season.

Low Impact:

The Nelson River has had literally no sport fishing prior to 2007. In 2007 Hoodoo Sport Fishing Lodge was established. Hoodoo Lodge has a maximum of twelve guests that fish the Nelson River during the King season. The normal amount of anglers that this lodge has on the river on a given day is ten. Hoodoo Lodge has practiced a catch and release policy for King salmon since 2009.

In 2010 a tent camp was established on the Nelson River. This camp is operated by a joint venture between the Aleutian and Pribilof Island Community Development Association (APICDA) and the Nelson Lagoon Corporation. It is my understanding that this camp has the capacity of six anglers. In the years since established, this camp has shown minimal use. In 2012 the camp was not utilized during the Chinook season.

Below is “King Salmon Guided Catch and Effort” statistics from ADF&G Guided Sport Fishing Logbooks. These stats show Hoodoo Lodge along with the total catch for all guided sport fishing for King Salmon since a catch and release policy was implemented at Hoodoo Lodge.

Year	Hoodoo Harvest	Hoodoo Release	Combined Harvest	Combined Release
2009	41	1,093	41	1,093 (no other guided activity)
2010	14	603	14	603 (no other guided activity)
2011	14	700	19	726



It is a rare occasion when there are others anglers on the Nelson River. This rarity is due to the fact that access to the river is difficult considering the Nelson Lagoon Corporation owns all the land along the lower portion of the river in which the Chinook hold until they move upstream to spawn later in the season. The only accessible land other than the corporation land is the private parcel that Hoodoo Lodge owns.

Since establishing the first sport fishing business on the Nelson River, in 2007, I have only witnessed three occasions during the Chinook season where other anglers have accessed the river other than Hoodoo Lodge and APICDA anglers. Two of these instances were aircraft that landed at the ADG&G weir site and as I understand were authorized to do so by the Nelson Lagoon Corporation. The third occasion was a private individual that was not aware of the ownership and was asked to respect the land ownership restrictions and departed to prevent trespassing consequences.

Considering the current use, remoteness and limited accessibility, there is a maximum of 18 anglers on the Nelson River at any one time, with the average amount of daily anglers being 10. **This is the sport fishing audience that utilizes the Nelson River and the impact by which it should be managed.**

Run Assessment Difficulties:

The Nelson River is a fairly short system. The river runs 35 miles from Sapsuk Lake to Nelson Lagoon.

The first ten miles (mile 1-10) upstream from the mouth of the Nelson Lagoon has a gentle gradient, slow current and sandy bottom. This lower section has no gravel or desirable conditions where Kings typically hold. Therefore the salmon that enter the river migrate through this area to get to better holding areas.

The center section (mile 10-22) of the Nelson River has steeper gradient, faster current, consistent small gravel and abundant holding areas. This section begins approximately ten miles upstream from the mouth and continues for about twelve miles.

The upper section (mile 22-35) of the Nelson River is optimum spawning habitat for the Chinook. This section has areas of larger gravel and optimum conditions for Chinook spawning.

It has been my experience since establishing Hoodoo Lodge and hosting anglers on the Nelson River for the previous six years that the Chinook move through the lower section and then hold in the middle section until they are prepared to move into the upper section to spawn. This is a very reliable assessment, as the Nelson River is a fairly small river that runs crystal clear. This size and clarity allows for visual assessments of salmon locations and movements. We have conducted float trips consistently over the last six years during all stages of the season from Sapsuk Lake downstream to the lower section. These float trips have provided useful and proven knowledge of the salmon run characteristics in Nelson River.



Relative to these assessments, Chinook salmon do not move upstream to spawn until mid-August.

The ADF&G weir is located approximately in the middle of the section where most all the Kings stage. This location has proven to be unreliable in the assessment of how many Kings and other salmon species are in the river system at any given time. Run timing, water conditions and other factors seem to have a direct effect on when and to what extent salmon pass through the weir.

