

Written materials from December 2006 Board of Fisheries relative to restructuring proposal #39 (Eliminate the 32-foot vessel length limit in Bristol Bay)

Proposal

Staff comment

AC comment

Public comment

PROPOSAL 39 - 5 AAC 06.341. Vessel specifications and operations. Amend this regulation as follows:

Amend 5 AAC 06.341. to eliminate the 32-foot limit on vessels used in the driftnet fishery in Bristol Bay.

ISSUE: Vessel safety, quality of salmon caught and the arbitrary 32-foot limit on the length of vessels allowed to fish in Bristol Bay's driftnet fishery.

WHAT WILL HAPPEN IF NOTHING IS DONE? If the board continues to limit the size of the vessels to 32 feet, harvesters will continue to be limited in the equipment and the ability to outfit their vessels to make improvements in fish quality while maintaining safety aboard the boats. At present many 32-foot vessels within the fishery just do not have the capacity or space to properly install an RSW unit or the size and power needed to utilize holds that are filled with a mixture of ice and water. At present, one need only look in a boat yard in Naknek or Dillingham to see that many boats do not even look like boats, evidence of efforts made to put too much into a 32-foot boat. Frankly, some of those boats look like a disaster or serious accident waiting to happen.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The proposal is made to specifically address the need to allow harvesters to design, purchase, adapt current vessels to safely accommodate equipment used to chill or freeze salmon that are caught in Bristol Bay. The quantities of salmon that are caught in a short time in this fishery require a large deck space and large capacity to hold and treat thousands of pounds of product within hours. Some harvesters may see the use of larger and longer vessels as an option to help achieve such goals as processing and freezing their own product on board, in combination with marketing their own product.

WHO IS LIKELY TO BENEFIT? If larger and longer vessels were allowed, fishermen that would like a bigger and longer vessel to accommodate and operate refrigeration and possibly freezing equipment on board would benefit. Vessel manufacturers and fabricators would benefit from the work that would be generated.

WHO IS LIKELY TO SUFFER? If a larger vessel has complete advantage over smaller vessels, the smaller vessels will become obsolete in the fishery. But, I do not think a complete loss of smaller vessels from the fleet would be realized, as smaller vessels can and will always be able to fish shallower waters. They are also generally faster and much more economical to operate.

OTHER SOLUTIONS CONSIDERED? As mentioned above, the elimination of the 32-foot limit would not necessarily mean the end of smaller vessels which will always have their own advantages and value over large vessels. It depends on how a fisherman chooses to fish. He or she may choose not to use any type of RSW or CSW system, as gas engine, outboard engines, jet water propulsion, etc. to make ends meet for their individual needs. I thought about proposing a longer limit on the length of vessel, such as 42 feet but the reality is that fishermen will not want a vessel that is too long or too deep and much of the type of vessel depends on a fisherman's favorite way or area to fish. The importance is giving harvesters the option and ability to choose what he or she knows is best for their personal situation.

PROPOSED BY: Erick Sabo

(HQ-06F-006)

PROPOSAL 39 continued:

FAVOR

Howard Knutsen PC2
Mikal Mathisen PC55
Michael Palmgren PC57
Eric Hesselroth PC59

Todd Granger PC90

Mike Friccero PC92
Gerold Gugel PC99
KJ Herman PC109
Erick Stevens PC112
Peter Thompson PC164
Karl Spielman PC169
Andrew Worhatch PC170
Lower Bristol Bay AC5

OPPOSE

Togiak AC1
Nushagak AC2
Naknek/Kvichak AC3
Lake Iliamna AC4
LaVerne Pettigen PC 5
Jared, Jay, Kesa Hakkinen PC8
Don Alvarado PC18
Robert E. Pries PC32
Jerry Ball PC52
Jeanne Pleier, L. Loftus PC104
Kim Rice, Family PC116
Joseph R. Faith PC139
Barbara Blanc PC63
Shannon Ford PC91

TO RESTRUCTURING
COMMITTEE.
TO COME BACK TO
FORUM IN CIRCUIT -
(IN 3 WEEKS)

FINAL ACTION: Carries Fails Tabled No Action See Prop. # _____

ABSENT _____ ABSTAIN HEYANO

DATE 12/11/06 TIME 2:38 TAPE # _____

STAFF COMMENTS

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, permit holders would be allowed free movement among the districts in Bristol Bay until June 23.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay fishery. They are not needed for biological or management reasons.

Since there is no limit to the number of times a permit holder can transfer between districts, training of crew and testing of equipment can be accomplished early in the season when the volume of fish is low. The permit holder may then transfer and wait the 48-hour transfer period when more information becomes available.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 39 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Erick Sabo

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 40 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Charles W. Treinen

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capital outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 41 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Larry Christensen

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

Togiak Fish and Game Advisory Committee

Meeting Minutes November 2, 2006

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approval. Frank asked question on drifting for subsistence on the river if he would be ticketed. Answer: yes, only set net subsistence in Bristol Bay. Yukon/Kusko with this proposal can drift for subsistence.

Break 3:05-3:12 pm

Proposal 7 Subsistence for Lodges not including caretakers. Helen G. moves to accept proposal seconded by Mike M. Motion passed.

Proposal 14 One person can have two permits and operate 200 F net.

Mike M moved to accept proposal seconded by Frank L. Motion failed.

* **Proposal 15 Gillnet/Setnet specifics.** Posen A. moved to accept proposals and all similar proposals seconded by Helen G. Motion passed.

Proposal 17 Removes requirement for light at end of net. Posen moves to not remove lights seconded by John N. Motion passed.

Proposal 18 Identification of gear. Julius H. moves to leave regulations as is seconded by John B. Motion passed.

Proposal 20 Permit holders must report lost nets to Fish/Game within 15 hours of loss. Helen G. moved to accept seconded by John N. Motion passed.

* **Proposal 39-47 Seek to repeal 32' length limit on fishing boats.** Posen A. moved to accept proposal seconded by Julius H. Motion fails.

Proposal 49 Establish shares of salmon catch similar to crab IFQ. Helen G. moves to accept proposal seconded by John B. Motion Fails

Proposal 51 Allows General District Fishing. Julius H. moved to accept proposal seconded by John N. Motion fails. Problem: will never know which district is in trouble.

Proposal 52 Allows General District Fishing after every district meets its maximum escapement. No action taken in relation to action taken on Prop. 51.

Herring Proposals no action as there is no Herring fishery in Togiak.

