

On-Time Public Comment List

Bristol Bay Finfish

December 2–8, 2015

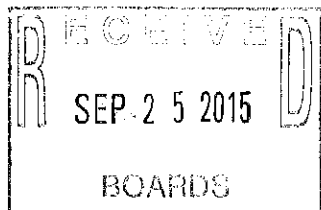
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City of Egegik
P.O. Box 189
Egegik, AK 99579
Phone (907) 233-2400
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September 18, 2015

Dear Board of Fisheries Members,

I am writing at the direction of the Egegik City Council to express their position on a number of proposals that have been submitted to the board that we believe would affect the City of Egegik and its residents.

The proposals that the council are concerned with fall into three categories: proposals that would expand the boundaries of the Egegik Fishing District, or create districts outside, but adjacent to, the current boundaries (Proposals 25 & 26); proposals to change the required drift fleet registration date (Proposals 31, 32, 33, 35, 36, 37, 38 & 41); and a proposal (Proposal 54) that is confusing to us but appears that it would close some, or all, of the Egegik Fishing District for a 5 day period.

Proposal 25: The Egegik City Council is strongly in **opposition** of Proposal 25 for several reasons. We believe that the Ugashik, Egegik and Naknek/Kvichak fishing districts were created and located where they are, at the mouths of the corresponding rivers, in an attempt to harvest the salmon returning to that river and reduce the intercept of salmon migrating towards other rivers as much as possible, and for the most part, do a very good job of doing that. The City of Egegik, the City of Pilot Point, and the Bristol Bay Borough all use their respective fishing district boundaries as their western municipal boundary and all three have local raw fish taxes on the fish harvested within those respective districts. Expanding the districts by creating new district boundary lines outside of the current lines moves the majority of the fishing effort outside of the taxing jurisdictions of all 3 municipalities and creates an expanded fishing area at the mouths of the rivers, and an inevitable increase in the intercept of salmon headed elsewhere. Changing the boundary line does nothing to reduce the "concentrated combat line fishing" as the proposer states, it merely moves that combat fishing to the new boundary line. The proposer also states that ADF&G does not have adequate flexibility in designating district specific openings to maximize the value of the fishery...". ADF&G has total flexibility in designating openings, and all openings are district specific, but the constitutional mandate of ADF&G is the sustainability of the fishery, not the maximization of the value of it.

Proposal 26: The Egegik City Council is strongly in **opposition** of Proposal 26 for primarily the same reasons as Proposal 25. Once these two new districts were open we believe that fishermen would claim that 100% of their harvest would be in these two districts since they would be outside of the taxing jurisdictions of the City of Egegik, City of Pilot Point and Bristol Bay Borough and the fishermen would not have to pay a tax on them, and we believe that is the primary reason for this proposal. The City of Egegik, City of Pilot Point and Bristol Bay Borough all experience huge increases in population during the salmon fishing season and all



three have instituted raw fish taxes as the only method we have to pay for the infrastructure that is required to accommodate these large increases in population.

Proposals 31, 32, 35 & 41: These proposals all propose more or less the same thing, eliminating the June 25th drift fleet registration date and requiring drift fleet fishermen to register in a district prior to fishing in that district. The Egegik City Council is strongly in **support** of these proposals for the reasons outlined in the proposals.

Proposal 34: The Egegik City Council is strongly in **opposition** to Proposal 34. Reducing the waiting period from 48 hours to 12 hours would create a migratory fishing fleet that would be free to move from district to district almost at will for the entire season. Many of the ADF&G Emergency Order opening announcements are announced for fishing periods more than 12 hours after the announcement is made. If ADF&G announces a closure in a district the fisherman happens to be in, and an opening in another district, the fisherman could register in the new district and be there fishing the next tide. Many of the reasons for not having a migratory fishing fleet are outlined in Proposals 31, 32, 33, 35, 36 & 41.

Proposal 54: The Egegik City Council is in **opposition** to Proposal 54 for several reasons, the first being that it is unclear to us what the proposal is even proposing other than some sort of 5 day closure of some, or all, of the Egegik Fishing District “during a 5 day period when the interception of sockeye stocks migrating through the Egegik District are the highest”. We do not believe that there is a significant intercept issue in the Egegik Fishing District and it is clear in the WASSIP report, which the proposer cites, that there are fish being intercepted in all three of the eastern Bristol Bay districts. The proposer states that according to the report that Ugashik fish are being intercepted in Egegik. This is true, according to the study, there were an estimated 1,185,986 Ugashik fish that were harvested in the Egegik Fishing District during the 3 years of the study (2006, 2007 & 2008). The proposer fails to disclose in the proposal that the same study shows that there were an estimated 1,580,291 Egegik fish that were harvested in Ugashik, a net 394,305 fish for Ugashik, not Egegik. The WASSIP report shows that the Egegik intercept of Ugashik and Naknek/Kvichak fish is spread throughout the entire fishing season and the run timing is different every year. We believe that even if there was a significant intercept issue, which we don’t believe there is, that it would be impossible to predetermine the “5 day period when the interception of sockeye stocks migrating through the Egegik District are the highest”, and even if one could predetermine when that was going to occur that the overall effect of eliminating the intercept for those 5 days would be minimal and in no way would the benefit of the closure exceed the harm it would do to the Egegik Fishing district.

We appreciate your consideration of our comments and we thank you for your service and all the hard work you do to benefit Alaska’s fisheries.

Sincerely,

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

Don Strand
City Administrator



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
I.A.2 (AKRO-RNR)

OCT 26 2015

Mr. Tom Kluberton, Chairman
ATTN: Alaska Board of Fisheries, Board Supports Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Kluberton:

Please accept these comments from the National Park Service (NPS) for proposals # 78 and #83 for the Alaska Board of Fisheries Bristol Bay Finfish meeting in December 2-9, 2015 in Anchorage, Alaska. These proposals have the potential to affect fishing in Katmai National Park and Lake Clark National Park and Preserve, respectively. We share with you the desire to implement a sound management strategy for the fishery resources of these areas.

Proposal 78 requests changing the boundaries, methods of harvest, and seasons for the harvest of spawned out sockeye salmon, traditionally called "red fish", in the Naknek River drainage within the Katmai National Park and Preserve. If adopted, the proposal would allow the use of beach seines in addition to existing gear types, expand the area open to harvest to include Idavain Creek, and add a separate season for Brooks River. This proposal was submitted by the Bristol Bay Regional Subsistence Advisory Council.

NPS Position/Recommended Action: Support with modification. The NPS supports this proposal but recommends including a definition of beach seine that parallels the currently authorized 25 fathom length and additionally recommends placing restrictions on the mesh size at a maximum 3-inches to reduce injury to released fish.

Proposal 83 seeks exemption to the current "no chumming" sport fishery regulation by allowing the harvest of non-salmon fish in the fresh waters of the Bristol Bay Area where bait is not allowed with the exception of River Miles 1 – 22 of the Newhalen River.

NPS Position/Recommended Action: Take no action. Current State of Alaska regulations prohibit the practice of chumming in the Bristol Bay sport fisheries. This regulation was clarified on the record at the 2012 Bristol Bay Board of Fisheries during deliberations on Proposal 4. Additionally, chumming is prohibited by NPS regulations and offenders have been successfully cited and prosecuted by Federal law enforcement officers in the Bristol Bay region. This activity should not be allowed within the boundaries of the Lake Clark National Park and Preserve, Katmai National Park and Preserve, and the Alagnak Wild River corridor. If adopted, the proposal could be modified to limit chumming to areas outside of NPS jurisdiction around Sixmile Lake and Iliamna Lake.



If you have any questions about these comments, please contact Bud Rice, Management Biologist (907-644-3597), Troy Hamon, Chief of Natural Resources Management at Katmai National Park and Preserve (907-246-2121), or Dan Young, Acting Chief of Natural Resources Management at Lake Clark National Park and Preserve (907-644-3629 or 907-781-3018). Our analysis is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Debora Cooper".

Debora Cooper
Associate Regional Director for Resources

Enclosure

cc:

Sam Cotten, Commissioner, ADF&G
Charlie Swanton, Deputy Commissioner ADF&G
Michael Johnson, Special Assistant to the Secretary for Alaska
Tim Towarak, Chair, Federal Subsistence Board
Glen Haight, Executive Director, Boards of Fish and Game
Scott Kelly, Director Commercial Fisheries Division ADF&G
Tom Brookover, Director, Division of Sport Fish, ADF&G
Hazel Nelson, Director, Division of Subsistence, ADF&G
Drew Crawford, Federal Subsistence Liaison Team, ADF&G
Diane Chung, Superintendent, Katmai National Park and Preserve
Margaret Goodro, Superintendent, Lake Clark National Park and Preserve
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Herbert Frost, Regional Director, National Park Service



DEPARTMENT OF THE INTERIOR
National Park Service Analysis of BOF Proposals #78 and #83

State of Alaska
Board of Fisheries Meeting
December 2-9, 2015
Anchorage, Alaska

Proposal 78 requests changing the boundaries, methods of harvest, and seasons for the harvest of spawned out sockeye salmon, traditionally called “red fish”, in the Naknek River drainage within the Katmai Park. The proposal requests allowing the use of beach seines in addition to existing gear types, expanding the area open to harvest to include Idavain Creek, and adding a separate season for Brooks River. This proposal was submitted by the Bristol Bay Regional Subsistence Advisory Council.

Existing State Regulations:

5 AAC 01.320. Lawful gear and gear specifications

(b)(2) from August 30 through September 30, by spear, dip net, and gillnet along a 100 yard length of the west shore of Naknek Lake near the outlet to the Naknek River as marked by ADF&G regulatory markers;

(3) from August 15 through September 15, by spear, dip net, and gillnet at Johnny's Lake on the northwestern side of Naknek Lake;

(4) from October 1 through November 15, by spear, dip net, and gillnet at the mouth of Brooks River at Naknek Lake;

(5) at locations and times specified in (2) - (4) of this subsection,

(A) gillnets may not exceed five fathoms in length and may not be anchored or tied to a stake or peg;

(B) the permit holder must be present at the net while the net is being fished;

And

(c)(3) beach seines may not exceed 25 fathoms in length



Existing Federal Regulations:

36 CFR §13.1204 Traditional red fish fishery.

Local residents who are descendants of Katmai residents who lived in the Naknek Lake and River Drainage will be authorized, in accordance with State fishing regulations or conditions established by the Superintendent, to continue their traditional fishery for red fish (spawned-out sockeye salmon that have no significant commercial value).

Proposed State Regulations:

5 AAC 01.320. Lawful gear and gear specifications

(2) from August 30 through [September 30] December 31, by spear, dip net, beach seine, and gillnet along a 100 yard length of the west shore of Naknek Lake near the outlet to the Naknek River as marked by ADF&G regulatory markers;

(3) from August 15 through September 15, by spear, dip net, beach seine, and gillnet at Johnny's Lake on the northwestern side of Naknek Lake;

(4) from [October 1] September 18 through [November 15] December 31, by spear, dip net, and gillnet at the mouth of Brooks River at Naknek Lake;

(5) from August 30 through December 31 by spear, dip net, beach seine, and gillnet at the outlet of Idavain Creek on the north side of Naknek Lake;

[(5)] (6) at locations and times specified in (2) – [(4)] (5) of this subsection,

(A) gillnets may not exceed five fathoms in length and may not be anchored or tied to a stake or peg;

(B) the permit holder must be present at the net while the net is being fished;

(C) a beach seine may not exceed 25 fathoms in length or 100 meshes in depth. Seine mesh size may not exceed three inches stretched measure.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impacts to Federal subsistence users/fisheries: Adoption of this proposal would increase the area and season length as well as authorize an additional gear type to target red fish in the Naknek Lake drainage. Though this fishery is not categorized as a subsistence fishery within the boundaries of Katmai National Park and is not governed by the Alaska National Interest Lands Conservation Act and federal subsistence regulations at 50 CFR Part 100, park-specific regulations at 36 CFR §13.1204 restrict the fishery to “local residents who are the descendants of Katmai residents who lived in the Naknek Lake and River Drainage.” Many of the descendants live in rural Alaska and are Federally-qualified subsistence users. Adoption of this proposal would liberalize this fishery by creating more opportunity and allowing a gear type that allows users to be more selective in which red fish they wanted to retain. Though the regulations governing this fishery are in State of Alaska subsistence regulation and subsistence permits are issued by the State of Alaska, the fishery is managed by the Katmai National Park and Preserve



Superintendent. The park authorizes participation to local residents who are descendants of Katmai residents who lived in the Naknek Lake and River Drainage.

Participation and harvest has been limited in recent years. From the inception of this fishery to the present, very few qualified users have harvested red fish under these regulations. Users find these fish have a lower oil content than fresh salmon and they preserve longer and contain a delicate flavor.

NPS Position/Recommended Action: Support with modification. The National Park Service supports this proposal but recommends including a definition of beach seine that parallels the currently authorized 25 fathom length and additionally recommends placing restrictions on the mesh size at a maximum 3-inches to reduce injury to released fish.

Proposal 83 seeks an exemption to the current “no chumming” sport fishery regulation to allow the harvest of non-salmon fish in the fresh waters of the Bristol Bay Area where bait is not allowed with the exception of River Miles 1 – 22 of the Newhalen River.

Proposed State Regulation

5 AAC 67.022 (k) is amended to read:

(k) In the fresh waters of the Bristol Bay Area where the use of bait is not allowed as described in 5 AAC 01.325(c), (only including the Newhalen River from Mile 1 to 22), a person may not apply to fishing gear or place in the water any substance for the purpose of attracting fish by scent, including

- (1) fish eggs in any form;*
- (2) natural or preserved animal, fish, fish oil, shellfish, or insect parts;*
- (3) natural or processed vegetable matter; and*
- (4) natural or synthetic chemicals..*

Existing State Regulations

5 AAC 67.022 Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area

(k) In the fresh waters of the Bristol Bay Area where the use of bait is not allowed, a person may not apply to fishing gear or place in the water any substance for the purpose of attracting fish by scent, including

- (1) fish eggs in any form;*
- (2) natural or preserved animal, fish, fish oil, shellfish, or insect parts;*
- (3) natural or processed vegetable matter; and*
- (4) natural or synthetic chemicals.*



Existing Federal Regulations

Federal Subsistence Regulations

50 CFR § 100.27 Subsistence taking of fish:

(b) Methods, means, and general restrictions.

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

All twenty legal types of gear including

(xix) A rod and reel

(e) (5) Bristol Bay Area

(vii) Outside the boundaries of any district, unless otherwise specified, you may take salmon by set gillnet only.

(xvii) You may take rainbow trout only by rod and reel or jigging gear. Rainbow trout daily harvest and possession limits are two per day/two in possession with no size limit from April 10 through October 31 and five per day/five in possession with no size limit from November 1 through April 9.

50 CFR §100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

National Park Service Applicable Law and Regulation

The Alaska National Interest Lands Conservation Act of 1980 (ANILCA) Section 201(7) states:

- (a) Lake Clark National Park ... shall be managed to ... protect the watershed necessary for perpetuation of the red salmon fishery in Bristol Bay ; ... and to protect habitat for and populations of fish and wildlife”*
- (b) No lands conveyed to the Nondalton Village Corporation shall be considered to be within the boundaries of the park or preserve....”*

ANILCA Section 202(2) establishes Katmai National Park and Preserve: “...To protect habitat for, and populations of, fish and wildlife, including, but not limited to, high concentrations of brown/grizzly bears and their denning areas; to maintain unimpaired the water habitat for significant salmon populations.



ANILCA Section 603 added a portion of the Alagnak River west of Katmai National Park and Preserve to the Wild and Scenic River System to be managed by the National Park Service for the Secretary of the Interior.

The attached map shows the area of primary interest with salmon set net sites adjacent to Six Mile Lake above its outlet into the Newhalen River and outside the park boundary. Pursuant to ANILCA, this set net area is not within the boundary of the park or preserve.

The applicability and scope of the compendium is articulated in 36 CFR Sections 1.2 and 13.2, and 43 CFR Section 36.1

PART 2. RESOURCE PROTECTION, PUBLIC USE AND RECREATION

36 CFR 2.3(d)(2) Fresh waters designated as open to bait fishing with live or dead minnows or other bait fish, amphibians, nonpreserved fish eggs or fish roe.

No waters are designated as open to fishing with the types of bait identified above. Other types of bait may be used in accordance with state law. Subsistence fishing by federally qualified rural residents is allowed in accordance with 36 CFR part 13 and 50 CFR part 100.

A National Park Service regulation prohibiting chumming is applicable in Lake Clark and Katmai National Park and Preserve and all other waters in the Bristol Bay Area within National Park System units.

36 CFR 2.3(d)(3) The following are prohibited:

(3) Chumming or placing preserved or fresh fish eggs, fish roe, food, fish parts, chemicals, or other foreign substances in fresh waters for the purpose of feeding or attracting fish in order that they may be taken.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Adoption of this proposal would authorize Federally-qualified subsistence users, who choose to use a rod and reel and fish under Federal subsistence fishing regulations, to harvest fish other than salmon near areas where attractants are deposited intentionally or unintentionally. Adoption of this proposal could improve efficiency of Federal subsistence users when targeting non salmon species in waters under Federal subsistence fisheries jurisdiction.

50 CFR §100.14 (a) indicates the lack of a specific Federal regulation, so State of Alaska regulations apply. Currently, no Federal subsistence regulations exist that authorize or prohibit the use of a rod and reel near attractants in waters where the use of bait is prohibited by State regulation. If this proposal is adopted as written, the practice would be authorized throughout the Bristol Bay region, including all waters under Federal subsistence fisheries jurisdiction, with the exception of river miles 1-22 of the



Newhalen River. The attached figure 1 shows the primary area of concern, though the proponents also request the practice for areas around Lake Iliamna.

NPS Position/Recommended Action: **Take no action**, current State of Alaska regulations prohibit the practice of chumming in the Bristol Bay sport fisheries. This regulation was clarified on the record at the 2012 Bristol Bay Board of Fisheries during deliberations on Proposal 4. Additionally, chumming is prohibited by National Park Service regulations as cited above and offenders have been successfully cited and prosecuted by Federal law enforcement officers in the Bristol Bay region. This activity should not be allowed within the boundaries of the Lake Clark National Park and Preserve, Katmai National Park and Preserve, and the Alagnak Wild River corridor. If adopted, the proposal could be modified to limit chumming to areas outside of National Park Service jurisdiction around Sixmile Lake and Iliamna Lake.

Figure 1. Six Mile Lake. Nondalton Village is on the west side of the lake. Yellow circles indicate salmon set net sites near the outlet of Six Mile Lake into the Newhalen River. The green line indicates the boundary of Lake Clark National Park and Preserve.





November 2, 2015

Dear Board,

I support the position presented proposal 29 - 5 AAC 06.335, because it would result in more effective fishing, safer operation for fishermen. It would be optimal to remove limitations on spaces between the 50 fathom set net site (seaward on the single-site line) to create spaces along the running line for the small skiffs to safely get under the net.

Thank you for your time and willingness to discuss this matter.

Sincerely,

Krystal Foote
Permit Holder, Kvichak district



KING SALMON, ALASKA



PC 04
1 of 1

November 11, 2015

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



RE: Proposal 87

Dear Members of the Board,

PROPOSAL 87 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay area. Eliminate the use of egg-simulating lures in rainbow trout fishing, as follows: 5 AAC 67.022(d) is amended to read: 70 Only unbaited, single-hook artificial lures excluding plastic, rubber, neoprene, fiber, or any other material that simulates a fish egg or egg cluster may be used year round.

What is the issue you would like the board to address and why? Hook injury and mortality due to the use of egg simulator lures is causing excessive harm to rainbow trout populations catch and release techniques attempted by inexperienced fishermen are generally not effective especially younger age class fish. This would constitute a conservation measure. PROPOSED BY: Joe Klutsch (HQ-F15-075)

End.

I believe this proposal to be too-far reaching, difficult to enforce and not true in my experience.

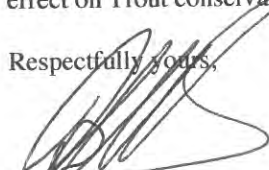
In 28 seasons of guiding in the Bristol Bay Area; from 100 miles west of Dillingham to 100 miles east of King Salmon; I have witnessed rises and falls of Rainbow Trout populations, crashes in Rainbow Trout age-classes (large fish disappearing, being replaced by small fish, then steady growth of those fish into large classes then the cycle repeating over several years) eclipses of Rainbow Trout populations by Arctic Char within a fishery and vice-versa. Most of the places I have witnessed these phenomena's are fisheries with high sport fishing pressures, while some are not. While some fish certainly DO suffer from hook mortality and poor handling, I am constantly amazed at how fisheries can consistently sustain the pressure they do while producing the abundances they do. I believe there are greater natural forces at work influencing Rainbow Trout abundance than, literally, the individual hands of man.

One thing I know for sure in 28 years is that hook mortality by fish taken on pegged-bead fishing methods is far, far less than fish taken on flies that imitate eggs. Flies that imitate eggs, if only by color and not by shape, would again take the place of the materials and methods mentioned in the proposal if the proposal were to pass. Enforcement of the proposed would be difficult. What would or would not constitute and egg imitation?

If egg imitating lures were prohibited, what would sport fishermen use to catch fish? While the Rainbow Trout of the Western United States, and most of the world, for that matter, eat a varied diet that is largely insect-based, the Alaska Rainbow Trout, due to their unique evolution, has a diet that is almost exclusively based on salmon-generated food sources (eggs, decayed salmon carcasses and juvenile salmon). The reason most sport fishermen use egg-imitating flies is because they work. When Rainbow Trout are eating salmon eggs, they pretty much only eat salmon eggs and ignore everything else. When people are famished, none of us want to eat a salad when plates of the finest meats are being passed.

This proposed law would be a disaster for the guided and recreational sport fishing industry and would not have the intended positive effect on Trout conservation. Please strike it down.

Respectfully yours,

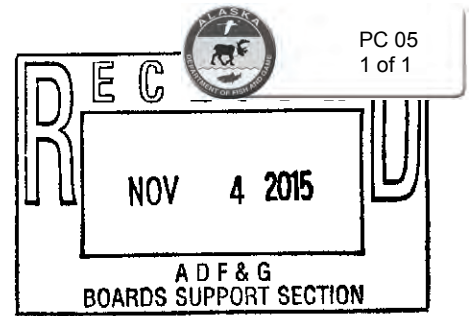

Daniel J. Michels
Owner/operator

P.O. Box 872729 ■ Wasilla, Alaska 99687-2729

(907) 357-3153 (800) 525-3153

info@crystalcreeklodge.com ■ www.crystalcreeklodge.com

Alaska Board of Fisheries
November 3, 2015



My comments will be brief and specific with regards to proposal 59 which I submitted.

On June 26, 2015 I was extremely proud to witness my grandson Preston become a bona fide member of our fishing "Crew". He is the 4th (fourth) generation of Armstrong's to do so since his great-grandfather obtained this site in 1954.

We are here today because our set net sites that we have fished for 55 years and 35 years are outside the district. How can this be?

Thank you for listening,

A handwritten signature in black ink, appearing to read "Curt Armstrong".

Curt Armstrong



Submitted By
Eric Hesselroth
Submitted On
10/25/2015 1:53:09 PM
Affiliation
captain/owner

Phone
425-318-9606
Email
erichesselroth@yahoo.com
Address
1001 Duchess Road
Bothell, Washington 98012

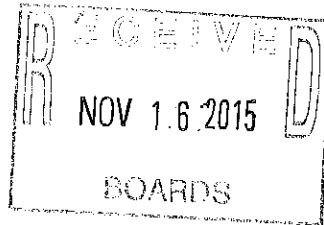
Please do not change the so called "free week" in Bristol Bay .. It gives the fishermen time to fish in any district so they can decide where to register on the 25th of June.. We need this flexibility before we have to commit to a district.. The canneries and processors need these early fish to get their operations up and running..

Also,, if there is a proposal on the 32 foot boat limit.. I am in favor of extending that to 34 feet - 36 feet... This would help fishermen install quality added equipment like RSW to their vessels .. Please Please !!! Thank you.... Eric Hesselroth.. 43 year Bristol Bay fishermen...



John Holman
6218 Beechcraft Cir
Wasilla, Ak 99654
(907) 232-0729

November 12, 2015



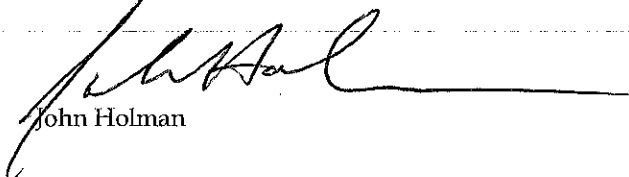
Alaska Department of Fish and Game
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board Members,

I am writing in response to PROPOSAL 87 - 5 AAC 67.022. This seems to be a very far reaching idea that lacks any common sense. Why would an egg imitation cause more or less harm if using a single, un-baited hook? Furthermore, how does this relate to an experience level in an angler?

I am firmly opposed to this proposal and believe it will harm Alaska's fisheries.

Sincerely,



John Holman





Submitted By
Audrey Salmon
Submitted On
10/28/2015 10:06:22 AM
Affiliation
UCIDA

Phone
9072609436

Email
info@ucida.org

Address
43961 K-Beach Rd, Ste E
Soldotna, Alaska 99669

Just an observation:

I did a little research into the number of Cook Inlet commercial permit holders from the Valley (set and drift); the combined number is barely over 100. It makes no sense for the Upper Cook Inlet regulatory meeting to be conducted in a location closer in proximity for 100 permit holders than to have the meeting on the Kenai Peninsula, where over 800 permit holders live year round. These local fishermen should be allowed the opportunity to participate in a meeting that is held for a fishery that takes place in their back yard. Many Kenai Peninsula residents have not attended previous meetings due to financial reasons.

This is also the home of the Kenai and Kasilof Rivers, which are frequented by many local, private anglers.

The resistance of the Board of Fish members to hold the meeting on the Kenai has led to an unprecedented lack of faith and trust in the very people who have been appointed to determine the livelihood of the Cook Inlet salmon fishing industry.

Audrey Salmon



Submitted By
David Hillstrand
Submitted On
11/1/2015 10:27:30 AM
Affiliation
None

Phone
907 399-4444
Email
alaskaseafood@alaska.net
Address
4110 Main street
Homer, Alaska 996093

Alaska Board of Fisheries Members

It is highly encouraged for you to hold your meetings for the directed fisheries in the area were they occur. This is especially true with Cook Inlet!

The Board of fisheries has over time fallen away from the protection and importance that the fisheries means to the communities. Influences from the Majority and Convenience will affect local communities and fishers!

The original intent of the Limited Entry Permit system is to protect the local area communities and permit holders from outside influence, such as from Processors and other political groups of people.

"Limited Entry helped stabilize a source of monetary income to the permit holder in those communities and by preserving the dilution or destruction of that economic base through the influence of large numbers of outsiders."

"The State of Alaska must preserve the economic base in fishing communities, with declining oil revenues, and state subsidies".

"The opening of new fisheries without limits on outside competition holds the potential for degradation of the resource or loss of value of the resource to more heavily capitalized competitors. further the need to preserve a commercial resource from over exploitation requires the application of restrictive management systems from state or federal agencies".

These are conversations that took place in 1950 to 1977 and should be your concerns today and into the future.

The Commercial Fisheries Entry Commission Statistics show 2014 entry permit holders residence in the fisheries

Cook Inlet Setnet Alaskans held 614 out of the total 735, non-residents held 121. Alaskans local to the fishery held 594 only 20 were not local to the fishery.

Cook Inlet Driftnet Alaskans held 411 out of the total of 569 permits. non-residents held 158. Alaskans local to the fishery held 387, thats only 24 that were not local to the fishery.

You have a chose to make today. You are seeing a little push from not having a place to meet on the scheduled date. You have a Governor encouraging you to meet on the Kenai Peninsula. You have the Limited Entry Law and historical conversations that encourages you to meet in local areas.

Return to the local areas remove as much influence from outside area groups, and besides we have the best hospitality in the world, as well as fishing.

David Hillstrand born in Homer Alaska 1961.



Submitted By
Nick Smeaton
Submitted On
11/5/2015 11:51:49 AM
Affiliation
Com. fisherman

Phone
907-843-1210
Email
nicksmeaton@hotmail.com
Address
3045 Squaw Creek RD.
Dillingham, Alaska 99576

This letter is to the Alaska board of fish.

It is in concern on the Proposal 5AAC 06 (68 69 70)

The (Wood River special harvest area) is a wonderful tool for ADFG and Nushagak fishermen it lets the fisherman in the Nushagak River catch fish. (This is an in river fisheries area.)

1--This Area only opens when the Nushagak River is under escapement and the Wood River is about to go over escapement. With a tool like this the fisherman can have their nets in the water catching fish during the Fishing season. Also it helps with the possibility of over escapements.

2--There is another district in Bristol bay that has a In River fisheries is the Naknek section And it is working for them Very well it is giving the fisherman time with their nets in the water.

3--With it closed the fisherman will have to stop fishing to let the Nushagak River catch up and then Wood River possibly get over escapement.

4-- This fishing area has worked in the past and will work into the future.

5--The ADFG fish biologist should have this tool for a way to get fishing time for the Nushagak fisherman.

6--ADFG's job is to get the escapements and to give the fisherman the most time they can to catch fish.

7--Without this we will be anchored up and not catching any fish.

With this knowledge now on the wood river special harvest area I hope that you vote to keep the in river fisheries tools, and help the Nushagak fisherman.

Thank you very much on this matter.

Sincerely;

Nick Smeaton
PO Box 1205 Dillingham Alaska 99576
PH # 907-843-1210



Submitted By
Omar Keval
Submitted On
11/10/2015 3:37:55 PM
Affiliation

I support Proposal 51: Regarding the stacking of drift permits allowing one person to own two permits in his or her name.



Submitted By
Dwight Kramer
Submitted On
11/11/2015 8:18:20 AM
Affiliation
Kenai Area Fisherman's Coalition

~~Dear Board Members,

In August 2014 we submitted a letter to you outlining reasons why we felt it was important to hold the 2017 UCI meeting in the Kenai / Soldotna area. We have long advocated for the Board to consider a method of fairness whereby the meetings would be alternated between the Anchorage / MATSU area and the Kenai / Soldotna area. This would provide fairness to users in both geographic locations that wish to participate. We are encouraged that you are considering this concept with further discussion slated for sometime during your upcoming December meeting.

By continuing to hold the UCI meeting in Anchorage you are precluding a large segment of the Kenai Peninsula fishing community from attending and participating. This would be private anglers, personal use and subsistence users who have no commercial interests in the outcome but do have concerns about opportunity, access and the sustainability of our resources for the long term. Unlike the guide industry and commercial fishing attendees, these folks cannot write off their travel expenses as a part of doing business. They have to bare the total financial burden on themselves and that is why you have seen very few of these folks at past UCI meetings. It could easily cost \$500 - \$1,000 for an individual just to participate through the testimony and committee stages to support proposals that are important to them. This financial burden alone creates an unfair system for non-commercial users.

Some Board members continue to assert that the Anchorage venue offers a "Central" or "Neutral" location. Central in what way? Anchorage / MATSU folks that can easily commute from their homes on a daily basis, but it's not so central for folks from the Kenai Peninsula that must drive over a mountain pass in winter conditions and bare the expenses of travel, lodging and meals for the opportunity to participate in the process. Still roughly 90% of UCI meeting attendees, after the public comment period, are from the Peninsula because this is where most of the fisheries take place and this is where 80 – 85% of the proposals are relative to. Neutral in what way and why? The Board is mandated to hold its meetings in locations most appropriate to the fisheries under consideration, however, that has not occurred in nearly 20 years of UCI meetings. By purposefully and repeatedly holding the UCI meetings in Anchorage you disenfranchise many who live nearest the fishery and will be most affected by the outcomes of your decisions.

Furthermore, why is it a BOF consideration to hold every other LCI meeting in Homer to accommodate local access to the process, but the same principal does not apply to the Kenai area? Prior to the 2005 meeting, our local legislators requested a price comparison for holding a meeting in the Kenai / Soldotna area versus Anchorage. Because of lower lodging and meeting room costs in the Kenai / Soldotna area the price was comparable. Since then additional hotels, stores and restaurants have been built and provide plenty of comfort and accessibility for Board members, participants and agency folks.

The idea of the BOF holding periodic UCI meetings in the Kenai / Soldotna area has wide based support including Governor Walker, all Peninsula legislator, the Kenai Peninsula Borough, all municipalities, native organizations and all of our AC's up and down the Peninsula. Additionally, all Kenai area commercial fishing organizations and private angler sport fishing groups agree that it is important to once again hold meetings in the Kenai / Soldotna area where their constituents can afford to attend and participate. It hardly seems fair that Kenai Peninsula residents are the only ones asked to shoulder such a financial burden simply to participate in a process that directly affects their fisheries and community.

We would encourage you to support an alternating UCI meeting schedule starting with the 2017 meeting being held in the Kenai / Soldotna area.

On behalf of private resource users from the Kenai Peninsula we would like to thank you for consideration in this matter.

Respectfully Submitted,

Ed Schmitt – Chairman
Kenai Area Fisherman's Coalition



Submitted By

Eric Marble

Submitted On

11/11/2015 4:38:02 PM

Affiliation

Permit holder and owner/skipper of FV Sally Jean II

Phone

3603914155

Email

Eric.marble@ymail.com

Address

11278 Sahalie Rd

La Conner, Washington 98257

Please allow us to stack permits in one individuals name. It will take nets out of the water and make our permits more valuable. Better for everybody in the fishery.



Submitted By
Luke Gardner
Submitted On
11/11/2015 11:55:58 PM
Affiliation
Fisher

Proposals 51, and 52 are spot on. One issue that has not been raised is that permits are being used two at once by one person at present with great risk. This is how, the primary fisher will purchase a second permit on a handshake deal with a crewmate or otherwise, under a non binding agreement that the permit will be used as the primary fisher sees fit... on his vessel. All too often disagreement arises between the two and the permit travels out of control of the person who paid for it, and it is thus stolen from the primary fisher with no recourse. I have heard 3 of these instances just in the past 2 years. Another less risky way for an individual to manage two permits at once, is to do the same with another under a medical transfer for one year. I just ask ADFG to please eliminate not only the hustle, but also the risk involved with managing two permits from one vessel by one individual. Current regulation creates inherently a violation of primary boat code, "there can be only one captain". please allow one person to own and operate two permits aboard one vessel without the hassle.



Submitted By
KIM HAGER
Submitted On
11/12/2015 10:39:53 AM
Affiliation
k-b

Phone
9074243694
Email
khfish@gmail.com
Address
box1552
CORDOVA, Alaska 99574

Proposals 51-52 I am a 40 year fisherman of alaska p.w.s. an b.b. an I fully support these proposals. I beleive the nature of gear stacking was to reduce the amount of gear being fished in Bristol Bay an not to have to skippers on one vessel. The gear has been reduced an now is the time to refine gear stacking. In my case I own a permit an so does my son. I am disabled an at the end of med. transfers an will be asked to sell permit or fish it. It's been my hope to turn permit over to son to fish an help with fishing vessel payments an expences. Fishing is not an option for me any more but paying off upgrade an a new engine loans are a fact or life.



Submitted By
Karen McGahan
Submitted On
11/5/2015 11:17:05 PM
Affiliation

I would appreciate the Board of Fish meeting in the central Kenai Peninsula area for their Upper Cook Inlet meeting in 2017. I have attended the BOF meetings in Anchorage but it's expensive and I haven't been able to stay for the entire slate of meetings. It would be great to be able to attend all the meetings. The Kenai/Soldotna area has good accommodations.