In 2010 the ADF&G closed down the sport fishing for Kings on the Nelson River only to have over 50% of the escapement pass through the weir in the last three days of the king season and another 15% of escapement passed through the weir in the five days in which the weir was still in operation after the close of the regulatory season. The escapement goal; set by the Department was met and exceeded due to this circumstance. On another occasion in 2012 the Nelson Lagoon commercial sockeye fishery was closed due to low run escapement, only to have 50% of the sockeye escapement pass through the weir in three days thus substantiating an emergency opening. **These situations provide solid evidence that the weir location is unreliable for evaluating estimates of salmon in the system when used as a monitoring system towards management goals.** The closures associated with the weir assessments have proven to have a negative economic impact on both the commercial and sport fishery users.

Below are condensed ADF&G statistics that reinforce the above mentioned circumstances.

2010 Nelson River King Salmon Weir Escapements (abbreviated)

Dates	Daily Count	Cumulative	
June 16 – July 22		921	
July 23	191	1112	(65% of total escapement through the weir in the last eight days the weir operated)
July 24	592	1704	
July 25	548	2252	
July 26	118	2370	
July 27	36	2406	
July 28	94	2500	
July 29	47	2547	
July 30	22	2569 (ADF&G Escapement Goal 2400)	

2012 Nelson River Sockeye Salmon Weir Escapements (abbreviated)

Dates	Daily Count	Cumulative	
June 2 – 26		11,179	
June 27	16,462	27,641	(50,522 though the weir in 3 days. 50% of total escapement)
June 28	20,793	48,434	
June 29	13,267	61,701	
June 30- July 24	40,265	101,966	



Economic Hardships:

Most individuals just don't understand what we have invested in each client well before they arrive. Marketing, correspondence, coordinating travel, insuring airplanes and boats, guides and staff already hired and ticketed to the lodge, fuel transported and paid for, supplies shipped and received well before the season, and the list goes on and on. A total closure is absolutely devastating to our small businesses and our seasonal employees. Not to mention canceling scores of Alaska vacations.

Angling Preference and Experiences:

The Nelson River provides a unique opportunity for the avid sport fisherman. Whether novice or expert, the Nelson River supports an environment that many sport fishing enthusiasts have had the opportunity to experience. Having an audience that supports "safe catch and release techniques and principals" while considering the low impact, will guarantee a continued resource for future enthusiasts. The implementation of a proper management plan and/or regulations that eliminates closures is critical to supporting this unique opportunity.

Overview:

The ongoing difficulty to annually assess run strength and total abundance of king salmon during the sport fishery has led to recent emergency closures by ADF&G which have significant economic hardships for service providers. Establishment of a catch and release, single hook, no bait regulation will mitigate the need for inseason restrictions in the face of uncertainty by maintaining a conservative management strategy that also reflects current angler preference in this remote and very low effort fishery.

Your considerations to these comments are greatly appreciated.

Sincerely,

Rod Schuh
Hoodoo Sport Fishing Lodge



574 River Bend Road
Roseburg, Or. 97471
Jan. 23, 2013



This is in reference to proposal #250 dealing with dual set net permits at the upcoming Alaska Peninsula meetings in Anchorage, Ak Feb. 26-March 4.

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

We are a 3 generation family who own land and fishing sites in the borough of Egegik. We rely on our three sites and permits as part of our incomes, and it takes 6 people to fish the sites properly & efficiently at the peak of the season. But, it is not profitable for 6 people to fish the full season, consequently, some have to shorten their stay, returning home to other jobs.

By having dual permits, some members can fish the slower first & last periods of the season and extend their incomes. Our buyers are 80 – 90% dependent on set net fish. I feel this helps manage the fish runs properly and adds necessary income to the borough and city of Egegik.

My crew and I thank you for considering our concerns on this matter.