Proposal 121 Pebble Mine to be designated by State Fish/Game as refuge area.

Julius H. moved to accept proposal seconded by John B. Motion passed. Question was asked if the Board of Fisheries has authority to designate refuge area for fish. Example of Prop. 158 Holitna Refuge that Board of Fish introduced to Legislature in March 2006 and was approved. Frank suggested we support Nushagak Advisory Council with amendment to include Salmon River has no salmon.

AFN Leadership Forum. Helen G. had attended and distributed hand out on Recommendations from AFN Subsistence Forum on Maintaining our Traditional Way of Life. Joe C. suggested Togiak Advisory Council write letter of support for AFN recommendations. Helen G. will write letter.

7. OLD BUSINESS: nothing under Old Business

Charlotte W. Togiak Spawn on Kelp Task Force needs to organize and meet.

Reminder: Board of Fish meeting in Dillingham, Dec. 4-12, 2006. Let Joe know who is going to the meeting from TAC, he can make arrangements for 2 people to attend. Important to attend public and committee sessions.

8. TIME AND PLACE OF NEXT MEETING Left up to the Chairperson.

9. Adjournment: Julius H. moved to adjourn seconded by John B. Meeting adjourned at 5:08 pm

Minutes provided courtesy of BBNA
Helen Gregorio, Recording Secretary

AC. COMMENT# 1

Back to order at 10:20 am.

Proposals 39-47

The committee decides to take up these proposals because they all have the same intent.

Tim says the department is neutral on the issue.

Harry moves to adopt, Nick seconds.

William opposes. In the Cordova fishery, Bill Webber does processing at sea right out of his boat. He doesn't need larger boats to increase quality. If passed, this would create a different class of fishermen.

Curt supports. This would give fishermen more room but doesn't know what the limit should be.

Peter agrees with William. 32 foot is long enough and has been good for many years. He doesn't see a need for any change, besides the local people couldn't afford them.

Victor states that he has mixed feelings. He started fishing in a skiff. Safety and quality issues could be a factor. Quality of fish could be improved with room for refrigeration and not having to stack the fish so high in the holds.

Kenny agrees with Victor. He has mixed feelings. The last board cycle, it almost passed. There are a lot of 38 foot boats out there just waiting to come into the bay. He would prefer 36-37 foot boats. 32 foot is a little too small with the amount of fish that we are getting.

Ofi says that the state did a survey in the bay that showed overwhelmingly that we retain the 32 foot limit. AIFMA supports the 32 foot limit. Look at the fleet! There are large boats that are capable of holding 30,000 plus pounds. The last ten years our fishery has been depressed and doesn't think that we could afford them. People are losing their permits and can't afford the boats. Look at the Chignik Co-op, the fishermen there are having trouble.

Jerry Liboff is opposed to longer boats. This is a one-way proposal. Other proposals on different subjects allow going back. This one, if allowed, would be impossible to go back. The state would have to buy the boats back. The rich get richer and the 32 foot boats would be at a disadvantage. The cycle would eventually eliminate village fishermen from participating in the salmon fishery. He gives the comparison of 32 foot Bristol Bay boats competing against larger boats in the Togiak herring fishery, it would be unfair to the people. Quality and safety are overruled!

Kenny says "you're right". I would accept a 34 foot limit. I wouldn't accept anything drastic, just a couple feet longer. An additional two feet would make quite a bit of difference on what we could carry. All we've been hearing is quality. He used to fish a

Rawson but when he bought a larger boat, it changed the way he fishes. He is now able to carry more safely especially in bad weather.

Joe says that he was with Jerry when this came up in the 70's. Most people were against it. The poll by the state indicated that people were unanimously against it. Anytime there is a regulation that benefits just a few, it hurts other fishermen. He gives an example of the 200 fathom boats ability to catch a lot more fish, it's unfair to those who can't compete. If he were able to vote, he would status quo. He doesn't think that it would make much of a difference, the processors aren't paying much more with slush-ice; maybe a little more on early kings and sockeye. He doesn't think that prices will jump if longer boats were allowed.

Andy says that lots of people are in trouble and still trying to stay in the fishery. This would prevent them from competing and for those reasons, as well as many mentioned, opposes the proposals.

Peter says that fishermen from New Stuyahok don't get free slush bags from BBEDC because they're not part of the CDQ group. They're just a little bit too far upriver even though they're real close. They're not getting the extra money for slushed fish. They're fishing for the same company, getting less money. Nothing has changed. He is opposed, they should poll the villages first before deciding.

Chris said that when he was in the fishery with an old wooden Bryant, he couldn't keep up with the larger newer fiberglass boats. What about the Wood River Special Harvest Area? Wouldn't larger boats be harder to fish there??

David "Buck" Williams said that he fished with his dad in 1966. In 1997, he was a permit holder. Any decision now will affect us now for the next 50-60 years. He questions the make-up of this advisory committee because it is predominately drift fishers.

William mentions quality again. If you need more capacity, get a wider boat! Larger boats will be able to fish in rougher water, there will be more drop-outs and lower quality fish. Once larger boats are in, we'll never be able to go back.

Kenny doesn't support 38 foot or longer. Lots of them down in Area M. Leader Creek's fleet is 100% RSW. It won't be very long before the processors mandate us having to have either slush or RSW. Longer boats will help. Area M got \$.83 last year, we got \$.60.

10:40 am. Chris is excused to catch scheduled flight home and Wassillie has a dental appointment.

Ofi says that the state has a matching grant, dollar-for-dollar available for those who want to upgrade their boats. Take a look at the Skagaraak, it was built for rough seas and carrying lots of fish. He has RSW and many present boats are big enough to have RSW.

Kodiak boats would love to come here. He wants to retain the 32 foot limit and says that we shouldn't make the rich, richer.

Hans asks Joe to conduct a roll call vote because the issue is so contentious.

Roll call vote is 2 in support and 8 opposed.

Proposal 48

Tim says that this proposal would force more boats over here into the Nushagak. Egegik biologists have a hard time responding to big pushes of fish into the river. The department supports the special harvest areas and don't want to automatically start in-river every year. It takes away their management tools.

William moves to adopt, Harry seconds.

Hans opposes based on Tim's explanation and potential increase of boats into the Nushagak.

Curt isn't in favor because of the interception issue. His site is at Graveyard in the Kvichak. He's waiting for the fish to show up, this would help him. When they keep the fishermen in-river at Egegik, this helps Kvichak escapement.