Thank you for considering my comments.



Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:14:53 AM
Affiliation

Phone
4258709104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth PI
Everett, Washington 98203

I support Proposal 24. This will help managers in Bristol Bay meeting escapement and harvest goals to keep our fishery sustainable.

Thank You,
Peter Arnestad

Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:20:41 AM
Affiliation
Phone
4258709104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth PI
Everett, Washington 98203

Please pass proposals 25 and 26 as we have invested in improving quality. Increased prices for our fish would benefit local economies.

Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:07:05 AM
Affiliation
Phone
425-870-9104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth PI
Everett, Washington 98203

I support proposals 51 and 52. Permit stacking would benefit the fishery by reducing the amount of gear in the water, fleet size and improve safety. This would benefit all permit holders stacked or non stacked buy reducing gear and boats. Please implement these proposals into action.

Thank you,
Peter Arnestad



Submitted By
David Vardy
Submitted On
11/9/2015 6:47:07 PM
Affiliation
S03T Gillnet Permit Holder

Proposal 52 -- 5 AAC 06.333

I **strongly support** proposal 52 as written by Abe Williams.

This proposal certainly would serve to bring the fishery closer to the Optimum Number Study. With more D boats and less gear in the water, fisheries intercept becomes less of a problem and line fishing would become less congested (These are things everyone wants-- even opponents of the proposal).

Under the current regulation 5 AAC 06.333, permit stacking is only allowed for two separate individual permit holders on drift gillnet vessels. In 2009, BOF (2009) Passed 5-1 for setnet permit stacking 5 AAC 06.333(f) with no optimum number study. The Optimum Number Study was released October 11, 2005. It has been over 10 years and it is time to make some sort of progress even if that means adopting proposal 52 on a trial basis. Allow this proposal to benefit our fishery.

Thank you.

Submitted By
David Vardy
Submitted On
11/10/2015 10:55:01 AM
Affiliation
S03T Gillnet Permit Holder

I support Proposal 51 as it is written.

One individual has the right to own 2 S03T Drift permits under the current rules yet they cannot fish them both at the same time. The board holds the authority to allow permit holders to fish 2 permits on the same vessel under individual ownership. Permit stacking is the only method currently available to progress the fishery towards the Optimum Number Study. The sooner this is realized and adopted by the board, the sooner this fishery and everyone involved will benefit from it.



Submitted By
Joel Ludwig
Submitted On
11/5/2015 12:46:53 PM
Affiliation

Phone
4258700747

Email
jludwig581@gmail.com

Address
4018 226th PL NE
Arlington, Washington 98223

I support proposals 25 & 26. These are good proposals for the board to pass. As harvesters, we have made investments in quality, and we also need management to assist us in this venture. This will increase quality and ex vessel prices, which will increase the tax base for the local boroughs and economies. Thank you,

Joel Ludwig

I support proposal 24. Area M's indiscriminate interception of Bristol Bay-bound salmon negatively affects Bristol Bay harvest and escapement. ADF&G has recognized intercept fisheries as dangerous to the sustainability of fish stocks. Area M fisheries intercepting Bristol Bay stocks is in violation of such mandatory efforts. Passage of this proposal will support Bristol Bay managers in meeting optimum escapement and harvest goals.

Thank you,
Joel Ludwig

I support proposals 51 & 52, It's time for permit stacking to be passed by the board. These proposals will benefit the fishery by reducing the amount of gear in the water, reduce fleet size for managers to better manage fish openings and provide more fishing time because of a reduced fleet size. Passage will improve harvest methods for improved quality of fish and ex vessel pricing. Reduced fleet size will make for a safer fishery. Please pass these proposals, so that we won't have to be subjected to a expensive fleet reduction buy back program that is in the works. This can be done at the board process for free. Alaska State Legislature and CFEC has already paved the way for this to be implemented.

Thank You Joel Ludwig



Date: October 9, 2015

Addressee: Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
fax (907) 465-6094

Hello Glen,

I am writing to request the 2017 Upper Cook Inlet Board of Fisheries meeting be held in Kenai/Soldotna. The Board has not met here since 1999 and by now you have probably been filled in on the history, KRSA .It is my understanding that the City of Kenai/Rick Koch have offered over \$60,000 in accommodations in the form of a facility, ground transportation, coffee etc. With the current budget woes of the state this seems very generous.

Board Member Morisky has called Anchorage a "neutral" location. Nothing could be farther from the truth. The political interests from the Mat-Su swarmed the 2014 meeting in "neutral" Anchorage. A board generated proposal from Board Member Kluberton passed in the last two hours of a two week long meeting to satisfy valley politicians by further restricting the drift fleet.

There has been talk of having board meetings on a rotational basis, Anchorage-Wasilla-Kenai, which I could agree to, after meetings are held in Soldotna for 16 consecutive years. Perhaps by looking at this proposal you can begin to comprehend the frustration felt by Kenai Peninsula Residents. The board process has changed dramatically in the 30 plus years I have served on our local advisory committee. It is my hope that board members can see their way clear to holding the 2017 meeting UCI meeting in Soldotna. That action could be perceived as reaching out and revitalizing a public process. Some of the age-old antagonisms may not disappear but it is time for some bridge building. Thank you for your consideration in this matter.

Sincerely,

John McCombs
Ninilchik, Alaska
[907-567-3334](tel:907-567-3334)

Alaska State Legislature

State Capitol, Room 208
Juneau, Alaska 99801-1182
Phone: 907-465-3779
Fax: 907-465-2833
Toll Free: 800-469-3779



PC 21
1 of 1

Second Floor
Kenai, Alaska 99611
Phone: 907-283-7223
Fax: 907-283-7184

REPRESENTATIVE MIKE CHENAULT SPEAKER OF THE ALASKA STATE HOUSE

November 9, 2015

Alaska Board of Fisheries
Alaska Department of Fish & Game
P.O. Box 115526
Juneau, AK 99811-5526

RE: Board of Fisheries (BOF) 2017 Upper Cook Inlet Finfish Meeting

Tom Kluberton, Chair
John Jensen, Vice Chair
Sue Jeffry
Fritz Johnson

Orville Huntington
Reed Morisky
Bob Mumford

Dear Board of Fisheries,

I'm writing to encourage the Board to consider moving the 2017 Upper Cook Inlet (UCI) Finfish Regulatory Board of Fish (BOF) meeting to the Kenai Peninsula.

The last meeting held on the Kenai Peninsula was in 1999. It makes sense to host a meeting of this nature in our "backyard" where the fishing community works, lives and fishes. Some of my constituents have said they haven't able to attend due to the hardship of traveling to the Anchorage area. Those who have attended spent a considerable amount of their own time, expense and effort yearly. It is essential to offer these important meetings in a realistic location.

The City of Kenai provided excellent examples of facilities, lodging, and services available on the Peninsula in a letter to the BOF dated September 30, 2014. Should you choose a Kenai facility, the city has committed to offering the meeting venue at no cost to the BOF. In these times of financial hardship, this is a winning proposal. Whether you choose Kenai or another city on the Kenai Peninsula, there are facilities and services to accommodate the Board's needs.

Thank you for your consideration of holding the meeting on the Kenai Peninsula and for your commitment to serve on the Board of Fish.

Sincerely,

A handwritten signature in cursive script that reads "Mike Chenault".

Representative Mike Chenault
Speaker of the Alaska House of Representatives

New email: rep.mike.chenault@aklegis.gov

Representative_Mike_Chenault@legis.state.ak.us



550 S. Alaska St., Ste 101, PO Box 45, Palmer, AK 99645
Tel: (907) 745-2880 Fax: (907) 746-4164
www.palmerchamber.org info@palmerchamber.org

November 9, 2015

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

and

Alaska Board of Fisheries Chairman and Members

During the last Board of Fisheries meeting in Anchorage, The Greater Palmer Chamber of Commerce worked diligently to inform, and encourage our membership of issues related to Upper Cook Inlet fishery management that effect commerce in our area.

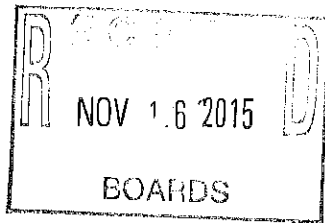
Our Board of Directors would once again like to voice our support of the 2017 Upper Cook Inlet Board of Fisheries meeting being held in Anchorage.

As the Greater Palmer Chamber of Commerce has previously stated, Anchorage provides several convenient transportation and lodging options. It is in geographically the most neutral place when compared with other possible locations. Most importantly, the location should invite and welcome public input and participation. Anchorage fits these needs.

We thank you for the opportunity to voice our concerns and weigh in with our recommendations. We appreciate your tireless efforts and work for the fisheries of Alaska.

Respectfully submitted,

DanaLyn Dalrymple
President
Greater Palmer Chamber of Commerce



Janet Armstrong Schlagel
POB 714
Dillingham, AK 99576
bayair@hughes.net
H. 907-842-2570
C. 907-843-0585

Re: *Board of Fisheries' December 2015 agenda item, Proposal 59, to change the Northern Naknek-Kvichak boundary line (5 AAC 06.350)*

November 11, 2015

Dear Alaska Board of Fisheries' Member:

Five generations of the Armstrong Family have lived and worked in Alaska, starting in the early 1930's. Four generations of my family continue to live and work in Bristol Bay. We are blessed to be able to provide for our families with our natural resources through subsistence and commercial means. We pick berries, smoke and can fish and we hunt birds and big game. We also work very hard at and rely economically on commercial fishing.

The December agenda item that we initiated is Proposal 59, to change the East-side, Northern Naknek-Kvichak line to:

58.52.141 N
157.00.774 W

(See Shore Fishery Plat, Proposed ADF&G Closure Line, Red.)

My family and I would very much appreciate the Board of Fisheries' help with furtherance of our proposal that the latitude-longitude coordinates for the East-side Graveyard boundary line be amended so that our family can resume fishing all three of our set-net sites that we have fished since 1954 and 1981. (See SFP, Site 1/Tract C, Site 2/Tract B and Site 4/Tract A, Armstrong.)

The following history should aid the Board of Fisheries regarding Proposal 59:

- My father, Dick Armstrong, began fishing at Graveyard Point in 1954.
- In 1954 there were no sites between my father and Ray & Pomela O'Niel who fished sites 8 & 9. (See SFP, Site 8/Tract J, Grossi and Site 9/Tract K, Grossi.)



- In 1955 my father brought his friend Lyle Smith to Graveyard Point and together they "staked" four sites. (See SFP, Site 2 Armstrong, Site 3 Smith, Site 4 Armstrong and Site 5 Smith.)
- My brothers, Curt and Ross, started fishing with Dad at Graveyard in 1971.
- My brother, Ross, died in a plane crash in 1978.
- My mom and my sisters and I had always set-netted on South Naknek beach but we moved to Graveyard Point in 1979.
- We established Site 1 in 1981 and fished 50-fathoms of gear inside the ADF&G boundary line. Our latitude/longitude proposal will allow us to fish Site 1 and Site 2 as we have in the past, but will not create room for any site above Site 1. (See SFP Site 1/Tract C, Armstrong.)
- None of the topmost five East-side Graveyard sites has ever been fished by anyone other than an Armstrong or a Smith family member.
- Until 1992 there existed no coordinates for the East-side North Naknek-Kvichak boundary line, the Board of Fisheries' boundary regulation designating the boundary line merely as follows: "a line from Graveyard Point to a point on the opposite shore at 58° 53' 22" N lat., 157° 04' 16" long."
- Unlike the West side which had latitude/longitude coordinates, the East-side had no coordinates. There was a physical marker establishing the East-side boundary line which fell over the bank a long time ago.
- Fish & Game has acknowledged to the Board (1) that in 1992, upon changing from the West-side's Loran C coordinates to latitude/longitude coordinates and again in 2001 using GPS coordinates, about a 1000 foot-to-southward error was made and (2) that the Board of Fisheries should expand the fishing district Northward to rectify that error. (See ADF&G BOF Meeting (Excerpt), March 20, 2014, page 4.)
- Fish & Game's acknowledged West-bank error regarding the 2001 GPS regulation, a mistake that happened even though the West-bank had Loran C coordinates until the 1992 change to latitude/longitude coordinates, makes considerably more apparent the inadvertent mistake concerning the East-side latitude/longitude coordinates.
- A letter dated April 11, 1990 from F&W Protection's Richard Dykema and ADF&G's Don Bill states, "we have noted Mr. Armstrong's set-net sites, and they have always appeared to be in waters open to fishing, South of the ADF&G markers. (See April 11, 1990 Rendi Patterson.)



- Regarding our Armstrong petition to have the East-side Northern Naknek-Kvichak boundary line moved Northward, Fish & Game informed the Board at the Board's March 2015 meeting that "The department is NEUTRAL on considering shoreline erosion to establish new coordinates."

My family has been trying to resolve this issue by working within the State system. We have had discussions with DNR, with ADF&G and with the Troopers. We have attended the ADF&G Board of Fisheries meetings; first the ACR on October 16, 2014, then the March 2015 BOF meeting and we will be at the meeting in December 2015.

We believe that the significant erosion that has taken place at Graveyard Point causing buildings to fall completely over the bluff and graves to wash out to sea is a factor in our sites being lost; however, the lack of surveyed markers and the general confusion by the ADF&G regarding their historical markers is, in my opinion, a more relevant factor hindering a resolution for us. When asked at the October 16, 2014 BOF meeting, "how are the environmental variables out there, are those sites stable as far as environment goes, water, erosion, channel change? the ADF&G staff member responded, "that is also part of the comment is that that area has been eroding and the entire bank has been moving backwards and it further complicated the interpretation of it and, as we kept looking for additional clarity doing additional background research, it just got more confusing and that adds another layer of confusion." (See ADF&G BOF Meeting (Excerpt) October 16, 2014, page 7.)

So it is that no one can say with any certainty, it was there and now it is here and it needs to go back to there.

We are asking you to restore us to fishing our historical sites.

My family and I thank you for adjusting the latitude/longitude coordinates so that four generations of our family can continue to provide for their families.

Sincerely,

Janet Armstrong Schlagel



STEVE COWPER, GOVERNOR

DEPARTMENT OF FISH AND GAME

P.O. BOX 37
KING SALMON, ALASKA 99613-0037

April 11, 1990

Rendi Patterson
Dept. Natural Resources
Div. of Land and Water Mngt.
3601 C Street
Box 107005
Anchorage, AK. 99510-7005

Dear Rendi:

In reference to your inquiring on placement of the regulatory markers near Graveyard on the North East side of the Kvichak River. Don Bill and I have discussed it thoroughly and to the best of our knowledge, this marker has not been moved in at least 10 years. We have noted Mr. Armstrongs set net sites, and they have always appeared to be in waters open to fishing, south of the A.D.F.& G. markers. It appears to us that the surveyors mistook the Coast Guard marker for the A.D.F.& G. marker.

Sincerely,

Richard Dykema
Fish & Wildlife Protection

Don Bill
Alaska Dept. Fish & Game

RECEIVED
APR 19 1990
Subcentral
Fishing Division



ALASKA DEPARTMENT OF FISH AND GAME
BOARD OF FISHERIES MEETING (EXCERPT)
OCTOBER 16, 2014



1 CHAIR: Staff have comments, please.

2 MR. LEWIS: Good morning, Mr. Chairman, members of the
3 Board. My name is Bert Lewis. I'm their regional management
4 coordinator for Bristol Bay and Prince William Sound. ACR
5 No. 11 changed the Naknek-Kvichak District boundary line at
6 Graveyard Point to include two historically-fished setnet
7 sites and this relates to regulation 5 A.A.C. 06.350.

8 Present situation, two historically-fished setnet sites
9 at Graveyard Point are outside of the Naknek-Kvichak district
10 boundary as established by GPS coordinates. The staff comment
11 on this propo -- ACR were based on the possibility that the
12 location of the boundary line may have changed when the
13 location identification method changed from Loran to GPS.

14 The Armstrong's have fished on the boundary line for
15 decades and claim that the change in the way it was defined
16 resulted in the boundary line moving shoreward. There was a
17 pending open citation case related to this ACR and, because of
18 that, the Department is going to defer to Department of Public
19 Safety, Alaska Wildlife Troopers, Mr. Chairman.

20 CHAIR: Defer what to them?

21 MR. LEWIS: Comment.

22 CHAIR: Sergeant, do you have any comments to make on
23 this? I hate to put you on the spot like this but they're not
24 going to give us any assistance at this point so maybe you
25 can.



1 SERGEANT: Mr. Chair, on -- far as the Department is
2 concerned, we know of no changes in this line. It switched in
3 2001 from Loran to GPS and that's what the line's been and
4 that's how we've been enforcing it since 2001 off the GPS
5 coordinates.

6 CHAIR: Can we assume from that comment that the
7 Department of Public Safety believes that these people have
8 been fishing in closed water all these years then?

9 SERGEANT: The Department won't say they have not been
10 fishing in closed, we just haven't observed them until
11 recently. 2012 was the first time. People have been observed
12 above the line and then, as the staff said, 2014, the citation
13 was issued.

14 CHAIR: Well, we'll have to flesh this out among ourselves
15 here I think. Any comments? Mr. -- now Mr. Johnson.

16 MR. JOHNSON: If I were to, by some error, find myself
17 fishing over the line, I think I would get a citation
18 immediately, not to say that that's never happened. The fact
19 that a number of years, at least since 2000 when the line was
20 redefined, no one discovered this supposed error baffles me.
21 That's just a comment. I, you know, haven't drawn any
22 conclusions from that but -- except to say that it would seem
23 that if someone were fishing in closed waters for all these
24 many years, there would have been some indication, you know,
25 prior to now.



1 CHAIR: Mr. Kluberton.

2 MR. KLUBERTON: Thank you, Mr. Chairman. I -- a question
3 for the Department. How long has this site been fished?
4 We're talking about a change from Loran to GPS in 2000
5 whatever but my understanding is that the families fished this
6 same site for some 60 years. Is that correct?

7 MR. LEWIS: There are two sites in question and one has
8 been fished, I believe, since 1954 is what was submitted in
9 part of the ACR documentation and a second site we know that
10 there was a DNR lease application submitted in the eighties.
11 So, yes, they have been fished for a considerable amount of
12 time.

13 MR. KLUBERTON: Okay. So when the Loran line -- there was
14 never a citation issued under the Loran line. Do we know for
15 certain that the GPS coordinates accurately reflect where the
16 Loran line was and that, under the Loran line, these sites
17 were never cited?

18 MR. LEWIS: I feel the need to be cautious here because,
19 as we were having these discussions and making a determination
20 which is actually an opinion about whether the line moved or
21 not, could influence or bias the case when this comes up and
22 in our comment -- for example, additional information -- we
23 state however, changes in how the boundary line is defined
24 unintentionally resulted in changing the location of the
25 boundary line and that is likely an error and something that



1 we cannot stand by because we do not know that and should read
2 how the boundary line is defined may have unintentionally
3 resulted in changing location. So by us taking a position on
4 if it changed during the translation could influence the case
5 and this is where we started being advised to back off of
6 commenting on this.

7 MR. KLUBERTON: So we have no idea what reality is here?

8 MR. LEWIS: That's a deep philosophical question and --

9 MR. KLUBERTON: The Department does not know whether the
10 line was accurately translated?

11 MR. LEWIS: We haven't made a determination on that,
12 correct.

13 CHAIR: I'm confused. You've made a statement and then
14 you say it was incorrect and you've corrected it?

15 MR. LEWIS: Well, it was published and then as we had
16 additional discussions about this ACR, it came to light it was
17 more complicated than we thought and, as we were looking for
18 clarity, it got more confusing and then when we also were
19 informed that we had this open pending case. We were advised
20 to step back from taking a firm stance on where the line is
21 and if it changed --

22 CHAIR: When you made the first statement, did you mean it
23 at the time? Was it an --

24 MR. LEWIS: I would assume --

25 CHAIR: In your opinion, it was an accurate statement or



1 MR. LEWIS: I believe it is under your authority, yes.

2 CHAIR: Okay. Any other comments? Mr. Huntington.

3 MR. HUNTINGTON: Yes, I'm not sure where we're going with
4 this but it seems to me the criteria of unforeseen, how are
5 the environmental variables out there, is -- are those sites
6 stable as far as environment goes, water, erosion, channel
7 change?

8 MR. LEWIS: Through the Chair, that is also part of the
9 comment is that that area has been eroding and the entire bank
10 has been moving backwards and it further complicated the
11 interpretation of it and, as we kept looking for additional
12 clarity doing additional background research, it just got more
13 confusing and that adds another layer of confusion, Mr.
14 Chairman.

15 CHAIR: Mr. Kluberton.

16 MR. KLUBERTON: Yeah, thank you, Mr. Chairman. When I
17 think about this issue moving to court and trying to imagine
18 how might the court resolve it, it occurs to me that I have
19 complete lack of faith that the court's going to dig back, fly
20 a helicopter out there and decide whether this was a mistake
21 or not. The court's going to look at the existing regulation
22 which is expressed in GPS coordinates. They're going to look
23 at the location that the wildlife troopers observed the
24 fishing taking place and render a decision based on those two
25 points. It's not, I believe, the responsibility of the court



November 11, 2015

Dear Board of Fish:

It has been nearly 20 years since the BOF met on the Kenai Peninsula, and it's time to bring the BOF and the important issues it will consider to a region where commercial, sport, personal use and subsistence fishing play vital roles.

On behalf of Cook Inletkeeper's more than 2500 members and supporters around the Cook Inlet watershed, I respectfully request the BOF restore some geographic balance to the BOF meeting process, and meet in Homer, Kenai or Soldotna in 2017.

Very truly yours,

Bob Shavelson
Inletkeeper



Submitted By
Tom Rollman Jr.
Submitted On
11/13/2015 2:51:26 PM
Affiliation

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Proposals 45, 46 & 48 – Reinstate Setnet Permit Stacking - SUPPORT

I am very much in favor of reinstating permit stacking for setnetters in Bristol Bay. The ability for a permit holder to own and operate two permits was in place in Bristol Bay from 2009-2012. This allowed family operations like mine to consolidate and not be forced to constantly transfer permits among family members as well as take the risk of putting permits in crewmembers' names. . It will continue to allow setnetters to be more viable in the face of low prices and processing capacity issues.

Proposals 47 & 49 - Setnet Permit Stacking - Allow 75 fathom nets - OPPOSED

While I support the permit stacking part of this, I am opposed to allowing one permit holder to fish a 75 fathom net. There are very few places (in the Nushagak District anyway) where a 75 fathom net could be fished safely and effectively. It would pit setnetters against one another as the larger net would effectively "cork" a shorter net behind it. There would most likely be other unforeseen consequences from this change. I would rather see setnetters be allowed to have 2 permits in their name and fish 2 50 fathom nets as before.

Proposal 64 - Mandating flood time fishing for Drifters in the Nushagak District – OPPOSED

It is my understanding that Nushagak-bound chinook tend to move into the district on the flood tide and that ADF&G often fishes the drifters on the ebb tide to allow the chinook to move up. Limiting drift fishing time on the flood tide also allows sockeye to move into the district where both gear types can have access to the resource. Fisheries managers should not be restricted in their ability to manage the fishery. The allocation plan is already in place to make sure the catch is equitable.

Proposal 65 – Remove 4 ¾” mesh emergency order tool to protect Nushagak sockeye – OPPOSED

While this Emergency Order tool has never been used in the Nushagak, it should be left on the books as a management tool for the Nushagak biologists.

Proposal 68 – Repeal Wood River Special Harvest Area and Management Plan – OPPOSED

Like proposals 64 and 65, this proposal seeks to remove a management tool that ADF&G has had at its disposal since 1996. The WRSWA has not only been used to protect Nushagak coho late in the season, but also Nushagak sockeye over the years. In 2014 it was used to help harvest excess Wood River sockeye for the first time, allowing fishermen to catch fish that eluded nets in the main district and would have otherwise escaped. This proposal describes the WRSWA fishery as “not fair”, “hard on gear”, and producing “poor quality fish”. These are all very subjective descriptions of a fishery that has allowed many fishermen additional opportunities to catch fish.

Proposal 69 – Change how fishing time in the WRSWA is allocated, add 3:1 ratio – OPPOSED

This proposal seeks to eliminate the 74% drift / 26% setnet allocation in the Wood River Special Harvest Area and change it to the 3 to 1 ratio. As written, whatever gear type is behind in the general district's allocation is allowed to fish in the WRSWA until caught up. This 3 to 1 ratio would always favor the drift fleet and allow them significantly more fishing time over setnetters. Sticking with the original 74/26 split would be much more equitable. Drifters are already allowed 3 times the gear and in both the regular fishing district (150:50) as well as the WRSWA (75:25) How is giving them triple the amount of time to fish in addition even close to being equitable?

Proposal 70 – Repeal 3 to 1 fishing time ratio between gear types in the WRSWA – SUPPORT

The 3 to 1 ratio (drift to setnet) of fishing time in the Wood River Special Harvest Area would always favor the drift fleet. Fishing in the WRSWA is not always consistent and allowing the drifters to fish for triple the amount of time as setnetters is grossly unfair and allocative. Because they have 3 times the gear does not mean they should have 3 times the fishing time! They are already allowed 75 fathoms to the setnetters 25 while in the river. Because this is done in another Special Harvest Area in the Bay, does not make it fair and equitable for use in the Wood River. Proposal 69 seeks to extend this 3:1 ratio to Wood River openings that harvest excess fish as well. See above.



Submitted By
Linda S Vardy
Submitted On
11/14/2015 3:30:27 PM
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Bristol Bay D Permit holder

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I support 51/52. I'm a D permit holder in Bristol Bay. I strongly support proposal 51 / 52. It is very important that the fishery thins out the boat coat and raises the ex-vessel value of the fishery so all fishermen can make a reasonable living fishing in bristol bay. I would prefer the captain or operator hold both permits, making it a safer fishery. This would slightly downsize the fleet, but it takes D permit holder off the boat. Call this the next step in an indirect buy back. Extra net in the water doesn't make anyone a better fisherman, it will make it a safer fishery.



Submitted By
Katie Arnestad
Submitted On
11/14/2015 3:33:16 PM
Affiliation

I support proposals 52 and 52 as they are written. It is too much risk for owners to buy a second permit and put it in an employees name where they could run off and sell it out from under them.



Submitted By
Timothy A Vardy
Submitted On
11/14/2015 3:58:59 PM
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Captain/Owner Bristol Bay Gillnet permit holder

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I'd like Bristol Bay fishery to get close to the optimum permit level where as all Bristol Bay fishermen could benefit, and make a decent living. Stacking the permits gives us more leverage over the processors because there's less boats, which has the potential of driving the price up on the salmon & permits.

This would financially benefit everyone in the fishery, even single permit holders in so many ways. This would complete the stacking process approx 11 years ago.



Submitted By
Erick Sabo
Submitted On
11/15/2015 4:52:49 AM
Affiliation
Mr.

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Goodyear, Arizona 85338

I would like to submit my support for the following proposals being made at this year's Bristol Bay Finfish BOF meetings:

- I support proposals to allow permit stacking, specifically the ability for one person to hold and fish two permits. This should be allowed for both drift and set net permit holders.
- I support proposals to eliminate June 25th as the date to register to fish (blue card). Fishermen should be required to register where they fish regardless of the date.
- I support proposals being made to reduce the transfer time. I believe 48 hours is too long, in that it is a severe penalty in loss of income/fishing opportunity, but I believe 24 hours is more reasonable.

Thank you for your consideration

11/18/15: Boards Support staff confirmed author was commenting on:
Permit stacking (proposals 45,46, 47, 48, 49, 50, 51, 52, & 53)
Elimination of June 25th registration date (proposal 32)
Reduce transfer time (proposal 34)



Submitted By
Nat Coffeen
Submitted On
11/15/2015 7:26:15 AM
Affiliation
Bristol Bay drift permit holder

I oppose ending the D/200 permit stacking option for drift boats. This option is already reducing the number of boats fishing the Bay. I also favor district registration immediately upon a vessel starting the fishing season.



Submitted By
Ivan F. Basargin
Submitted On
11/15/2015 11:45:32 AM
Affiliation

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Permit stacking under one vessel/individual in Bristol Bay drift fishery should be allowed for both economic reasons and consolidation of the fleet, at \$.50 a pound payed out in 2015 and another large run forecasted for 2016, it will be very difficult to pay debts and make a living otherwise.

I hope the board will look into stacking the permits in Bristol Bay salmon fishery more seriously, permit stacking can also be a great benefit to fishermen as opposed to a federal permit buyback program which is circulating in the news today, If permit stacking is allowed, there most likely won't be a federal permit buyback involved with additional tax for fishermen to payoff the buyback loan.

Ivan F Basargin

F/V Top Notch

11/16/15-- Boards Support confirmed with author and this comment is for proposal 52.



Submitted By
Leonard Ferrigno
Submitted On
11/15/2015 2:38:47 PM
Affiliation
Owner of Bristol bay drift permit

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Equal fishing time on the Kvichek River, Between Set and dritnetters. Current regulations giving way more time to the setnetters and not allowing Drift fisherman equal opportunity at stock. It has been shown that the setnetters can not control escapement. I propose equal opportunity for both gear groups.



Submitted By
Bruce Skolnick
Submitted On
11/15/2015 8:29:05 AM
Affiliation

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Propose Stacking of 2 Bristol Bay Drift Permits or Set Net Permits by a single person. A single person may own and operate 2 permits. Stacking of the drift permit may allow an additional 50 Fathoms per vessel. Stacking of set net permits does not increase the amount of gear, set net gear shall remain the same as per permit.

Submitted By
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Propose, Eliminate dropping Blue cards on June 25 and adopt the following. Dropping of blue cards is required before any fishing can be done.

Submitted By
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11/15/2015 8:36:38 AM
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Propose to eliminate the 48 hour transfer time and adopt that the transfer time between districts to a 24 hour wait period.



Submitted By
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Submitted On
11/14/2015 7:52:41 PM
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Permit holder, boat owner, operator

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Please vote YES on proposals 31, 32, 33, 35, 36, 37, 38 & 41, or roll them all into proposal 37 and vote yes to pass proposal 37 repealing the Blue card registration date of June 25. Egegik is the earliest run historically in Bristol Bay with the earliest E.O. period. When 500 boats fish there on an early opening, even at only 2,500 lbs a boat 1 million fish can be taken in 4 openings, often before the counting tower is even up. Too much of the front side of the run is being harvested among the many other problems mentioned in the proposals.

Please vote to repeal June 25th Blue Card Registration, Thank you

Submitted By
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I support and strongly urge you to vote in favor of proposals 51 & 52 regarding permit stacking. The legislature empowered the Board of Fish to implement permit stacking (2 permits in 1 individual's name) 13 years ago with the passage of HB 286. It's time for the Board to quit caving to the racist rhetoric that because of the color of their skin or the region they live that local watershed people would be disenfranchised by permit stacking.

Also, with the discussion of a buyback, permit stacking would perhaps render a buyback unnecessary saving tens of millions of dollars. Please vote YES, thank you



Submitted By
Chad Sorenson
Submitted On
11/16/2015 3:21:10 PM
Affiliation

~~Response to Proposal 54: ~~Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing.

I do not support this proposal because of the following reasons: 1: Given district biologist will not be able to manage escape and run the risk of over escapement. 2: Acts of nature with winds can either blow fish in or out of districts and presents its own challenges that are not controllable or predictable. 3: Scale samples have shown all districts catch other districts fish. To single out one district from the others is not equitable.... 4: Proposal does not take into account Egegik's run timing and will force the area biologist to possible have the fleet stand down as mass amounts of fish swim up river.

Chad Sorenson



Submitted By
Michael Woolcock
Submitted On
11/11/2015 11:13:19 AM
Affiliation
none

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I am in of having the statewide BOF held in Kenai so that Spirts fisherman from this area can provide input in person.



Submitted By
Michael Grubman
Submitted On
11/14/2015 7:09:46 PM
Affiliation

This comment is submitted in support of proposal 52 (to permit stacking of BB 2 permits for drift gill net/200 fathom gear limit), and against proposal 53 (to permit in excess of 200 fathoms for stacked permits. The reasons are as follows:

1. Alaska public policy, as reflected in the existing optimum number of permits statutes, fishermen "the number of entry permits sufficient to maintain an economically healthy fishery that will result in a reasonable average rate of economic return to the fishermen participating in that fishery, considering time fished and necessary investments in vessels and gear" AS 16.43.290 This public policy is based on the economic reality that an oversupply of fishermen is detrimental to fishermen obtaining a reasonable return.
2. currently, there is an oversupply of fishermen/gear in the water, as reflected by past optimum permit determinations, and other economic manifestations, including gross disparity in bargaining power resulting in open price deliveries to processors and parallel pricing at \$.50 for 2015. The 2015 price is inconsistent with the public policy of fostering reasonable economic return to fishermen.
3. The optimum permit statutes permit an assessment up to 8% catch value on all fishermen to fund permit buyback. That system is not in effect.
4. Allowing permit stacking with a 200 fathom limit would promote the same public policy of increasing economic return to fishermen, towards an optimum number already determined to be significantly below current numbers. For every permit stacked, there is a reduction of 100 fathoms of gear in the water. Those not stacking are benefited by a reduction in competition (1 x 200 vs 2 x 150). The system is completely voluntary, based on individual operator decisions to buy and sell, stack or not, as opposed to an involuntary assessment on all, which many cannot afford, to achieve the same result. Fewer boats in the water also would increase safety, based on less congestion during fishing, retirement (presumably) of older, less well maintained, boats, and (by fostering better economic returns) by greater investment in boat maintenance and safety systems. Also, in previously determining that the optimum number of permits is significantly lower than current levels, F&G already has determined that the BB salmon resource can be properly managed and the run properly harvested with far less gear in the water.

Submitted By
Michael Grubman
Submitted On
11/16/2015 1:04:40 PM
Affiliation
permit holder

Further comment in favor of permit stacking, but not expanding gear limits for stacked operators: Prices paid by processors for 2015 have caused economic distress to many fishers. The Alaska Constitution was amended to permit limited entry into fisheries with the stated Constitutional public policy the economic welfare of fishers:

Article 8, § 15. No Exclusive Right of Fishery [as amended in 1972 to allow limited entry] — No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the state.

Permit stacking, with gear restriction, has the same economic effect as permit reduction, in ameliorating economic distress to fishermen who choose to fish, whether with one or two permits. The collective reduction of boats/gear in the water might also, over the long run, change the current equation in which processors wield so much market power and are so concentrated as to be able to buy fish under an open price ticket based on a promise to pay whatever they decide to pay later.



Submitted By
Dale I Weese
Submitted On
11/17/2015 8:29:19 AM
Affiliation
SO4T 59962A

I am very in favor of set netters being able to have dual permits but only being able to fish or have fish in 50 fathoms at any given time per site not pulling in one 50 fathom net full and putting a clean net out first net would have to be cleaned totally before deploying new net and never putting more than 50 fathoms on any site .as prices drop it is very hard to make expenses and show any profit .We would still need the same amount of helpers so no jobs would be lost and more fishers could have nets out on the shoulders of the season that would help adfg control fish escarpment and prossesers get more fish. On the shoulder season .I am also in favor of drifters dropping there blue cards before they fish in any district for management reasons Thank you. Dale Weese



November 17th, 2015

Name: Louis Hoffman
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City/State/Zip: Wasilla/AK 99654

Alaska Department of Fish and Game
Board Support Section
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Email: dfg.bof.comments@alaska.gov

Alaska Board of Fisheries Chairman and Members,

I support having the 2017 Upper Cook Inlet Board of Fisheries Meeting in Anchorage.