Frank Tunno SO4T59153A, SO 4T64878E

Dianne Tunno SO4T59531F

Crew: Luke Anderson

Rose Anderson

Scott Hammond

Marc Hammond

A



Don Alvarado
725 Palm Haven Ave.
San Jose, Ca. 95125
408 293-4125

ADF&G
Boards Support Section

My name is Don Alvarado and I have been a Naknek Kvichak Setnetter since 1981 and continue to fish in that district. This letter concerns the proposal 250-5 AAC 06.331. I sent in my comments for the regular cycle meeting this winter concerning the possible sunseting of the set net permit stacking rule. I was in favor of keeping the permit stacking rule for set netters. I was disappointed to see it sunset at that meeting. With this new proposal from the Board my hopes are that it will in fact pass but be enlarged to include the entire Bristol Bay set net fleet. There should be no differentiation between districts. The stacking concept allows many set net families to keep their operations viable. I have not seen the concern that new potential owners will be "locked out" be true but rather have seen more fishermen being able to work due to families dusting off their seldom used permits and getting net in the water. I hope the Board may see fit to include all the set net districts for permit stacking.

Sincerely,

A handwritten signature in black ink that reads "Don Alvarado".

Don Alvarado





RECEIVED

FEB 04 2013

**BOARDS
ANCHORAGE**

AK Board of Fisheries
Statewide Meeting – Comment on Proposal 250

I would like to comment on the “out-of -cycle” set net permit stacking proposal for the Egegik and Ugashik districts. I am a long-time set net fisherman, (since 1973 in the Kvichak) , that has fished in all of the Eastsider districts over the years. I have transferred in and out of districts several times during the same season, much as a drift fisherman might.

I think it unrealistic to treat the districts differently on this proposal. What is legal for one, should be the same for all. Imagine the mess that potentially would occur if this option was extended to the drift fleet??!!

I am in favor of permit stacking---I see no downside to it. AND--it needs to be the same for all districts, Bay-wide.

The main concern I have heard expressed was that permits would possibly leave families. On the contrary, I believe it would save family permits. There are local households with multiple permits in the family. If one of the kids goes off to school or to work, the permit can not be fished, so it might be sold for added cash. However, if he/she could transfer it to a relative who is already fishing, and recieve some money for the fish that is caught on the permit, it would well be in his/her best interests to hang on to the permit and keep it in the family.

thank you, John Schandelmeier



January 28th, 2013

Dear Board of Fisheries,

I have written a formal letter to the Fisheries Board regarding permit stacking in Bristol Bay for set net fisherman, but wanted to also write a brief personal letter for the upcoming Area M meeting in on Anchorage since you will be addressing this issue then. Please know that this regulation has a lot of implications for our family as we prepare for the 2013 fishing season.

I would like the Board to reinstate the rule allowing set net fisherman in Bristol Bay to hold two set net permits. I recently purchased two permits from Bill Kuhlmann who had fished in Egegik for over 20 years. I have fished for him for 8 years and when he sold his operation to me and a fellow deckhand last year he was able to pass it on to us largely due to the new permit stacking rule that was in affect at the time. Our hope is to raise our family with commercial fishing being a significant part of our livelihood. At this point, my wife is not able to hold and fish a permit due to our children's ages. We must fish both permits to pay off our loan on the business, but the recent sunsetting of the regulation is making it difficult for us to do this.

In my other letter I go into further detail and address some of the arguments against permit stacking, but I simply want you to know the heart of my plea in the above paragraph in this letter. Thank you for hearing our perspective on the matter. We will await your decision.

Sincerely,

A handwritten signature in cursive script that reads "Corey Lockbeam".

Corey Lockbeam
Egegik Set Net Fisherman
509-834-8798
clockbeam@gmail.com





Proposal 95. I am against this proposal. It is unclear how this would affect someone who cleans a fish and dumps the carcass in a water body. Would it then be considered chumming if that person or a member of his party continued to fish? If this proposal was limited to guides or persons utilizing a guide I would not be opposed.