William opposes the proposal because management has enough tools to achieve the Kvichak escapement. There is no sense tying the managers hands.

Victor opposes because this would have the negative impact on the Nushagak.

Kenny remembers an Area M meeting where they're trying to show the board that we're trying to rebuild the Kvichak and they're allowing them to intercept more of our stocks of fish. We sacrifice and they benefit. There is good and bad with the intent of the proposal. If the Kvichak comes back, then the boats in the Nushagak will disappear.

Ofi speaks to one of Tim's hand-outs on Bristol Bay's district's harvest information. Even though Egegik was fishing on the 110 line, there was still enough escapement up the Egegik River. Egegik had a 9 million run and a 7 million harvest. He doesn't know where this guy is coming from. Egegik was still able to get their escapement. Even with pulling the lines in, the Kvichak is still not getting its fish.

Tim says that the Kvichak got its escapement goal this year. Why is the Alagnak run healthy and the Kvichak failing? It happens elsewhere in Bristol Bay too. We still don't know what is going on. Is it interception? He doesn't know if it impacts the Kvichak. Genetic studies have been ongoing, hopefully this will shed some light.

Committee votes 1 in support and 9 opposed.

ADVISORY COMMITTEE MINUTES

Date: 10/30/06

Page 1 of

ADVISORY COMMITTEE NAME: NAKNER/KVICHAK

Location (City, town, village): KING SALMON

Members Present: RALPH ANGASAN SR., VINCE WEBSTER, JOE KLUTSCH, FRED PIKE, GEORGE RIDDLE, ABE WILLIAMS, OLIVER SASSER,

Members Absent HOWARD NELSON, RYAN WILLSON, CARVEL ZIMAN JR, RICHARD WILSON, DALE PETERS

Members Excused NONE

QUORUM PRESENT: YES NO

ADF&G Staff Present: SLIM MORSTAD, CRAIG SWANKE, JOE PHYTHLOK

Time meeting called to order 6:07 AM / PM

Old Business and New Business: -- Use additional pages

Time Meeting Adjourned 11:15 AM / PM

Signature: 
Committee Secretary

P.O. Box 189
NAKNEK, ALASKA 99633

www.theborough.com



TELEPHONE
(907) 246-4224
FAX
(907) 246-6633

Bristol Bay Borough

September 5, 2006

Commissioner McKie Campbell
Alaska Dept. of Fish and Game
POB 115526
Juneau, AK 99802-5526

Commissioner:

Finfish Proposals for Bristol Bay will be coming up in December of this year. The Bristol Bay Borough was formed in 1962, the first borough in the state, with a plan that the Naknek/Kvichak District and the fish industry would generate revenue for the borough to provide a portion of the services to the villages of King Salmon, Naknek and South Naknek. Today we continue to count on this revenue and are home to over 1000 commercial fishing vessels laid up within the borough each year. With this revenue benefit, comes the responsibility of providing services to the large influx of people the fish industry brings.

The Borough is concerned with the burden that has been placed on the Naknek/Kvichak District for the past 21 years. The restrictions placed on this district have resulted in lost fishing time and an economic hardship for the fishermen of the Naknek/Kvichak District and the Bristol Bay Borough. I have been told that DNA samples have been taken this year and may aid in the better understanding of the salmon migration and the natal streams they are destined for. Lacking results of this information lets look at known facts. Businesses are run to make a profit. There were eight shore based processors operating in the Naknek/Kvichak District in 2006. Previously, there had been an additional three shore base plants and another company camp that operated within the Naknek/Kvichak District. Going further back there are two more abandoned canneries on the Naknek River and another six on the Kvichak River. These facilities were not built where there were so they could haul fish from Egegik and Ugashik. These facilities were built to be close to the fish!

In 1960 and 1961 reports from ADFG recommended curtailing fishing in the outside waters of Egegik and Ugashik. We are confident that DNA sampling will bear this out. This year's daily summaries, put out by ADFG, show that when fish are moving into the Egegik River the escapement ratio is about 1/4-1/3 to that of the harvest. Yet other days the catch remains high with very little escapement (example: July 14th 450,000 harvest, 6,552 escapement, Ugashik has no escapement in early season openings). The other river systems do not have this oddity.

AC. COMMENT#

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Fishermen of the Naknek/Kvichak District, especially set net fishermen, should be afforded the opportunity to fish at their regular sites; 250 to 300 set net fishermen have been displaced 12 out of the last 21 years and forced to fish in the Naknek River Special Harvest Area, a cesspool of fish guts, created by the harvest of fish in other districts, that may or may not have been bound for the Naknek/Kvichak District.

We understand the political pressure, placed by processors, to extend the season, and allow for a reduced work force to create the pack necessary for a positive bottom line, but we can no longer stand idly by and allow this mismanagement to occur. 5AAC 39.220 (b)....., the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern.

It is time we move the western boundaries of the Ugashik District and Egegik District shoreward and allow at least a portion of the Naknek/Kvichak District to fish. We will be glad to put a 10 year sunset clause in regulation if this does not work. The Bristol Bay Borough Assembly concurs, that we should manage with good science and not political pressure.

I would be glad to discuss this matter at length with you and you are always welcome to come out to Naknek to give your thoughts to our Assembly. The Borough Assembly meets the first Monday of each month at 7:30 PM, at the Borough Building, in Naknek.

Thank you



Michael S. Swain Sr.
Bristol Bay Borough, Mayor

cc: Governor Frank Murkowski
Denby Lloyd, Director of Commercial Fisheries
Jeff Regnart, Regional Supervisor



Bristol Bay Borough

RESOLUTION 2006-14

A Resolution of the Bristol Bay Borough to Increase the Naknek River Special Harvest Area (NRSHA).