I believe Anchorage is the most neutral location.

I believe that holding the meeting in Anchorage will provide the greatest opportunity for all stakeholders of Upper Cook Inlet to participate.

I believe Anchorage provides the most convenient travel, lodging, and meeting options.

I respectfully ask for your vote in support of the 2017 UCI BOF meeting to be held in Anchorage.

Sincerely,



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SOLDOTNA
City of Soldotna, Alaska



PC 40
1 of 30



November 13, 2015

The Alaska Board of Fisheries
Alaska Department of Fish & Game
PO Box 25526. M/S 1100
Juneau, AK 99802-5526

Thomas G. Kluberton, Chair
John E. Jensen, Vice-Chair

Orville H. Huntington
Frederick T. Johnson
Bob Mumford

Susan Jeffrey
Reed J. Morisky

Subject: Alaska Board of Fisheries 2017 Upper Cook Inlet Finfish Meeting

Dear Board Member,

The purpose of this correspondence is to respectfully request that the Board of Fisheries (BOF) hold the 2017 Upper Cook Inlet Finfish (UCI) Regulatory Meeting in the Kenai-Soldotna area of the Kenai Peninsula.

The Kenai Peninsula Borough and the Cities of Soldotna and Kenai appreciate the Boards willingness to consider having the meeting in the Kenai-Soldotna area.

The last BOF UCI meeting held on the Kenai Peninsula was in 1999, or over five full cycles ago. For this period, Alaskans living on the Kenai Peninsula have not enjoyed reasonable access to the Board of Fish.

Over the two week period of the UCI meeting Government officials and representatives of special interest groups from the Kenai Peninsula have been able to attend UCI meetings, because costs associated with attendance are not borne by those officials and representatives. This is not the circumstance for the vast majority of residents on the Kenai Peninsula.



Fairness & Process

For residents of the Kenai Peninsula to participate in the BOF process for the UCI meeting, where 75%-85% of the proposals affect watersheds on the Kenai Peninsula, it has been necessary to travel to Anchorage to provide testimony and/or participate in committees. As you know, the schedule for the BOF UCI meetings is somewhat fluid, therefore difficult for residents from the Kenai Peninsula to effectively know when to travel to Anchorage in order to participate. This often requires burdensome costs associated with multiple days of lodging and subsistence, in addition to transportation costs. Not having reasonable, periodic access to the BOF process is simply unfair to the large population of Alaskans residing on the Kenai Peninsula.

Additionally, the BOF process itself is rendered less comprehensive and effective by the difficulties imposed upon Alaskans residing on the Kenai Peninsula by not holding the UCI meeting on the Kenai Peninsula on a periodic basis. By minimizing or eliminating input and testimony from residents on the Kenai Peninsula, the BOF is denied the knowledge of individuals that are closest to, and most directly affected by, the fisheries and decisions made by the BOF.

Cost Savings

There are cost savings that will be realized by holding the 2017 UCI meeting in the Kenai-Soldotna area. The Kenai Peninsula Borough, and the Cities of Kenai and Soldotna commit to providing a venue for the meeting and providing coffee, tea and water, at no cost to the State of Alaska. **Savings based on costs for the 2014 UCI meeting are \$61,228.00.**

The venues which are available and capable of hosting the meeting are the Soldotna Regional Sports Center and the Kenai Central High School Auditorium & Challenger Center.

The Kenai Municipal Airport is a full-service airport offering over 20 scheduled flights per day to and from Anchorage. The Soldotna Kenai area supports hotels and motels with approximately 500 rooms. During the February and March time period, vacancy levels are generally high, so availability of lodging for the BOF, staff, and other meeting participants is easily accommodated. The Kenai-Soldotna area also hosts a wide range of support services including over 30 restaurants and cafes within a short distance from either of the two available venues.

To date, we have not undertaken a comprehensive effort to determine other specific costs associated with the BOF meeting, but have received a lodging quote for \$89 per night for singles and \$99 per night for double occupancy at a national chain located in both Soldotna and Kenai. A portion of the historical Ward's Cove processing facility has been renovated into a full service hotel and meeting area encompassing 29 hotel rooms, dining, and business support facilities on a campus. This facility could provide a secure comfortable environment for the Board outside of the meeting.



Presently, when purchased in advance in quantities of six tickets, round trip air fare to and from Anchorage is either \$180 or \$200 per ticket, depending on the carrier selected. More cost effective fares may be able to be negotiated based on the number of air fares required.

Ground transportation for the Board and staff from local hotels to and from the meeting will be provided at no cost to the State. We are unaware of past costs for transportation, but this will result in cost savings.

The Borough and Cities will establish a point of contact for BOF and staff to assist in identifying resources and cost savings for the State. We believe that additional savings will be realized subsequent to a decision to locate the meeting in the Soldotna-Kenai area and specific needs/services are identified.

Security

Both the Cities of Soldotna and Kenai have committed to providing a police officer to be present at the 2017 UCI BOF meeting at no cost to the State.

Information Technology (IT) Support

The Kenai Peninsula Borough and the Cities of Soldotna and Kenai will provide IT support as requested by the BOF.

Support from Individuals, Organizations and Political Subdivisions

There has been strong support for the BOF to hold the 2017 UCI Meeting on the Kenai Peninsula. They include but are not limited to the following:

1. Alaska Governor Bill Walker, Letter to the Alaska Board of Fisheries dated October 21, 2015
2. Speaker Mike Chenault, Letter to the Alaska Board of Fisheries dated November 9, 2015
3. Senator Kathy Giessel, Senator Peter Micciche, Speaker Mike Chenault, Representative Kurt Olson, and Representative Paul Seaton, Letter dated September 24, 2014
4. Kenai Peninsula Borough, City of Homer, City of Kenai, City of Seldovia, City of Seward, and the City of Soldotna, Joint Resolution No. 2014-01
5. City of Homer, Resolution 14-0195
6. City of Kenai, Resolution 2013-06



7. City of Seldovia, Resolution 15-04
8. City of Seward, Resolution 2014-075
9. City of Soldotna, Resolution 2014-01
10. Kenai/Soldotna Fish & Game Advisory Committee
11. Anchorage Fish & Game Advisory Committee
12. Kenai Area Fisherman's Coalition, Letter to the Alaska Board of Fisheries dated Nov. 9, 2014
13. Kenai River Special Management Area Advisory Board, Resolution 2014-01

Thank you for your attention and deliberations regarding our request.

The residents and governments of the Kenai Peninsula look forward to being your hosts for the 2017 Alaska Board of Fisheries Upper Cook Inlet Finfish Meeting.

Sincerely,

KENAI PENINSULA
BOROUGH

Mike Navarre
Mayor

CITY OF SOLDOTNA

Pete Sprague
Mayor

CITY OF KENAI

Pat Porter
Mayor

Attachments

cc: Governor Bill Walker
Senator Kathy Giessel
Senator Peter Micciche
Speaker Mike Chenault
Representative Kurt Olson
Representative Paul Seaton
Sam Cotten, Commissioner ADF&G
Glenn Haight, Executive Director BOF

STATE CAPITOL
P.O. Box 110001
Juneau, AK 99811-0001
907-465-3500
fax: 907-465-3532



PC 40
5 of 30

550 West Seventh Avenue, Suite 1700
Anchorage, AK 99501
907-269-7450
fax 907-269-7461
www.Gov.Alaska.Gov
Governor@Alaska.Gov

Governor Bill Walker
STATE OF ALASKA

October 21, 2015

Mr. Tom Kluberton, Chairman
P.O. Box 200
Talkeetna, AK 99676

Mr. Orville Huntington
P.O. Box 107
Huslia, AK 99746

Mr. John Jensen, Vice Chairman
P.O. Box 681
Petersburg, AK 99833

Mr. Reed Morisky
P.O. Box 83707
Fairbanks, AK 99708

Ms. Sue Jeffrey
P.O. Box 3363
Kodiak, AK 99615

Mr. Bob Mumford
13391 Baywind Drive
Anchorage, AK 99516

Mr. Fritz Johnson
P.O. Box 1129
Dillingham, AK 99576

Dear Chairman Kluberton, Vice Chairman Jensen, and Board Members:

I am writing to ask for your consideration of an issue with the upper Cook Inlet Board of Fisheries meeting scheduled to take place in early 2017. The board has scheduled this meeting for Anchorage, and I would like you to consider holding the meeting on the Kenai Peninsula. It will have been 18 years since a meeting was held in the area where much of the fishing takes place. I recognize other users live in Anchorage, the Matanuska-Susitna Valley, and throughout other parts of Alaska. However, as a courtesy to those who live and work and fish on the Peninsula, there should be an opportunity to participate in a board of fisheries meeting close to home on some occasion. In the past, I have attended a Board of Fish meeting in Anchorage and would do the same should a meeting be held in the Matanuska-Susitna Valley.

I would personally come to the meeting for the opening session and would attend the proceedings as much as time would allow. There has been much attention given to the controversies surrounding the Cook Inlet fisheries, and I feel we should attempt to improve the communications and exchanges among the many interested parties. Holding a meeting on the Peninsula, possibly Soldotna, may show a willingness to consider points of view from local residents who may not have been able to participate over the past five board cycles.

Board of Fisheries Members
October 21, 2015
Page 2



PC 40
6 of 30

Thank you for the work you do. I recognize the commitment and sacrifice you offer for Alaska's fisheries with your service on the board.

Sincerely,

A handwritten signature in black ink, which appears to read "Bill Walker". The signature is written in a cursive, flowing style.

Bill Walker
Governor

Alaska State Legislature



PC 40
7 of 30

State Capitol, Room 208
Juneau, Alaska 99801-1182
Phone: 907-465-3779
Fax: 907-465-2833
Toll Free: 800-469-3779



145 Main St, Loop
Second Floor
Kenai, Alaska 99611
Phone: 907-283-7223
Fax: 907-283-7184

REPRESENTATIVE MIKE CHENAULT SPEAKER OF THE ALASKA STATE HOUSE

November 9, 2015

Alaska Board of Fisheries
Alaska Department of Fish & Game
P.O. Box 115526
Juneau, AK 99811-5526

RE: Board of Fisheries (BOF) 2017 Upper Cook Inlet Finfish Meeting

Tom Kluberton, Chair
John Jensen, Vice Chair
Sue Jeffry
Fritz Johnson

Orville Huntington
Reed Morisky
Bob Mumford

Dear Board of Fisheries,

I'm writing to encourage the Board to consider moving the 2017 Upper Cook Inlet (UCI) Finfish Regulatory Board of Fish (BOF) meeting to the Kenai Peninsula.

The last meeting held on the Kenai Peninsula was in 1999. It makes sense to host a meeting of this nature in our "backyard" where the fishing community works, lives and fishes. Some of my constituents have said they haven't able to attend due to the hardship of traveling to the Anchorage area. Those who have attended spent a considerable amount of their own time, expense and effort yearly. It is essential to offer these important meetings in a realistic location.

The City of Kenai provided excellent examples of facilities, lodging, and services available on the Peninsula in a letter to the BOF dated September 30, 2014. Should you choose a Kenai facility, the city has committed to offering the meeting venue at no cost to the BOF. In these times of financial hardship, this is a winning proposal. Whether you choose Kenai or another city on the Kenai Peninsula, there are facilities and services to accommodate the Board's needs.

Thank you for your consideration of holding the meeting on the Kenai Peninsula and for your commitment to serve on the Board of Fish.

Sincerely,

A handwritten signature in cursive script that reads "Mike Chenault".

Representative Mike Chenault
Speaker of the Alaska House of Representatives

New email: rep.mike.chenault@aklegis.gov

Representative_Mike_Chenault@legis.state.ak.us



ALASKA STATE LEGISLATURE

Senator Cathy Giessel
Senator Peter Micciche



Representative Mike Chenault
Representative Kurt Olson
Representative Paul Seaton

Kenai Peninsula Delegation

September 24, 2014

Alaska Department of Fish and Game
Glenn Haight, Executive Director; Alaska Board of Fisheries
PO Box 115526
Juneau, Alaska 99811-5526

Dear Director Haight:

The Kenai Peninsula Delegation is writing this to you as a unified voice, requesting that you schedule and hold the 2017 Upper Cook Inlet Finfish Board of Fish (BOF) meetings in the Kenai/Soldotna area.

The time has come to offer these important meetings in locations that are fair and reasonable to all the stakeholders, not just those located near the metropolitan area of Anchorage. A large number of stakeholders are from the Kenai Peninsula who attend at their own considerable time, expense and effort, year after year. It seems appropriate and equitable that, from time to time, the Board of Fish would meet in our vicinity. The last full BOF meeting held here was back in 1999. This request is not unreasonable, given that a vibrant fishing community exists on the waters of Cook Inlet and the Peninsula.

One rationale for the extended period of time since any Kenai Peninsula meetings is the alleged "unruly behavior" by a handful of fishermen at the 1999 meeting that has had a lasting negative effect on some members of the Board. This is unfortunate, but avoiding the Central Peninsula area for BOF meetings for almost 15 years seems a bit over-reactive for a group comprised of professionals and knowledgeable fishermen who know and understand the passions of those who make their living from Alaska waters. There is no denying that the Board of Fisheries process can be contentious, but this is not unique to the Upper Cook Inlet alone. It is time to stop looking back and move forward, for the benefit of all.



Given the fact that over 25% of the proposals considered by the Board of Fish during the past 10 years have been relevant to Upper Cook Inlet fisheries, a meeting here is long overdue. Many of these Upper Cook Inlet specific proposals address the Kenai and Kasilof Rivers' salmon stocks and management goals. Recognizing that impressive 10-year statistic (1075 out of 4196 proposals), a 2017 BOF meeting held in the Kenai/Soldotna area would go a long way in promoting good will and participation from all user groups, commercial, sport, subsistence and personal use fishers alike.

Along with the Kenai Area Fishermen's Coalition, the Kenai Peninsula Borough, the City of Kenai, the City of Soldotna, the City of Homer, the City of Seldovia, the Kenai River Special Management Area Advisory Board (Resolutions attached) and all interested Kenai area fishermen, we strongly urge you to schedule the 2017 Board of Fish meeting in the Central Peninsula area. We would welcome the Board and look forward to an informed, respectful discussion of the prevailing fish issues that come before you.

Respectfully,

Senator Cathy Giessel

Senator Peter Micciche

Rep. Mike Chenault

Rep. Kurt Olson

Rep. Paul Seaton

- cc: Governor Sean Parnell
- Cora Campbell, Commissioner, Alaska Department of Fish and Game
- United Fisherman of Alaska
- Kenai Area Fishermen's Coalition
- Kenai Peninsula Borough
- City of Kenai
- City of Soldotna
- City of Seldovia
- City of Homer
- Kenai River Special Management Area Advisory Board



KENAI PENINSULA BOROUGH
CITY OF HOMER
CITY OF KENAI
CITY OF SELDOVIA
CITY OF SEWARD
CITY OF SOLDOTNA

JOINT RESOLUTION NO. 2014 - 01

A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH, COUNCILS OF THE CITY OF HOMER, CITY OF KENAI, CITY OF SELDOVIA, CITY OF SEWARD AND CITY OF SOLDOTNA, REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS 2017 UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA.

WHEREAS, Upper Cook Inlet Finfish issues are vitally important to, and directly impact residents, municipal governments and communities on the Kenai Peninsula; and

WHEREAS, many local residents and businesses of the Kenai Peninsula depend on, participate in, and are otherwise affected by decisions made by the Board of Fisheries with regard to subsistence fisheries, sport fisheries, commercial fisheries, personal use fisheries and conservation measures in Upper Cook Inlet; and

WHEREAS, when making informed decisions regarding finfish issues in Upper Cook Inlet, the Board of Fisheries should consider the comments and interests from residents of the Kenai Peninsula; and

WHEREAS, the costs and travel time to attend meetings outside the Kenai Peninsula pose a significant burden to local residents, limiting participation and the Board of Fisheries' ability to benefit from local knowledge; and

WHEREAS, the Alaska Board of Fisheries has not held its Upper Cook Inlet Finfish meeting on the Peninsula since 1999 despite numerous requests that it do so; and

WHEREAS, holding the meeting on the Kenai Peninsula would show local residents, businesses and communities that the Board of Fisheries listens, cares about and understands the local impacts of its decisions; and

WHEREAS, there are local quality venues of sufficient size with advanced technologic capabilities to host public meetings, as well as exceptional lodging and dining opportunities on the Kenai Peninsula;

NOW, THEREFORE, BE IT RESOLVED BY THE KENAI PENINSULA BOROUGH ASSEMBLY, AND THE COUNCILS FOR THE CITY OF HOMER, CITY OF KENAI, CITY OF SELDOVIA, CITY OF SEWARD AND CITY OF SOLDOTNA;

Section 1. That the Alaska Board of Fisheries is respectfully and strongly urged by the Kenai Peninsula municipal governments representing their constituents to hold the 2017 Upper Cook Inlet Finfish meeting on the Kenai Peninsula.



Kenai Peninsula Joint Resolution
Page 2 of 3

Section 2. That this Joint Resolution be forwarded to Governor Sean Parnell, Senator Peter Micciche, Senator Gary Stevens, Speaker Mike Chenault, Representative Kurt Olson, Representative Paul Seaton, Governor's Chief of Staff Mike Nizich, Department of Fish & Game Commissioner Cora Campbell, Alaska Board of Fisheries Members - Karl Johnstone, Orville Huntington, Susan Jeffrey, John Jensen, Fritz Johnson, Thomas Kluberton, Reed Moriskey, Alaska Board of Fisheries Executive Director Glenn Haight

Section 3. That this resolution takes effect immediately upon approval by the participating city councils.

APPROVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 20th
DAY OF September 2014.



Hal Smalley
HAL SMALLEY,
ASSEMBLY PRESIDENT

Mike Navarre
MIKE NAVARRE,
KENAI PENINSULA BOROUGH MAYOR

ATTEST:

Johani Blankenship
Johani Blankenship, Borough Clerk

APPROVED BY THE COUNCIL OF THE CITY OF HOMER this 8th day of
September, 2014.

Mary E. Wythe
MARY E. WYTHE, HOMER MAYOR

ATTEST:

Jo Johnson
Jo Johnson, City Clerk



Kenai Peninsula Joint Resolution
Page 3 of 3

APPROVED BY THE COUNCIL OF THE CITY OF KENAI this 8th day of
~~September~~, 2014.

Pat Porter
PAT PORTER, KENAI MAYOR

ATTEST:

Sandra Modigh
for Sandra Modigh, City Clerk

APPROVED BY THE COUNCIL OF THE CITY OF SELDOVIA THIS 10 DAY OF
~~September~~, 2014.

Keith Gain
KEITH GAIN, SELDOVIA MAYOR

ATTEST:

Mary Klinger Deputy Clerk
for Mary Klinger, City Clerk

APPROVED BY THE COUNCIL OF THE CITY OF SEWARD, THIS 11th DAY OF
~~September~~, 2014.

Jean Bardarson
JEAN BARDARSON, SEWARD MAYOR



ATTEST:

Johanna Kinney
Johanna Kinney, City Clerk

APPROVED BY THE COUNCIL OF THE CITY OF SOLDOTNA, this 10th day of
~~September~~, 2014.

Nels Anderson
NELS ANDERSON, SOLDOTNA MAYOR

ATTEST:

Michelle M. Sauer
Michelle M. Sauer, City Clerk



CITY OF HOMER
HOMER, ALASKA

RESOLUTION 14-095

Mayor / Council

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA
REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS 2017
UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA AND
APPROVING JOINT RESOLUTION 2014-01.

WHEREAS, Upper Cook Inlet finfish are a vital and very important component of the Homer economy and the social and cultural fabric of the community; and

WHEREAS, Homer residents are all impacted by Upper Cook Inlet finfish fisheries either directly or indirectly and many participate in commercial, sport, subsistence, and personal use fisheries there; and

WHEREAS, The Alaska Board of Fisheries Upper Cook Inlet Finfish regular meeting has not been held on the Kenai Peninsula since 1999; and

WHEREAS, City of Homer residents and businesses benefit from informed science based fisheries management, strategies, and practices; and

WHEREAS, Sound management strategies and practices are developed by transparent processes, accessible public meetings, and user participation, knowledge, and representation; and

WHEREAS, Conducting the Alaska Board of Fisheries regular meetings concerning Upper Cook Inlet finfish exclusively in Anchorage instead of rotating between Anchorage and the Kenai Peninsula greatly limits participation by Homer residents because of the substantial expense association with travel and lodging for multi-day meetings in Anchorage; and

WHEREAS, All users of public resources are entitled to reasonable access to public meetings and processes concerning matters affecting their economy, livelihood and lifestyle; and

WHEREAS, Holding the 2017 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve the amount of testimony about local traditional knowledge, which is a great resource for the Board of Fisheries; and

WHEREAS, It is in the best interest of the residents and visitors to both the Kenai Peninsula and the Anchorage area to maintain healthy, well managed salmon stocks and provide opportunities and access for diverse user groups; and

WHEREAS, Joint Resolution No. 2014-01; A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH, COUNCILS OF THE CITY OF HOMER, CITY OF KENAI, CITY OF SELDOVIA, CITY OF SEWARD, AND CITY OF SOLDOTNA, REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS



Page 2 of 2
RESOLUTION 14 095
CITY OF HOMER

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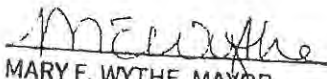
2017 UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA, is proposed to be sent to the Alaska Board of Fisheries and other interested parties for consideration.

NOW, THEREFORE, BE IT RESOLVED that the Alaska Board of Fisheries is respectfully and strongly urged to schedule its full Upper Cook Inlet Finfish Meeting of 2017 and future such meetings on the Kenai Peninsula on a semi-regular basis.

BE IT FURTHER RESOLVED that the Homer City Council hereby expresses its support for Joint Resolution 2014-01 and authorizes Mayor Wythe to sign it on behalf of the City of Homer.

PASSED AND ADOPTED by the Homer City Council this 8th day of September, 2014.

CITY OF HOMER


MARY E. WYTHE, MAYOR

ATTEST:


JO JOHNSON, MMC, CITY CLERK

Fiscal Note: N/A



Sponsored by: Mayor Pat Porter
Vice Mayor Ryan Marquis
Council Member Robert Molloy
Council Member Brian Gabriel
Council Member Tim Navarre
Council Member Terry Bookey
Council Member Mike Boyle

CITY OF KENAI

RESOLUTION NO. 2013-06

A RESOLUTION OF THE COUNCIL OF THE CITY OF KENAI, ALASKA, RESPECTFULLY REQUESTING THAT THE ALASKA BOARD OF FISHERIES MEETING, SCHEDULED FOR JANUARY 29, 2014 THROUGH FEBRUARY 11, 2014 TO CONSIDER UPPER COOK INLET FINFISH ISSUES BE HELD ON THE CENTRAL KENAI PENINSULA.

WHEREAS, the consideration of Upper Cook Inlet Finfish issues are important to, and directly affect many residents of the Central Kenai Peninsula; and,

WHEREAS, Central Peninsula residents are comprised of many individuals involved in commercial fisheries, sport fisheries, subsistence fisheries, and personal use fisheries; and,

WHEREAS, many Central Kenai Peninsula residents derive their livelihood from Upper Cook Inlet Fisheries; and,

WHEREAS, it is a significant burden to travel to Anchorage and stay for an extended period to ensure an individual is able to testify before and have their concerns heard by the Alaska Board of Fisheries; and,

WHEREAS, it is consistent with the mission of the Alaska Board of Fisheries to provide an opportunity for affected Alaskans' voices to be heard; and,

WHEREAS, venues of sufficient size having necessary support technology are available in the Central Kenai Peninsula to successfully hold the Alaska Board of Fisheries meeting; and,

WHEREAS, the Municipal Governments and residents of the Central Kenai Peninsula would be gracious hosts, and appreciative of the opportunity to host the Alaska Board of Fisheries.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, that the Council respectfully requests that the Alaska Board of Fisheries Meeting scheduled for January 29, 2014 through February 11, 2014 to consider Upper Cook Inlet Finfish Issues be held on the Central Kenai Peninsula.



Resolution No. 2013-06
Page 2

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, this 20th day of
February, 2013.

Pat Porter
PAT PORTER, MAYOR

Mike Boyle
MIKE BOYLE, COUNCIL MEMBER

Robert Molloy
ROBERT MOLLOY, COUNCIL MEMBER

Terry Bookey
TERRY BOOKEY, COUNCIL MEMBER

ATTEST:
Sandra Modigh
Sandra Modigh, City Clerk

Ryan Marquis
RYAN MARQUIS, VICE MAYOR

Tim Navarre
TIM NAVARRE, COUNCIL MEMBER

Brian Gabriel
BRIAN GABRIEL, COUNCIL MEMBER



**CITY OF SELDOVIA
RESOLUTION 15-04**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SELDOVIA, ALASKA
REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS 2017 UPPER COOK
INLET FINFISH MEETING ON THE KENAI PENINSULA AND APPROVING JOINT
RESOLUTION 2014-01**

WHEREAS, City of Seldovia is located on the southern portion of the Kenai Peninsula and waters of Cook Inlet; and

WHEREAS, many local residents are impacted by Upper Cook Inlet Finfish fisheries either directly or indirectly; and

WHEREAS, conducting the Alaska Board of Fisheries Upper Cook Inlet Finfish meeting exclusively in Anchorage hinders local attendance, participation and knowledge due to the expenses and time required to travel such distances; and

WHEREAS, all users of public resources are entitled to reasonable access to public meetings and processes concerning matters affecting their economy, livelihood and lifestyle; and

WHEREAS, holding the 2017 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve that access for locals; and

WHEREAS, Joint Resolution No. 2014-01; A Joint Resolution of the Assembly of the Kenai Peninsula Borough, and Councils of the City of Homer, City of Kenai, City of Seldovia, City of Seward and City of Soldotna, Requesting the Alaska Board of Fisheries hold its 2017 Upper Cook Inlet Finfish Meeting on the Kenai Peninsula is proposed to be sent to the Alaska Fisheries Board and other interested officials for consideration.

NOW THEREFORE BE IT RESOLVED THAT: The City Council by this resolution respectfully request the Alaska Board of Fisheries hold its Upper Cook Inlet Finfish Meeting on the Kenai Peninsula in 2017 as well as in the future on a semi-regular basis.

BE IT FURTHER RESOLVED THAT: The City Council by this resolution authorizes Mayor Keith Gain to sign Joint Resolution 2014-01 on behalf of the City of Seldovia.

PASSED and APPROVED by a duly constituted quorum of the City Council of Seldovia, Alaska, this 10th day of September 2014

ATTEST:

Mary Klinger

City Clerk, Mary Klinger
Mary Klinger
Deputy City Clerk

SIGNED:

Keith Gain

Mayor, Keith Gain
Coreneal
Council member
acting mayor





Sponsored by: Hunt

CITY OF SEWARD, ALASKA
RESOLUTION 2014-075

A RESOLUTION OF THE COUNCIL OF THE CITY OF SEWARD, ALASKA, REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS 2017 UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA, AND APPROVING KENAI PENINSULA BOROUGH AND MUNICIPALITIES JOINT RESOLUTION 2014-01

WHEREAS, Upper Cook Inlet finfish are a vital and long-standing component of the City of Seward economy and community; and,

WHEREAS, Seward residents are impacted by Board of Fisheries decisions regarding Upper Cook Inlet finfish; and,

WHEREAS, the Alaska Board of Fisheries Upper Cook Inlet Finfish regular meeting has not been held on the Kenai Peninsula since 1999; and,

WHEREAS, Alaska and Seward residents and businesses benefit from informed science based fisheries management, strategies and practices; and,

WHEREAS, sound management, strategies and practices are developed by transparent processes, accessible public meetings and user participation, knowledge and representation; and,

WHEREAS, conducting the Alaska Board of Fisheries regular meetings concerning Upper Cook Inlet finfish exclusively in Anchorage instead of rotating locations between Anchorage and all communities affected by the Board's management decisions greatly hampers public participation due to the substantial expense and burden of attending multi-day meetings in Anchorage; and,

WHEREAS, all users of public resources are entitled to reasonable access to public meetings and processes concerning matters affecting their economy, livelihood and lifestyle; and,

WHEREAS, holding the 2017 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve the amount of testimony about local traditional knowledge to the board, which is a great resource for the Board of Fisheries; and,

WHEREAS, it is in the best interest of the residents and visitors to both the Kenai Peninsula and the Anchorage area to maintain healthy well-managed salmon stocks and provide opportunities and access for diverse user groups; and,

WHEREAS, Joint Resolution No. 2014-01; A Joint Resolution of the Assembly of the Kenai Peninsula Borough, and Councils of the City of Homer, City of Kenai, City of Seldovia, City of Seward and City of Soldotna, Requesting the Alaska Board of Fisheries Hold its 2017 Upper Cook



CITY OF SEWARD, ALASKA
RESOLUTION 2014-075

Inlet Finfish Meeting on the Kenai Peninsula is proposed to be sent to the Alaska Fisheries Board and other interested officials for consideration.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEWARD, ALASKA that:

Section 1. That the Alaska Board of Fisheries is respectfully and strongly urged to schedule its full Upper Cook Inlet Finfish Meeting of 2017 and future such meetings on the Kenai Peninsula on a semi-regular basis.

Section 2. That Mayor Jean Bardarson is authorized to sign Joint Resolution 2014-01 on behalf of the City of Seward.

Section 3. That this resolution takes effect immediately upon passage.

PASSED AND APPROVED by the City Council of the City of Seward, Alaska, this 8th day of September, 2014.

THE CITY OF SEWARD, ALASKA

Jean Bardarson

Jean Bardarson, Mayor

AYES: Keil, Casagrande, Terry, Butts, Darling, Bardarson
NOES: None
ABSENT: Squires
ABSTAIN: None

ATTEST:

Johanna Kinney

Johanna Kinney, CMC
City Clerk

(City Seal)





Introduced By:
Date:
Action:
Vote:

City Manager
September 10, 2014
Adopted
6 Yes, 0 No

CITY OF SOLDOTNA
RESOLUTION 2014-037

A RESOLUTION REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS
2017 UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA AND
APPROVING JOINT RESOLUTION 2014-01

WHEREAS, Upper Cook Inlet finfish are a vital and long-standing component of the City of Soldotna economy and community; and

WHEREAS, all City of Soldotna residents are impacted by Upper Cook Inlet finfish fisheries either directly or indirectly; and

WHEREAS, the Alaska Board of Fisheries Upper Cook Inlet Finfish regular meeting has not been held on the Kenai Peninsula since 1999; and

WHEREAS, City of Soldotna residents and businesses benefit from informed science based fisheries management, strategies and practices; and

WHEREAS, sound management, strategies and practices are developed by transparent processes, accessible public meetings and user participation, knowledge and representation; and

WHEREAS, conducting the Alaska Board of Fisheries regular meetings concerning Upper Cook Inlet finfish exclusively in Anchorage instead of rotating locations between Anchorage and the Kenai Peninsula greatly hampers public participation by City of Soldotna residents due to the substantial expense and burden of attending multi-day meetings in Anchorage; and

WHEREAS, all users of public resources are entitled to reasonable access to public meetings and processes concerning matters affecting their economy, livelihood and lifestyle; and

WHEREAS, holding the 2017 Alaska Board of Fisheries Upper Cook Inlet Finfish meeting on the Kenai Peninsula would improve the amount of testimony about local traditional knowledge to the board, which is a great resource for the Board of Fisheries; and

WHEREAS, it is in the best interest of the residents and visitors to both the Kenai Peninsula and the Anchorage area to maintain healthy well-managed salmon stocks and provide opportunities and access for diverse user groups; and

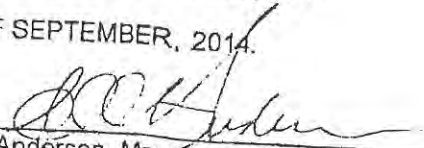
WHEREAS, Joint Resolution No. 2014-01; A Joint Resolution of the Assembly of the Kenai Peninsula Borough, and Councils of the City of Homer, City of Kenai, City of Seldovia, City of Seward and City of Soldotna, Requesting the Alaska Board of Fisheries Hold its 2017 Upper Cook Inlet Finfish Meeting on the Kenai Peninsula is proposed to be sent to the Alaska Fisheries Board and other interested officials for consideration;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SOLDOTNA, ALASKA:



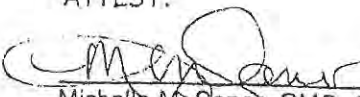
- Section 1. That the Alaska Board of Fisheries is respectfully and strongly urged to schedule its full Upper Cook Inlet Finfish Meeting of 2017 and future such meetings on the Kenai Peninsula on a semi-regular basis.
- Section 2. That Mayor Nels Anderson is authorized to sign Joint Resolution 2014-01 on behalf of the City of Soldotna.
- Section 3. This resolution shall become effective immediately upon its adoption.

ADOPTED BY THE CITY COUNCIL THIS 10TH DAY OF SEPTEMBER, 2014.



Nels Anderson, Mayor

ATTEST:



Michelle M. Saner, CMC, City Clerk

Ayes: Bos, Sprague, Murphy, Baxter, Whitney, Daniels
Noes: None



STATE OF ALASKA

Kenai/Soldotna Fish & Game Advisory Committee

Sean Parnell, Governor

Kenai/Soldotna Advisory
Mike Crawford, Chair
P.O. Box 2067
Soldotna, AK 99669
(907) 260-9210
creditcardmike@yahoo.com

September 30, 2014

Alaska Board of Fisheries
ADF&G/ Board Support
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board Members,

The Kenai Soldotna Fish and Game Advisory Committee (KSF&GAC) is an established Advisory committee (AC) under AS 16.05.260. The committees are governed under the rules proscribed in; 5 AAC 96, 5 AAC 97, and 5 AAC 99. Original advisory committees were formed in 1959 to provide a local forum to discuss and make recommendations on fish and wildlife issues before the Boards of Fish and Game. At present there are 71 Advisory Committees (AC's), 18 within the southcentral region.

The KSF&GAC is comprised of 15 board members and 4 alternates. To better insure a wide degree of public representation, our AC functions with designated interests (seats): 3 limited entry salmon permit commercial fishers, 3 commercial fresh water sports guides, 1 personal use user, 1 subsistence user, 1 trapping person, 1 hunting person, 5 at - large representatives and 4 alternates (1 commercial fisher, 1 guided sport and 2 general). We believe that we fulfill the statute requirement of being, "well informed on the fish and game resources of the locality."

It has come to the attention of the Kenai/Soldotna Fish and Game Advisory Committee that the venue for the 2017 Alaska Board of Fish meeting is up for consideration, and that the Kenai Peninsula is one of the possible hosts. As an AC, we understand and appreciate the uniqueness of both the Board of Game and Board of Fish processes in Alaska. We also recognize the importance to the communities that host these meetings as they are often the most impacted by the decisions made therein, as well as the benefits to the community itself for hosting such meetings.

In the spring of 2013, the city of Kenai hosted the Alaska Board of Game meeting, as it addressed many of the regulatory proposals and issues that directly affected this area. The meeting was a great success with regard to both the quantity and quality of public input from local residents. The qualitative aspect of the testimony of local residents provided a combination of historical, local and traditional knowledge; and various commercial, sport, and personal use aspects. The Board of Game commented that it appreciated this perspective particularly since it had not convened a regulatory meeting on the Kenai since 1992. They truly appreciated the amount of local knowledge that was brought forth. In the end, the greatest reason for the amount and quality of input provided was an accessible and open process for the local public.