Proposal 111. I am against this proposal. There appears to be no shortage of fish in the Eek River. There is no biological reason to eliminate sport fishing. The proposer may not participate in sport fishing, however, that is not a valid reason to deny that right to others.

Proposal 112. I am against this proposal. This proposal mixes two separate issues. Closing the river to sport fishing should only be done if biologically necessary. It is doubtful that the number of fish caught as a result of sport fishing is significant.

Proposal 113. I am against this proposal. The proposer is not opposed to sport fishing as long as the fish caught are kept and not released. The proposer implies that if all the fish caught by sport fishing are kept that this will cause salmon stocks to increase as opposed to catch and release fishing, this makes no sense.

Proposal 114. I am against this proposal. There appears to be a concerted effort to eliminate sport fishing in this region. However, fish belong to all residents of the state, and unless stocks are low there is no reason to eliminate sport fishing.

Proposal 215. I am for this proposal.

Proposal 224. I am against this proposal. Since the proposal states "one or more of the following means...", e-mail will become the only method used to announce emergency orders as it will be the easiest and least costly alternative. However, not everyone has access to a computer or smart phone, nor is there coverage throughout the state.

Proposal 228. I am for this proposal.

Proposal 233. I am against this proposal. The felt sole ban was enacted due to damage caused to stream beds and spawning habitat. Felt sole boots had not been in existence for long and seniors and handicapped individuals were able to fish before their introduction.

Proposal 235. I am against this proposal. This places an unnecessary burden on all fisherman in an attempt to catch those poaching fish. This proposal does nothing to stop that. If someone is willing to break the law when catching fish why would they fill out a form or provide truthful responses on that form? If poaching is a problem in an area individuals should request additional enforcement and provide information to authorities when appropriate.

Proposal 242. I am against this proposal. This proposal is poorly conceived. It attempts to rectify a problem created solely by a fisherman who buys poor gear. Under this proposal those fisherman who purchased low quality gear will now have an advantage over those who bought quality gear. This is because not only will their nets be deeper but the mesh size will be smaller. When the nets shrink they will lose some depth but as the mesh size will be reduced they will catch more fish when compared to a net of the same depth that does not shrink. Mesh size will be the critical variable for catching fish as opposed to depth of net for the few extra feet added. Furthermore, nothing prevents a fisherman from replacing the nets that have shrunk with those of a higher quality. This is strictly a self inflicted



problem which the Board should not have to remedy. Additionally, increasing the depth of net for all fisherman will increase the number of fish caught before they can pass to other areas of the state.

Proposal 243. I am against this proposal. The proposer states that lead in the environment can cause injury to wildlife. Lead is a naturally occurring mineral, would he have the state remove all naturally occurring lead also? Lead sinkers do not remain on the surface of stream beds and beaches when lost, they sink into the stream bed and beach gravel out of the reach of waterfowl.

~~SA~~

Submitted By Brian West
1000 OCEANVIEW DR
ANCH AK 99515



Permit #'s are: S04T60036M and S04T64716X

To whom it may concern, my name is Frank Hoff and I fish in the Egegik District with my wife, Renee Hoff and my son, Justin Hoff. We have 2 setnet operations and a drift operation. The setnet permits are in my son's name. We support the Permit Stacking Program because I run the drift operation and my wife works on the boat with me because she had back surgery a few years ago and cannot run a setnet operation. My son runs the setnets with hired help and without Permit Stacking we would have to have one permit in a helpers name. There are 2 setnet operations in our area that got their permits and sites put in their names from former permit holders and walked away with them. We employ 5 people and help make our living for two families (my wife and me and my son's family). We need the permits. We have to catch the volume of fish we need to make this work financially. Please consider reinstating Proposal 250 for Permit Stacking. Thank You.

Sincerely, Frank Hoff

Frank Hoff

Renee L Hoff

A stylized, handwritten signature in black ink, appearing to be a variation of the name Frank Hoff.