WHEREAS, the Bristol Bay Borough was formed, at the request of the State of Alaska, with a plan to provide revenue generation through taxes collected from the fishing industry within the Bristol Bay Borough and the Naknek/Kvichak District and;

WHEREAS, fishers of the Naknek/Kvichak District and the Bristol Bay Borough have suffered economic loss and hardship through disproportionate reduction of area in relation to other east side districts and;

WHEREAS, 250-300 set net fishers have been displaced 12 out of the last 21 years and forced to fish in the Naknek River, (an area 1/3 of a mile wide and 4 1/2 miles long), with no end of this management practice in sight, while there is no displacement of set net fishers in other eastside districts and;

WHEREAS, past ADFG reports, indicate significant interception of Naknek/Kvichak bound sockeye, within other east side fishing districts and;


WHEREAS, 5AAC 39.220.9B) the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern,

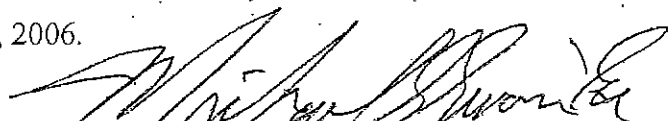
NOW THEREFORE BE IT RESOLVED by the Bristol Bay Borough Assembly request the State of Alaska Department of Fish and Game, through Board of Fish actions, expand the NRSHA to allow Naknek Section set net fishers the opportunity to fish at their normal site, within the Naknek & NRSHA Section of the Naknek/Kvichak District and;

BE IT FURTHER RESOLVED by the Bristol Bay Borough Assembly that fishing in the Ugashik District will not occur west of a line (described by lat. / log.) from the northwestern most tip of South Spit northward to the southwestern most tip of Smokey Point, prior to June 23rd.

ADOPTED and approved, 2nd day of October, 2006.

ATTEST:


Betty J. Bonner
Borough Clerk


Michael S. Swain, Sr.
Mayor

AC. COMMENT# 3

STATE OF ALASKA

FRANK H. MURKOWSKI
GOVERNOR

DEPARTMENT OF FISH AND GAME OFFICE OF THE COMMISSIONER

P.O. BOX 115526
JUNEAU, AK 99811-5526
PHONE: (907) 465-4100
FAX: (907) 465-2332

October 11, 2006

The Honorable Michael S. Swain Sr.
Mayor of Bristol Bay Borough
P.O. Box 189
Naknek, AK, 99633

Dear Mayor Swain:

Thank you for writing and conveying the concerns of the Bristol Bay Borough regarding the restrictions to Naknek-Kvichak District salmon fishery. In addition, I received a copy of the Borough's letter and resolution to Board of Fisheries (BOF) Chairman Art Nelson. I understand the importance of the salmon harvested in this district to the wellbeing of the residents and communities of the Bristol Bay Borough. I also fully appreciate your concern that the burdens of conserving and rebuilding the Kvichak River sockeye salmon stocks should be shared equitably among all users that harvest these stocks.

Sockeye salmon in the Kvichak River have exhibited poor production since 1996. This extended period of low production resulted in the designation of Kvichak River sockeye salmon as a stock of concern by the BOF. This triggered a number of management actions, including those which you have identified, intended to protect the spawning population returning to the Kvichak River. While the fishing areas closest to river received the brunt of the restrictions, the Egegik and Ugashik Districts have also taken restrictions. The Egegik and Ugashik management plans require that if the Naknek-Kvichak District is closed to fishing because of a low forecast, then the outer portions of the Egegik and Ugashik Districts may be closed. Since 2000, commercial fishing has frequently been limited in the Naknek River Special Harvest Area, as well as in the Egegik River Special Harvest Area, and a reduction in the fishing area of the Ugashik District, either for an entire season or a significant portion of the season.

These restrictions are producing positive results in the Kvichak River escapements. In 2004, 5.5 million sockeye entered Kvichak River, near the 6 million escapement goal. In 2005 and 2006, the minimum goal of 2.0 million sockeye salmon was exceeded with 2.3 and 3.0 million sockeye. The most exciting news is that the Alaska Department of Fish and Game (ADF&G) is seeing an increase in returns-per-spawner from a recent 10-year average of 1.1 to over 3.0 this past season. This may be an indication that the period of low productivity is giving way to a more normal level of sockeye salmon production in the Kvichak River.

You also explain some of the hardships Naknek-Kvichak District set gillnet fishermen have endured as a result of Kvichak River sockeye salmon being designated as a stock of management concern at the 2003 BOF meeting. You have asked that the Egegik and Ugashik fisheries be

AC. COMMENT#

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restricted to smaller areas and to allow some part of the Naknek-Kvichak District to be opened to commercial fishing. There are varying analyses of district harvests and escapements that suggest different conclusions regarding the level and significance of the interception of Kvichak River sockeye in the Egegik and Ugashik districts.

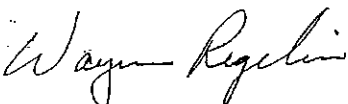
In fisheries of similar magnitude, proximity, and run time as those supported by the major Bristol Bay systems, some interception will occur regardless of where district boundaries are established. However, recent large runs to the Naknek and Alagnak rivers (with current management strategies in place) suggest that current measures are being effective in curtailing interception of Naknek/Kvichak bound sockeye salmon.

The responsibility for allocating the burdens of conservation and benefits of harvest lies with the BOF. The BOF has expressed its intent in the *Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan* that Bristol Bay sockeye salmon be harvested in the traditional harvest locations (5 AAC 06.355). The BOF has also recognized in this plan the guiding principles that the Bristol Bay area salmon districts should be managed as terminal fisheries, that interception between districts is unavoidable, and that management plans and practices should be used to ensure that salmon are harvested in districts of origin. You can see the difficulties in balancing all of these guiding principles along with an over-arching priority for achieving escapement goals.

ADF&G is conducting genetic stock identification of sockeye salmon in Bristol Bay to help clarify some of the issues you raise regarding where various sockeye salmon stocks are harvested. The genetic baseline for the major drainages in Bristol Bay has been completed and fishery sampling began in 2006. ADF&G anticipates the genetic stock identification project will bring greater clarity to the determination of the contributions of the Bristol Bay sockeye salmon stocks to the various fisheries in which they are harvested. With this objective and definitive data in hand, the users, ADF&G, and the BOF can make informed decisions regarding Bristol Bay area management plans.

I share your concerns regarding the Bristol Bay fisheries. I regret the hardship caused by these management actions, but I believe they are necessary for the recovery of the Kvichak River sockeye salmon stocks. Thank you for bringing these issues to my attention and for your invitation to address the Borough Assembly. I urge you to attend the BOF meeting, December 4-12 in Dillingham. The BOF will consider several proposals that address the issues you raised in your letter.

Sincerely,



for McKie Campbell
Commissioner



#32 NO ACTION Repeat

#33 Motion by Abe, second by George to approve: committee opposes this, paperwork nightmare.

MOTION FAILED 0-7.

#34 NO ACTION due to action taken on #31

#35 Motion by Abe, second by George to approve: committee opposed, similar to #33, unfair advantage to a few.

MOTION FAILED 0-7.