It has been approximately 15+ years since the Board of Fish has convened one of its meetings on the Kenai Peninsula. Since the vast majority of the people impacted by the decisions that will be made at the 2017 Board of Fish meeting reside and/or work or play on the Kenai Peninsula, we find it only fair and appropriate to host the Board of Fish meetings within. When you think of fishing, with regard to the waterways of Upper Cook Inlet, whether it be subsistence, commercial, sport, or personal use, you think of the Kenai Peninsula. When you think of a location or venue to host the meetings to determine regulations for an area, you think of access for the people most impacted.

The March 2013 Board of Game meeting was a great success because the people that attended were most affected by current regulations, they were able to attend and testify at the meeting. When it comes to the Board of Fish process, which often exceeds two weeks in length, the proposition of attending, testifying, and being involved often becomes cost and time prohibitive to the local Peninsula resident. Particularly when the meetings are hosted in a distant city. The main reason for having a public meeting is so that the public can have a chance to participate in a meaningful manner. When considering the demographics of Alaska, location of the meeting is a primary consideration with regard to those most affected.

Therefore, we humbly request that you host the 2017 Board of Fish meeting on the Kenai Peninsula. This request can be easily accommodated by our local community and we feel that it will allow for greater qualitative and quantitative input from the people most impacted by the decisions made.

It should be noted that the Kenai-Soldotna AC members will do whatever is possible to ensure that the community is aware of the considerations of respect and tolerance necessary to conduct a highly emotionally charged meeting. The Kenai/Soldotna Advisory Committee has unanimously voted on and supports this request.

If there should be further questions please do not hesitate to contact our chair or other representatives of the Peninsula on the logistics of convening a UCI regulatory meeting in our community.

Respectfully,

Kenai/Soldotna Fish and Game Advisory Committee

Mike Crawford, Chairman (sport fish guide)
Bob Ermold, vice chair (at large)
Christine Brandt, secretary (commercial fish)
Andrew Carmichael, (subsistence)
Dick Dykema, (trapping)
Pegge Erkeneff, (at large)
Michael Hamrick, (at large)
John Joseph, (sport fish guide)
Monte Roberts, (sport fish guide)
Paul A. Shadura II, (commercial fish)
Jerry Strieby, (sport fish guide alt.)
Dyer Van Devere, (commercial fish drift)
Michelle Williams, (hunting)



Kenai Area Fisherman's Coalition

PROTECTING YOUR FISHING RIGHTS & RESOURCES

P. O. Box 375 Kenai, Ak. 99611 (907) 283-1054 dwimar@gci.net

Board of Fisheries
ADF&G/ Board Support
P.O. Box 115526
Juneau, Ak. 99811-5526

November 9, 2014

Dear Board Members,

In August 2014 we submitted a letter to you outlining reasons why we felt it was important to hold the 2017 UCI meeting in the Kenai / Soldotna area. We have long advocated for the Board to consider a method of fairness whereby the meetings would be alternated between the Anchorage / MATSU area and the Kenai / Soldotna area. This would provide fairness to users in both geographic locations that wish to participate. We are encouraged that you are considering this concept with further discussion slated for sometime during your upcoming December meeting.

By continuing to hold the UCI meeting in Anchorage you are precluding a large segment of the Kenai Peninsula fishing community from attending and participating. This would be private anglers, personal use and subsistence users who have no commercial interests in the outcome but do have concerns about opportunity, access and the sustainability of our resources for the long term. Unlike the guide industry and commercial fishing attendees, these folks cannot write off their travel expenses as a part of doing business. They have to bare the total financial burden on themselves and that is why you have seen very few of these folks at past UCI meetings. It could easily cost \$500 - \$1,000 for an individual just to participate through the testimony and committee stages to support proposals that are important to them. This financial burden alone creates an unfair system for non-commercial users.

Some Board members continue to assert that the Anchorage venue offers a "Central" or "Neutral" location. Central in what way? Anchorage / MATSU folks that can easily commute from their homes on a daily basis, but it's not so central for folks from the Kenai Peninsula that must drive over a mountain pass in winter conditions and bare the expenses of travel, lodging and meals for the opportunity to participate in the process. Still roughly 90% of UCI meeting attendees, after the public comment period, are from the Peninsula because this is where most of the fisheries take place and this is where 80 - 85% of the proposals are relative to. Neutral in what way and why? The Board is mandated to hold its meetings in locations most appropriate to the fisheries under consideration, however, that has not occurred in nearly 20 years of UCI meetings. By purposefully and repeatedly holding the UCI meetings in Anchorage you disenfranchise many who live nearest the fishery and will be most affected by the outcomes of your decisions.

Furthermore, why is it a BOF consideration to hold every other LCI meeting in Homer to accommodate local access to the process, but the same principal does not apply to the Kenai area? Prior to the 2005 meeting, our local legislators requested a price comparison for holding a meeting in the Kenai / Soldotna area versus Anchorage. Because of lower lodging and meeting room costs in the Kenai / Soldotna area the price was



comparable. Since then additional hotels, stores and restaurants have been built and provide plenty of comfort and accessibility for Board members, participants and agency folks.

The idea of the BOF holding periodic UCI meetings in the Kenai / Soldotna area has wide based support including Governor Walker, all Peninsula legislator, the Kenai Peninsula Borough, all municipalities, native organizations and all of our AC's up and down the Peninsula. Additionally, all Kenai area commercial fishing organizations and private angler sport fishing groups agree that it is important to once again hold meetings in the Kenai / Soldotna area where their constituents can afford to attend and participate. It hardly seems fair that Kenai Peninsula residents are the only ones asked to shoulder such a financial burden simply to participate in a process that directly affects their fisheries and community.

We would encourage you to support an alternating UCI meeting schedule starting with the 2017 meeting being held in the Kenai / Soldotna area.

On behalf of private resource users from the Kenai Peninsula we would like to thank you for consideration in this matter.

Respectfully Submitted,

Ed Schmitt – Chairman
Kenai Area Fisherman's Coalition

cc: Gov. Bill Walker
Sen. Peter Micciche
Rep. Mike Chenault
Rep. Kurt Olson
Rep. Paul Seaton
Sam Cotton, Commissioner ADF&G
Mayor Mike Navarre, Kenai Pen. Borough
Mayor Pat Porter, City of Kenai
Mayor Pete Sprague, City of Soldotna



KENAI RIVER

Special Management Area

"Working together...for the river"

ADVISORY BOARD

KENAI RIVER SPECIAL MANAGEMENT AREA ADVISORY BOARD

RESOLUTION NO. 2014 - 01

A RESOLUTION OF THE KENAI RIVER SPECIAL MANAGEMENT AREA ADVISORY BOARD, REQUESTING THE ALASKA BOARD OF FISHERIES HOLD ITS 2017 UPPER COOK INLET FINFISH MEETING ON THE KENAI PENINSULA.

WHEREAS, Upper Cook Inlet Finfish issues are vitally important to the Kenai River and the Kenai Peninsula; and

WHEREAS, many local residents and businesses of the Kenai Peninsula depend on, participate in, and are otherwise affected by decisions made by the Board of Fisheries with regard to subsistence fisheries, sport fisheries, commercial fisheries, personal use fisheries and conservation measures in the Kenai River; and

WHEREAS, when making informed decisions regarding finfish issues for the Kenai River, the Board of Fisheries should consider the comments and interests from residents of the Kenai Peninsula; and

WHEREAS, the costs and travel time to attend meetings outside the Kenai Peninsula pose a significant burden to local residents, limiting participation and the Board of Fisheries' ability to benefit from local knowledge; and

WHEREAS, the Alaska Board of Fisheries has not held its full Upper Cook Inlet Finfish meeting on the Peninsula since 1999 despite numerous requests that it do so; and

WHEREAS, holding the meeting on the Kenai Peninsula would show local residents, businesses and communities that the Board of Fisheries listens, cares about and understands the local impacts of its decisions; and

WHEREAS, there are local quality venues of sufficient size with advanced technologic capabilities to host public meetings, as well as exceptional lodging and dining opportunities on the Kenai Peninsula;

NOW, THEREFORE, BE IT RESOLVED BY THE KENAI RIVER SPECIAL MANAGEMENT AREA ADVISORY BOARD:

Section 1. That the Alaska Board of Fisheries is respectfully and strongly urged by the Kenai River Special Management Area Advisory Board to hold the full 2017 Upper Cook Inlet Finfish meeting on the Kenai Peninsula.

Section 2. That this Resolution be forwarded to Governor Sean Parnell, Senator Peter Micciche, Senator Gary Stevens, Speaker Mike Chenault, Representative Kurt Olson, Representative Paul Seaton, Governor's Chief of Staff Mike Nizich, Department of Fish & Game Commissioner Cora Campbell, Alaska Board of Fisheries Members – Karl Johnstone, Orville Huntington, Susan Jeffrey, John Jensen, Fritz Johnson, Thomas Kluberton, Reed Moriskey, Alaska Board of Fisheries Executive Director Glenn Haight



Kenai Area Office, PO Box 1247, Soldotna, AK 99669, 907-262-5581
Kenai Peninsula Borough, 144 N. Binkley, Soldotna, AK 99669 907-262-4441
Gilman River Center 514 Funny River Road, Soldotna, AK 99669, 907-260-4882
Alaska Division of Parks and Outdoor Recreation, Department of Natural Resources, in cooperation with the Kenai Peninsula Borough





APPROVED BY THE KENAI RIVER SPECIAL MANAGEMENT AREA ADVISORY BOARD THIS 11TH DAY OF SEPTEMBER, 2014.

A handwritten signature in black ink, appearing to read "Joe Connors", written over a horizontal line.

JOE CONNORS,
KENAI RIVER SPECIAL MANAGEMENT
AREA ADVISORY BOARD PRESIDENT



Lodging in the Kenai Soldotna Area

NAME	ADDRESS	CITY, STATE, ZIP	TEL #	ROOMS AVAILABLE	Number of Beds
Aspen Suites Hotel	10431 Kenai Spur Hwy.	Kenai, AK 99611	283-2272	49	105
Aspen Hotel	326 Binkley Cir	Soldotna, AK 99669	260-7736	63	130
Best Western King Salmon Motel & Restaurant	35546 Kenai Spur Hwy	Soldotna, AK 99669	262-5857	47	100
Captain Bligh's	1035 Angler Dr.	Kenai, AK 99611	283-7550	14	30
Eagle Rock Lodge	5679 Kenai Spur Hw	Kenai, AK 99611	283-1951	10	18
Kenai Airport Hotel	230 N. Willow	Kenai, AK 99611	283-1577	6	13
Kenai River Raven Lodge	48630 Funny River Rd	Soldotna, AK 99669	262-5818	21	40
PRL Logistics (Old Kenai Landing	Old Cannery Road	Kenai, AK 99611		30	60
Main St. Tap & Grill	10800 Kenai Spur Hwy.	Kenai, AK 99611	283-0394	31	60
Potters Lodge	43880 Supreme Ct	Kenai, AK 99611	252-4579	3	5
Quality Inn	10352 Kenai Spur Hwy	Kenai, AK 99611	283-6060	52	100
Soldotna Inn & Mykels Restaurant	35042 Kenai Spur Hwy.	Soldotna, AK 99669	262-9169	18	36
Stillwaters Chalet	42737 Sterling Hwy	Kenai, AK 99611	252-4991	6	8
Tanglewood B&B	2528 Beaver Lp.	Kenai, AK 99611	283-6771	8	18
The Duck Inn (Lodging & Restaurant)	43187 Kalifornsky Beach Rd	Soldotna, AK 99669	262-1849	18	28
Uptown Motel-Louie's Restaurant	47 Spur View Dr.	Kenai, AK 99611	283-3660	49	106
Other Facilities with cabins, rooms, studios can accommodate up to:					71
TOTALS				425	928



Restaurants and Dining in the Kenai Soldotna Area

NAME	ADDRESS	CITY, STATE, ZIP	TEL #
Acapulco	44578 Sterling Hwy Ste A.	Soldotna AK 99669	260-4999
Arby's	10733 Kenai Spur Hwy.	Kenai, AK 99611	283-5636
Arby's - Soldotna	44433 Sterling Hwy.	Soldotna, AK 99669	260-5648
Buckets Sports Grill	43960 Sterling Hwy.	Soldotna, AK 99669	283-9611
Burger Bus	Overland Ave	Kenai, AK 99611	283-9611
Carl's Jr.	10640 Kenai Spur Hwy.	Kenai, AK 99611	283-3538
Charlotte's Restaurant	115 S. Willow St. #102	Kenai, AK 99611	283-2777
Don Jose's	205 S. Willow St.	Kenai, AK 99611	283-8181
Don Jose's	44109 Sterling Hwy.	Soldotna AK 99669	262-5700
Duck Inn Restaurant	K-Beach Rd	Soldotna AK 99669	262-1849
Fine Thyme Café	43965 Sterling Hwy	Soldotna, AK 99669	262-6620
Froso's	35433 Kenai Spur Hwy.	Soldotna AK 99669	262-5356
Jersey Subs	Willow St.	Kenai, AK 99611	283-9898
Katina's	11888 Kenai Spur Hwy	Kenai, AK 99611	283-4403
Kenai River Pizza Company	10544 Kenai Spur Hwy.	Kenai, AK 99611	335-2555
King Salmon Restaurant	35455 Kenai Spur Hwy.	Soldotna AK 99669	260-8292
Louie's Restaurant	47 Spur View Dr.	Kenai, AK 99611	283-3660
Main St. Tap & Grill	10800 Kenai Spur Hwy.	Kenai, AK 99611	395-0394
Maria's Mexican Food	47245 E. Poppy Ln.	Soldotna AK 99669	262-6777
McDonald's - Soldotna	4462 Sterling Hwy	Soldotna, AK 99669	262-1074
McDonald's of Kenai	10447 Kenai Spur Hwy.	Kenai, AK 99611	283-4008
Mykels Restaurant	35041 Kenai Spur Hwy.	Soldotna, AK 99669	262-4305
New Peking Restaurant	145 S. Willow St.	Kenai, AK 99611	283-4662
Niko Gardens	36100 Kenai Spur Hwy.	Soldotna, AK 99669	262-7122
Odie's Deli	44315 Sterling Hwy.	Soldotna, AK 99669	260-3255
Odie's Deli	305 N. Willow St. In Kenai Airport	Kenai, AK 99611	283-7551
Paradisos Restaurant	811 Main St.	Kenai, AK 99611	283-2222
Playa Azul	104 Haller St	Kenai, AK 99611	283-2010
St. Elias Brewing Company	434 Sharkathmi Dr.	Soldotna, AK 99669	260-7837
Taco Bell	43845 Sterling Hwy.	Soldotna AK 99669	262-3555
Thai Town	106 S. Willow St.	Kenai, AK 99611	283-7250
Veronica's Café	604 Petersen Way	Kenai, AK 99611	283-2725



Transportation in the Kenai-Soldotna Area

NAME OF BUSINESS	ADDRESS	CITY, STATE, ZIP	Tel #
Alaska Cab	47623 West Point Ave	Soldotna, AK 99669	907-283-6000
Avis Car Rental	305 N Willow St #114	Kenai, AK 99611 (airport)	283-7900
Budget Rental	305 N Willow St #114	Kenai, AK 99611 (airport)	283-4506
Budget Rental	245 Trading Bay	Kenai, AK 99611	283-4506
Grant Aviation	305 N. Willow St - Kenai Municipal Aiport	Kenai, AK 99611	283-6012
Midway Auto Park Rentals	37452 Kenai Spur Hwy.	Soldotna, AK 99611	260-3722
Payless	305 N Willow St #114	Kenai, AK 99611 (airport)	283-6428
Ptarmigan Taxi & Courier Service	PO Box 2342	Kenai, AK 99611	(907) 598-4242
RAVN	305 N. Willow St. - Kenai Municipal Airport	Kenai, AK 99611	
Budget Rental	43965 Sterling Hwy/	Soldotna, AK 99611	800-866-8394 335-3970



Submitted By
Gary L. Hollier
Submitted On
11/17/2015 2:36:00 PM
Affiliation
self

Phone
907-252-5890
Email
glh@alaska.net
Address
36045 Reef Dr
Kenai, Alaska 99611

Dear Chairman Kluberton and members of the Alaska Board of Fish,

I am writing to urge the BOF to have the 2017 Upper Cook Inlet Finfish meeting on the Kenai Peninsula.

I have attended every UCI BOF meeting since 1986. I have conservatively spent \$30,000 on attending BOF meetings. Even tho the BOF is on a three year cycle, there were years when the BOF met darn near annually on UCI issues.

Additionally, with the annual Agenda Change Request meeting in October and the subsequent Statewide meeting in the Spring of the year, you can see that lodging, food, transportation, etc. over a thirty year period has been expensive. I obviously wanted to attend these meetings and was my choice. I believe that it would be more than equitable to hold the meeting on the Peninsula, in 2017.

As a thought, public testimony could be taken in the Valley and then in Anchorage, then move the meeting with public testimony taken on the Peninsula and deliberations to be held there also.

On a side note, with the State of Alaska's financial situation, I would be in favor of the BOF and BOG to be on a FIVE year cycle. The public would still have the ability to submit ACR's at the appropriate time, but I believe this could be a very cost cutting mechanism.

Thank you,
Gary L. Hollier

36045 Reef Dr.
Kenai, Ak.

907-252-5890



Submitted By
Leah Clark
Submitted On
11/17/2015 12:07:01 PM
Affiliation
Fisherman

Phone
360-430-8522

Email
clark88@me.com

Address
27 Howard Rd
Cathlamet, Washington 98612

i support the permit stacking law. please pass the permit stacking in the Egegik District. As a set netter here it's always difficult to find someone to transfer my other permit to who can work all summer. By not passing this does not mean I will sell one it just means the inconvenience of finding a name/body to put it in will continue.



Submitted By
Lorali Simon
Submitted On
11/17/2015 11:22:40 AM
Affiliation

I strongly believe the 2017 Upper Cook Inlet Board of Fisheries Meeting should be held in Anchorage. Anchorage is the most neutral location, and I believe that holding the meeting in Anchorage will provide the greatest opportunity for all stakeholders of Upper Cook Inlet to participate. Anchorage provides the most convenient travel, lodging, and meeting options. I respectfully ask for your vote in support of the 2017 UCI BOF meeting to be held in Anchorage.



Submitted By
Michael Duta
Submitted On
11/17/2015 1:50:54 PM
Affiliation
Set Net Fisherman

Phone
2062769586

Email
maduta@alaska.edu

Address
1700 Eastridge Drive
Anchorage, Alaska 99501

1. For dual permits for setnetters
2. For Proposal 32, registration timing of the drift fleet.



Submitted By
Michael J Clark
Submitted On
11/17/2015 11:53:01 AM
Affiliation
Fisherman

Phone
3604312571

Email
mclark8991@rocketmail.com

Address
27 Howard Rd
Cathlamet, Washington 98612

I support set net permit stacking for Bristol Bay or at least in the Egegik district



November 17, 2015

Ralph Renzi Jr.
2640 N. Hematite Dr.
Wasilla, AK 99654

Alaska Department of Fish and Game
Board Support Section
Po Box 115526
Juneau, Alaska 99811-5526
Fax: (907)465-6094
Email: dfg.bof.comments@alaska.gov

Alaska Board of Fisheries Chairman and Members,

I support having the 2017 Upper Cook Inlet Board of Fisheries Meeting in Anchorage. Anchorage will provide the greatest opportunity for all stakeholders of Upper Cook Inlet to participate in a meeting which most likely will be attended by a great number of individuals.

Anchorage is the most neutral and commonsense location. It offers the most convenient travel options for attendees as well as ample accommodations in terms of lodging, dining and local transportation. Anchorage also affords participants a remarkable technological infrastructure which will enable real-time communication opportunities and research advantages.

I respectfully ask for your vote in support of the 2017 UCI BOF meeting to be held in Anchorage.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Renzi Jr.", written in a cursive style.

Ralph Renzi Jr.



Submitted By
Regg Simon
Submitted On
11/17/2015 1:53:27 PM
Affiliation

Phone
907-982-2844
Email
reggsimon@hotmail.com
Address
1940 Driftwood Circle
Palmer, Alaska 99645

Alaska Board of Fisheries Chairman and Members,

I support having the 2017 Upper Cook Inlet Board of Fisheries Meeting in Anchorage.

Do not bow to the political pressure and special interest fishing groups from the Kenai Peninsula. You have a responsibility to represent EVERYONE in the Cook Inlet. Especially us at the headwaters of the inlet. The largest population base that uses the Cook Inlet is in Anchorage.

I believe Anchorage is the most neutral location.

I believe that holding the meeting in Anchorage will provide the greatest opportunity for all stakeholders of Upper Cook Inlet to participate.

I believe Anchorage provides the most convenient travel, lodging, and meeting options.

I respectfully ask for your vote in support of the 2017 UCIBOF meeting to be held in Anchorage.

Sincerely,

Regg Simon

Palmer, AK



Submitted By
Terri Meier
Submitted On
11/17/2015 1:15:41 PM
Affiliation
Terri Meier

Phone
907-745-3707
Email
meier@mtaonline.net
Address
6701 E. Zephyr Dr.
Wasilla, Alaska 99654-4700

I support having the 2017 Upper Cook Inlet Board of Fisheries Meeting in Anchorage.

I believe Anchorage is the most neutral location.

I believe that holding the meeting in Anchorage will provide the greatest opportunity for all stakeholders of Upper Cook Inlet to participate.

I believe Anchorage provides the most convenient travel, lodging, and meeting options.

I respectfully ask for your vote in support of the 2017 UCI BOF meeting to be held in Anchorage.



Submitted By
Michael J Clark
Submitted On
11/17/2015 11:53:01 AM
Affiliation
Fisherman

Phone
3604312571

Email
mclark8991@rocketmail.com

Address
27 Howard Rd
Cathlamet, Washington 98612

I support set net permit stacking for Bristol Bay or at least in the Egegik district



Submitted By
Michael Duta
Submitted On
11/17/2015 1:50:54 PM
Affiliation
Set Net Fisherman

Phone
2062769586

Email
maduta@alaska.edu

Address
1700 Eastridge Drive
Anchorage, Alaska 99501

1. For dual permits for setnetters
2. For Proposal 32, registration timing of the drift fleet.



Submitted By
kodi vetsch
Submitted On
11/17/2015 3:58:47 PM
Affiliation

Phone
5098336725

Email
kodivetsch@gmail.com

Address
po 321
ranchester, Wyoming 83839

My Name is Kodi Vetsch and I am writing In favor of permit stacking for set gillnet operations in the Egegik District / Bristol bay area. Most set gillnet operations are family moonlight businesses, as anyone who participates knows there is simply no way to make a living on the fishing alone. Therefore we spend our vacations and burn up our time off to gamble on the fishing season every summer. The fact that we can only operate one shackle of gear under a permit holders name can greatly reduce our catch for the season. These permit holders are the working class, blue collar citizens who are juggling careers, college, trade schools, as well as unexpected tragedies that we cannot plan for, such as family emergencies and the unforeseeable problems that can arise. Permit stacking allows families to operate their set net gear more effectively because we can fish all of our gear through out the season. The salmon season is roughly a month long and not many people can take a month off from their day job or from school, however, they can usually afford to take a couple of weeks off and come help out the family. On a personal note, last season my grandfather had heart related issues and had to leave 2 weeks early. The fishing was good late in the season and it hurt our catch last year because my mother and I could not operate his net. Please take permit stacking into consideration this year, for it greatly helps these family businesses survive. Thank you

11/18/15: Boards Support confirmed with author that he is commenting on proposals 48 & 50.



**Alaska Independent Fishermen's
Marketing Association**

P.O. Box 60131
Seattle, WA 98160
Phone/Fax (206) 542-3930
aifma1@seanet.com



November 18, 2015

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 25526
Juneau, Alaska 99802-5526

Dear Board of Fisheries Members:

The **Alaska Independent Fishermen's Marketing Association (AIFMA)** has positions on three proposals:

Proposal 51: Support
Proposal 84: Oppose
Proposal 86: Support

AIFMA represents permit holders who fish for salmon in Bristol Bay. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon permit holders in Bristol Bay.

Thank you for the opportunity to provide comment on these proposals.

Sincerely,

A handwritten signature in cursive script that reads "David Harsila".

David Harsila
President



ALASKA BOARD OF FISHERIES BRISTOL BAY SALMON PROPOSALS REVIEW

AIFMA Supports Proposal 51 – 5 AAC 06.333

The dual permit regulation has accomplished three goals and has been generally accepted in the Bristol Bay fishery. The goals are 1) continuing to keep local watershed fishermen on the water, who own a permit, 2) continue to reduce harvest capacity by removing gear from the water and 3) increasing proportional catch percentage by each boat as boat numbers decrease. (See CFEC report of 11/6/12: Vessels Fished in the Bristol Bay Drift Gillnet Fishery).

The report shows a steady increase of earnings between 2004 and 2011, or since the two permit law was put into effect. This report shows all three permit holder groups, Borough, Other Alaskan, and Nonresident with increased earnings from 2004-2011.

Bristol Bay driftnet fishers, on average, have experienced a chronic decrease in economic value of their individual businesses, adjusted for inflation. For example, the 2015 ex-vessel price of 50 cents per pound is the lowest price in recent times. There continues to be overharvesting capacity in Bristol Bay, see CFEC optimum number report 04-3N, October, 2004.

Improved Economics

The number of vessels in operation will more likely be reduced to the recommended number cited in the CFEC Optimum Number Study of 800-1200 permits. This important analysis by the CFEC revealed a critical economic balance point for the well being and sustainability for the commercial drift fleet in Bristol Bay.

Improved Quality

This proposal will significantly contribute to improved quality of salmon harvested from the waters of Bristol Bay. By achieving the CEFC optimum number range, the intense competition, “race for the fish”, will be effectively diminished. Fisher’s attention and work will be redirected to help themselves improve profits by focusing on increasing the quality of fish harvested that will then be available for higher value markets.

Everyone Benefits

Fishers who choose not to invest in a second permit gain the advantages of reduced boats, gear and competition on the water, but do not bear the costs to achieve it. If there are disadvantages, they are outweighed by the individual economic gains that would be realized by individual fishers to improve and promote their businesses.

AIFMA Opposes Proposal 84 – 5 AAC 67.022

Hook and release sport fisheries incur unacceptable mortality rates for king salmon. Low stocks of chinook salmon directly affect regulations that impact the Bristol Bay commercial salmon fishery.

AIFMA Supports Proposal 86 – 5 AAC 67.020



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November 17, 2015

Glenn Haight
Executive Director
ADFG Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526
glenn.haight@alaska.gov

Re: Recommendation to hold the 2017 Board of Fisheries Upper Cook Inlet meeting on the Kenai Peninsula, in either Kenai or Soldotna

Dear Mr. Haight:

The Alaska Salmon Alliance (ASA) recommends the Board of Fisheries conduct the 2017 Board of Fisheries meeting in Kenai or Soldotna. Governor Walker submitted a letter on October 21, 2015 recommending the change in venue for the meeting. In his letter the Governor correctly noted that it has been 18 years (five full cycles) since a meeting was held in the area where much of the fishing takes place. He also makes reference to this being a fairness issue, and that as a courtesy to those who live and work and fish on the Peninsula, there should be an opportunity to participate in a Board of Fisheries meeting close to home on some occasion.

The ASA is aware that recently the Anchorage ADFG Advisory Committee adopted a motion to change the venue of the meeting to either Kenai or Soldotna, and to use the opportunity to create a rotating three year cycle, that will allow for rotating meeting locations between the Kenai area, Anchorage and the Mat Su Valley. The Anchorage AC notes concern for fairness issues and cost savings that can be incurred. The ASA supports the Anchorage AC motion to change the venue of the meeting to the Kenai area and to implement a rotating schedule of meetings in the Southcentral Region of Alaska.

The Kenai/Soldotna ADFG AC also supports the change in location of the meeting. It is also noteworthy that the Mayors of Kenai, and Soldotna and the Mayor of the Kenai Peninsula Borough, on behalf of the Peninsula municipalities filed a detailed letter of support for the change of venue dated November 13th. The letter documents supporting resolutions from Peninsula municipalities and several legislators.

The Kenai Mayors' letter notes significant cost savings that can be realized by holding the 2017 meeting in the Kenai-Soldotna area. They have offered at no cost to the State of Alaska, meeting space at either the Soldotna Regional Sports Center, and the Kenai Central High School Auditorium and challenger Center. The Mayors are also offering



complimentary coffee service for the meetings. Based on costs incurred for the 2014 UCI meeting in Anchorage, the offers represent a savings of over \$60,000.

Best regards,

Paul Dale, President
Alaska Salmon Alliance

cc: Governor Bill Walker
Senator Cathy Giessel
Senator Peter Micciche
Speaker Mike Chenault
Representative Kurt Olson
Representative Paul Seaton
Commissioner Sam Cotten



Submitted By
teresa coghill
Submitted On
11/18/2015 10:38:45 AM
Affiliation
life time fisherman

I am in support of proposal #45 which would allow a set net permit holder to hold an dfish 2 permits. this should never have been done away with. i believe that set nets should be allowed to stack their permits. I also support #29 mininum distance between units of gear. setnetters should be allowed to split their 50 fathoms on the same site.



Submitted By
Loren Flagg
Submitted On
11/18/2015 11:01:57 AM
Affiliation
Private Angler

Phone
907-283-0440
Email
lsflaggs@gmail.com
Address
PO Box 1883
Kenai, Alaska 99611

To BOF Members:

As a long time Alaska resident sport fisherman I would like to add my voice to those supporting the return of an Upper Cook Inlet BOF meeting to the Kenai Peninsula. The Kenai/Soldotna area is the support center for commercial, sport, and personal use fisheries in UCI. Two of the three most productive salmon systems for UCI, the Kenai and Kasilof Rivers, are in this area. It is difficult, and expensive, for those in the area to travel and attend BOF meetings in Anchorage. This is especially true for resident sport fishermen living on the Kenai. It is only fair that they be given more of an opportunity to participate in the meetings. Thank you for considering the Kenai/Soldotna area for the 2017 UCI meeting.

Sincerely,

Loren Flagg
PO Box 1883
Kenai, AK 99611



**ALASKA BOARD OF FISHERIES
BRISTOL BAY FINFISH
DECEMBER 2-8, 2015**

**Alaska Board of Fisheries Proposals
WRITTEN COMMENTS**

BY

The Bristol Bay Economic Development Corporation

NOVEMBER 2015





Board Meeting: Bristol Bay Finfish: 11/19/2015

Name: Gene J Sandone

Affiliation: Bristol Bay Economic Development Corporation (BBEDC)

Contact Phone: 907-631-6033

Email: gjsandone@gci.net

Address Line 1: PO Box 1464

Address Line 2

City: Dillingham,

State: Alaska

Zip: 99576

Do you consent to your contact information being included on printed copies of your comment? Yes



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District Boundaries/Gear (6 proposals; Proposals 25-30)

PROPOSAL 25--5 AAC 06.100. Description of area.

RECOMMENDATION: OPPOSE (increases interception; allocative between BB Districts)

BBEDC COMMENTS:

BBEDC opposes Proposal 25. The largest concern with this proposal is the possibility of intercepting fish bound for other districts. Since the suggested new fishing district lines are situated both north and south of the established fishing district, except for Ugashik (only north extension; Figure 9), there is a good probability that expanding the fishing area will result in additional interceptions, especially for the northern expansion.

There is no doubt that expanding the fishing area would give the fishers more opportunity to fish and would probably result in less crowding. However, the fishers may pile up against the new line, as they did in the original fishing district.

This proposal may change salmon catch allocation to the various districts through increased interception.

Enforcement leaves and there is much illegal fishing. Boundaries are meaningless...Illegal fishers benefit and legal fishers are left with left overs.

We agree with the Department’s position to Oppose.

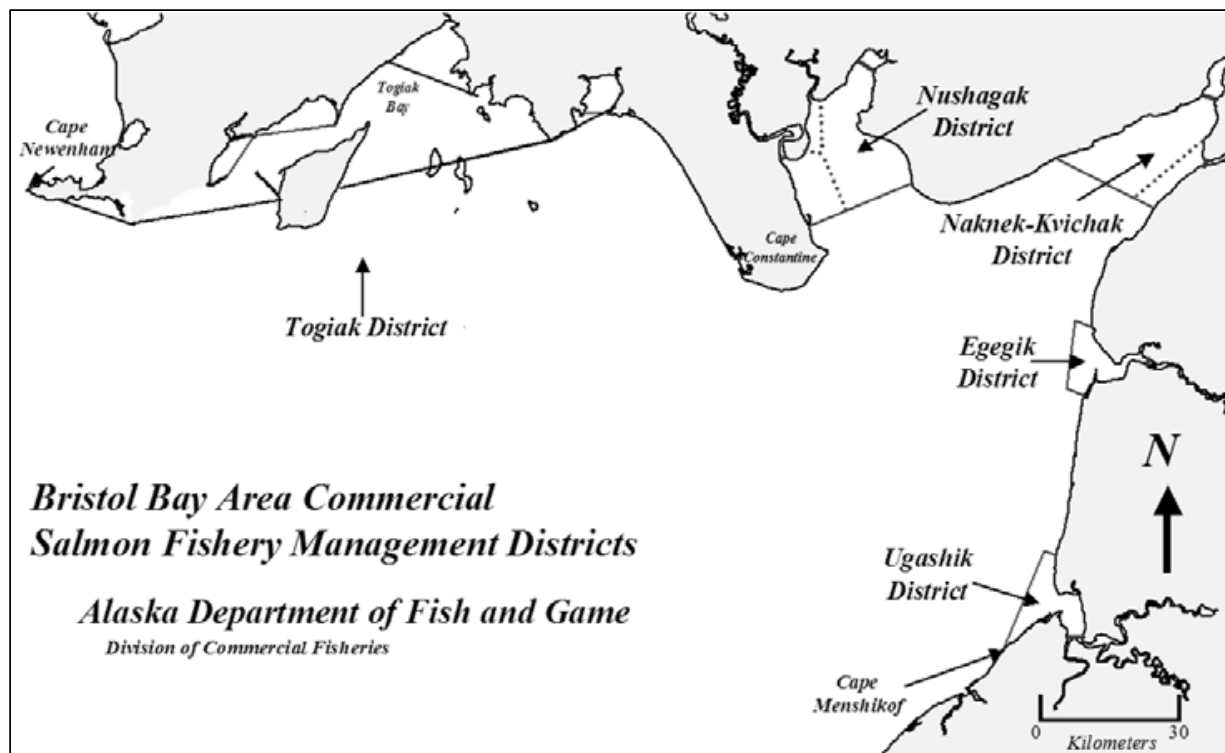


Figure 1. Map of the Bristol Bay Management Area showing fishing Districts.



PROPOSAL 26 – 5 AAC 06.200. Fishing districts and sections.

RECOMMENDATION: OPPOSE (increased interception; allocative between Districts)

BBEDC COMMENTS: BBEDC opposes Proposal 26. The concern would be elevated interception of fish bound for other districts. See map above in Proposal 25 (Figure 9) for reference.

There may also be district allocation changes because of the possible increased interception of fish bound for other districts. This proposal may change salmon catch allocation to the various districts through increased interception.

We agree with the Department’s position to OPPOSE.

PROPOSAL 27 – 5 AAC 39.280. Identification of stationary fishing gear.