Boards Support Section
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

255 NW 17th St
Newport, OR 97365
February 5, 2013

Dear Alaska Board of Fisheries Members,

I am a Bristol Bay salmon drift gillnet permit holder for the past 25 years and have been fishing in Alaska for over 37 years. I am writing to you today concerning regulation proposal #200, of which I am strongly opposed. It is already known from the WASSIP study that a large percentage of the northern Area M June-July salmon caught are Bristol Bay bound fish. To move that line even closer to Area T and start fishing on June 20th would mean even more interception of Bristol Bay salmon.

I would recommend that the current Area M northern boundary line be moved back to Stroganof Point or further south to end the Bristol Bay interception that has been going on for decades. It is my understanding that fishing in a particular area is meant to target the salmon returning to that area and to minimize interception.

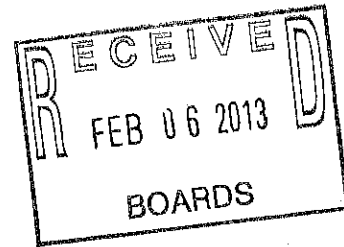
I hope you consider my comment when deciding the best practices for our fisheries.

Sincerely,

Rex Capri



Alaska Department of Fish and Game, Board of Fish
PO Box 115526
Juneau, AK 99811-5526



February 4, 2013

To: Alaska Department of Fish and Game, Board of Fish

I am writing this letter to address the concern of the Permit Stacking program in Bristol Bay. I am asking for your support to reinstate this program at the board of fish meetings in Anchorage this February 26 – March 4, 2013. Please give your support to Proposal 250, keeping our ability to stack permits.

We have a family run fish site on the Egegik River in Bristol Bay. Stacking permits allows us to keep permits in the names of family members. If we had to put permits in the names of people other than our family members, it would be a detriment to our family run business. We wish to keep our family business intact, and the only way to do that is if we can stack permits. It has worked very well for us these past few years and I would very much like to see it continue this year and for years to come.

I have been involved with the fishing site for several years now. I have had 2 permits stacked in my name since the inception of the program. However, this summer, I will be doing an internship toward completing my degree in accounting so I will not be able to have the permits in my name. We will have to put both of my permits in someone else's name. The inability to stack our permits would not allow us to operate all of our nets and therefore would hurt our monetary income.

I thank you in advance for your support in this concern.

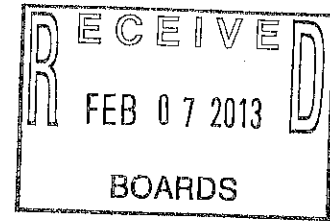
Sincerely,

Sarah B Ralston

Sarah Ralston
51655 Iris Circle
Kenai, AK 99611



Alaska Department of Fish and Game, Board of Fish
PO Box 115526
Juneau, AK 99811-5526



February 4, 2013

To: Alaska Department of Fish and Game, Board of Fish

I am writing this letter to address the concern of the Permit Stacking program in Bristol Bay. I am asking for your support to reinstate this program at the board of fish meetings in Anchorage this February 26 – March 4, 2013. Please give your support to Proposal 250, keeping our ability to stack permits.

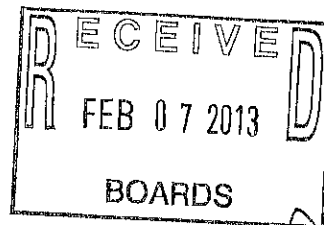
We have a family run fish site on the Egegik River in Bristol Bay. Stacking permits allows us to keep permits in the names of family members. If we had to put permits in the names of people other than family members, it would be a detriment to our family run business. We wish to keep our family business intact, and the only way to do that is if we can stack permits. It has worked very well for us these past few years and I would very much like to see it continue this year and for years to come.