#36 Motion by Ralph, second by George to approve: too restrictive, ties the hands of ADFG.

MOTION FAILED 0-7.

#37 Motion by Abe, second by George to approve: similar to #36, do not support.

MOTION FAILED 0-7.

#38 Motion by Abe, second by George to approve: opposed to changes to the present system, what we have works.

MOTION FAILED 0-7.

* #39 Motion by Abe, second by George to approve: **We are adamantly opposed to changing the vessel length. It will adversely impact the Bristol Bay watershed residents.**

#40 - #47 NO ACTION due to prior action taken on #39.

#48 Motion by Ralph, second by Abe to approve: would be very difficult to manage therefore we are opposed.

MOTION FAILED 0-7.

#50 Motion by Abe, second by George to approve: this would tie ADFG hands.

MOTION FAILED 0-7.

#51 Motion by Abe, second by George to approve: **this issue has been opposed by all Bristol Bay AC's in the past. It is not good management and in direct conflict with the policies of ADFG.**

MOTION FAILED 0-7.

#52 Motion by Abe, second by George to approve: we oppose the establishment of a "General District".

MOTION FAILED 0-7.

#53 Motion by Abe, second by Fred to approve: committee is in agreement that something needs to be done with how the NRSHA is managed. This may be part of a solution.

MOTION PASSED 7-0.

#54 NO ACTION due to action taken on #53.

#55 Motion by Ralph, second by Abe to approve: committee agrees for the same reasons as in #53.

MOTION PASSED 7-0.

#56 Motion by Ralph, second by Fred to approve: support for the same reason as in #53.

MOTION PASSED 7-0.

#57 NO ACTION due to action taken on previous proposals.

LBBAC, P. 4.

Proposal 37. No action per 36.

Proposal 38. Roland B./Dan K. moved/seconded to adopt.
The committee agreed this was similar to proposal 36. Motion failed 0-7.



Proposals 39-47. Roland B./Tim E. moved/seconded to adopt as a block.
After considerable discussion for the pros and cons, it was agreed that they would take a specific proposal and take action.

Proposal 45. Tim E./Roland B. moved/seconded to adopt.
The majority felt the intent of this proposal best fit the thought of being able to do processing onboard and to give the locals ability to compete with others in the State who can do what the proposal says. The minority opinion was that this would be cost prohibitive for most locals and that the arguments given for increasing the length of 32 foot boats can already be done with the existing boats. The minority also expressed that lengthening boats would favor outside fishermen who already have longer boats elsewhere and can also lengthen their existing boats because they have the money to do so. The motion carried 6-1 by roll call vote.

Proposals 39-44, 46 and 47. No action per 45.

Proposals 64-67. No action per action taken on similar Naknek River Sockeye Special Harvest Area proposals.

Proposal 75. Roland B./Tim E. moved/seconded to adopt.
The committee agreed this would hamper management of a historically big run that returns to Egegik. The Egegik special harvest area is also larger than other special harvest areas that do not have enough room to merit longer nets. Motion failed 0-7.

Proposal 76. Roland B./Tim E. moved/seconded to adopt.
The majority agreed this would result in undue burden and would be difficult to do. The Egegik SHA is not like the Naknek and Wood River SHAs. The minority thought this could be implemented similar to what is already being done in the Naknek SHA. Motion failed 1-6.

Proposal 106. No action per action of 76.

Proposal 58. Tim E./Nancy F. moved/seconded to adopt.
The majority agreed this would not help the Kvichak and was contrary to intent of creation of SHAs in response to the weak Kvichak runs. The minority felt there was not enough information to make a definitive decision one way or the other. Motion failed 0-6-1 abstain.

Proposal 59. No action per action of 58.

Howard Knutsen

PROPOSAL 33 – 5 AAC 06.370. Registration and Reregistration.
FAVOR, This would add some incentive to purchase another Permit.
However, under these circumstances, only 150 fathoms should be allowed.
Management may have a problem with it.



PROPOSAL 39 – 5 AAC 06.341. Vessel specifications and operations.
FAVOR. I am a long time proponent of eliminating the 32 foot limit. I will say again, what I testified to 26 years ago. There is no biological or other reason for maintaining a 32-foot limit. A longer vessel would be safer, draw less water, go faster on less fuel, have a larger work area to better maintain good fish quality, provide more room for refrigeration equipment, and provide more room for shallow fish holds. There is no negative. It is important to remove the limit now, so that as equipment is gradually replaced, Fishers would have the option of having a longer vessel. Considering the current economics of the BB fishery, it's not likely that we would see a sudden surge in larger vessels, but over a period of twenty years, our fleet would gradually be upgraded. There is no need to specify maximum length because the nature of the fishery would dictate the practicality of the vessel.

PROPOSAL 49 – 5 AAC 06.355. Bristol Bay commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.
OPPOSE. An IFQ system would be totally unworkable, unnecessary, unmanageable, and would create many more allocation problems than it would solve. The current system was proposed and won by the Setnetters and has obviously worked very well for them.

PROPOSAL 51 – 5 AAC 06.356. General District Salmon Management Plan.
FAVOR. We need to keep improving the quality of fish harvested in Bristol Bay. Subsection (c) should be amended to allow fishing in the general district from June 7th through June 27th, the commissioner may open or close, by emergency order, the General District or portions of the General District as necessary to harvest up to 25 percent of the projected forecast for the Bristol Bay Area.
All districts would be getting some escapement during this time and in the event of foreseeing a possible problem in any district, the commissioner can still manage by emergency order any district or portion of district. In the mean time the processors would be getting a higher percentage of high quality fish. Having fished the Naknek-Kvichak District in years past, (up to 37

COMMENT#

2

Jared Hakkinen
Jay Hakkinen
Kesa Hakkinen
PO Box 701
Kasilof, Alaska 99610

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OCT 26 2006
BOARDS

Oct. 20, 2006

Board of Fisheries Comments
ADF&G
PO Box 25526
Juneau, Alaska 99802

Comments Bristol Bay Finfish Proposals

We submit these comments as a life long Alaskan and fisherman.

Proposal # 20 SUPPORT - loss of fishing gear is an important conservation issue and reporting is the first step to know the extent of the problem.

Proposal # 21, 22, 23, 24, 25, 26,27,28 OPPOSE- We strongly oppose all of these proposals that want to put more fishing gear on drift boats or to stack permits as to fish more gear. There is already more than enough gear in the bay! The drift fishery is already aggressive and very effective. If the fishery is not lucrative enough for some people they will not fish, which only makes a better fishery for the rest of us.