RECOMMENDATION: NEUTRAL (SUPPORT PROPOSAL 28)

Require that a CFEC permit holder’s name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers (***This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.***)

Set net markings signs shall include the name of the permit holder in letters at least 6" high and 1" wide, the same as the vessel name for drift vessels. The permit holder may include a phone number for contact.

BBEDC COMMENTS:

BEDC is Neutral on Proposal 27. BBEDC supports a similar proposal, Proposal 28. There already are number size requirements for the CFEC number, but not the letters of the name. This proposal will specify that the letters of the name appear the same as for the numbers. ***Numbers must be at least six inches in height with lines at least one-inch-wide and of a color contrasting with the background.*** Some may argue that the CFEC number is identification enough because it is tied to the name of the fisherman operating the gear. The owner or operator of a set gillnet in operation shall have at each end of the set gillnet a red keg, buoy, or cluster of floats, or, in the case of set gillnets anchored to land, shall have a red keg, buoy, or cluster of floats at the outer end of the net. The CFEC number is required on the kegs, buoys, or clusters of floats may bear only a single number - that of the permit holder operating the gear.

This proposal will have state-wide implications. Although the proposal will be probably heard in each area BOF meeting, it will be deliberated on in the March state fin fish meeting. Testimony and written comments can be provided to the BOF for the March meeting.



PROPOSAL 28 – 5 AAC 39.280. Identification of stationary fishing gear.

RECOMMENDATION: SUPPORT

Change the character size requirements for set gillnet marking signs, as follows
Insert "twelve inches" where now says "six inches" and add "with lines at least one inch wide."
(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)

BBEDC COMMENTS:

BBEDC supports Proposal 28. Proponent cites discrepancy between drift boats and set gillnets. He states that the drift boats and set net skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, but shore side set net markings are only required to be six inches. He would like consistency. He also cites that it is difficult to read CFEC numbers on a set net beyond 200 feet.

This proposal will have state-wide implications. Although the proposal will be probably heard in each area BOF meeting, it will be deliberated on in the March state fin fish meeting. Testimony and written comments can be provided to the BOF for the March meeting.

PROPOSAL 29 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: SUPPORT AS AMENDED (include only Egegik District; no extension of offshore set net limit)

Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's set net site, as follows: 5 AAC 06.335 Minimum distance between units of gear needs to include the wording "**Except that a CFEC permit holder may operate seaward of their own set gillnet.**"

BBEDC COMMENTS: BBEDC supports Proposal 29 as amended. We support restricting this proposal to the Egegik District. Other area fishermen should testify if this practice needs to be codified in other districts.

This practice of having a short break between a couple nets of 25 fa each has been done for a while in the Egegik District and has just come to the attention of Public safety. Public Safety is now issuing citations for this practice because the break between these nets is less than 300 feet. We understand that a CFEC permit holder may split their 50 fathoms of net into two 25-fa nets and fish them separately with a short break between them. Under current regulations this practice is illegal; the break needs to be at least 300 feet. This proposal would allow the same permit holder to break up his 50 fathoms of net in to different sized nets and fished closer together than 300 feet apart. This practice has been going on for years; it is not an allocative issue.



PROPOSAL 220 – 5 AAC 06.XXX. Vessel specifications and operations.

RECOMMENDATION: OPPOSE

Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods.

BBEDC COMMENTS: BBEDC opposes Proposal 220. This proposal seeks to have the stated exclusions applicable only to the Egegik District during driftnet fishing periods. Proposal 221 is similar but only seeks to prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites within all Districts. This proposal (220) seeks to exclude those vessels but also includes hard fixed buoys in the exclusion. Additionally, Proposal 220 seeks to exclude these vessels and hard fixed buoys from the district for a specified time, 30 minutes before the start of the fishing period to 1 hour after high tide. BBEDC opposes this proposal because it will have serious impacts to the delivery process. It will negatively affect fishermen as well as tenders and those who have net barges in the area.

PROPOSAL 221 – 5 AAC 06.XXX. Vessel specifications and operations.

RECOMMENDATION: SUPPORT WITH MODIFICAITONS (apply to Togiak District only)

This proposal seeks to prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites, as follows with suggested language

5 AAC 06.341 Vessel specifications and operations.

(c) No tender, buyer or fish transport vessel shall willfully or intentionally interfere with commercial fishing operations, sites and gear. No tender, buyer or fish transport vessel shall not take mooring, anchor or remain stationary for an extended period within 1,500 feet of an operational set net site.

BBEDC COMMENTS: BBEDC supports Proposal 221 only for the Togiak District. Other area fishermen should testify as to applicability of this proposal to other districts.

The proponent sites conflict in the Togiak District between set netters and a tender barge. However, this proposal appears to seek that the regulation apply to all districts. BBEDC supports this proposal within the Togiak District only. BBEDC does not support an Area-wide regulation.



Replace Reference to Regulatory Markers with GPS Coordinates (8 proposals: Proposal 30, 71, 72, 73, 74, 76, 80, and 91

PROPOSAL 30 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: SUPPORT (housekeeping)

Remove reference to department regulatory markers from the regulations describing gillnet specifications and operations. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

BBEDC COMMENTS:

BBEDC conditionally supports Proposals 30. This is an ADF&G housekeeping proposal. However, before the members of the BOF support and pass this innocuous-appearing proposal, BBEDC suggests that all GPS locations using latitude and longitude be verified by an ADF&G staff member using an appropriate sensitive GPS navigational device. Comments heard while attending various Bristol Bay AC meetings seem to indicate that many of the coordinates for the locations of the regulatory markers were provided by members of the public based on their personal knowledge of the location of the regulatory marker. We suggest that ADF&G verify all coordinates before the start of the 2016 fishing season.

We agree with the Department’s position to support this proposal, contingent on verification of the coordinates.

PROPOSALS 71 – 74, 76, 80, and 91 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan; 5 AAC 06.370. Registration and reregistration; 5 AAC 06.200. Fishing districts and sections; 5 AAC 06.350. Closed waters; 5 AAC 01.310. Fishing seasons and periods; 5 AAC 27.850. Closed waters in Bristol Bay Area.

These proposals would clarify regulations by removing reference to Department regulatory markers and inserting latitude and longitude coordinates for area boundaries.

BBEDC COMMENTS: BBEDC conditionally supports these proposals These are ADF&G housekeeping proposals. However, before the members of the BOF support and pass this innocuous-appearing proposal, BBEDC suggests that all GPS locations using latitude and longitude be verified by an ADF&G staff member using an appropriate sensitive GPS navigational device. Comments heard while attending various Bristol Bay AC meetings seem to indicate that many of the coordinates for the locations of the regulatory markers were provided by members of the public, based on their personal knowledge of the location of the regulatory



marker. If this is true, then we suggest that ADF&G verify these coordinates before the start of the 2016 fishing season.

We agree with the Department's position to support this proposal, contingent on verification of the coordinates.



Registration (14 proposals; Proposals 31-54)

PROPOSAL 31, 32, 33, 35, 36, 37, 38, 39, 40 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT THE CONCEPT

Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay, as follows:

BBEDC COMMENTS:

BBEDC supports the concept in these proposals. We recommend that the BOF take no action on these proposals and deliberate on Proposal 41.

Several proposals, Proposals 31-33 and 35-40, address this issue of no transfer restrictions before June 25. All are in favor of registration for a specific district and thereby instituting the 48-h transfer restrictions. BBEDC suggests that the BOF take no action on Proposals 31-33 and 35-40.

Proposal 32 seeks to return to regulations prior to 2010. However, this may not be the most appropriate solution because it would eliminate regulations that do not need to be eliminated to solve this problem. The language in Proposal 32 seeks to eliminate **5 AAC 06.370** (a)(1) through (a)(6). There is merit in keeping regulations that specifically address each district because there are several important regulations contained in (a)(1) through (a)(6).

Proposal 37 lists the problems with the late registration (June 25) and offers how early registration eliminates the problems.

See also comments and recommendation found in Proposal 41.

PROPOSAL 41 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT

Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date, as follows:

In 5 AAC 06.370 (a) (4) delete the words "Beginning June 25" and begin the paragraph "Before taking"

BBEDC COMMENTS: BBEDC supports Proposal 41. Since there are several proposals addressing this issue, the BOF will most likely choose one of the proposals to discuss and deliberate on. The final proposal may or may not look exactly like the one proposal they choose as a vehicle for the discussion and deliberation. We support registration of permit holders to a specific fishing district prior to June 25th and include transfer restrictions. BBEDC supports passage of Proposal 41.



Proposal 41 suggests the most expedient method of eliminating the June 25 registration date so that before taking salmon a CFEC permit holder must register in the district where he intends on fishing is just deleting the phrase in (a)(4), [BEGINNING JUNE 25,]. This phrase deletion would not affect the other regulations in this section and will eliminate the delay of registration until June 25. Although Proposal 41 suggests this change, it doesn't provide suggested language. SEE SUGGESTED LANGUAGE BELOW.

SUGGESTED LANGUAGE:

5 AAC 06.370. Registration and reregistration

(a) Before taking salmon in the Bristol Bay Area, a commercial salmon CFEC permit holder shall register for a district described in 5 AAC 06.200, as follows:

(4) [BEGINNING JUNE 25, b] Before taking salmon in the Naknek, Kvichak, Egegik and Ugashik Districts, a commercial salmon drift gillnet CFEC permit holder shall register for one of these districts;

PROPOSAL 34 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Reduce the required waiting period when registering for a new district from 48 hours to 12 hours, as follows:

Modify the language in the regulation to reflect a waiting period of 12 hours instead of 48 hours. Draft language. Substitute

BBEDC COMMENTS: BBEDC opposes Proposal 34. Replacing the 48-h transfer restriction to 12 hours would effectively be similar to no waiting time to transfer to another district. It may result in the type of complains that no transfer restrictions caused in Proposals 31-33 and 35-41. We support keeping the 48-h transfer restriction.

We agree with the Department's position to oppose this proposal.

PROPOSAL 42 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement, as follows:

BBEDC COMMENTS: BBEDC opposes Proposal 42. In 2009, the BOF removed all transfer restrictions for set netters within a fishing district except for the Nushagak District. It was the set net fishers of this Nushagak District that wanted the 48-h transfer restriction to remain. There are 6 statistical Areas within the Nushagak District that are open to commercial fishing. The 48-h transfer restriction does benefit some set netters because it deters the immediate influx of set netters from a poor area to a good fishing area. Eliminating this transfer requirement will no doubt alter the allocation among set netters within a statistical area when fishing is good in one



area and poor in another. Additionally, note that the notification period may be reduced by commissioner's announcement.

PROPOSAL 43 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District

BBEDC COMMENTS: BBEDC opposes Proposal 43. This proposal retains the 48-hour transfer for initial registration for set netters. However, after registering for a statistical area, there is no waiting period to transfer to a new statistical area within the Nushagak District. BBEDC is opposed to this proposal. BBEDC seeks to have the 48-hour waiting period as currently in regulation.

PROPOSAL 44 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT

Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 44. Although legal, it may not be in the spirit of the law that a permit holder who fishes another district with his vessel can fish with another permit holder who has registered in Togiak with the same vessel. Permits that fish in other districts cannot transfer to Togiak until a set date and likewise permits that fish in Togiak cannot transfer to other districts until the same set date, July 27. Having a fisher register in the Togiak District and then use a boat that has fished in another district, tends to circumvent the spirit of the law. The owner of the boat can fish in the Togiak District prior to July 27 by having another permit holder register in Togiak District.



Permit Stacking (9 proposals; Proposals 45-53)

PROPOSAL 45, 46, 47, 48, 50 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: OPPOSE (allocative between gear types and districts)

PROPOSAL 45, 46, 48, 50:

Reauthorize Bristol Bay set gillnet permit stacking to allow one permit holder to operate 100 fa of set gillnet gear in the aggregate

BBEDC COMMENTS: BBEDC opposes all set net permit stacking proposal. Although there are minor differences among these proposals, **Proposals 45, 46, 48 and 50** seek to reestablish permit stacking for set gillnet permits. These proposals, however, limit the amount of gear at one site to 50 fa. **Proposal 47** seeks to establish permit stacking also, but seeks to allow 75 fa of gear to be fished at a single site. We oppose all these proposals and believe that it is not in the best interest of the watershed fishermen nor the fishery to allow permit stacking. Specifically, we believe that allowing permit stacking will cause reallocation between different gear types and among districts. BBEDC also believes that permit stacking will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.

We agree with the Department’s position to oppose Proposal 47.

PROPOSAL 49 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: OPPOSE

Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign, as follows:

BBEDC COMMENTS: BBEDC opposes Proposal 49. BBEDC believe that it is not in the best interest of the fishermen nor the fishery to allow dual operation of set net gear. Specifically, we believe that allowing dual operation of set net gear will cause reallocation between different gear types and among districts. BBEDC also believes that the dual operation of set net gear will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. Additionally, the operation of 75 fa of set net gear on one set net site will present problems associated with allocation within the gear type. It would probably negatively affect neighboring set gill net operations.



PROPOSAL 51, 52 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

RECOMMENDATION: OPPOSE (allocative between gear types and districts)

PROPOSAL 51 and 52:

This proposal would allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay. These proposals seek to operate 200 fa of gear using two permits rather than the 150 fa allowed using one permit.

BBEDC COMMENTS: BBEDC opposes Proposals 51 and 52. These proposals (51 and 52) would allow one permit holder to operate 200 fa of drift gillnet gear instead of 150 fa as in regulation. BBEDC opposes this proposal and believe that it is not in the best interest of the fishermen nor the fishery to allow permit stacking using drift gillnet permits. Specifically, we believe that allowing permit stacking for drift gillnet permits will cause reallocation between different gear types and among districts. BBEDC also believes that permit stacking will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.

PROPOSAL 53 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

RECOMMENDATION: OPPOSE

Increase the amount of drift gillnet gear allowed to 300 fa when two permit holders are jointly operating

COMMENT: BBEDC opposes Proposal 53. This proposal seeks to allow the use of 300 fathoms of gear when two CFEC permit holders are fishing from the same vessel. Currently, only 200 fathoms of gear can be used in Dual operations. We oppose this proposal and believe that it is not in the best interest of the fishermen nor the fishery to increase the amount gear under dual operation. Specifically, we believe that allowing in increase in the amount of drift gillnet gear used under dual operation will cause reallocation between different gear types and among districts. BBEDC also believes that an increase in the dual operation of drift gillnet gear will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.



MANAGEMENT PLANS: Egegik/Ugashik Districts

PROPOSAL 54 – 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE (takes away opportunity; allocative between districts)

Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing, as follows:

COMMENTS: BBEDC opposes Proposal 54. Tables 4, 5, and 6 present the information from the WASSIP study regarding the catch of Bristol Bay stocks within the Egegik, Ugashik, and Naknek/Kvichak Districts, respectively. Note that while the percent interception of other BB salmon stocks within the Naknek/Kvichak District are very low, (mean=5.1%; range: 3.3% - 6.4%), the mean percent interception rate within the Ugashik District (mean=16.3%; range 12.3% - 21.2%) is not that dissimilar to the Egegik District interception rate (mean=21.2%; range 13.3% - 27.5%) (Tables 4, 5, 6). Additionally if adopted, the regulations may impede ADF&G's ability to manage the Egegik fishery. There would be substantial loss of management flexibility along with loss of harvest. This must be weighed in relation to the benefits gained by reducing interception through by closing the District for 5 days through this proposal. Additionally, the closing of the Egegik District for 5 days will most likely effect allocation among districts. BBEDC opposes this proposal because it basically takes away opportunity with no substantial benefit to reduce interception.

We agree with the Department's position to Oppose this proposal.



Table 1. Estimated median catch of Bristol Bay sockeye salmon stocks in Egegik District, 206-2008

	Median Catch of Bristol Bay Stocks			Egegik District Harvest Composition (%) of Bristol Bay Stocks			Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008	2006	2007	2008	2006	2007	2008
Togiak	0	10,585	1,674	0.0	0.2	0.0	0.0	1.0	0.2
Igushik	1,370	15,916	33,169	0.0	0.2	0.4	0.2	1.9	1.9
Wood	16,224	47,540	42,172	0.2	0.7	0.6	0.1	0.6	0.6
Nushagak	2,516	7,165	18,278	0.0	0.1	0.2	0.1	0.3	0.9
Kvichak	158,605	518,635	686,044	2.1	8.0	9.3	2.8	8.9	10.9
Alagnak	73,314	245,324	221,340	1.0	3.8	3.0	2.2	5.1	4.9
Naknek	227,783	427,387	730,498	3.1	6.6	9.9	4.3	4.9	8.3
Egegik	6,412,241	5,015,799	5,358,613	86.7	77.4	72.5	74.5	66.6	67.3
Ugashik	507,177	202,540	300,359	6.9	3.1	4.1	12.2	2.6	9.5
Total	7,397,000	6,478,290	7,388,790	100.0	100.0	100.0			
Total interceptions of OTHER BB stocks	986,989	1,475,092	2,033,534	13.3	22.8	27.5			



Table 2. Estimated median catch of Bristol Bay sockeye salmon by stock in the Ugashik District, 2006-2008.

	Median Catch of Bristol Bay Stocks			Ugashik District Harvest Composition (%) of Bristol Bay Stocks			Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008	2006	2007	2008	2006	2007	2008
Togiak	73	0	186	0.0	0.0	0.0	0	0	0
Igushik	97	4,427	1,249	0.0	0.1	0.1	0	0.5	0.1
Wood	22,718	5,147	5,136	0.9	0.1	0.2	0.2	0.1	0.1
Nushagak	641	0	5,344	0.0	0.0	0.2	0	0	0.3
Kvichak	40,817	106,958	43,674	1.7	2.1	1.9	0.7	1.8	0.7
Alagnak	12,544	41,729	35,306	0.5	0.8	1.5	0.4	0.9	0.8
Naknek	37,748	93,246	40,457	1.6	1.9	1.7	0.7	1.1	0.5
Egegik	180,775	513,071	358,024	7.6	10.3	15.5	2.1	6.8	4.5
Ugashik	2,103,104	4,250,184	1,832,096	87.9	85.0	79.2	50.5	53.9	57.6
Total	2,392,509	5,001,014	2,312,506	100.0	100.0	100.0			
Total interceptions of other BB stocks	295,413	764,578	489,376	12.3	15.3	21.2			



Table 3. Estimated median catch of Bristol Bay sockeye salmon by stock in the Naknek/Kvichak District, 2006-2008.

	Median Catch of Bristol Bay Stocks			Naknek-Kvichak District Harvest Composition (%) of Bristol Bay Stocks			Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008	2006	2007	2008	2006	2007	2008
Togiak	391	0	1,923	0.0	0.0	0.0	0.1	0.0	0.3
Igushik	3,656	9,674	7,273	0.1	0.1	0.1	0.5	1.1	0.4
Wood	46,016	45,496	106,578	0.6	0.5	1.0	0.4	0.6	1.5
Nushagak	11,467	89,256	28,790	0.2	1.0	0.3	0.4	3.4	1.4
Kvichak	2,322,878	2,146,599	2,517,895	32.5	23.8	24.3	40.9	36.8	39.9
Alagnak	1,464,145	1,852,336	1,961,095	20.5	20.5	18.9	43.1	38.3	43.3
Naknek	2,962,182	4,726,847	5,227,813	41.5	52.4	50.5	55.4	54.4	59.3
Egegik	291,406	144,811	468,007	4.1	1.6	4.5	3.4	1.9	5.9
Ugashik	45,089	5,874	47,892	0.6	0.1	0.5	1.1	0.1	1.5
Total	7,138,829	9,014,702	10,358,237	100.0	100.0	100.0			
Total interceptions of other BB stocks	398,025	295,111	660,463	5.6	3.3	6.4			

PROPOSAL 55 – 5 AAC 06.331. Gillnet specifications and operations.
RECOMMENDATION: OPPOSE

Modify set gillnet operations in the Ugashik District to extend to 1,000 feet from the 18-foot high tide mark in statistical area 321-50 (Ugashik Village), with the provision that all gear farther than 600 feet from the 18-foot east bank high tide mark, except anchors and buoys, would be removed during closed periods.

BBEDC COMMENTS: BBEDC opposes Proposal 55. This proposal has been before the BOF several times before and in different forms. The problem is that the Ugashik River is approximately 1,500 feet across where the proponent fishes. Allowing the set net to be 1,000 feet from shore has caused navigational problems and has been classified as a navigational obstruction. After the last Bristol Bay finfish BOF meeting, ADF&G submitted an Agenda Change Request (ACR) to shorten the distance to the original 600 feet after the BOF allowed the set gillnet to extend to 1,000 feet from the 18-foot high tide mark. The community and the proponent have not been able to agree on a compromise. We oppose this proposal because it appears to benefit only a few individuals and, if adopted, would impede navigation.

We agree with the Department’s position to oppose this proposal.



Management Plans: Naknek/Kvichak (5 proposals; Proposals 56-60)

PROPOSAL 56 – 5 AAC 06.XXX. Alagnak River Salmon Fishery Management Plan.
RECOMMENDATION: SUPPORT

Create an inriver Alagnak River Salmon Fishery Management Plan

BBEDC COMMENTS: BBEDC supports Proposal 56. However, there is already an Alagnak River Sockeye Salmon Special Harvest Area Management Plan. The Levelock Village Council should work with ADF&G and the BOF within this plan. The plan could be changed to allow for the harvest of excess Alagnak River salmon but determining the excess could be difficult because no assessment tower is presently operated. The information may have to come from aerial survey information.

PROPOSAL 57 – 5 AAC 06.XXX. Kvichak River Salmon Fishery Management Plan.
RECOMMENDATION: OPPOSE

Create an inriver Kvichak River Salmon Fishery Management Plan to harvest surplus Kvichak River salmon.

BBEDC COMMENTS: BBEDC opposes Proposal 57. There is already a good management plan for Kvichak River salmon that addresses the harvest of surplus Kvichak River salmon.

We agree with the Department’s recommendation to oppose this proposal.

PROPOSAL 58 – 5 AAC 06.200. Fishing districts and sections.
RECOMMENDATION: OPPOSE (increases interception rates; allocative between districts)

Expand the boundaries of the Naknek Section of the Naknek-Kvichak District

BBEDC COMMENTS: BBEDC opposes Proposal 58. Adjusting the boundary lines will most likely increase the harvest of salmon bound for the Kvichak River and other districts. Additionally, this may affect the allocation of fishers of other districts.

We agree with the Department’s recommendation to oppose this proposal.



PROPOSAL 59 – 5 AAC 06.350. Closed waters

RECOMMENDATION: NEUTRAL

Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District, as follows:

Change the GPS numbers on the east (Graveyard Point) side of the river.

BBEDC COMMENTS: BBEDC is neutral on Proposal 59. This issue was fully addressed at the Statewide meeting in March. We believe that this is an issue between set netters near Graveyard Point. Therefore, BBEDC is neutral on this proposal.

PROPOSAL 60 – 5 AAC 06.XXX. Graveyard Creek Special Harvest Area Management Plan.

RECOMMENDATION: NEUTRAL

Create a special harvest area in the Graveyard Creek area, as follows:

We request the Board of Fisheries to create a special harvest area or something similar to allow certain right(s) to be protected and preserved or simply restore our right to fish. We request this be done via grandfathered rights or creating special provisions created for cases similar in nature.

COMMENT: BBEDC is neutral on Proposal 60. Fishermen fishing in Graveyard Creek have been informed that they are fishing illegally. They would like to create a special harvest area within the creek to allow them to fish their set net sites. The stream is non anadromous stream and has no spawning stock of salmon.



Management Plans: Nushagak (14 proposals; Proposals 61-74)¹

PROPOSAL 61 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: OPPOSE

Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

5 AAC 06.335 (b) Minimum distance between units of gear is amended to read:

No part of a drift gillnet may be operated within 300 feet of the side of a set gillnet and within 100 feet of the offshore end of a set gillnet. [THE 100-FOOT RESTRICTION DOES NOT APPLY SEAWARD OF THE OFFSHORE SETNET DISTANCE RESTRICTIONS SET OUT IN 5 AAC 06.331 (M) AND (N).]

-OR-

(e) In the Nushagak District, from the cannery dock at Clark’s Point to an ADF&G regulatory marker at First Creek, no part of a drift net (including a drift gillnet vessel while operating fishing gear) may be within 100 feet of the offshore end of a set gillnet anchoring device, or outermost marker buoy.

BBEDC COMMENTS: BBEDC opposes Proposal 61. This proposal is allocative in nature in that it seeks to reduce the available area that drift gillnets can operate. If a set netter sets their net to the limit of the offshore set net distance restrictions, a drift netter could legally drift right next to the outer limit of the set net (**5 AAC 06.335 (b)**). Requesting an additional 100 feet of space between the offshore end of the set gillnet and the drift gillnet in this scenario encroaches on the drifter’s fishing area. This proposal requests that the 100-foot restriction applies to the drift gillnetter no matter where the set netter places his net. Note that if a drift gillnetter entangles a set net he may receive a citation from Public Safety. BBEDC opposes this proposal.

PROPOSAL 62 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: OPPOSE

Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

Prohibit the operation of a drift gillnet inshore of a set gillnet within the entire Nushagak District or a specified area within the Nushagak District.

BBEDC COMMENTS: BBEDC opposes Proposal 62. This proposal requests that drift gillnetting be prohibited inshore of the inshore limit of a set gillnet. This proposal is allocative in nature in that it seeks to reduce the available area that drift gillnets can operate. Requesting that a drift gillnet cannot be operated inshore of the inshore end of a set gillnet either within the



entire District or within a specific area encroaches on the drifter’s fishing area. Note, however, if a drift gillnetter entangles a set net he may receive a citation from Public Safety. BBEDC opposes this proposal.

PROPOSAL 63 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: NEUTRAL

Change the seaward minimum distance between set gillnet gear in the Clark’s Point area in the Nushagak District from, 500 feet to 750 feet to compensate for a mud bar that is filling in.

BBEDC COMMENTS: BBEDC is neutral on Proposal 63. This proposal is allocative in nature in that it reduces the area that the drift gillnets can fish and gives it to the set netters. It reallocates resources. However, we understand that environmental changes have caused these sites to have insufficient water for adequate fishing time. Therefore, BBEDC is neutral on this proposal. We urge the BOF to consider the possible allocative aspects of this proposal between gear types and within the set net gear types when deliberating on this proposal.

PROPOSAL 64 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

RECOMMENDATION: SUPPORT

Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District. Drift gillnet openings will begin at least one hour before book high water.

BBEDC COMMENTS: BBEDC supports Proposal 64. This proposal seeks to schedule the drift gill net opening at least one hour before the high tide. Fishers would rather fish on the flood rather the high tide or the ebb. There is more productive and more efficient fishing on the flood. BBEDC supports this proposal.

PROPOSAL 65 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

RECOMMENDATION: OPPOSE

In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches, as follows:

BBEDC COMMENTS: BBEDC Opposes Proposal 65. The regulation, 5 AAC 06.367(e), was adopted during the previous Bristol Bay finfish BOF meeting. The main purpose of the original proposal and subsequent regulation was to be able to harvest one stock of sockeye salmon over another (Nushagak River vs. Wood River sockeye salmon stocks). Fishermen presented it and lobbied for it. However, some fishermen believe that stock specific harvests of



sockeye salmon are not possible through mesh size restrictions. BBEDC believes that ADF&G can use different mesh size nets to differentially harvest the two runs of sockeye salmon. Therefore, BBEDC opposes this proposal.

PROPOSAL 66 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: PARTIALLY SUPPORT (support date changes, and reference to pink salmon fishery management)

Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement:

BBEDC COMMENTS: BBEDC partially supports Proposal 66. ADF&G has submitted Proposal 67 to change the trigger points in the management plan based on newly adopted sustainable escapement goals. We recommend **SUPPORTING ADF&G’s changes in the trigger points** in Proposal 67. However, we also **SUPPORT other changes to the Coho Salmon Management Plan contained in this proposal, Proposal 66.**

A projection of a run size depends on passage through a date and the historic proportion that passed through that date. Projections of run size can be extremely variable from day to day, especially in the early portion of the run. Confidence in the projection increases as the run progresses and the historic proportion of run passage increases. There is very little confidence in a run size projection of any salmon run at the 6% historic proportion passage. Therefore, BBEDC agrees with the problem statement in this proposal. There is much more confidence at the historic quartile point or when 25% of the run has passed, but obviously not as much confidence after the historic median (50% passage point) or the third quartile (75% passage point). **Accordingly, BBEDC agrees with moving the start date of the Coho Salmon Management Plan from July 23 to August 1 and altering all dates in the Coho salmon management plan accordingly. BBEDC also supports removing all references to pink salmon fishery management.**

However, the Nushagak Sonar for the fall season has been eliminated because of budget cuts. Therefore, the management plan is useless and will not be used to manage the coho salmon fishery. ADF&G management will most likely depend on their subjective assessment of the run through catch rates. Prosecution of the fishery will also depend on the demand for fish.

PROPOSAL 67 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: PARTIAL SUPPORT (support trigger points based on SEGs)

Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals for coho and pink salmon that have previously been implemented.

BBEDC COMMENTS: BBEDC partially supports Proposal 67. ADF&G has submitted Proposal 67 to change the trigger points in the management plan based on newly adopted



sustainable escapement goals. We recommend **SUPPORTING ADF&G’s changes in the trigger points** in Proposal 67. However, we also **SUPPORT other changes to the Coho Salmon Management Plan contained in this proposal, Proposal 66.**

A projection of a run size depends on passage through a date and the historic proportion that passed through that date. Projections of run size can be extremely variable from day to day, especially in the early portion of the run. Confidence in the projection increases as the run progresses and the historic proportion of run passage increases. There is very little confidence in a run size projection of any salmon run at the 6% historic proportion passage. Therefore, BBEDC agrees with the problem statement in this proposal. There is much more confidence at the historic quartile point or when 25% of the run has passed, but obviously not as much confidence after the historic median (50% passage point) or the third quartile (75% passage point). **Accordingly, BBEDC agrees with moving the start date of the Coho Salmon Management Plan from July 23 to August 1 and altering all dates in the Coho salmon management plan accordingly. BBEDC also supports removing all references to pink salmon fishery management.**

However, the Nushagak Sonar for the fall season has been eliminated because of budget cuts. Therefore, the management plan is useless and will not be used to manage the coho salmon fishery. ADF&G management will most likely depend on their subjective assessment of the run through catch rates. Prosecution of the fishery will also depend on the demand for fish.

PROPOSAL 219 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: NO ACTION

Address allocation impacts that may come from potential changes in escapement goals and trigger points in the Nushagak River Coho Salmon Management Plan, as follows:

BBEDC COMMENTS: BBEDC took no action on Proposal 219. This proposal seeks to have a discussion regarding possible allocation changes with the changes in the trigger points for coho salmon within the Nushagak River Coho Salmon Management Plan. It also seeks to possibly alter Section C 1 and makes a comment regarding pink salmon escapement goals. While we support having discussions regarding all concerns raised in this proposal, this proposal does not specifically seek to change any sections of the Management plan. However, we believe that all concerns raised in Proposal 219 will be addressed during discussions surrounding Proposals 66 and 67.



PROPOSAL 68 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE

Repeal the Wood River Sockeye Salmon Special Harvest Area Management Plan

BBEDC COMMENTS: BBEDC opposes Proposal 68. This proposal would eliminate the opportunity to fish on the Wood River sockeye and coho salmon stock when the Nushagak sockeye or coho salmon stock needs protection and the Nushagak commercial fishing district is closed or restricted. BBEDC opposes this proposal because it takes opportunity away to harvest surplus fish.

PROPOSAL 69 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: SUPPORT

Amend the Wood River Sockeye Salmon Special Harvest Area Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 69. When the Wood River Special Harvest Area is open under 5 AAC 06.358 (c) (3), there are surplus Wood River sockeye salmon and the general Nushagak fishing district is open. There is commercial fishing in both the general commercial district and within the Wood River. The intent of the management plan is to provide the extra fishing in Wood River to the gear type that is behind in their allocation.

In years when the Nushagak River run is low and fishing is not allowed in the general Nushagak fishing district, and the Wood River Special Harvest Area is open, there is no gear that is below allocation. They both start at 0 because there was no harvest in the general district. Therefore, the 3:1 seasonal fishing period applies.

The proposer seeks to delete 5 AAC 06.3588 (5), along with reference in of 5 AAC 06.3588 (5) in of 5 AAC 06.3588 (4) so that the fishing periods in the Wood River Special Harvest Area are prosecuted in a seasonal ratio of 3 drift fishing periods to 1 set net fishing period, regardless of the catch proportion for drift and gillnet fisheries. Accordingly, the proposer seeks that the allocation proportions stipulated in 5 AAC 06.367(b)(1) of 74% drift gillnet, and 26% set gillnet does not apply to the Wood River Special Harvest Area catch. The proposer seeks to have the fisheries prosecuted solely on a seasonal fishing period ratio of 3 drift net periods to 1 set net fishing period. Because of the inherent problems associated with fishing and delivering fish in the Wood River Special Harvest Area, BBEDC believes that this approach would provide both viable options for both gear types to harvest the surplus sockeye salmon.



PROPOSAL 70 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE

BBEDC COMMENTS: BBEDC opposes Proposal 70. The proposer seeks to eliminate the seasonal ratio of 3:1 drift to set gillnet fishing periods in the Wood River Special Harvest Management Area (WRSHA). The proposer seeks to have the allocation percentages dictates which gear type is allowed to fish in the WRSHA. However, in 5 AAC 06.358. (d)(4) the general district would probably not be open prior to the opening of the WRSHA. Therefore, there would not be a gear type that is below allocation. They would both start at harvest allocation of 0. The seasonal ratio of 3:1 would be initiated and continue through the season. The alternative would to keep track of the allocation after the first set of 3:1 ratio fishing periods and then determine what gear type was below allocation and proceed accordingly to achieve the 74%: 26% allocation criteria for drift and set net gear types, respectively. BBEDC believes that the fair and most efficient method of harvesting surplus Wood River sockeye salmon is to conduct the fishery in a seasonal 3 drift periods to 1 set net period throughout the fishery in the Wood River Special Harvest Management Area. Because of the inherent problems associated with fishing and delivering fish in the Wood River Special Harvest Area, BBEDC believes that this approach would provide both viable options for both gear types to harvest the surplus sockeye salmon.



Management Plans: Togiak (3 proposals; Proposals 75-77)

PROPOSAL 75 – 5 AAC 06.350. Closed waters.

RECOMMENDATION: SUPPORT

Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet, as follows:

5 AAC 06.350. Closed Waters is amended to read:

...

(e)(3) from June 1 through **July 11** [JULY 15], those waters of the Togiak District inside a line from 59° 03.19' N lat., 160° 20.18' W. long. to 59° 01.76' N. lat., 160° 28.17' W. long. are closed to commercial fishing for salmon with a drift gillnet.

COMMENT: BBEDC supports Proposal 75. This proposal would allow an additional 4 days of fishing in the currently closed area when sockeye salmon are numerous. The Togiak Fishery is a primarily a small boat fishery. The closed area restricts fishing in shallower, calmer waters during the peak sockeye salmon fishing. We believe that relatively a small amount of Chinook salmon would be taken and these Chinook would probably be mainly small male salmon because of the selectivity of the small mesh gear used in this fishery. It is interesting to note that the sport fishery probably high grades their catch most often for the largest fish which are primarily female salmon. We believe this to be unfair to the commercial fishers during the most productive portion of the sockeye salmon run. Having the ability to fish at the narrows would result in an unknown catch of kings but possibly a large catch of sockeye in waters that are fishable during the peak of the sockeye run. With the king run returning better, it may be appropriate to open those waters that were previously closed because of a king salmon concern. Although the department cites the Togiak Chinook salmon escapement goal, that goal has been discontinued.