In the past all 3 of my daughters have been permit holders. One just recently got married and does not come back to Alaska to help with the fish site. My oldest daughter continues to be involved in the fish site. Her son is seven years old and hopes to be more involved in the future, but is too young now to hold a permit. My youngest daughter has had 2 permits stacked since the inception of the program. However, this summer, she will be doing an internship toward completing her degree in accounting so she will not be able to have the permits in her name. The inability to stack our permits would not allow us to operate all of our nets and therefore would hurt our monetary income. I have spoken with several other fishermen in the Egegik district who also want to keep the permit stacking ability in our district.

I thank you in advance for your support in this concern.

Sincerely,

Craig J Ralston
51655 Iris Circle
Kenai, AK 99611



02/02/13

TO: Board of Fishery Members
Board of Fisheries Personal Comment Book

FROM: Paul Sorenson - Permit Numbers: S04T-656879/S04t-61730
Jeanne Sorenson - Permit Numbers: S04T-58481/S04T-65689

RE: Proposal 250 - Bristol Bay Set Net Permit Stacking

On behalf of my wife and myself , we are asking for your support for Proposal 250 to allow Permit Stacking in Egegik and Ugashik. The opportunity to stack our four permits has allowed our family to:

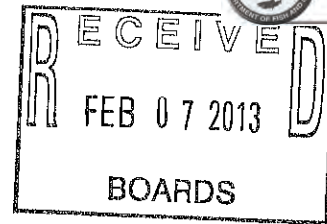
- 1) Make fishing profitable and hire quality help which promotes a safe working environment.
- 2) Make plans to pass on permits and sites to our grandchildren: Austin - 7 and Cameron - 9. This will be our third generation working these sites. These kids have been coming to the site since they were 2 years old.
- 3) Retain our permits and site without transferring these permits to some else, thus risking the chance of losing them. Our family has commercially fished in Egegik the past 26 years to build this life style and business.
- 4) Purchase new equipment in order to produce a better finished product in a safer working environment. Most of this new equipment and supplies have been purchased in Alaska, thus supporting our local economy.

We have resided in Alaska since 1983 and have no plans of leaving this great state. Commercial fishing is not only our livelihood, but it is also a way of life. Having to give up some of our permits would rob us of this family tradition. With your support this proposal will allow our family to continue this way of life and pass down our permits and sites to our grandchildren.

Thank you for considering this proposal.



Alaska Department of Fish and Game, Board of Fish
PO Box 115526
Juneau, AK 99811-5526



February 4, 2013

To: Alaska Department of Fish and Game, Board of Fish

I am writing this letter to address the concern of the Permit Stacking program in Bristol Bay. I am asking for your support to reinstate this program at the board of fish meetings in Anchorage this February 26 – March 4, 2013. Please give your support to Proposal 250, keeping our ability to stack permits.

We have a family run fish site on the Egegik River in Bristol Bay. Stacking permits allows us to keep permits in the names of family members. If we had to put permits in the names of people other than family members, it would be a detriment to our family run business. We wish to keep our family business intact, and the only way to do that is if we can stack permits. It has worked very well for us these past few years and I would very much like to see it continue this year and for years to come.

I have been involved with the fishing site for several years now and plan on continuing. I have a seven year old son who comes out to Egegik and just loves it. Someday he hopes to become more involved and we may put a permit in his name, but is too young now to hold a permit. My sister has had 2 permits stacked in her name since the inception of the program. However, this summer, she will be doing an internship toward completing her degree in accounting so she will not be able to have the permits in her name. We will have to put both of her permits in someone else's name. The inability to stack our permits would not allow us to operate all of our nets and therefore would hurt our monetary income.

I thank you in advance for your support in this concern.