***Proposal # 39, 40,41,42,43,44,45,46,47 OPPOSE** - There is no reason to increase the length of boats fishing the Bay. The 32 foot rule keeps the quality of the product higher

COMMENT#

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* as boats need to deliver more often and fish are not squished in the holds. What needs to be done is: drop out baskets need to be made mandatory in the 32 foot length so there is not the huge waste of fish from them dropping out of nets, one in 20 fish often drops out of the net when it is being pulled onto the drift boat. The fish then rot on the beach.

Proposal # 51 OPPOSE - We oppose the general district for all it does is further allow the interception of fish from returning to their the natal streams.

Proposal # 53,54,55,56,57 - SUPPORT We support any proposal that makes a more equitable fishery between drift and set. The NRSHA plan is not working since allocation went into effect. The number of boats fishing the river is different by hundreds of boats from those that fish the bay which the original allocation numbers were based on. Drifters now often choose not to fish the whole tide or even tides with marginal fish knowing that with allocation they can simply wait to fish a more lucrative tide and meanwhile set fisherman are not allowed to fish. At the beginning of the season less than 200 boats were fishing and on July 9 350 boats were registered to fish, fishing allocation numbers were based on an average of over 650 boats. When allocation was put into effect we were told that it would be revisited, as of yet all that has happened is that the drift fleet has had more fishing time and gear while set fishermen have less and less. We support the allocation of 64% Drift and 35% Set.

Proposals #58, 59,60, 61,62 **OPPOSE** The boundaries of the NRSHA work and everything possible should be done to support the Kvichak meet its escapement goals.

COMMENT#

8

November 15, 2006

Re: Written Comments for Bristol Bay Finfish

ADF&G, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

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BOARDS

Mr. Chairman and Members of the Alaska Board of Fisheries:

I am writing in support of several proposals under consideration by the board this year. Permit stacking and the elimination of the 32 ft limit being the most important.

I have been a commercial fisherman for over 30 years, participating in fisheries in Hawaii and Alaska. I have been a permit holder in Bristol Bay since 1983 and have been Captain of a Bering Sea trawler since 1983. I catch, refrigerate, and deliver millions of pounds of Pollock every year and have expert knowledge in refrigerating and handling fish. I have participated in just about every fishery in Alaska. Bristol Bay salmon fishing has been a mainstay of my business interests for many years. In 1993 I had a top of the line gillnet vessel constructed that cost over \$325,000 and included one of the best RSW systems available and included the ability to individually flood the fish holds with refrigerated sea water. We have been floating our salmon catch in 32/33 degree RSW since the vessel was built. Currently we have been working with a "trampoline" system that lies underneath the gill net and is supported by bungee cords. With this system the picked fish fall onto the tarp and slide right into a fish hold and drop into water without ever touching the deck of my boat. We are working with this technique in order to improve the quality of our fish in response to market demands. Leader Creek Fisheries estimates that a greatly increased grounds price for fish is possible with a fleet that gives first consideration to quality.

One of the problems we have is the short deck space available on a 32 foot boat. The 32 ft limit has no counterpart in other fisheries in Alaska. It is an antiquated regulation that diminishes the value of the boats greatly and should be eliminated entirely. With longer lengths, the fuel economy improves, fish handling abilities improve greatly, and safety increases. The value of the vessels will increase as a longer vessel lend themselves to uses outside of salmon. Now these boats sit for 11 months of the year which is a real shame. There are lots of fisheries that a 36 or 40 foot vessel could participate in or charter or tourism work offseason to make it possible for a small boat owner to utilize the boat year around. Increased deck space will also make it possible for fishermen to start working on value added processing right on board and increase the ability of those boats to have flooded holds with real good RSW capacity, instead of the token spray systems that most of the fleet has now. The only way to really produce a top quality RSW product is the float the fish in holds filled with chilled sea water—not washing or spraying the fish with cold water.

COMMENT# 57

RECEIVED TIME NOV. 16. 9:13AM

Head and gut product may be an alternative during slower periods of fishing, increasing the revenue for the operator. Everything about the elimination of this 32 foot limit is a plus for the fishery and the crews working in Bristol Bay.

To increase revenue and make the vessels in the bay profitable we need to decrease the number of vessels or the amount of gear fishing. Stacking active permits in one operator's name is a very good way to limit the number of active permits in the fishery which is one problem highlighted in the recent studies by the BBEDC. The current system already allows for vessels to fish an extra 50 fms of gear with a second permit, but not with both permits in one name. This second permit is a cost to the operator which further diminishes profitability in this fishery, which is already marginally profitable for most fishermen some years. Studies have already shown that there are too many permits in the Bristol Bay fishery and this is a very good way to capture the latent permits and prevent them from becoming active in the fishery with 150 fms of gear on vessels. The relative result is that each permit that is stacked eliminates a potential 100 fms of gear from the fishery and it is self capitalized. This is clearly a positive in all respects. The vessels in the fishery will be more profitable and the communities and businesses associated with the salmon fishery will all benefit.

The third proposal concerns the 48 hr penalty imposed for transferring. When you consider that fishing in the bay really occurs over only about a 14 day period of time, a fisherman stuck in an unproductive river faces a potential great loss of income. There should be some mechanism for allowing transfers without a great time penalty to enhance the profitability of the fishery. The 48 hr transfer waiting period does not help the fisherman in any regard. Whereas the catch of the bay is monitored closely and information is available nearly instantaneously to biologists and processors, this waiting period is another outdated regulation. In this era of increasing fuel prices and decreasing fish prices due to a number of factors, the fishery needs to streamline itself so that the fishermen remaining as participants have the best possible chance to succeed. Even a single transfer without a time penalty would greatly increase the likelihood of the fishermen having a profitable year. The more successful fishermen there are every year, the more revenue the boroughs will receive and more funds will be spent improving vessels and taking advantage of value added possibilities.

Sincerely,



Michael Palmgren
Captain F/V Morning Star (148 ft)
Captain/Owner F/V Marissa (32ft)

COMMENT#

57

RECEIVED TIME NOV. 16. 9:13AM

November 15, 2006

Board of Fish
Bristol Bay Fin Fish

RECEIVED
NOV 16 2006
BOARDS

Dear Board Member:

I am having problems down loading the proposals so I don't know which number to refer to in this letter to you.