PROPOSAL 77 – 5 AAC 06.369.

Togiak District Salmon Management Plan

RECOMMENDATION: SUPPORT AS AMENDED (alter language; suggested language provided)

BBEDC COMMENTS: BBEDC supports Proposal 77 as amended. Change the Togiak District salmon management plan to reflect the sockeye salmon sustainable escapement goal established by the department and remove coho and king salmon escapement goals from regulation to reflect recent department escapement goal review changes. These changes will reflect the current escapement management directives the department follows, removing any confusion and clarifying the regulations.

New regulatory language, 5 AAC 06.355(d)(1) that instructed the department to manage escapements, to the extent practicable, commensurate with run size was passed by the BOF in



March 2015. This new language was included in the [5 AAC 06.355. Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan](#). However, the Togiak District is not included in this allocation plan. Therefore, this BOF management directive does not apply to Togiak River sockeye salmon management. However, it makes sense to include this language in the Togiak Management plan so that the management of the sockeye salmon fishery is consistent throughout the Area.

We propose that this a portion of the same language **5 AAC 06.355(d)(I)** be substituted for portions of **5 AAC 06.369(b)**. It is rare to have an actual SEG range specified in regulation because escapement goals change from time to time and regulations should be consistent and not have to be changed to reflect escapement goal changes. Currently, the Togiak River SEG is the only SEG range specifically defined in a Bristol Bay Area management plan.

SUGGESTED LANGUAGE:

5 AAC 06.369(b) is amended to read:

The department shall manage the commercial fishery in the Togiak River Section of the Togiak District **to achieve adequate escapement from all segments of the run by spacing openings throughout the run and, to the extent practicable, manage for escapements within the lower or upper portions of escapement goals proportional to the run size based on the preseason forecast and inseason assessment of the run size.**
[FOR A BIOLOGICAL ESCAPEMENT GOAL OF 150,000 SOCKEYE SALMON PAST THE COUNTING TOWER AT TOGIK LAKE AND BIOLOGICAL ESCAPEMENT GOALS OF 50,000 COHO SALMON, AND, 10,000 KING SALMON IN THE TOGIK RIVER]



Bristol Bay Subsistence (5 proposals; Proposals 78-82)

PROPOSAL 78 – 5 AAC 01.320. Lawful gear and gear specifications.

RECOMMENDATION: SUPPORT AS AMENDED (SUGGESTED LANG)

Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage, as follows:

5 AAC 01.320 is amended to read:

From August 30 through DECEMBER 31 by spear, dipnet, gillnet, AND BEACH SEINE. Along a 100-yard length of shoreline near the outlet of Naknek River as marked by ADF&G regulatory markers; at Johnny’s Lake on the Northwestern side of Naknek Lake; at the outlet of Idavians Creek on the North side of Naknek Lake; at the mouth of Brooks River from September 18 through December 31.

Suggested language:

5 AAC 01.320. Lawful gear and gear specifications

(b) Outside the boundaries of any district, salmon may only be taken by set gillnet, except that salmon may also be taken as follows:

(2) from August 30 through **December 31** [SEPTEMBER 30], by spear, dip net, [AND] gillnet **and beach seine** along a 100-yard length of the west shore of Naknek Lake near the outlet to the Naknek River as marked by ADF&G regulatory markers;

(3) from **August 30** [AUGUST 15] through **December 31** [September 15], by spear, dip net, [AND] gillnet, **and beach seine** at Johnny's Lake on the northwestern side of Naknek Lake;

(4) **from August 30 through December 31, by spear, dip net, gillnet, and beach seine at the outlet of Idavians Creek on the North side of Naknek Lake**

(5) from **September 18** [October 1] through **December 31** [November 15], by spear, dip net, [AND] **beach seine, and** gillnet at the mouth of Brooks River at Naknek Lake;

BBEDC COMMENTS:

BBEDC supports Proposal 78 with the suggested language. BBEDC provided this substitute language to the BBRAC and they accepted this language. We support this proposal with the addition of the suggested language.

Spawned out sockeye have traditionally been harvested for personal (subsistence) use by the Katmai descendants. Harvest of spawned-out salmon occurs when the commercial/sport fishing season are inactive. It makes fall red fish (spawned out salmon) available to traditional and cultural descendants of Naknek Lake and its river drainages for all Naknek Lake and River descendants.

The current methods, dates, and places do not reflect the proper access to our traditional and cultural foods. The harvest of spawned-out sockeye salmon has no significant commercial value,



but is a traditional food source for local residents. There is no threat to the resource and there are no allocation problems.

Title 36 CFR, Part 13. Alaska regulations. Katmai National Park and Preserve Special Regulations 13.1204 allows for a traditional redfish fishery for “Local residents who are descendants of Katmai residents who lived in the Naknek Lake and River Drainage...” Seasons and methods for the take of redfish will be set by the Alaska Department of Fish and Game in the annual Subsistence and Personal Use Statewide Fishing Regulations booklet.

Rural residents of King Salmon, Naknek, South Naknek have traditionally had access to their traditional foods (subsistence resources) in Naknek Lake and its surrounding drainages. The current dates in regulation will not allow access to traditional food supply (resources) traditionally practiced by local traditional tribes. The current dates in regulation will not allow access to traditional food supply (resources) traditionally practiced by local traditional tribes.

May want to include beach seine specifications.

BBEDC agrees with the department’s position to support this proposal.

PROPOSAL 79 – 5 AAC 01.310. Fishing seasons and periods.

RECOMMENDATION: SUPPORT

Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 79. Naknek River is the focus of this proposal. The location where the subsistence harvest takes place is easily accessible in the Naknek River while subsistence fishing in the Egegik and Ugashik Rivers in the subsistence harvest area required some travel. In the Bristol Bay Area, commercial fishing and subsistence fishing is allowed concurrently in the commercial fishery area. Most residents get their subsistence fish during these concurrent openings. However, there may not be enough space between commercial sites for subsistence nets. In recent years, ADF&G has opened the Ugashik River special harvest area for subsistence fishing 24-h a day, 7 days a week, under Emergency Order (EO) authority. The proponent would like this practice to be codified. The subsistence harvest is relatively small compared to run size and commercial harvests. BBEDC supports this proposal.

BBEDC agrees with the department’s position to support this proposal.



PROPOSAL 81 – 5 AAC 01.320. Lawful gear and gear specifications.

RECOMMENDATION: SUPPORT (housekeeping)

Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers

BBEDC COMMENTS

housekeeping proposal. **BBEDC supports Proposal 81.** This proposal corrects an error in regulation.

BBEDC agrees with the department’s position to support this proposal.

PROPOSAL 82 – 5 AAC 01.336.

Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.

RECOMMENDATION: NEUTRAL

Establish and adopt amounts reasonably necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District, as follows:

5 AAC 01.336(b) is amended by adding a new paragraph to read:

(b) The board finds that

(3) X, XXX – X, XXX pounds of herring spawn on kelp in the waters of the Togiak District as described in 5 AAC 27.805(a) are reasonably necessary for subsistence uses in the Bristol Bay Area.

BBEDC COMMENTS: BBEDC is neutral on Proposal 82, This proposal established the reasonable amounts necessary for spawn on kelp in the waters of Togiak District. Subsistence is the priority consumptive use of the resource and establishing this amount will facilitate management of the Togiak herring fishery. Data are available but level of amounts necessary for subsistence is unknown. We are neutral because we do not know what level the department will suggest.



BRISTOL BAY SPORT FISHERIES (5 PROPOSALS: 83-87)

PROPOSAL 83 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

RECOMMENDATION: NEUTRAL

Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River

BBEDC COMMENTS:

BBEDC is neutral on Proposal 83. This issue should be solved between the BOF, the Department and those affected in the Nondalton and Newhalen area. It appears that public safety will not issue violations for local fishermen fishing with rod and reel below where fish are either processed or kept in the water. This appears to be against regulation and should be dealt with by the BOF. Additionally, this area is beyond the area serviced by BBEDC

PROPOSAL 84 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Nanci Morris Lyon

RECOMMENDATION: NEUTRAL

Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage, as follows:

5 AAC 67.022(d) (11) is amended to read:

(11) the Big Creek drainage [, INCLUDING WATERS WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER] is closed to **the retention of all** [SPORT FISHING FOR] king salmon year round.

BBEDC COMMENTS: BBEDC is neutral on Proposal 84. This proposal would allow people to fish for king salmon but not retain king salmon. Currently, the ¼ mile radius around the confluence of Big Creek and the Naknek River extends all the way across the Naknek River. This causes people sport fishing and drifting the Naknek River to stop fishing through this section of river. One solution is to draw a straight line somewhere on Big Creek from shore to shore where the non-retention of king salmon starts.

PROPOSAL 85 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

RECOMMENDATION: NEUTRAL



Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage, as follows:

5 AAC 67.022(d) (11) is amended to read:

(11) the Big Creek drainage, including waters **from the confluence of Big Creek with the Naknek River** [WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER:].

Closed all year round to all king salmon fishing.

BBEDC COMMENTS: BBEDC is neutral on Proposal 85.

PROPOSAL 86 – 5 AAC 67.020.

Bag limits, possession limits, annual limits, and size limits for Bristol Bay.

RECOMMENDATION: SUPPORT

Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries, as follows:

This proposal would require anglers to record their harvest (and catch?) data on a department provided mail-in harvest ticket much like that for big game hunting in Alaska. The cards must be returned to ADF&G at the end of the Chinook salmon season in Bristol Bay.

BBEDC COMMENTS:

BBEDC supports Proposal 86. BBEDC believes that the collection of these data would provide the department with more timely data to manage the fisheries.

PROPOSAL 87 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay area.

RECOMMENDATION: NEUTRAL

Eliminate the use of egg-simulating lures in rainbow trout fishing, as follows:

5 AAC 67.022(d) is amended to read: Only unbaited, single-hook artificial lures excluding plastic, rubber, neoprene, fiber, or any other material that simulates a fish egg or egg cluster may be used year round.

BBEDC COMMENTS: BBEDC is neutral on Proposal 87 and has no comments.



BRISTOL BAY HERRING (4 PROPOSALS; PROPOSALS 88-91)

PROPOSAL 88 – 5 AAC 27.832. Seine specifications and operations for Bristol Bay Area.

RECOMMENDATION: SUPPORT (housekeeping)

Change the regulatory description for herring purse seine and hand purse seine

BBEDC COMMENTS: BBEDC supports Proposal 88. ADF&G Housekeeping proposal. Minor change to regulations to correct an editing error and to conform to industry standards. BBEDC supports this change in regulation.

PROPOSAL 89 – 5 AAC 27.865. Bristol Bay Herring Management Plan.

RECOMMENDATION: SUPPORT

Delete references to sac roe in the Bristol Bay Herring Management Plan.

BBEDC COMMENTS: BBEDC supports Proposal 89. This proposal may provide an incentive to fish for herring for other purposes than sac roe. BBEDC also believes that the elimination of the term sac roe will allow the department flexibility to manage the fishery for other purposes.

PROPOSAL 90 – 5 AAC 27.865. Bristol Bay Herring Management Plan.

RECOMMENDATION: SUPPORT AS AMENDED (new language).

Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets, as follows:

5 AAC 27.865 is amended to read:

(b)(8) After the spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. The department **may** [SHALL] manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet. To maintain those percentages inseason, the commissioner **may** [SHALL] make adjustments to fishing periods and fishing areas by emergency order. After the gillnet and purse seine fleet have harvested at least 50 percent of each gear group’s allocation, the commissioner may allow either fleet to harvest its remaining allocation without further restrictions.

BBEDC COMMENTS: BBEDC opposes Proposal 90 as written. Substituting the first “may” for “shall” effectively transfers the responsibility of determining allocation from the BOF to ADF&G. This is not acceptable since all allocation decisions are made by the BOF. ADF&G,



through their management of the resource, follows the BOF’s direction. Substituting the second “may” for “shall” is less problematic because this is the role of ADF&G, to follow allocation directions from the BOF.

BBEDC supports Proposal 90 with suggested language. The current regulation was adopted when the price for a ton of herring was much higher than the price paid today. Although the first portion of the regulation sets the allocation, the second portion of the regulation specifically establishes the management of the resource between the user groups for the first 50% of each gear group’s allocation. Because the current price per ton is so low, approximately \$50 per ton, the gillnet fleet has dwindled to only a few fishers. With so few gillnetters on the grounds, it is nearly impossible to manage the first 50% of each gear group’s harvest so that the harvest percentages are close to the allocation percentages. Therefore, we propose to eliminate the entire second portion of the regulation but retain that portion of the regulation that speaks to the allocation of the resource between the two gear type users. In this way, the purse seine and the gillnet fleet can harvest their portion of the allocation at their own speed, regardless of the number of gillnetters or purse seiners on the grounds.

Suggested Language

5 AAC 27.865 is amended to read:

(b)(8) After the spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. The department shall manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet. [TO MAINTAIN THOSE PERCENTAGES INSEASON, THE COMMISSIONER SHALL MAKE ADJUSTMENTS TO FISHING PERIODS AND FISHING AREAS BY EMERGENCY ORDER. AFTER THE GILLNET AND PURSE SEINE FLEET HAVE HARVESTED AT LEAST 50 PERCENT OF EACH GEAR GROUP’S ALLOCATION, THE COMMISSIONER MAY ALLOW EITHER FLEET TO HARVEST ITS REMAINING ALLOCATION WITHOUT FURTHER RESTRICTDIONS]

The suggested language does not alter the allocation between the user groups. It eliminates the unnecessary management direction to maintain those allocation percentages inseason for the harvest of the first 50% of each gear group’s allocation.



Submitted By
Alan West
Submitted On
11/18/2015 2:22:00 PM
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Set Net S04T 56899K

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My name is Alan West and I have been fishing in Bristol Bay 35+ years. There a couple of comments I would like to make regarding fishing in Bristol Bay. First in regards to drift fisheries: the drift fisherman should have to drop their blue cards before they fish in Bristol Bay, so that Fish and Game would know what river system the early fish caught come from. Second, in regards to dual permit allowance for set netters in Bristol Bay: My immediate family has two set net permits in Bristol Bay. One is in my name (Set Net S04T 56899K) and the other is in my mother, Veryl West's, name (Set Net S04T 64879V). My mother is 86 years old and has expressed her desire to retire in the next year or two. We do not plan on selling our set net permits and also do not want to transfer a permit outside of our family. We also do not have another immediate family member at this time to transfer her permit to. In order for us to successfully fish each year and afford the expense of this fishery we need two permits. In the mid to late 70's the fish price per pound was higher than it was in 2015 and also airfares and expenses have increased threefold since the 70's. It is imperative that we keep two permits to be able to support our commercial fishery. My mom and I as permit holders are in favor of a dual permit allowance in order to abate any negative outfall from her retiring from fishing.



Submitted By
Cody Rice
Submitted On
11/18/2015 2:18:21 PM
Affiliation
Bristo bay drift gill netter

I would like to comment on proposal number 45 addressing the stacking of Bristol bay set gill net permits. I believe that the permit stacking was a very successful program during its years of operation from all that I could see in my home district of Egegik. It was good for families in particular who had multiple permits but due to work schedules or college schedules were unable to always be present for the entire season. It allowed the operations to continue to operate the same amount of gear that they always had without having to risk permanently transferring a limited entry permit to crew members. I am a S03T Drift fisherman so this proposal does not affect me in any way, but it is extremely important to my family and friends who rely on set gill net fishing for a living and have been forced to scale back the amount of gear they can operate with, which in turn has caused hardship for many fishermen and made it difficult to profit from set netting in Bristol bay. If drift permit stacking continues to be allowed in the bay then set net permit stacking should be reinstated.



Submitted By
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Submitted On
11/18/2015 1:25:05 PM
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I would like to address proposal #37 concerning Area Registration regulation. I support this proposal, as I feel it a great importance in effecting management of the fishery. Last year the biologist voiced frustration over this very issue.

By moving the vessel registration for June 1st, Fish and Game can then regulate openings with much more control as they will know how many drift boats will be participating. This greatly effects control over catch, allocation, and escapement.

I have been a set net fisherman in Egegik for 24 seasons, and have seen the impact of the number of vessels that show up early in June to fish. This proposal can make the drift - set net allocation more of an attainable goal, and can help distribute fish caught throughout the district, not just at the district line boundaries.

It also impacts the local fleet that does not transfer out of Egegik. If permit holders were required to register, then they may not be so inclined to compete for these early fish. I urge you to reinstate this registration requirement for June 1st for Egegik Bay. Thank you

Submitted By
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11/18/2015 1:04:15 PM
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My comment concerns the permit stacking issues for set net permits in Bristol Bay, primarily Proposal #45 and #50. I would like the

Board to once again allow set net fishermen to hold and legally fish two permits. This was allowed in the past, and it did not show any negative effects on the fishery or participants. Permit prices in this time frame did not increase, they remained at the historic value of approximately one third of a Bay drift permit.

I have set netted in Egegik for 24 seasons, raised my children at fish camp, fishing one permit for many years.

When my son was a

teenager we began to fish two permits. By fishing two nets, we were able to make the operation economically viable, as equipment, cabin, labor were shared. As my children grow and move into their own fishing operations, I continue to run my operation as a family fish camp by hiring many local youth over the years. My crew is made up of young Alaskans that most I have known since they were small. I believe stacking set net permits encourages families by making the set net operation more viable.

The set net fishery is unique in that it encourages families and especially women to be involved in the fisheries. It is easier to enter the salmon fishery as the drift operations take a great deal more capital. Many young people who grew up set netting make the step to become drift permit holders. They have the experience from set net camp and also have the family support. This in turn helps keep commercial fishing permits within the state. I urge you to once again allow two set net permits to be fished in Egegik and all of Bristol Bay.



Submitted By
mark munro
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11/18/2015 1:54:01 PM
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Drift Permit, Bristol Bay Permit

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---Permit Stacking, Please return it to the original regulation in the spirit of Limited Entry.

No Stacking Drift or Setnet.

----Dropping Cards. Please return it to the regulation that requires a fisher to "Drop their card"

before fishing in any district. Beginning early June. This is unfair particularly to Egegik fishermen.

The state needs to resist the move to put more of the wealth in fewer people. This is a public resource and should be spread out amongst as many Alaska residents as possible. Particularly Bristol Bay watershed residents. Permit stacking, amongst other industry factors have moved more of the wealth of this region into fewer and fewer, out of state. hands. Resist.



Soldotna
Alaska's Kenai River City

**Chamber of Commerce
Visitor Center**



PC 61
1 of 1



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- Soldotna Professional Pharmacy
- Sweeney's Clothing
- Wells Fargo Bank

MEDIA PARTNERS



November 19, 2015

The Alaska Board of Fisheries
Alaska Department of Fish & Game
PO Box 25526. M/S 1100
Juneau, AK 99802-5526

Reed J. Morisky, Orville H. Huntington, Susan Jeffrey,
John E. Jensen, Frederick T. Johnson, Thomas G. Kluberton,
Bob Mumford

Good Morning,

The Soldotna Chamber of Commerce is writing to express our full support for holding the **2017 Upper Cook Inlet Finfish meeting on the Central Kenai Peninsula**. Local governments recently weighed in with the offer for substantial financial contributions to help offset meeting costs. We at the Chamber would also like to offer whatever services we can to help the board, state employees and members of the public attend.

Many, if not most, of the Chamber's business members are closely tied to various sectors of the fishing industry; including many of the same visitor accommodation and service oriented businesses necessary to conduct a smooth Board of Fisheries meeting. To the extent we can help your staff find the appropriate connections with those needed services, we as always are ready to help.

Thank you in advance for your consideration.

Regards,

Tami Murray

Tami Murray
Executive Director



Soldotna Chamber of Commerce & Visitor Center
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Soldotna's Community Partners - Developing Soldotna's Future



Submitted By
Aaron Schrier
Submitted On
11/19/2015 10:16:09 AM
Affiliation

Proposal # 29. **Support.** The proposal provides flexibility in operation of legal gear within existing areas of operation. 50 fathom nets in rough water and/or extreme current can be problematic. The practice of fishing two 25's is widely used and having the freedom to have them on their own anchors provides safer fishing and safer traveling for neighboring fishermen. This proposal allows setnetters to fish their sites more efficiently while helping keep travel and the working of gear safe. The need to have extra running lines setup and to fish 50 fathom nets is decreased, helping improve safety and quality of fish.

Proposal #26. **Oppose.** The potential for increased interception would go up. The Naknek Kvichak district have historically later runs. Some fishing seasons the Kvichak section doesn't receive very much fishing time until other districts have already achieved their escapement goals. There are years that the Kvichak doesn't get many openers until the minimum goals have been met. Creating a larger district at this point would specifically hinder and potentially cause economic hardship to the fisherman in the Kvichak section.

If the language of the proposal was changed to read, the new district would be allowed, "Only from July 17th – July 27th", my argument wouldn't be valid and I would have no issue with the amended proposal.

Proposal #221. **Oppose.** The idea of this proposal may work well in certain districts, but if it was adopted "Bay wide" it could have serious unforeseen consequences. The upper east side of the Kvichak section has very limited mooring opportunities for tenders due to sand bars, shallow waters, and increased erosion. The tenders currently have a small amount of deep water to anchor in and almost all of the space is within 1500ft of setnet sites. If tenders don't park in optimum places there is increased risks to safety, as well as risk to potential harvest quantity and quality due to wasted time.

This may be a very serious issue in Togiak and I would suggest the language be adopted to the proposal to only effect the Togiak district, as to not bring about the many un-intentionally consequences that this proposal creates.

Proposals # 45,46, and 48. **Support.** I support setnet permit stacking. It is hard for small single permit operations to be economically viable due to increased expenses, lack of consistent price, and processor imposed limits becoming normal. There are many larger family operations, as well as groups or co-ops, that team up and fish together in order to save on expenses and crew costs, that would benefit from permit stacking. Permit stacking increases delivery rates, helping create a safer fishery, as well as saving all fishermen time delivering; either creating time to sleep, or time to harvest salmon. Since so many family and group operations exist, permit stacking would help streamline the labeling of sites, gear, and vessels, as well.

Proposal #47. **Oppose.** The proposal has non-transparent language. If the issue at hand is protecting non-transferable permits from leaving family businesses and Alaskan residents, the proposal should reflect that. Instead the proposal would span much greater than claimed purpose, creating a more complex regulation allowing any permit holder to stack permits with a small gear increase. Dual setnet permits should be allowed double gear, or not be allowed. There is no need to complicate things with a 1.5 times gear increase.

Proposal #49. **Oppose.** I am strongly opposed to proposal 49. This proposal has many un-intended, potentially damaging outcomes. This proposal would increase the number of nets in many areas, instead of decrease like the language states. Having a 75 fathom net would be much harder to control, the bow of the net would be larger than that of the neighboring – causing conflict of being too close, and potentially create un-safe situations.

Fishermen "groups", or "teams" already exist. These fishermen, as well as existing family groups would be hindered, not helped by this. One wouldn't want to fish 3 nets instead of 4.

#49 would make it even more difficult for a small single permit operation to be economically viable; imagine a single permit owner who now has 3 nets on each neighboring site instead of 2. There wouldn't be adequate space between neighboring sites if this proposal passed. Fisherman who want to expand, but don't want to pay for sites will stack more nets on existing sites causing neighboring fishermen to harvest less. The potential for conflict between setnetters and drifters would increase.

Proposal #50. **Amend to Support.** Amend to say "All Districts in Bristol Bay," not just Egegik. I support dual setnet permits. Great



Proposal #53. **Oppose.** Overloading vessels and not keeping pace with one's gear reduces salmon quality. Proposal #53 would decrease the quality of fish, leading to decreasing the economic vitality of the industry. It also goes against the "Optimum Number Study" -- The current regulations at 200 fathoms for a dual drift permit decrease the number of potential fathoms by 100 per dual, while the proposed regulation doesn't decrease the total fathom number. A step in the opposite direction.

This proposal allows too much opportunity for "out of control fishing" -- Conflicts with other boats, going dry, wrapping tenders or setnetters, and overloading are examples.

Proposal #54. **Support.** I believe that interception of salmon bound for other districts is occurring in Egegik. Fish and Game have claimed that they intend to keep interception rates low. The research conducted by the WASSIP shows interception is occurring and regulation 5AAC 06359(c)(3) states that the commissioner should move the Egegik outer line shoreward during times of high interception. Proposal #54 is a great compromise that only asks for the line to be drawn in for the 5 days of highest interception.

The Ugashik district and the Naknek Kvichak district river systems and fishermen deserve the opportunity of the salmon headed there. It is especially important for these river systems -- They have had incidences of not meeting escapement goals (both minimum and optimum) during some recent years. If we are to be a successful sustainable terminal fishery, we must limit interception.

Proposal #56. **Support.** In previous years the Alagnak Special Harvest Area has provided many fisherman a viable option while districts struggled. The creation of this fishery would help the local residents of the area immensely, as well as be an option for all fishermen when their districts are in hardship.

It seems that more Alaskan residents and Bristol Bay locals fish the "late season". This proposal would help create more late season opportunities. With a non-exclusive processor in such proximity, the late season fishery created would be more fuel efficient than others.



Submitted By
Barrett Gribble
Submitted On
11/18/2015 6:37:53 PM
Affiliation

I would like to comment and show my support for proposal number 46. I think it is in the best interest of all Bristol Bay setnetters, to have the opportunity to own 2 permits. With salmon prices being cut in half, I would think it only logical to support a proposal that would double your production. Also, salmon prices being what they are, the dreaded increase in the cost of a permit is not happening. Therefore giving local watershed residents the option of utilizing the great loan program the BBEDC has to offer, and doubling the amount of permits locally owned. Please do not think of this proposal as some sinister plan put forth by non residents to monopolize the industry, it is a proposal geared toward economic opportunity, and family legacy.



Board of Fisheries
ADF&G/ Board Support
P.O. Box 115526
Juneau, Ak. 99811-5526

Dear Board Members

I am writing to you because I believe it is high time you consider holding an Upper Cook Inlet Board of Fish meeting on the Kenai Peninsula, starting with the meeting in 2017. This is the only way to provide fairness to the users of this resource and not preclude a large segment of the Kenai Peninsula fishing community from participating. By continuing to hold the UCI meeting in Anchorage you are shutting out most private anglers, personal use fishers, as well as subsistence users--the "regular folks," who honor, cherish, and use this great resource, but who have jobs and families to attend to and who are unable to spend the majority of a week away from home.

I want to encourage you to please begin alternating UCI meetings, starting with the 2017 meeting being held in the Kenai / Soldotna area, so that we will all have an equal access and an equal voice in issues concerning our fisheries.

Thanks,

Dave Atcheson
Box 145
Sterling, AK 99672
907-398-4216



IN REPLY REFER TO:

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199



FWS/OSM 15062.GP

NOV 19 2015

Mr. Tom Kluberton, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Kluberton:

The Alaska Board of Fisheries will deliberate 70 proposals, among other issues, at its Bristol Bay Area Finfish meeting beginning December 2, 2015. We have reviewed the proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that have potential impacts on Federal subsistence users and fishery resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.
Assistant Regional Director, OSM

Enclosure

cc: Sam Cotten, ADF&G
Tim Towarak, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Scott Kelly, ADF&G, Juneau
Tom Brookover, ADF&G, Anchorage
Glenn Haight, ADF&G, Juneau
Drew Crawford, ADF&G, Anchorage
Jill Kline, ADF&G, Anchorage
Chuck Ardizzone, OSM, Anchorage
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS
ALASKA BOARD OF FISHERIES PROPOSALS

BRISTOL BAY MANAGEMENT AREA

November 30 - December 7, 2015

Anchorage, Alaska

U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM)



Proposal 56 would create an inriver Alagnak River Salmon Fishery Management Plan. This Management Plan would open a commercial salmon fishery, during and after the June 20 through July 17 allocation period, one quarter mile above the mouth of the Alagnak River and extend up river one mile to both drift and set net fishing. After the allocation period, the commercial salmon fishery could open in the Alagnak River “every other day.”

Current Federal regulations:

50 CFR 100.27 (e)(5) Bristol Bay Area.

(i) Unless restricted in this section, or unless under the terms of a subsistence fishing permit, you may take fish at any time in the Bristol Bay area.

(ii) In all State commercial salmon districts, from May 1 through May 31 and October 1 through October 31, you may subsistence fish for salmon only from 9 a.m. Monday until 9 a.m. Friday. From June 1 through September 30, within the waters of a commercial salmon district, you may take salmon only during State open commercial salmon fishing periods.

(vii) Outside the boundaries of any district, unless otherwise specified, you may take salmon by set gillnet only.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impact to Federal subsistence users/fisheries: **Yes.** The lower portion of the Alagnak River described in this proposal is located several miles downstream from Federal public waters of the Wild River. Significant commercial exploitation rates within the Alagnak River may impact Federally qualified users ability to harvest salmon upstream from the proposed fishery. During years with large Sockeye Salmon returns to this river, there may be little effect from commercial harvests on Federal subsistence fishing that occurs in Federal public waters.

Federal Position/Recommended Action: **Neutral.** Annual Sockeye Salmon abundance in the Alagnak River system is variable does not necessarily have an annual harvestable surplus. Soundly managing the Sockeye Salmon returns within the Alagnak River may be difficult without a mechanism to estimate escapement of salmon into the river system. During years of low Alagnak River Sockeye Salmon abundance, significant inriver exploitation may impact Federally qualified users ability to harvest. If this proposal is adopted and an inriver commercial fishery is executed during low water stages, Chinook Salmon, as well as other species, may be concentrated and more susceptible to capture. Additionally, significant exploitation in the lower stretches of the Alagnak River may impact species other than Sockeye Salmon depending on timing and participation levels which could impact Federally qualified users ability to harvest upstream from the proposed fishery. If adopted, the Federal Subsistence Management Program supports the proponent’s stated intent of deferring fishing schedule determination decisions to



local management biologists. The Federal Subsistence Management Program recommends proceeding with cautious management if the proposal is adopted.

Proposal 57 would create an inriver Kvichak River Salmon Fishery Management Plan. This Management Plan would open a commercial salmon fishery after the June 20 through July 17 allocation period which would extend the Kvichak River upper fishing limit line to a point 15 miles upriver. The proponent requests the fishery be “open every other day” subject to local management biologist decisions.

Current Federal Regulations:

50 CFR 100.27 (e)(5) Bristol Bay Area.

(i) Unless restricted in this section, or unless under the terms of a subsistence fishing permit, you may take fish at any time in the Bristol Bay area.

(ii) In all State commercial salmon districts, from May 1 through May 31 and October 1 through October 31, you may subsistence fish for salmon only from 9 a.m. Monday until 9 a.m. Friday. From June 1 through September 30, within the waters of a commercial salmon district, you may take salmon only during State open commercial salmon fishing periods.

(vii) Outside the boundaries of any district, unless otherwise specified, you may take salmon by set gillnet only.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impacts to Federal subsistence users/fisheries: Possible. The lower portion of the Kvichak River described in this proposal is located several miles downstream from Federal public waters of the Lake Clark National Park and Preserve. Significant commercial exploitation rates on salmon stocks returning to spawn in Federal public waters may impact Federally qualified subsistence users ability to harvest salmon upstream from the proposed fishery. As long as recent large Sockeye Salmon runs to this watershed continue, commercial harvests that occur down river of Federal public waters may have little effect on Federal subsistence fishing success.

Federal Position/Recommended Action: Neutral. Adoption of this proposal would likely not impact Federal subsistence users if recent large Sockeye Salmon returns to the Kvichak River system continue but impacts may become noticeable during years of low abundance. If adopted, the Federal Subsistence Management Program supports the proponent’s stated intent of deferring fishing schedule determination decisions to local management biologists.



Proposal 75 requests reducing the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet. The proponent requests changing the drift gill net closure period to end July 11 instead of the current end date of July 15 to provide for more commercial fishing opportunity during the peak of the Sockeye Salmon return to the Togiak River system.

Current Federal Regulations: None. The proposal addresses waters immediately adjacent to the exterior boundaries of the Togiak Refuge.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impacts to Federal subsistence users/fisheries: Yes. Adoption of the proposal could allow an increased proportion of the Togiak River bound Chinook Salmon run to be harvested between July 11-15 potentially reducing opportunities for inriver Federal subsistence fishing and result in conservation concerns during times of low abundance. Federal subsistence users in the Togiak Area have previously voiced concerns about their inability to meet their subsistence Chinook Salmon harvest needs.

Federal Position/Recommended Action: Oppose. Statewide Chinook Salmon abundance has been very low in recent years and reduced exploitation rates have been necessary to address conservation concerns in many fisheries. Liberalizing the drift gillnet fishery season near the mouth of the Togiak River may increase exploitation rates on Chinook Salmon milling near or entering the Togiak River, decreasing the number of fish available for spawning, and potentially reducing harvest opportunities for Federally qualified subsistence users.

The Federal Subsistence Management Program supports a cautious and conservative approach for managing harvest of Chinook Salmon in the Togiak River system since an annual escapement monitoring program is not in place. The Federal Subsistence Management Program funded a tagging study to provide assessment of Chinook Salmon escapements in the Togiak River 2008-2012. Estimates of spawning distribution were achieved each year and showed some consistent differences from historic aerial survey estimates. Estimates of inriver abundance are available for 2010 (10,096), 2011 (7,041), and 2012 (13,050). The estimate for 2011 is less than the Sustainable Escapement Goal (threshold of 9,300).

Mark-recapture methods to calibrate aerial surveys and assist with abundance estimates are too expensive to continue on an annual basis. The primary components of the telemetry studies have been rendered unusable for obtaining future Chinook Salmon spawning abundance estimates because of the absence of aerial surveys or changes in recent aerial survey methodologies.



Proposal 79 seeks to eliminate subsistence fishing periods for Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur at any time.

Current Federal regulations:

50 CFR 100.27 (e)(5) Bristol Bay Area.

(i) Unless restricted in this section, or unless under the terms of a subsistence fishing permit, you may take fish at any time in the Bristol Bay area.

(ii) In all State commercial salmon districts, from May 1 through May 31 and October 1 through October 31, you may subsistence fish for salmon only from 9 a.m. Monday until 9 a.m. Friday. From June 1 through September 30, within the waters of a commercial salmon district, you may take salmon only during State open commercial salmon fishing periods.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impact to Federal subsistence users/fisheries: **Yes.** Eliminating the hours and days per week subsistence fisheries restrictions occur within the Naknek, Egegik, and Ugashik rivers will allow Federally qualified users to harvest fish during preferred weather, tide, vocational schedules, and other beneficial conditions. Allowing subsistence users to harvest fish during times they select will allow users to subsistence fish during less inclement weather, preferred conditions for processing fish, potentially spread out subsistence user effort, and reduce competition for successful fishing sites.

Federal Position/Recommended Action: **Support.** Annual Sockeye Salmon abundance to the identified watersheds as well as the commercial salmon harvests of stocks returning to these systems is exponentially larger than subsistence salmon harvests by Federally qualified users. Adoption of this proposal will likely not increase overall harvest by subsistence users but could potentially increase efficiency of harvesters, as well as reduce loss of harvest during processing due to spoilage and insects. If this proposal is adopted, a proposal could be submitted to the Federal Subsistence Board to realign State and Federal regulations to reduce regulatory complexity.

Proposal 81 defines subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere. This proposal also seeks to remove references to department regulatory markers and replace reference with GPS coordinates.