Sincerely,

Rebekah Ralston
PO Box 384
Naknek, AK 99633



Mark J. Wagner
P.O. Box 326
Sand Point, AK 99661

February 4, 2013

Board Support Section/ADF&G
P.O. Box 115526
Juneau, AK 99811

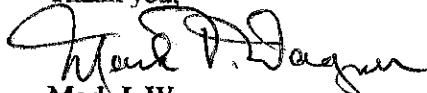
Dear Board Members,

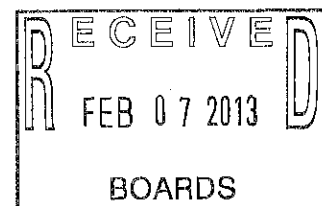
My name is Mark Wagner and I setnet for salmon out of Sand Point, Alaska. My written comments are directed toward proposals 194 and 15. I submitted proposal 194 to improve the setnet fishery in the South Eastern District Mainland (SEDM) and to avoid future conflicts between setnetters. The current regulation for Area M setnetters requires a minimum distance of 900 feet between setnetters, with the only exception being Nelson Lagoon that has a 1800 feet requirement. With the recent influx of setnetters fishing with bow pickers, the traditional setnetters are finding it increasingly difficult to fish without conflicts. A bow picker is more mobile than a traditional setnetter and that enables them to reset their gear at any location with much less time and effort. In conclusion, I'm asking the Board to change the distance from 900 feet to 1800 feet in the SEDM. The only exceptions would be grandfathering existing setnet leases and in Orzinski Bay.

Proposal 15 is asking that all setnet running lines be removed from non-registered fishing sites when not being fished. The proposal was submitted by two Sand Point fishermen who setnet with bow pickers and do not use running lines. The traditional setnetters fishing out of a skiff would be at a big disadvantage if this proposal was adopted. The current law allows each Area M setnetter to fish two 100 fathom nets and to register up to two fishing sites. In Sand Point, setnetters fish either the Shumigan Islands or the South Eastern Mainland District (SEDM). If a setnetter is fishing the SEDM and the area closes while the Shumigan Islands are open, they'll switch over and fish in the Islands. Putting running lines out and picking them up at closure takes 2-4 hours, and in a short opener, lost fishing time matters greatly. In addition to lost fishing time, safety is a big concern when the weather is rough and a setnetter is required to pick up all nets, anchors and running lines.

There is a better solution that would help boats avoid running over setnet lines in the Shumigan Islands and the SEDM but still allow the traditional fishermen to leave running lines in the water. This solution would require all setnetters in the Shumigan Islands and SEDM to fish within a ¼ mile corridor along the shoreline. A ¼ mile measures 1320 feet while a set net measures 600 feet if it is completely straight with no slack in the net. Most setnetters use a 15 fathom hook at the end of their net, and in addition to the net slack the total net will measure less than 500 feet when fully set. I believe a limit of ¼ mile from the shoreline is more than enough to give setnetters the area needed to set a net. Since a lot of local boats travel ¼ mile off the beach, this change would protect them and has the added benefit of reducing the interception of traveling fish.

Thank you,


Mark J. Wagner





Date: 01/31/13

To: Board of Fisheries Personal Comment Book
PO Box 115526
Juneau, AK 99811-5526

From: Alan West Permit# S04T 56899K and Veryle West Permit #S04T 64879V

RE: Proposal #250 Dual Setnet Permit Stacking Egegik, AK District

Dear: Board of Fisheries Personal Comment Book,

We, Alan West and Veryle West, each fish a setnet permit in Big Creek, AK in the Egegik District. We each have our own site in which we operate our individual permits. Veryle West, will be 84 years old by the time the 2013 season rolls around. She has indicated that she is thinking about retiring from fishing but is in a dilemma on how to keep the permit in the family. The permit that Veryle, Alan West's mother, operates previously belonged to Alan's wife, Sharlene West. The permit was put in Veryle's name after Sharlene became disabled. Veryle has fished the permit since in order to keep it in the family.

Alan West would like to put a dual permit in his name in order to keep it in the family. Being as there are no other family members with the ability to fish Veryle's permit, he would risk losing Veryle's permit by having to put it in someone else's name. Both Alan and Veryle feel that a dual permit would be an excellent way to avoid the risk of losing Veryle's permit as stated above.

Sincerely,

Alan West

Veryle West