I support either completely throwing away the allocation or use alternating tides. Alternating tides worked great in the past. The allocation is not fair or equal. This has been a real hardship for the set net fishery. Totally unfair and I strongly suggest throwing it out all together and using alternating tides. This is the number one concern for all set net fishermen.

I support set net fishing in the Naknek River Special Harvest area. This is a much safer fishery for the set net group and the fish are so much fresher when sold. With Tenders in the river we can deliver our fish within a half hour of taking them out of the net, and they are not smashed in the boat holds. This makes for better quality fish and that is our goal. Fish caught by set net fisherman are the best quality fish in the Bay.

I support allowing fisherman to have two Limited Entry Permits in their name. Those of us who really love the fishing and intend to stay in fishing would benefit from having two permits in our name. This would be good for both gear types. I don't see any reason why this would not be allowed.

I do not support lengthening the drift boats. They are big enough for the bay. Several years ago fisherman had to cut the noses off their boats, it wouldn't make any sense to let them now have larger boats. If the drift fleet would tender their fish more often, they would have a better quality of fish.

Thanks for readying my comments.

Barbara Blanc
801-607-1917

COMMENT #

63

RECEIVED TIME NOV. 15. 6:02PM

**F/V Eternity Inc.
1911 Dolly Varden Cir
Anchorage, Ak. 99516**

Tele:907 644 2918, Cell 907 223 0133, E-mail: gugell@yahoo.com

FAX

Fax #907 465 6094

Attn: BOF Comments

11/16/06

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

Re: Written comments on Proposal # 39, 40, 41, 42, 43, 44, 45, 46, 47

Dear board members:

I support proposal lifting the 32' limit.

Having grown up in Kodiak and being involved in the development of that seine fishery there over the last 50 years, I had the privilege to watch that transformation of the size of the vessels there. In the early 50s, a 37 foot seiners dominated the fishery. By the 60, the need for larger vessel was apparent and the 42 Delta came onto the seine. More bunk space, better cabin space and more packing capacity. By the 70's, the canneries started offering 5 cents for RSW and the need for a let larger vessel yet and vessels of 46 and larger appeared in the fishery. From the 80s, to the presence, the need for real RSW systems became apparent, coupled with need to pack adequate fish and gear, most of The vessels coming into the Kodiak fishery are now 58 feet. At present the quest is to widen the boats to meet the all the needs of now packing your own fish, large RSW systems, potential of processing your own fish and more. The Kodiak seine fleet has Made dramatic steps to meet the need of to days market.

I give this history to share that the 32 foot limit has limited the development and options for Bristol Bay to have made the changes to adjust to the changes taking place in the area of quality, fresh fish, and high end fish.

Reasons to increase the limit:

1. The 32' hardly makes room for an adequate RSW system. The 7.5 ton system installed on 99% of your RSW fleet is inadequate for the task. Dropping the temperature of 20,000 lbs., of sockeye fish to acceptable preferred marketing standards with spray systems, in undersized fish holes, in a reasonable amount of time, just does not happen. To place a 20 ton system on one of these 32 foot boats would require space for
A sizeable generator, an electric boxes, larger chiller, compress, would present

COMMENT#

99

RECEIVED TIME NOV. 16. 2:47PM

**F/V Eternity Inc.
1911 Dolly Varden Cir
Anchorage, Ak. 99516**

Tele:907 644 2918, Cell 907 223 0133, E-mail: gugell@yahoo.com

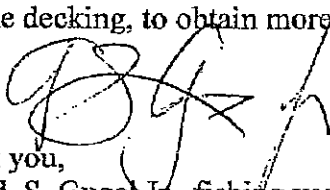
a challenge. The weight from an adequate RSW system would be very counterproductive.

2. The 32 foot vessel is very inefficient in terms of its displacement speed. According to one chart, the displacement speed of a water line of 30 feet at the water line is 7.6 knots. With the great distances presented in the Bristol Bay, the option of traveling against the tide with a load of fish is Not cost effective. Specially, when you calculate in the extreme beam as Fisherman attempt to have enough packing capacity, the vessels tend to be very slow.
3. Tendering your own fish directly to the processor, for best quality over long distance tends not to be an option at 32."
4. Make room for development of the fleet that will meet the demands of an ever changing market.
5. Bristol Bay boats make very poor combination vessels. They are not big enough for bad weather, not efficient enough for long distance, large enough to participate in any most other fisheries and poor value due to their limited nature.

I want to encourage the board to consider no limit, however, if there must be a limit consider 58 feet, however, I think that we should let the market determine the length of the vessel.

The 32 foot limit has been a very costly limitation to the potential of Bristol Bay. It is time for a change.

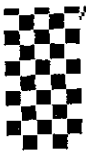
The boot boats came into existence by the fleets attempting to get more space by Double decking, to obtain more room.


Thank you,
Gerold S. Gugel Jr., fishing vessel Eternity

RECEIVED TIME NOV. 16. 2:47PM

COMMENT#

99



(907) 465 6094

RECEIVED
NOV 17 2006
BOARDS

To ADF&G, Boards Support Section

KJ Herman F/V Windward Box 4116 Kodiak, AK 99615

To the Board of Fish; Regarding proposals to the board. There is a proposal to allow 2 permits to be held and fished by one person in Bristol Bay. This proposal will effectively reduce the possible fishing gear available to fish the Bay by 100 fathoms for each permit that is allowed to be stacked by the proposal. I am IN FAVOR of this . I am also IN FAVOR of lengthening the 32 foot limit by at least 4 feet. This allows snubbed nosed boats to become whole again and it allows other boats to become more FUEL EFFICIENT as well as allowing smaller boats the added room to make adding reffridgeration more of a cost effective decision. Many small seiners in Kodiak added on to their sterns in order to make room for RSW units to take advantage of highers prices and to improve fish quality. I forsee a large number of Bristol bay boats doing the same thing. This will help lift the image of Bristol bay fish out of the stone age and will create opportunities for even the smallest of the Bay boats. Relative to new boat construction, stern extensions are cheap. I have yet to hear anyone say they regretted adding on to their boats. RSW is the way of the future . Let's create opportunities for everyone.

I am IN FAVOR of creating a general district fishery to help stretch the season and to allow more fresh fish marketing opportunities. Fresh fish are high dollar fish. It also allows processors a little more lead time for crew training to bring the processors up to speed before the big onslaught of the regular season.

Thank you,
KJ Herman..