The portion of this proposal of interest to the Federal Subsistence Management Program is replacing fishery boundary markers with GPS coordinates for the Togiak River subsistence drift gillnet fishery.



Current Federal Regulations:

§100.27 Subsistence taking of fish.

(e)(5)(vii) Outside the boundaries of any district, unless otherwise specified, you may take salmon by set gillnet only.

(A) You may also take salmon by spear in the Togiak River, excluding its tributaries.

(B) You may also use drift gillnets not greater than 10 fathoms in length to take salmon in the Togiak River in the first two river miles upstream from the mouth of the Togiak River to the ADF&G regulatory markers.

Portion of Proposed State Regulation of Interest to the Federal Subsistence Management Program.

5 AAC 01.320(b)(1)(B) between the mouth of the river and upstream approximately two miles to the ADF&G regulatory markers, by a drift gillnet that is not more than 10 fathoms in length;

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impact to Federal subsistence users/fisheries: **Yes.** Adoption of this proposal may result in enforcement concerns and user confusion. Removal of boundary markers which identify the lower two miles of the Togiak River may result in user confusion for Federally qualified subsistence users who do not own or use a GPS device to determine fishery area boundaries.

Federal Position/Recommended Action: **Oppose the above identified portion of proposal 81. Neutral on remainder of proposal.** 5 AAC 01.320(b)(1)(B) identifies the lower portion of the Togiak River in which both State and Federal subsistence salmon drift gillnet fisheries are authorized. If this portion of this proposal is approved, the referenced subsistence fisheries boundaries will no longer be physically identified by boundary markers. Removal of the markers and expecting subsistence users to rely upon GPS coordinates may be a burden to users who do not own or operate such devices and may result in enforcement concerns.

If the above referenced portion of the proposal is adopted and the boundary GPS locations are identifiable land markers, geographic features, structures, or other easily visible and identifiable objects to subsistence fishermen, the Federal Subsistence Management program would change the position to support.



PROPOSAL 83 seeks exemption to the current “no chumming” sport fishery regulation by allowing the harvest of non-salmon fish in the fresh waters of the Bristol Bay Area where bait is not allowed with the exception of River Miles 1 – 22 of the Newhalen River.

Current Federal Regulations:

Federal Subsistence Regulations (as pertains to use of rod and reel)

§ 100.27 Subsistence taking of fish:

(b) Methods, means, and general restrictions.

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

(xix) A rod and reel

(e) (5) Bristol Bay Area

(vii) Outside the boundaries of any district, unless otherwise specified, you may take salmon by set gillnet only.

(xvii) You may take rainbow trout only by rod and reel or jigging gear. Rainbow trout daily harvest and possession limits are two per day/two in possession with no size limit from April 10 through October 31 and five per day/five in possession with no size limit from November 1 through April 9.

§100.14 Relationship to State Procedures and Regulations:

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Current National Park Service Regulation

The applicability and scope of the compendium is articulated in 36 CFR Sections 1.2 and 13.2, and 43 CFR Section 36.1

PART 2. RESOURCE PROTECTION, PUBLIC USE AND RECREATION

2.3(d)(2) Fresh waters designated as open to bait fishing with live or dead minnows or other bait fish, amphibians, nonpreserved fish eggs or fish roe.



No waters are designated as open to fishing with the types of bait identified above. Other types of bait may be used in accordance with state law. Subsistence fishing by federally qualified rural residents is allowed in accordance with 36 CFR part 13 and 50 CFR part 100

A National Park Service regulation prohibiting chumming is applicable in Lake Clark and Katmai National Park and Preserve and all other waters in the Bristol Bay Area within National Park Service units.

36 CFR 2.3(d)(3) The following are prohibited:

(3) Chumming or placing preserved or fresh fish eggs, fish roe, food, fish parts, chemicals, or other foreign substances in fresh waters for the purpose of feeding or attracting fish in order that they may be taken.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations in early 2016.

Impact to Federal subsistence users/fisheries: Yes. Adoption of this proposal will authorize Federally qualified subsistence users, who choose to use a rod and reel and fish under Federal Subsistence Fishing Regulations, to harvest fish other than salmon near areas where attractants are deposited intentionally or unintentionally. Adoption of this proposal could improve efficiency of Federal subsistence users when targeting non salmon species in waters under Federal subsistence fisheries jurisdiction. §100.14 (a) indicates in the lack of a specific Federal regulation, State of Alaska regulations apply. Currently no Federal subsistence regulations exist which authorizes or prohibits users to fish with a rod and reel near attractants in waters where the use of bait is prohibited. If this proposal is adopted as written, the practice would be authorized throughout the Bristol Bay region including all waters under Federal subsistence fisheries jurisdiction with the exception of river miles 1-22 of the New Halen River.

Federal Position/Recommended Action: Take no action. Current State of Alaska regulations prohibit the practice of chumming in the Bristol Bay sport fisheries. This regulation was clarified on the record at the 2012 Bristol Bay Board of Fisheries during proposal 4 deliberations. Additionally, chumming is prohibited by referenced National Park Service regulations and offenders have been successfully cited and prosecuted by Federal law enforcement officers in the Bristol Bay region.



Submitted By
Dr. Alex Hills
Submitted On
11/18/2015 3:15:16 PM
Affiliation

I want to request that you comply with your original vote to have the next 2017 Upper Cook Inlet Meeting in Anchorage. I believe that an Anchorage meeting will provide the most opportunity for all affected parties to participate, for example, residents of the Mat Su Borough. Thank you.



Proposal 85: I Oppose.

Oppose for the same reasons I support 84.

Proposal 87: Oppose

As written, this proposal would eliminate a major portion of the terminal tackle currently used to take rainbow trout. It is too vague and would eliminate any tackle colored orange, yellow, pink including spinners, spoons, flies, soft plastic lures etc. Further, it could be extremely difficult to enforcer if the angler can claim to be fishing for any other species. naturally present in the waters.

I believe there is no biological justification for this regulation. Rainbow trout in the area are managed under the policies of the Bristol Bay Rainbow Trout Management Plan implemented in 1990 and carefully monitored ever since. That plan has numerous regulations to assure sound naturally reproducing wild populations of rainbow trout with spawning season closures, hook size limits, and size and harvest limits. Some time ago when beads became popular, the method of using the bead was addressed by the BOF when increasing hooking damage was observed. Further, the Plan seeks to provide a diversity of opportunity for varied gear groups from total catch and release fly fishing only, to allowing hardware and some hook and cook in selected waters. To my knowledge ADFG Sport Fish has not found any Bristol Bay rainbow trout populations to be in poor condition.

This proposal would be difficult to enforce, would be extremely burdensome on most anglers and just is not warranted.

Thank you



Comments to The Board of Fish for the December 2-8, 2015 meeting addressing the Bristol Bay Area.

From

Dan Dunaway

PO Box 1490

Dillingham, Alaska 99576

907-842-2636

Dear Board of Fish,

While I serve as secretary for the Nushagak AC, here, I only address some issues of interest to me that were not addressed by the AC. I have opportunities to occasionally sport fish throughout the Bristol Bay Area beyond the Nushagak drainage where I live. I retired from ADFG in 2002 after serving 22 years in commercial and sport fisheries; the last four as the Bristol Bay Area Sport Fish biologist. appreciate your consideration of the following items.

Bristol Bay Sport Fishing

Proposal 84: I Support.

I Support this proposal for several reasons: 1) The current regulation adopted last cycle did not follow proper process and was adopted without even the Division of Sport Fish having the opportunity to review this last-minute proposal. The sport angling public and other stakeholders had NO opportunity to comment on this as it was generated by the board late in the meeting by a few people and not properly distributed even among those at the meeting.

2) I do not believe the closure is warranted from a biological standpoint. When I worked for Fish and Game, I was deputized and I would do enforcement patrols in this area. I paid special attention to this area because of the frequent local rumors. I don't ever recall finding a violation there. I know some local folks, especially those not supportive of fly or sport fishing are deeply suspicious of any activity in that area but I never found any violations. I encourage you to ask the Wildlife Protection Troopers how many angling violations are recorded for this water.

3) This proposal is designed to provide a diversity of sport angling opportunity. Quite some years ago before the current closure, this area was carefully selected and worked out with other anglers and users to provide a fly fishing opportunity. I believe it should be restored.

I may provide additional information supporting this proposal verbally at the meeting.

page of 2



Submitted By
Jehnifer
Submitted On
11/19/2015 9:51:26 AM
Affiliation

Phone
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Address
Po Box 2144
Palmer, Alaska 99645

Alaska Board of Fisheries Chairman and Members,

Re: 2017 Upper Cook Inlet Meeting Location

I respectfully request your vote of support for having the 2017 Upper Cook Inlet Meeting held in Anchorage. Anchorage is the most neutral location, and moving the meeting to Kenai would create a great hardship for anyone outside of Kenai to participate. Anchorage is also the most fiscally responsible location for a meeting of this magnitude given the current fiscal situation the state is facing. Anchorage provides convenient travel and lodging options. The meeting should be held in a location that provides all UCI stakeholders an opportunity to participate and Anchorage provides this opportunity.

Thank you for your consideration,

Jehnifer Ehmann



Submitted By
Mike Clark
Submitted On
11/18/2015 8:40:16 PM
Affiliation
Fisherman

Phone
3604312571

Email
mclark8991@rocketmail.com

Address
27 Howard Rd
Cathlamet, Washington 98612

I support proposal #48 allowing the stacking of set net permits in Bristol Bay or at least in the Egegik district



Submitted By
MATTHEW LUCK
Submitted On
11/19/2015 7:34:38 AM
Affiliation
Commercial Fisherman

Phone
2087889427
Email
mattluck55@gmail.com
Address
po box 4997
Ketchum, Idaho 83340

I fully support adoption of proposal # 51 to be considered by the Alaska Board of Fisheries during the Bristol Bay meeting from December 2-8, 2015. We firmly believe that by voting in favor of amending the language of 5AAC 06.333 to allow one individual to hold two Bristol Bay Drift permits in his or her name and fish them concurrently with 200 fathoms of gear will create benefits to ALL Bristol Bay salmon drift gillnet fishers for the following reasons:

- There is no other mechanism available to help get the numbers of boats fishing closer to the optimum number established in CFEC report of 2005.
 - For every additional boat fishing in a dual configuration 100 fathoms of gear is removed from the water. This is the key benefit that would be achieved with adoption of the proposed change. If for instance over time 300 additional boats were to fish in a dual configuration, 30,000 fathoms less gear would be fished in Bristol Bay. 34 miles of gillnet would effectively be removed from the water. This creates the following benefits to ALL Bristol Bay fishers
1. The removal of thousands of fathoms of gillnet gear from the water combined with fewer boats fishing benefits those that choose to continue to fish a single, 150 fathom unit of gear and those fishing 200 in dual configuration. Less gear straining the water, fewer boats fishing means that every boat, regardless of single or dual permit has access to more fish in a much less crowded environment.
 2. The fishery becomes far more economically sustainable for all participants in all quartiles.
 3. Raising the average per vessel income will provide the necessary resources to continue to upgrade RSW, Icing and harvesting technology we so desperately need to enhance the overall quality of the Bristol Bay harvest to create more value in domestic and global markets.
 4. Please note that significant numbers of Alaska residents, non- residents and Watershed residents support this initiative.

In 2014 and 2015 I served as the chair of the Buyback committee with the Bristol Bay Regional Seafood Development Association. We worked with Northern Economics and created a report that evaluated and looked at potential impacts of different fleet reduction initiatives in the Bristol Bay salmon fishery.

During the 2015 Pacific Marine Expo I moderated a panel discussion that presented the document to the Industry and allowed interaction between the public and the panel members. Panel members included ADFG Director of Commercial Fisheries, CFEC Director, and NMFS Buyback coordinator. In an informal poll taken at the end of the meeting very few Bristol Bay fishermen present supported a federally funded buyback due to the extremely high costs but the vast majority showed support of some form of consolidation to bring the number of boats fishing down to a manageable number for all of the reasons listed above.

The stacking proposal before you potentially benefits all fishers in Bristol Bay. Those that can't afford a second permit or simply prefer to fish with a single unit of gear benefit by fishing in a less crowded environment and most important of all, with more fish available per boat. Simply put, the pie is divided up amongst fewer users and it does not cost these users one penny to gain these benefits.

Basically, the entire cost of this program is carried by those that buy the second permit because they want to fish that extra 50 fathoms.

Thank you for your time and consideration. Matthew Luck



Submitted By
MATTHEW LUCK
Submitted On
11/19/2015 7:00:47 AM
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OEG Industry Workgroup, BBRSDA Marketing Committee
Phone
2087889427
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111 Oxbow Lane
Lower Board Ranch
Ketchum, Idaho 83340

I submitted proposal # 34. I request that the Board consider adopting my proposal, amending the regulation to reflect that the change from the 48hr to 12 hr waiting period goes into effect on July 12 The primary reason I believe that this is necessary is:

1) I served as a member of the OEC Industry panel whose recommendations were adopted by the Board in March of 2015. When those new escapement goals were adopted the mid point of escapement goals for Naknek-Kvichak, Egegik and Ugashik changed significantly. These midpoint escapement goals are the trigger for waiving district registration prior to July 17. Because the mid-points are now higher it is unlikely on average returns that district registration will be waived in these districts prior to July 17. With normal run timing on years with an average return much of the fleet has quit fishing by around July 12. Previously before the higher mid point escapement goals were adopted a fisher could move freely between N-K, Egegik and Ugashik during late season scratch fishing. Now, because the mid-points are higher a fisher will have to wait 48 hrs to move where in the past he or she could move freely from district to district. This issue was brought up in the OEG process and it was agreed that this was a collateral negative impact of the plan and that ADFG and industry should work to find a solution. Thank you for your consideration.



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

November 10, 2015

Subject: BOF Comments - Kvichak Setnetters' Association

Dear Board Member:

The Kvichak Setnetters' Association (KSA) is comprised of 100+ members who fish sites in the Kvichak sub-district of the Naknek/Kvichak district. Our mission is to provide a unified voice of our members, especially at Board of Fisheries meetings. We work to ensure that set net fishers in the Kvichak section are given fair access to sockeye bound for the Kvichak River. Due to the nature of our district and our location at the end of Bristol Bay, we have unique needs and perspectives on the effective management of our salmon.

Our specific comments on the proposals before you are listed in the table below for your convenience. Please consider our opinions as you form the rules and regulations that govern our fishery.

Proposal	KSA Opinion	Comments/Notes
25, 26	Oppose	Creates additional interception of Kvichak stocks before fish enter Kvichak Section. Late season fish are also important for escapement, both in numbers and spreading out the run.
27, 28	Oppose	Current regulations are adequate.
29	Support	Provides flexibility in operation of legal gear within existing areas of operation. Extreme current often makes a connected 50 fathom net very tight and dangerous, with or without a running line. This proposal would improve safety, quality, and the setnetter's ability to manage gear.
45, 46, 48	Support	KSA supports these proposals regarding permit stacking for setnetters. We approve these proposals as amended. With prices down and processor limits becoming the norm, a single set net permit does not provide sufficient return on investment. It also helps keep family operations together.
47	Oppose	Support permit stacking but not under those restrictions. Sites and permits are planned and often operated as single entities. If a family operation with 4 sites is owned, the stacked permit would be insufficient to fish all available sites.
49	Oppose	75 fathom on a single site would create problems of adequate separation from neighboring sites due to flagging and bowing of net. Could create potential "corking" of neighbors.



50	Support	We support this proposal as amended "Allow set gillnet dual permit sta Bristol Bay'."
53	Oppose	Increases potential of conflict with set gillnet anchors and nets due to inability to control drift net. Also, could adversely affect fish movement to shore.
54	Support	Please consider WASSIP report. Create a better management plan to ensure that different river systems have equal opportunity to catch the fish bound for their system. For example, if Kvichak River fish are being harvested in Egegik, but Kvichak fishers are not catching Egegik fish, then take steps to pull the Egegik line in with more frequency when significant pushes of Kvichak fish are moving into the district.
58	Oppose	Expansion of the Naknek Section would reduce flow of fish into the Kvichak Section.
221	Oppose	In many areas of the Kvichak District, sand bars prevent tenders from anchoring further out than they currently are. A 1,500 foot minimum would prevent tenders from buying fish in much of the upper Kvichak District.

Thank you for your time, and the consideration of our comments.

Eric Meyer
President
Kvichak Setnetters' Association
(805) 235-8776



November 10, 2015

Subject: BOF Public Comment – Proposal 54

Dear Board Member:

This public comment is in regards to Proposal 54. This proposal was written by me with the intent to address the issue of interception of salmon bound for terminal river systems. With the Kvichak River being at the end of Bristol Bay, interception has always been an issue of concern for Kvichak setnetters. Historically, interception has been a difficult issue to monitor and control. With advances in technology and recent studies conducted using genetics, Fish and Game is now far better equipped to minimize interception and ensure that salmon stocks are caught and recorded in the district for which those salmon are bound. In my proposal, I recommend that the Egigik District lines be drawn in on certain days of the season to minimize interception when high percentages of salmon stocks are known to be bound for other Districts, particularly the Naknek/Kvichak District.

In the attached map of the Bristol Bay Management Area, you can visualize the fish that are returning for the Naknek/Kvichak District are following the East side of Bristol Bay and must pass the Egigik District to get there. I have also attached a map of the Egigik District Management area and you will notice that the outer district line sticks out a substantial distance beyond the mouth of the Egigik River. As Naknek/Kvichak bound salmon are swimming up the East side of Bristol Bay, Egigik driftnetters are able to intercept an unwarranted amount of Naknek/Kvichak fish that are now caught and recorded as Egigik fish. Those fish can influence harvest numbers and adversely affect escapement and allocation management. In the attached map, the dotted line represents the inner district line used during an Egigik River Special Harvest Area (ERSHA). According to AK Administrative Code 06.359.c.3, the commissioner may implement the ERSHA "...if interceptions of Naknek, Kvichak, or Ugashik sockeye stocks within the Egigik District have been documented by past studies and in season indicators". Proposal 54 calls for reducing the Egigik District from the outer district line to the inner district line during established times based either on the results of the WASSIP report presented in 2012, or using in-season identifiers like the Port Moller indices and the results of the genetics samples taken at that time.

I realize this it is difficult to create a resolution that addresses the issue of interception without upsetting one group or another. By submitting this proposal, it is simply my intent to bring the long time issue of interception back to the table. Hopefully, we can work together to create a regulation that improves the ability of Fish and Game to ensure that the salmon of Bristol Bay are returning to their intended Districts with minimal rates of interception.

Thank you for your time, and the consideration of my comments.

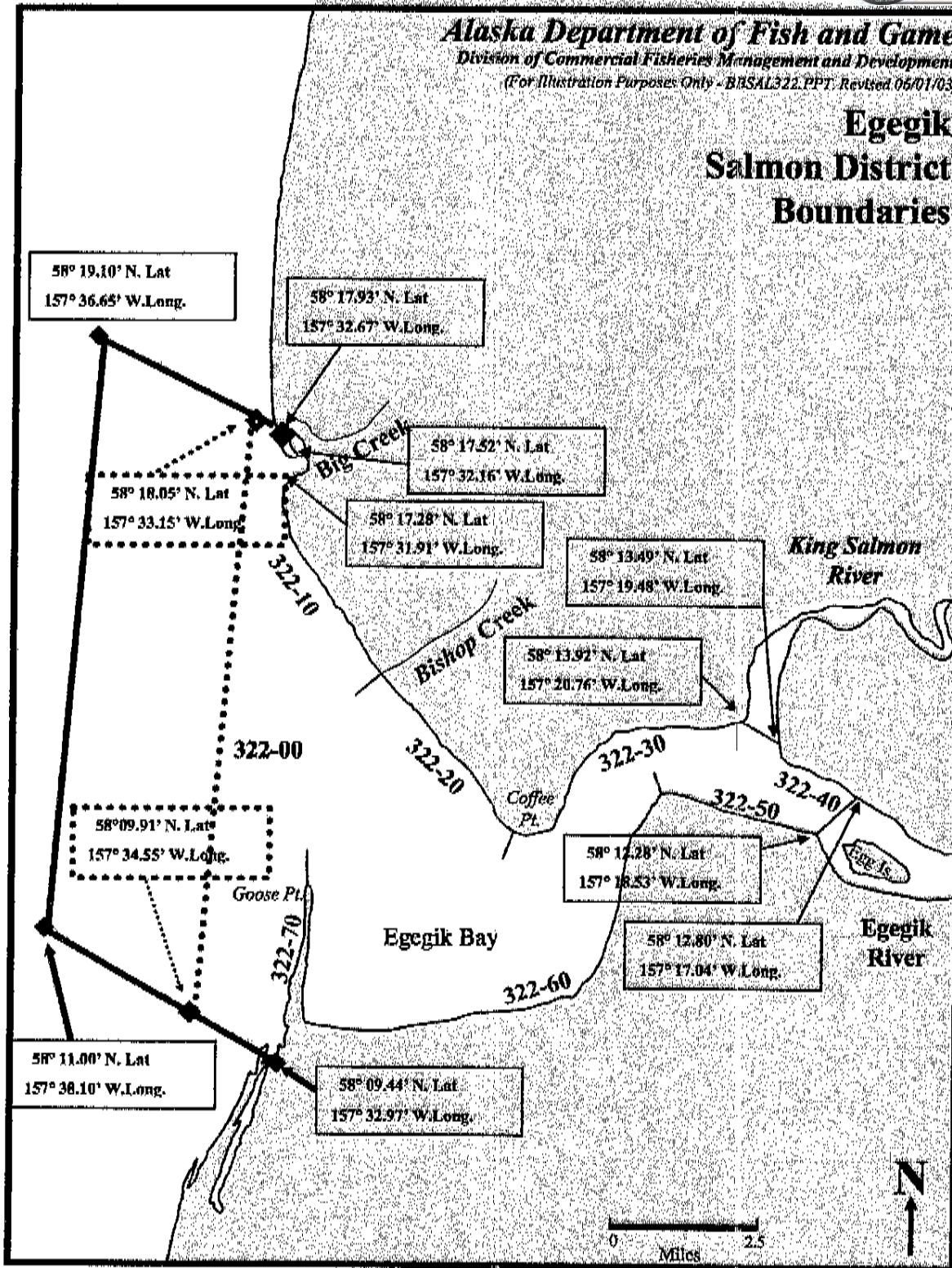
Sincerely,

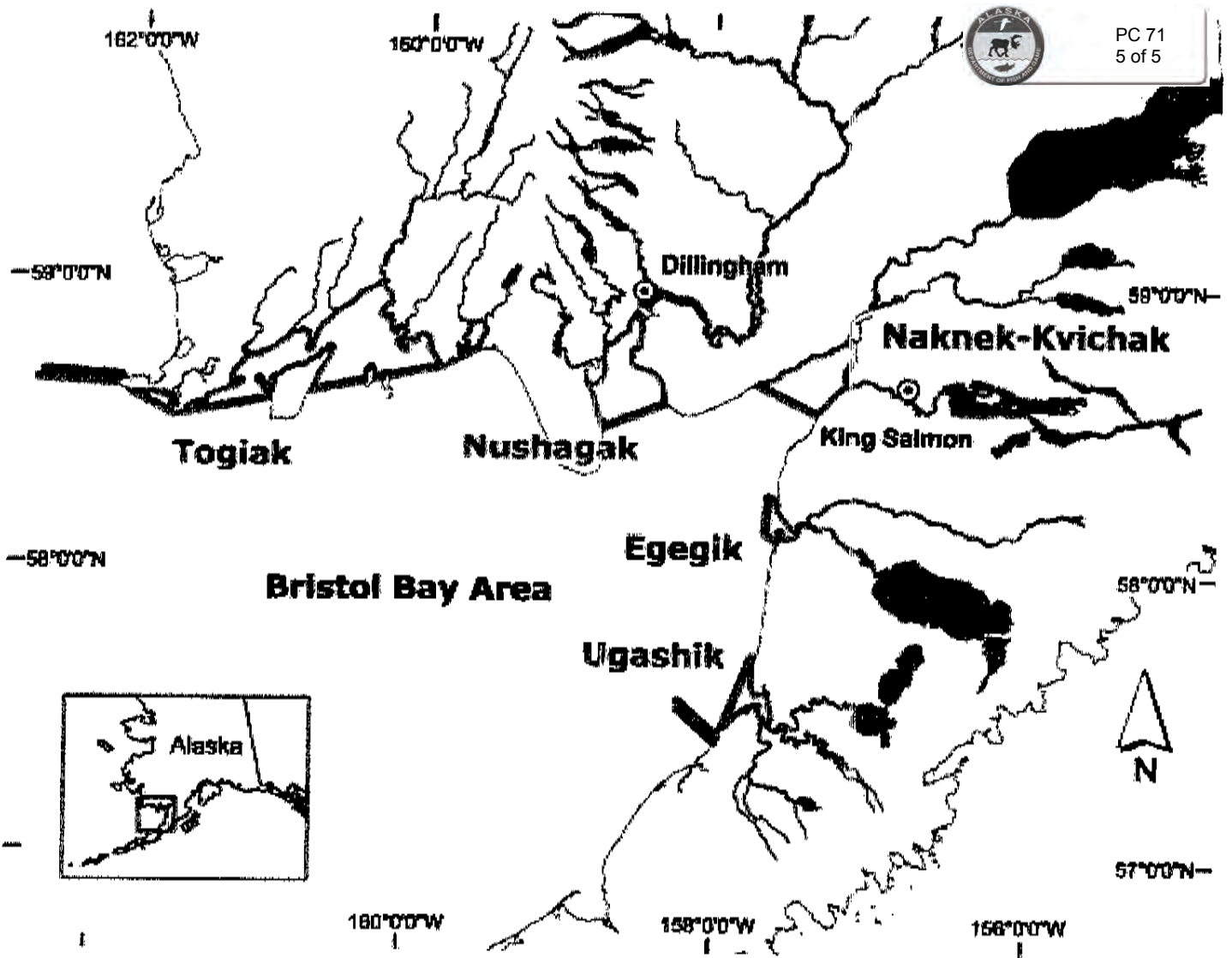
Eric Meyer
Kvichak Setnetter



Alaska Department of Fish and Game
Division of Commercial Fisheries Management and Development
(For Illustration Purposes Only - BASAL322.PPT, Revised 06/01/03)

Egegik Salmon District Boundaries







Submitted By
Thorey Munro
Submitted On
11/18/2015 10:21:43 PM
Affiliation
drift permitholder

Phone
907-299-6131
Email
thorey.rk@gmail.com
Address
PO Box 1260
Homer, Alaska 99603

I would like to write in favor of proposal 31 which requires permit holders to declare which district they intend to fish before they put gear in the water. "Free week" concentrates too many boats in Egegik, typically, during the beginning of the season, and on early years, makes it difficult to regulate catch in the district and creates chaotic, crowded openers.

I am in favor of the proposals that would allow permit stacking (proposals 45 -48) for set net operations. My mother and my brother set net, and permit stacking has allowed them to expand their operation, be more flexible, and hire more crew. Permit stacking for set net typically encourages family businesses and makes a set net operation more economically viable.

I am in opposition to the proposals that would allow drift permit stacking (proposals 51-53). Drift stacking leads to unfair advantages, particularly while line fishing, and encourages a climate of greed. In particular, processors give bonuses to vessels with higher production without factoring the difference of a D-permit. This perpetuates the cycle of greed and reward from the processors, and does not encourage family businesses nor the local Alaskan economy in the same way that set net stacking does. Based on my personal observations, those D-permits often move to out-of-state permit holders and would contribute to the issue of fewer Alaska and Bristol Bay resident permitholders. Please note that I am particularly in opposition of proposal 53 which suggests a D-boat could use 300 fathoms.

I am in favor of proposal 220 as amended to specify that set net bouys should not be included in the list of fixed bouys to be removed. It would be unnecessarily difficult for set netters to remove their bouys, anchors and gear every time drift gillnets have an opener. I would also note that the area behind Goose Spit is a much more favorable "tender alley", but concerns about quality and tender movability should be considered. It's not always possible to get into ship's channel at the lower tides.

I am also in favor of proposals 25 and 26. I am not convinced that these solutions are the answer to the late-season combat fishing, but they are worth exploring. I am particularly intrigued by proposal 26 which would open up the coastal area from Ugashik to Naknek once excapement goals are met.

Thank you for your time,
Thorey Munro



716 W 4th Avenue
Anchorage AK 99501-2133
907-269-0181



State Capitol
Juneau AK 99801-1182
907-465-4843

North to the Future

Senator Cathy Giessel

Senate District N

Board of Fisheries
Alaska Dept. of Fish and Game / Board Support
P.O. Box 115526
Juneau, AK 99811-5526

November 18, 2015

Honorable Board Members:

I am writing to support the request that the location of the Upper Cook Inlet (UCI) meeting in 2017 be held in the Kenai/Soldotna area, and also to support an alternated meeting schedule between the Anchorage and Mat-Su Valley region as well as the Kenai/Soldotna area. An alternated meeting location provides equal opportunities for users in both geographic locations who wish to participate.

Continually holding the UCI meetings in Anchorage precludes a large segment of the Kenai Peninsula fishing community from attending and participating. Many of these stakeholders are private anglers, personal use and subsistence users who have no commercial interests in the outcome of Board decisions, but do have concerns about opportunity, access, and the sustainability of our resources in the long term.

The vast majority of the UCI fisheries issues take place on the Peninsula. Moreover, many Board proposals specifically and uniquely affect the Peninsula. The Board of Fisheries (BOF) is mandated to hold its meetings in locations most affected by the fishing regulations under consideration. However, to my knowledge, that has not occurred in nearly 20 years of UCI meetings.

The concept of the Board holding periodic UCI meetings in the Kenai/Soldotna area has broad-based support. Governor Walker, the Peninsula legislative delegation, the Kenai Peninsula Borough, municipalities, native organizations and all of the advisory committees up and down the Peninsula support this. Additionally, all Kenai-area commercial fishing organizations and private-angler sport fishing groups agree that it is important to, once again, hold meetings in the Kenai/Soldotna area where their constituents can afford to attend and participate.



I encourage you to support an alternating UCI schedule starting with the 2017 meeting being held in the Kenai/Soldotna area. This change would be viewed as fair and equitable and would go a long way in promoting good will and participation from all user groups, commercial, sport, subsistence and personal use fishers alike. Thank you for consideration in this matter, as well as your service to the State of Alaska.

Respectfully,

A handwritten signature in cursive script that reads "Cathy Giessel".

Senator Cathy Giessel
Senate Resources Chair
Senate District N



Submitted By
Alannah M Rice
Submitted On
11/19/2015 11:51:26 PM
Affiliation
Permit Holder

My name is Alannah Rice, and I am a permit holder in the Egegik District. I am writing to comment on proposal 45, the reinstatement of permit stacking in the Bristol Bay set net fishery. When this program first came out it worked incredibly well for my family. My mothers job prevented her from being able to spend the whole season on the beach anymore and having the option to stack permits allowed us to continue fishing all of our gear through the peak of the season. Her job has continued to keep her from being able to fish the whole summer, and since the permit stacking went away we have had to fish one less permit throughout the peak which has certainly impacted our seasonal income. For the last 13 months I have been in nursing school at the University of Alaska Anchorage, a decision I made that did not allow for time off in the summer to go back to fish camp. I was only able to come out to Bristol Bay for 9 days, which did not happen to fall during the peak of the season. Because of my decision to go to school, my family was short a permit, two sites, and 50 fathoms of gear this summer. In a year that fishermen were paid \$0.50 per pound, not fishing my permit had a pretty significant impact on the yearly income of my family and crew. Permit stacking would have prevented this. This is a program that worked well for many people, and I believe was a mistake to remove. Please consider reinstating permit stacking!

REPRESENTATIVE
SHELLEY HUGHES

Transportation
Co-Chair
Labor and Commerce
Vice Chair

Unmanned Aircraft Systems Legislative Task Force
Co-Chair

Military & Veterans' Affairs Committee
Community & Regional Affairs Committee
Transportation Finance Subcommittee
Corrections Finance Subcommittee
Fish & Game Subcommittee

ALASKA STATE LEGISLATURE



HOUSE OF REPRESENTATIVES
District 11 – Greater Palmer



PC 75
1 of 1

State Capitol, Room 13
Juneau, Alaska 99801-1182
907-465-3743

Interim:
600 E. Railroad Ave.
Wasilla, AK 99654
907-376-3725
1-800-565-3743

Rep.Shelley.Hughes@akleg.gov
housemajority.org/members/ShelleyHughes
facebook.com/AKShelleyHughes

November 19, 2015

Dear Alaska Board of Fisheries Chairman and Members,

I request your support for upholding your original decision to conduct the 2017 Upper Cook Inlet Board of Fisheries meeting in Anchorage.

As you are well aware, board members are appointed by the governor and confirmed by the legislature. I wish to remind you that once this appointment and confirmation has occurred, the public expectation is that you make wise decisions based on your expertise and the information before you. The public expectation permits you to *consider* recommendations by the governor or to *consider* recommendations by the legislature, but it does not permit you to be obligated to specific instructions from either. Neither the governor nor the legislature are your puppet masters. You are an independent body expected to make decisions based on the best interest of Alaskans.

I ask you to recall why you initially selected Anchorage as the site of the 2017 meeting. As a board member serving the public, you hopefully made your decision based on the best interest of Alaskans. You likely selected Anchorage because of its central location for the sake of stakeholder access and because of the neutrality it offers in regard to sport and commercial interests. You may have also considered the location from a fiscal perspective, recognizing the savings to the State of Alaska if the meeting were held in Anchorage as opposed to elsewhere. Please use your best judgment once again; base your decision on your expertise and the information before you, and in the best interest of Alaskans.

Sincerely,

A handwritten signature in blue ink that reads "Shelley Hughes".

Representative Shelley Hughes
District 11 - Greater Palmer



Submitted By
chris poulsen
Submitted On
11/19/2015 3:57:32 PM
Affiliation
Ocean green LLC

Phone
(907) 843-0346
Email
wildsalmon1@mac.com
Address
Po Box 236
Togiak, Alaska 99678

To the Alaska Board of Fish,

I am against proposal 221. Tenders choose anchorage with the safety of fishermen and crew during deliveries in mind. Taking shelter on leeward shoreline in the vicinity of set nets for small skiff deliveries is a safety issue. It seems that the Togiak Advisory Committee has little regard for the safety of set net fishermen. Putting a 2500' line (1000' set net limit plus 1500' no anchoring zone) around the coast line of the fishing district would add extra danger to loaded skiffs. In times of heavy weather, tenders would have to seek shelter outside the district, and this would add extra danger to small set net skiffs. If adopted, this proposal would be a fundamental change in the way the Togiak gill net fishery is conducted.

Addressing the Togiak Advisory Committee's concerns for legal operation of gear: There are no restrictions on how close a drifter can operate a drift net from an anchored vessel. The assertion that a tender encroaches, assumes that drifters have territory other than their own gear. Tenders are a necessary part in the operation of salmon fisheries and take into consideration safety, proximity of deliveries, weather and draft in choosing where best to anchor. These factor change and tenders move their location.

With respect , Chris Poulsen



Submitted By
Debra Rice
Submitted On
11/19/2015 4:31:54 PM
Affiliation
Bristol Bay Set Gill Net Permit Holder

11/19/2015

Comments in support of PROPOSAL 45 – 5 AAC 06.331. Gillnet specifications and operations. Reauthorize Bristol Bay set gillnet permit stacking.

My name is Debra Rice, I have participated in Set gillnet fishery with my family in the Egegik District since 1987. I am lending my support to Proposal 45 to Reauthorize Bristol Bay Set Gill net permit stacking, also known as Dual Permits.