[Handwritten signature] 11/17/06

COMMENT# 109

Joseph Faith

BEFORE THE ALASKA BOARD OF FISHERIES

FOR THE DECEMBER 2006 MEETING AT DILLINGHAM

COMMENT

Vessel Specifications

Proposals 39-47

1. Proposals Will Create Race To Overcapitalize Boats And Waste Capital Resources

The 32 foot limit should stay in place. Allowing bigger boats into the fishery will cause overcapitalization of the fishery. Practically everything that has to be replaced or repaired on a bigger boat will cost more (i.e. engine replacement, shafts, props, etc.). Bigger boats will result in more expenses and waste of resources. We should not be figuring out ways to increase expenses for fishing operations. We should be figuring out ways to increase profits, so fishermen have more take-home pay.

Allowing bigger boats would likely set off a race to own bigger boats. To keep up, fishermen will necessarily pay substantial amounts for bigger boats and create more debt, causing more economic distress to the fishery.

On a related subject bigger boats will likely set the wheels in motion for future Board meetings at which the Board will need to reduce the number of permits to another optimum level. The increased expense of bigger boats will not be justified. To justify the higher expense, fishermen with bigger boats will want more fish to pay for them.

2. 32 Footer Almost Always Adequate

The Board should make rules for the general situation, not the exception. 32 foot boats adequately handle every fishing period for almost every fisherman every year. Often times 32 footers are more boat than is needed for the amount of fish caught. One period, maybe two, each year some fishermen could use a bigger boat when they catch a boat load. But the board should not change the policy to accommodate such a limited circumstance. The rest of the year for these fisherman, as well as all other fishermen, the extra space would be useless. It goes back to overcapitalization. Fishermen will be overcapitalized with the bigger boats.

3. Quality Can Already Be Achieved With 32 Footers

Quality can already be achieved with 32 foot boats. The quality problem is not due to the size of a 32 footer. The problem is not utilizing its space correctly. Over filled brailer bags compress fish too much. A single brailer bag filled too much will result in lower quality fish, regardless if it's on a bigger boat. Brailer bags should be filled only to an appropriate level to decrease compressing fish. More brailer bags can be used to accomplish this. If necessary, one brailer bag, with its weight put on hooks instead of the fish below, can be suspended over another brailer bag.

32 foot boats already have RSW and slush ice systems. There should be more. However, the obstacle has little to do with the size of a boat, but rather has everything to do with cost of installation and maintenance.

In my view, the quality problem for drift netters is due to gillnets, long sets, round hauling, over filling brailers, holding fish too long, not cooling fish, fish pumps on tenders, and canning fish.

4. Claim that Fishermen Will Use Bigger Boat For Processing Is Speculation

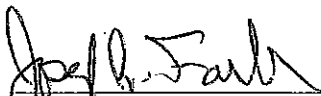
There is also a claim that bigger boats will allow for more on-board processing. How many fishermen is this? Without actual numbers, the Board will simply be speculating and could be making a decision based on something that won't happen much, if at all. Further, nothing is stopping anybody from bringing in a bigger boat now and processing off it. One set net operation on the Nushagak is doing it. Others could do it if they wanted. In other words, the opportunity to process off a bigger boat already exists.

5. Infrastructure Changes in Bay Communities Will Require Time and Money

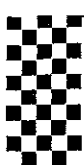
Bigger boats will likely require changes for boat hauling, harboring, and storage in Bay communities. Boat haulers will need bigger trailers. Boat storage spaces will have to be enlarged. Boat harbors could have to create special areas for bigger boats, and might be too small now to accommodate a lot of bigger boats.

I thank you for your time and consideration.

Dated: 11/17/06



Joseph R. Faith
PO Box 1316
Dillingham, AK 99576
Tel. 907-842-1200



Karl Spielman
2609 N. W. Market St.
Seattle, Wa. 98107
SO3T 61964V

Re: Written Comments for Bristol Bay Finfish

November 17, 2006

ADF&G, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Mr. Chairman and Members of the Alaska Board of Fisheries:

I would like to address the proposals for increasing the length limit for vessels fishing in Bristol Bay, which I support. Please allow the fishery to move forward in this aspect and eliminate the vessel length limit as proposed in **Proposals 39 to 42**. If a total repeal is not acceptable, then liberalization to lengths as suggested in **Proposals 43 to 47** is the next best option, **42 feet** being the most rational maximum regulated length, in my opinion.

In the past when ever larger new vessels were constructed it was to increase holding capacities to gain access to a slightly larger sliver of a finite financial "pie". In recent times with shorter openings the amount of gear in the water is by far the biggest factor affecting the catching power of the fleet—not vessel length. It is now within the Board's power, at this meeting, to help progressive fishermen and processors grow the total gross revenues of the fishery, by allowing the Bristol Bay fleet to begin to modernize. This more valuable fishery will spin off benefits for all gear groups and vessel sizes. Quality is now the most essential ingredient to growing that pie. You are all aware of some of these quality measures—bleeding the fish as they come aboard, floating the fish in tanked fish holds of refrigerated sea water, and off-loading them in 500 lb. brailers. All of these production refinements require a more capable, longer vessel to functionally accommodate them. In 2006 Leader Creek Seafoods offered an extra \$.05 per pound for fish delivered to them in 500 lb. brailers. This trend is extending to other "value added" production techniques as well as finished products. Leader Creek's fillet products are becoming widely emulated by other processors. This will eventually divert more of our fish to new products, bound for other countries than the traditional monopolies of Asia. The total value of the fishery (the "pie") will grow over the next ten years if the Board takes steps to modernize our products and the way we produce them. Its imperative that you make this possible.

Some of the attributes of longer vessels are:

Fish Quality—more space to "value add" by not stacking fish, tanking fish holds, bleeding, etc.
Diversification—larger vessels could take advantage of other fisheries or economic opportunities that the current fleet is excluded from. In addition, the future may hold entirely new product forms like a "Frozen-at-Sea" sockeye similar to current troll caught products.
Safety—more stability and room for safety equipment (raft)
Fuel Efficiency—short, fat vessels are not fuel efficient
Greater Economic Value to the Fishery as a Whole—"value adding" aboard requires larger crews, new products (fresh or custom frozen) requires local infrastructure, all participants and local bureaucracies benefit (taxes), from a larger gross dollar fishery through higher ex-vessel prices.

No other gillnet fishery in the State of Alaska has a vessel length limit, and all still include 32 foot long vessels.

Thank you,
Karl Spielman F/V Kindred Spirit

COMMENT# 169