There is value in one person being able to own and fish two permits. One source of value is being able to have a profitable fishing operation. For many set net permit holders, it requires fishing two permits to show a profit. For this reason you often see multiple permits within a family. If a family member holding a permit is unable to come out fishing, then the family is faced with not fishing that permit or finding an alternative that may be the best. Another value of Permit Stacking in this situation is that the permit holding family member able to fish that season can have the permit transferred to themselves and be able fish with full gear, 2 permits for the season.

This personally helped me in 2010, when I was not able to go out fishing due to a family matter, which would not have qualified for a Medical transfer. This was during the time that we had Permit stacking in force. I was able to transfer my permit to my husband and my family was able to carry on and fish full gear without me present. Being able to do this made a difference for our family.

Thank you for reading my comments, I hope it helps you to understand the importance of this proposal.

Sincerely,

Debra Rice



Submitted By
George (Will) Bishop
Submitted On
11/19/2015 11:42:42 AM
Affiliation

Phone
907-299-3377

Email
bishops@gci.net

Address
PO Box 1047
324 Lee St.
Homer, Alaska 99603

I am a life long Alaskan, born, raised and continuing to reside year around in Alaska. I have participated in the Bristol Bay set-net salmon fishery for 37 years in the Egegik district. Most of that time being with my family. I am in support of proposal #45 allowing permit stacking of set-net permits in Bristol Bay. Over my many years of fishing I have witnessed spouses dying or divorcing, children committing to jobs that do not allow sufficient time to participate in the fishery and the remaining fisher being forced out of the fishery since they no longer have the benefit of the additional permit income. I have been a participant of the permit stacking when allowed. It gives a sense of stability especially when the market is extremely down. It helps attract crewmembers due to the possibility of more income. It also helps the young person (or any one) attempting to make Bristol Bay set-netting a career. No one is going to invest in a business when there is little or no profit to be realized and no chance of expansion.

In addition I support any proposal that would require the drift fleet to drop their district registration cards at an earlier date than is required at this time. Preferably after the first week of June. This would allow the fisheries managers to calculate the actual catch in a given district.

Thank you



Submitted By
Grant Turner
Submitted On
11/19/2015 11:32:30 PM
Affiliation

Dear Chairman Kluberton and members of the Board of Fisheries,

My name is Grant Turner I am a 26 year old second year set net permit holder in the Egegik District. The following comment is intended to address proposal #45. It is extremely difficult to earn an adequate wage with the current regulation. 'Permit stacking' would allow fisherman like myself the opportunity to generate enough income to make set netting viable. Its difficult to make enough money with only one permit. It seems unlikely that I will be able to continue to participate in the fishery unless this rule is changed. The current regulation makes it tougher for fisherman who are new to the fishery to grow economically in the industry.



Submitted By
Gregg Marxmiller
Submitted On
11/19/2015 9:29:21 PM
Affiliation

Phone
9078430720

Email
GregoryMarxmiller@yahoo.com

Address
PO Box 862
Dillingham, Alaska 99576

November, 19 2015

Dear Board of Fisheries Members,

I would like to comment on the current proposal book relating to changes in Bristol Bay Finfish Commercial Salmon Management Regulations.

I support Proposal 42 and 43. I authored proposal 42. This proposal attempts to create a fair system for single permit holder setnetters in the Nushagak District. The 48-hour transfer time unfairly penalizes fishermen and women who are not able to control multiple permits. People that are able to have multiple permits under their influence are able to drop a permit in another sub district and use their existing resources (boats, crewmembers, trucks, sites) to fish remaining permits.

At the Nushagak Advisory Council Meeting in the fall, the merits and problems with this proposal were discussed and ultimately it was voted down with a significant number of members dissenting from the council's decision. I think the main reason that the NAC wasn't supportive is because of the Ekuk and Clarks Point sub-district permit holders' concern with other set netters coming in and messing up their running gear. I think that amending the proposal to exclude those sub-districts from the 48-hour waiver of reregistering would satisfy those fishers and the proposal would have been successful.

By passing this proposal with these amendments, the Nushagak becomes a fairer playing field. The original rule was not made by set netters and does not benefit most set netters. No other district has this type of regulation.

I also want to comment on my support for the idea of permit stacking for set net fishermen and women. Having multiple permits is a simple way of expanding a business. I think there is overwhelming support by set netters for this as indicated by the proposals before you. In a time where fish prices are pitiful and processors are putting fishers on permit based limits, the inability of stacking permits cripples set netters from catching fish and delivering them before they head upstream. I believe that permit stacking can help local fishermen if done right but the idea that you can compete with only one permit is archaic and eventually that type of fisher will be no longer.

I do not support the NAC proposal 68 to close down the Wood River Special Harvest Area. In the almost 20 years that the Wood River has been a management tool, it has been tweaked and rewritten for some groups to be able to take full advantage of this area. That has not worked and now the Council wants to get rid of it all together. I think the idea has merit but the timing is terrible. This year the Wood River is going to have a huge run of fish. If the Wood River Special Harvest Area is not a tool that the manager can use, we do not allow for effective harvest of escapement and put Nushagak escapement in jeopardy. This is not the year to close the Wood River.

I submit these comments respectfully.

Gregg Marxmiller



Submitted By
James Trott
Submitted On
11/19/2015 10:05:24 PM
Affiliation
Setnetter

I am in favor of proposal 48. I have been fishing in the Egegik District since I was 8 years old. My parents passed on their fishing to me and I am trying to do the same with my family. With the cost of airfare, fuel and a low fish price my dreams of watching my children grow up and be able make a living as a fisherman are slipping away.

Being able to hold 2 permits would allow me to have my children with me and teach them the way my parents taught me 40 yrs ago.



Submitted By
Kim S. Rice
Submitted On
11/19/2015 2:33:19 PM
Affiliation
Bristol Bay Set Net Permit holder

November 18, 2015

Kim Rice
PO Box 331
Gird wood, AK 99587

To Chairman Kluberton and Alaska Board of Fisheries Members,

My name is Kim Rice. I am an Egegik Setnet Fisher since 1987, and am a member of the Lower Bristol Bay Fish and Game Advisory board. I have fished with my family every year since 1987. My children have grown up setnetting in Egegik.

We started out in 1987 with one permit and quickly learned you could not make it on 1 fishing permit. We bought our second permit in 1989. The second permit allowed us to catch more fish and thus make a better income. Then prices dropped due to farmed fish and the Japanese Economy crash. The price drop made it so you had to catch more fish to get by. We bought our third permit for my son in 1992, which was eventually transferred to my daughter. Fish prices tanked ,during that time, down to \$.40/pound and stayed low for many seasons. As a result of low fish prices, spawned an idea for Setnet fishers to fish Dual Permits, also known as Permit Stacking. We tried multiple times in Board of Fisheries meetings to get Dual Permits passed. The Board at the 2009/2010 meeting saw the benefit that Dual permits would give Setnet Fishers, and gave approval to initiate this process. The dual permit allowed families to maintain their operations by not having to juggle permits between family and crew. Dual permits allowed Setnet Fishers to have some flexibility within our family, allowing a family member to come later in the season or take a summer off for educational or training purposes. We had Dual Permits for 3 years, then in 2012 Dual Permits were voted down by the Board of Fisheries.

Following is a recent impact this had on my family . My daughter is going to Nursing School at UAA, she made her educational plans during the time of Dual Permits. Currently she is in the final portion of the Nursing Program, which is on a Trimester system, meaning there was a mandatory summer session last summer. She didn't have a person she trusted to transfer her permit to. If we had had dual permits, we could have fished that permit, providing her with income while she was going to the University. She came out fishing for 7 days, which didn't make a season for her, she had to seek alternate sources of funding. Having the ability to have a family member fish her permit would have allowed her to continue with the summer off fishing in compliance with the trimester curriculum of the Nursing program, and earn funds to sustain herself and pay educational expenses.

Many Setnet Fishers said the Dual Permit worked for their family. But by Board of Fisheries cancelling a very popular program the Setnet Fishers had to go back to juggling permits between friends and family, taking away the flexibility within family and adding more cost.

I totally support Proposal # 45 to reauthorize Bristol Bay set gill net stacking. I believe this wording covers the need of families that Setnet. In 2015 Sockeye season, we had a huge price drop due to market and other factors from \$1.20/pound to \$.50/pound. Back to where we were when we started to seek dual permits. ADF&G has made a huge prediction for the 2016 season which means low fish low prices again. In most cases, especially at this price, a single permit in Egegik can't make a profit.

Look to the permit market. Setnet permits have dropped from \$40,000 to close to \$30,000 in one season. There are more Setnet operations for sale now than in the last 10 years. \$.50 cent fish is behind this, you can't make it on 1 permit. My daughter wants to continue Setnetting , but is concerned she won't be able to make it work without a dual permit operation. Most all testimony at the 2012 Board of Fisheries regarding Dual Setnet Permits was in favor of continuation of the Dual Permits. At that meeting, a few people representing the West side of Bristol Bay were very vocal against Dual Permits for Setnetters, and most Fishers representing the East side of Bristol Bay were in favor of dual permits. It worked well in Naknek, Egegik, and Ugashik Districts.

We need the dual permit program reinstated, it has been beneficial for many Setnet fishers. Not only do having Dual Permits allow flexibility within a family, it allows Setnet Fishers to have a business plan that they can work with. We need to have some stability in the Bristol Bay Setnet Fishery. I believe a return to Dual Permits is going to help the Setnet Fishery in Bristol Bay.

Proposal # 45 also states that no single gill net can be more than 50 fathom in length, and no more than 50 fathoms of net may be fished on an individual set net site. This is to stop the practice of setting one net till it fills up then dragging it up the beach and throwing out another net with a different permit. This practice needs to be stopped. It is called double dipping. This is a loophole that needs to be closed. Not only is it unfair to neighboring Fishers, but is very poor for fish quality. This practice in the Nushagak District is what many were opposed to at 2012 meetings. I support one 50 fathom net, one permit, one site.

By keeping the Status Quo, one permit per permit holder, it decreases possibilities of Setnet Fishers in many areas of making a living wage. Alaska is on the edge of a recession from low oil and fish prices, and we need to look at every economic opportunity to stay afloat. Please reinstate set net gear stacking in Bristol Bay to help all Bristol Bay set net fishers and their families.

Sincerely,

Kim S Rice



Submitted By
Nancy Trott
Submitted On
11/19/2015 9:53:42 PM
Affiliation
setnetter

Phone
360-849-4149
Email
memfs2003@yahoo.com
Address
239 E Little Island Rd
Cathlamet, Washington 98612

I am writing this in favor of proposal 48.

My points are as follows:

1. In the 3 years that dual permit holding was allowed it caused no issues in the Egegik District.
2. \$.50 fish price makes it almost impossible to pay an extra crewmember to stay an entire season to hold a permit.
3. I have been fishing in Alaska for over 50 years and I am doing everthing I can to pass my livelihood on to my children.

Thank you.



November 19, 2015

Alannah Hurley
PO BOX 1488
Dillingham, AK 99576
(907) 843-1633
girlasue@gmail.com

RE: Support for Bristol Bay Proposal #63

Attachments:

- 1) Clark's Point Village Council Letter of Support
- 2) Clark's Point Set Net Fleet Support Statement
- 4) Visual Aid Photos of Clark's Point Beach and Proposal Area
- 5) Shore Fishery Lease Map of Proposal Amendment Area

Dear Board of Fish Members,

Quyana (thank you) for your service and reviewing Bristol Bay Proposal #63. I look forward to meeting and discussing this important proposal with you at the upcoming Board of Fish meeting but am happy to submit additional comments, the attached support documents, and visual aids for your review. First, I'd like to highlight that this proposal has the full support of the Clark's Point set netters (I'm only awaiting response from one permit holder) and also from the local tribal government, the Clark's Point Village Council who represents 99% of Clark's Point residents.

Another important highlight not included in the proposal is all of Clark's Point set net fleet are Bristol Bay watershed residents and or have generational roots in Clark's Point and the commercial fishery. The vast majority of the sites in the proposed area of change are "single-site" fishermen who rely primarily on the income from their single set net operation. The sites in the area that that will be impacted by this proposal make up just under half of the entire Clark's point set net fleet and therefore would directly positively impact the vast majority of the beach. These highlights and the reasons outlined in the proposal/letter from the Village Council explain the broad and enthusiastic support of proposal #63.

The Nushagak Advisory Council is in full support of the concept (an extension of seaward distance to accommodate mud flat fishermen) and reasoning supporting proposal #63. But due to concerns raised at the meeting, the AC encouraged stakeholders in the area to meet to address the challenges and concerns raised. We convened the suggested stakeholder meeting this month and while we weren't able to agree on all points, we were able to find a solution to one of the challenges that arose.

That solution is proposal #63's impacted area must exclude the most southern set net site on Clark's Point beach because if it's extended to 750 ft. its shore fishery lease would intersect with Diane Wetter's shore fishery lease across the creek on the Ekuk side of the beach. Diane Wetter's sites on the Ekuk spit fish parallel (not seaward) to the Clark's Point beach and so to accommodate for this challenge we must exclude the most southern (last) site on Clark's point beach. This exclusion is supported by the last site's Captain (Christina Jeffery) as she accepts there is no way for her to extend her fishing distance without



intersecting with Diane's shore fishery lease. Please see the attachment with shore fishery lease maps that illustrate this challenge and the necessity of an exclusion of the last site from this proposal area. Therefore the amended GPS coordinate is (included in the amendment below) at the 2nd to last site on Clark's Point beach. An extension of the 2nd to last site (Captained by Robert Heavener) will not interfere with Diane Wetter's sites and therefore makes sense to be the new southern boundary of the proposal area.

As author of Proposal #63 I'm amending this proposal to the new GPS coordinate in bold below as a solution to the challenge stated above. The new proposed regulation would read:

Gillnet specifications and operations. Change the seaward minimum distance between set gillnet gear in the Clark's Point area in the Nushagak District, as follows:

5 AAC 06.331(n)(2) is amended to read:

From the cannery dock at Clark's Point to an ADF&G regulatory marker at First Creek, 500 feet from the mean high tide mark, or to the minus 3 foot low tide mark whichever location is closer to the mean high tide mark. Except between 50° 49.945' N lat., 158° 33.456' W long., and **50° 49' 18.3" N lat., 158° 33' 05.8" W long** (at Clark's Point Bluff mudflat) 750 feet from the mean high tide mark, or to the minus three foot low tide mark whichever location is closer to the mean high tide mark.

Best wishes,

A handwritten signature in cursive script that reads "Alannah Hurley".

Alannah Hurley

Lifelong Bristol Bay Resident, Subsistence fishermen, and 3rd Generation Set Netter on Clark's Point beach.



September 24, 2015

Alaska Board of Fish
PO BOX 115526
Juneau, AK 99811

Clark's Point Village Council
PO BOX
Clark's Point, AK 99569

RE: 2015 Board of Fish Proposal # 63 (attached)

To Whom It May Concern:

I am writing on behalf of the Clark's Point Village Council in support of Board of Fish Proposal #63 submitted by Alannah Hurley for consideration at the 2015 Board of Fish meeting. Clark's Point is one of Bristol Bay's smallest communities and the vast majority of the set net fishermen on our beach are Bristol Bay watershed residents with generational roots in Clark's Point. While Clark's Point strives to create and diversify year-round employment options for our residents, the vast majority of our population relies primarily on income from commercial fishing to support our families and community throughout the year. We support this proposal as it will positively impact our fishermen's season and therefore our community.

We are in agreement with the reasons and need for an extension of distance outlined in the proposal. If passed it would not only exhibit regulatory consistency with other similar areas in the Nushagak district but would accommodate for a changing mudflat that has lengthened and filled in over time. The extension of the seaward distance for the bluff set netters from 500 to 750 ft. will ensure our set netters in the specified area will have adequate fishing time and water to have an equitable chance at a successful season.

Sincerely,

A handwritten signature in cursive script that reads "Betty Gardiner".

Betty Gardiner, President

Clarks Point Village Council



Clark's Point Set Net Fleet Support Statement:

I am a Clark's Point set netter and support Proposal #63 to extend the set net distance from 500ft. to 750 feet on the Clark's Point bluff mudflat area specified in the proposal.

Clark's Point Captain's Name:

Christina Jeffery – Site in area of proposed change

Robert Heavener Jr. – Site in area of proposed change

Nina Heavener- Site in area of proposed change

Joseph Wassily – Site in area of proposed change

Barbara Nunn – Site in area of proposed change

Lawrence Olson – Site in area of proposed change

Renetta Haggard – Site in area of proposed change

Fred John Jr. – Site in area of proposed change *(awaiting support response)*

Nicole Jeffery

Gloria Thorson

Sophie Bullard

Christina Edenshaw

Desmond Hurley

Alannah Hurley

Theron Heavener

Malcom Wright

Mariano Floresta

Terry Steben



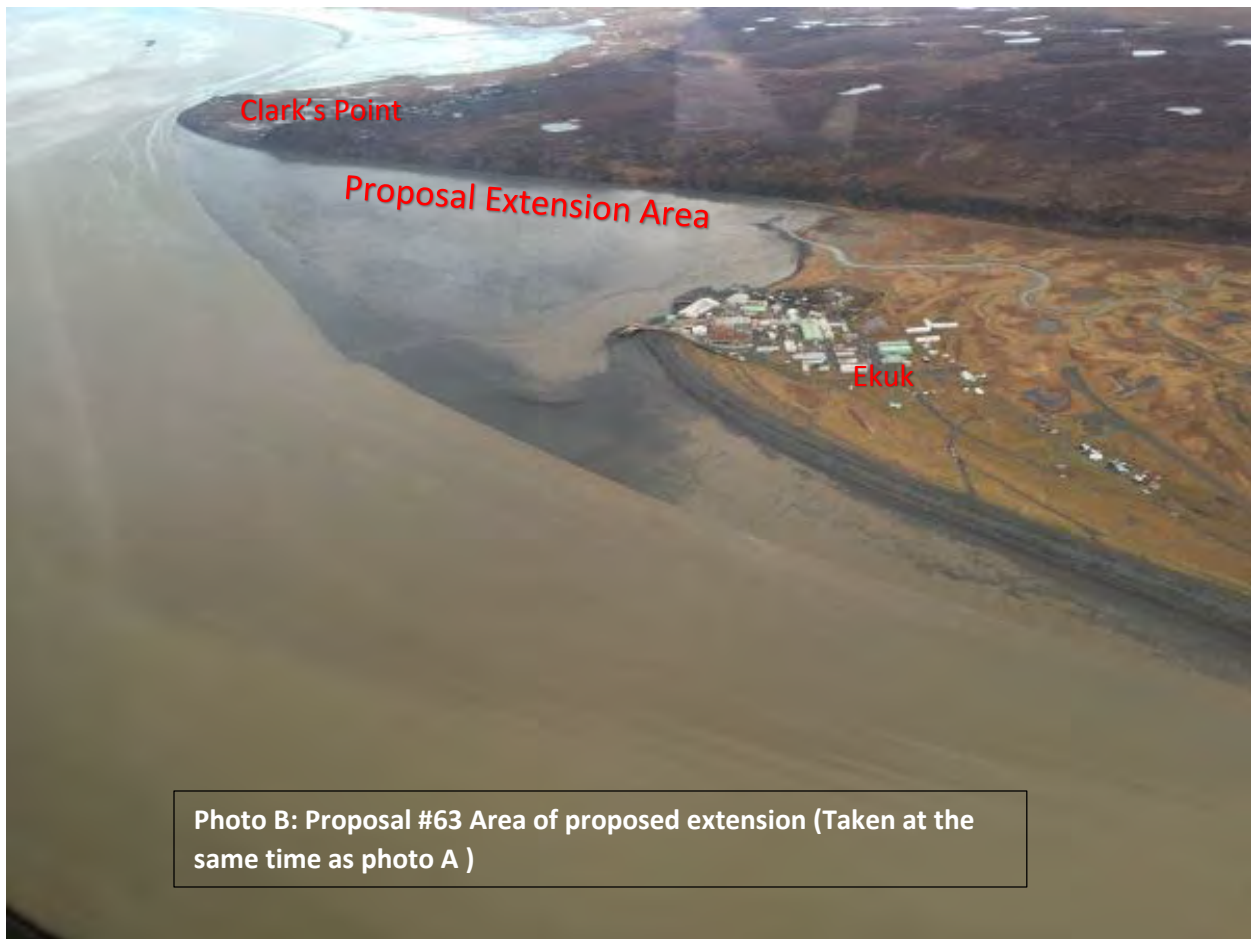


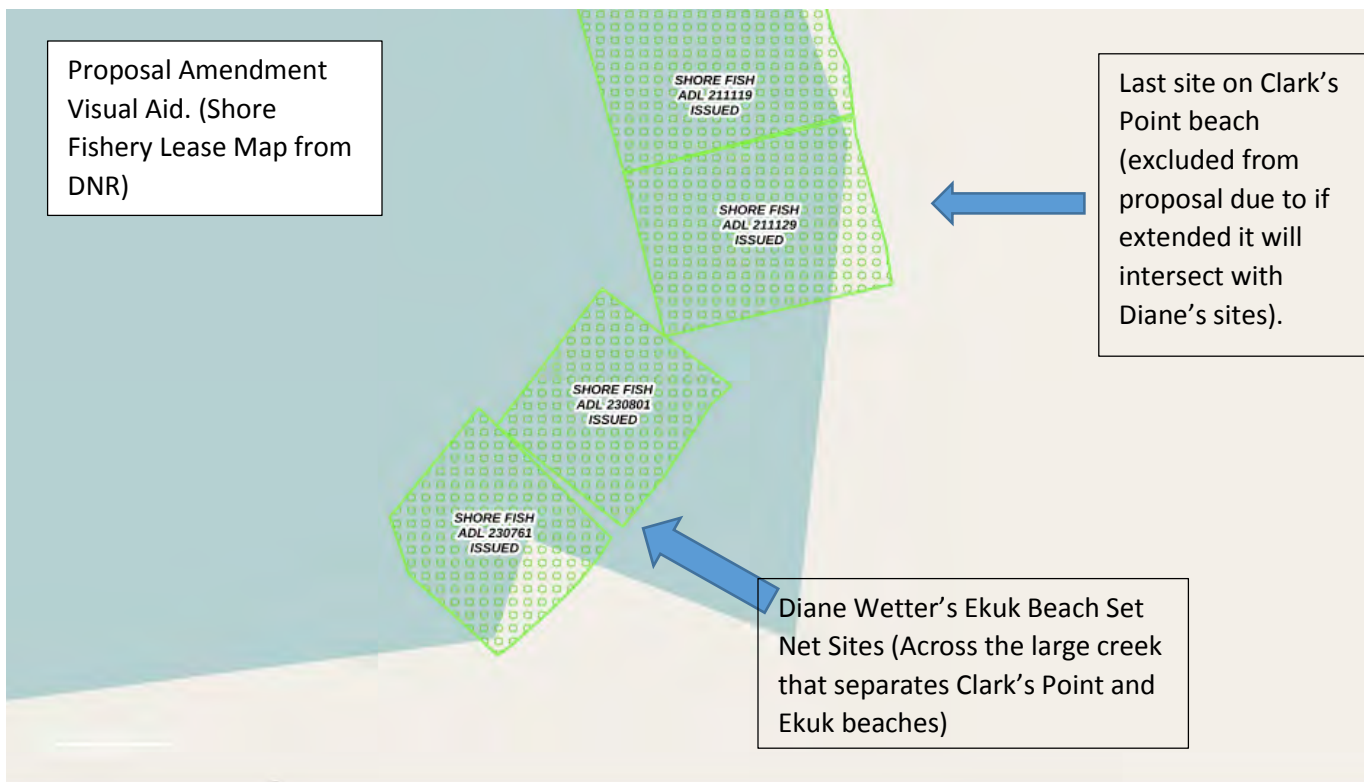
Photo B: Proposal #63 Area of proposed extension (Taken at the same time as photo A)



Photo C : Taken on the top and in the middle of Clark s Point bluff at 0 low tide.



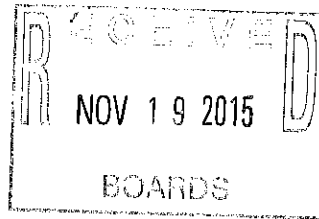
Photo D: Buoy at 500 ft. limit at a 0 outgoing tide in the middle of Clark's Point Bluff Mudflat.





11-13-15

Board of Fish
Bristol Bay Fin fish 2015 meeting



Re: Prop 87

Board Members:

I do not support proposal 87, the elimination of beads or any egg imitation for efforts to catch rainbow Trout in the Bristol Bay area. I would hope that the Board of Fish decides not to pass this proposal.

The goal of sport fishing for rainbow Trout is to outsmart the fish, gain enjoyment from catching the fish and releasing it. People enjoy catching fish and it is important for anglers, especially young and new anglers to our sport, to experience the thrill of catching fish as opposed to being on the water for many hours and not catching any fish. The egg imitation—bead—is obviously a very close replica to what our rainbow Trout are feeding upon and thus a very effective imitation that produces good catch rates. The egg imitation—bead, egg-sucking leach, glo-bug—are all “matching the hatch”, which is exactly what anglers try to do. Prop 87 seems to want to eliminate egg imitations because the author feels there is a high mortality in connection with these egg imitations. Is there any science that supports his theory? We can do other things to ensure the resource remains healthy if the author of Prop 87 or the Department is concerned about mortality from mishandling of fish. Education of the public, user groups, and guides would be a much better approach than the systematic elimination of lures or flies that closely represent the food source that the fish are feeding upon.

Having three lodges in the Bristol Bay area, I am very much aware and see what is happening with our fisheries. Our rainbow Trout populations in Bristol Bay are healthy. There are obviously cycles that certain rivers will go through, but it is my opinion that our fisheries are healthy and the populations are in good numbers. We used to use Glo-bugs as opposed to beads. The Glo-Bugs were effective however they actually caused more death of fish than the bead by far. The Glo-Bug is aggressively sucked deep into the fish and since the hook is right on the Glo-Bug the fish gets hooked deep in the throat and this causes a lot of damage when trying to remove the hook.

Please do not pass Proposal 87

Brian Kraft
Alaska Sportsman’s Lodge; Bristol Bay Lodge; Alaska Sportsman’s Bear Trail Lodge
907-227-8719



Submitted By
Remie Nelle Murray
Submitted On
11/19/2015 1:13:35 PM
Affiliation

I support proposal 45 - permit stacking in Bristol Bay 55AAC06.331. Holding two permits adds stability and viability to family fishing businesses. One individual with the ability to fish two permits would simplify family fishing since now families must transfer permits back and forth among family members.

Submitted By
Remie R. Murray
Submitted On
11/19/2015 1:20:32 PM
Affiliation
Phone
(907)764-0410
Email
remiemurray@icloud.com
Address
P.O. Box 1793
Girdwood , Alaska 99587
Proposal #45

I am a set net fisherman in the Egegik district in favor of #45. #45 allows myself and other set net fishers to fairly fish one additional permit to make a profitable season. I have two Bristol bay set net permits, one of which has had to remain idol. It would make a positive difference if I was allowed to fish a second permit in my name. I feel is is horribly unjust to allow a drift-net fisherman in the same district a 'form' of permit stacking while set-gillnetters are not. If D-permits are allowed for one gear type then a strict controlled 'form' of Dpermits should be allowed for another gear type.



Submitted By
Shelbi A Bishop
Submitted On
11/19/2015 12:36:39 PM
Affiliation

Phone
9073991007

Email
shelbiabishop@hotmail.com

Address
PO BOX 1047
Homer, Alaska 99603

My family has been apart of the Bristol Bay set-net fishery, in the Egegik district, for almost forty years and I have been born and raised into the set-net life. I am in support of proposal #45 for allowing permit stacking of set-net permits in Bristol Bay because there are many reasons in life that either a spouse, child, or any family member that holds a permit would no longer be able to participate in the fishery. That would effect income for the other permit holder(s) and the possibility of attracting crewmembers, especially when the price of fish is very low. I personally hope to one day expand my set-net career and obtain more sites and permit stacking would be very beneficial to me and motivate me to invest more into the fishery and not have to depend on others.



Submitted By
Stacey A CLARK
Submitted On
11/19/2015 12:11:16 PM
Affiliation

Phone
907-299-6240

Email
LIONESSTACEY@YAHOO.COM

Address
POBOX 1203
hOMER , Alaska 99603

To whom it concerns,

I, Stacey A Clark, have been in Bristol Bay fisheries for 37 years as a setnetter in the Egegik district, as well as my family. I am in full support of proposal #45 allowing permit stacking of setnet permits in Bristol Bay because this would allow my children to keep interest of making a better income in this fishery if I was to retire or no longer able to participate in the fishery.



Submitted By
Stephen Bishop
Submitted On
11/19/2015 8:04:22 PM
Affiliation

permit #SO4T59936

November 19, 2015

Dear members of The State of Alaska Board of Fisheries,

Thank you for addressing the Bristol Bay set-net permit stacking proposals during the upcoming meetings. Allowing the use of permit stacking I feel would aid greatly in the defense against the current disastrous fish prices. Permit stacking would allow the possibility for a single set-net fisherman to increase his or her real estate leading to an increase in poundage, or in other words, the only way to stay somewhat economically stable in the current market.

I am in favor of proposal #45, one person holding and fishing two Bristol Bay set-net permits.

I am also in favor of proposal 37, requiring vessels to register by June 1 rather than June 25.

Sincerely, Stephen Bishop



Tom O'Connor
Bristol Bay Finfish Comments

Permit Stacking Proposals

I am opposed to all permit stacking proposals for both set and drift.

In the case of set it would just be a license for one guy to operate twice as much gear. I think this would lead to fleet consolidation, where the big get bigger and the small disappear. If set net permit stacking is allowed with full complement of gear what is the justification for not allowing drift the same.

I once could see the point of supporters of the "D" permits for drift, that they helped local people deal with hard economic times in that an individual could get on another boat if his or her boat was having catastrophic problems. This for a time may have been an important safety belt for local and village fishers, but with the Vessel Upgrade, and other programs being implemented by BBEDC, this aspect of "D" permitting has less importance now than it had then.

The second argument for "D" permits that I also thought had merit was that "D" permits take gear out of the water. They may have begun to do that, but first I think they dredged a bunch of permits out of latency, and now I think we may have begun the painful process of taking gear out of the water.

You guys ever watch never cry wolf? Is permit stacking the tool that God gave fishermen to pull the sickness out of the heard, or just a wolf in sheep's clothing.

One of our largest processors had their fleet on a strict 4,000 pound limit for the most productive part of the season, but they gave their boats with "D" permits a 7,000 pound limit, nearly double that of the boats without a "D", even though only one more shackle of gear is in use on a d-boat. Why? Was this some kind of production bonus even under limit conditions? For their fishermen without a "D" it seemed to be a clear message. Step up and put a D on your boat or you won't get an equal support from us anymore.

Again, I think we should pause and ask ourselves why? Do they like the efficiency of the "D", or do they just like the aggressive captain who is willing to play the game, and willing to step on a few toes to get the job done? Single permitted boat captains already find it hard to compete with these types. They are aggressive. They are in some cases organized into large packs. If your ADF&G Fisheries Manager lets your river turn into a line fishery, and there are any gaps in enforcement they quickly dominate the hot spots, fishing farther and farther over the line. Even if there is good enforcement others in their pack will cut you off if you try to get in a productive set. This way of fishing leaves few to no productive sets to more conscientious and law abiding fishermen, so many locals and less aggressive fishermen are left to take the scraps. The power of a "D" permits superior catch potential, particularly when you are talking about a pack of "D" boats working together as a team has been a big problem for captains working without the "D". Add to this the obvious bias toward "D" boats by one of our largest processors, and the terrible seemingly unjustifiable low prices for our fish this year, I think you can connect the dots.



Is Bristol Bay being forced into a fleet consolidation? Where are these "D" permits going to come from? The aggressive less law abiding type, or the conscientious law abiding captain? Who do you think is going to be cut from the herd? Are they the cancer deep in the bone of the fishery? Or are they the life's blood of our Bristol Bay communities?

Fishermen have been told that quality is the answer to holding their place in the fishery. Many have stepped up, choosing to modify their small boats with insulation and flush decks, and going to extra expense to ice and RSW their fish. Now at least one processor is giving their fishermen the message that "D" trumps quality in guaranteeing your viable place in their fleet by offering about 40,000 pounds more processing support to boats with a "D" over this season's the long limit period. Please consider all current stacking proposals, as well as future "D" permit proposals very carefully.

Proposal 41: Free Week

I am in favor of proposal 41 to get rid of free week, and go back to the pre 2010 registration rules. I think that free week has a lot of potential to harvest early fish bound for the Nushagak and Igushik districts. When FRI presented their genetic study by Chris Boatwright, which I believe was funded by the BBRSDA, at the Naknek Board of Fish meeting in 2012 I believe it showed 80% Nushagak bound fish at station 13, which was just below the Kvichak Line. Also there are complaints from Egigik, and Ugashik fishers that the fleet is very quick to mob in on every small push of early fish.

48 hour transfer:

I am opposed to all proposals which would change the 48 hour transfer period. Without the 48 hour transfer period it would be free week all the time. Large numbers of boats would migrate around at will, with each push of fish that entered a district, crowding the district each time there was fish.

Proposal 42: Removing the 48 hour transfer period within sub districts in the Nushagak District.

As set net fishermen at Ekuk beach the 48 hour rule gives us a lot of protection from skiff fishermen from other sub districts attempting to set gear between our sites when our gear is out of the water for some reason such as us being on limit. We are concerned about damage to our running lines, which require low tides to put out or repair.



Proposal 64:

I am opposed to proposal 64. Any rule that ties the hands of the biologist reduces their flexibility to dynamic situations and can have unforeseen negative consequences. If passed this could get cumbersome when managing a large return to the district.

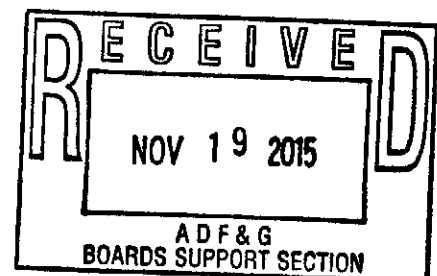
Second, I think leaning toward flood fishing could concentrate productive fishing further out in the district, away from set nets, and less aggressive drift fishermen.

Sincerely,

A handwritten signature in black ink that reads "Tom O'Connor".

Tom O'Connor

Nushagak Advisory Committee Member,
Ekuk Setneter, and half owner in Bristol Bay Drift boat,
life long resident of Dillingham, Alaska.





Submitted By
Yakov Reutov
Submitted On
10/28/2015 9:53:30 AM
Affiliation
F/V Dynasty LLC

Phone
9072990962

Email
yakovsdynasty@yahoo.com

Address
P.o. box 1251
Sterling, Alaska 99672

My name is Yakov Reutov I and my family live on the Kenai peninsula I Sterling ,it would be really nice if the board or fisheries would meet on the Kenai peninsula so we can have an opportunity to testify on Cook Inlet fishery issues ,thank you for your serviced



Diane Wetter
PO Box 336
Dillingham, AK 99576

November 19, 2015

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

RE: Comments for Bristol Bay Finfish Proposals 2015

Dear Directors of the Board,

I have several comments on the proposals before the Board regarding the Bristol Bay Finfish fishery.

Proposal 63 - I strongly oppose.

This proposal will adversely affect my family's shore lease. The location of our lease has a very unique land configuration. The lease is located on a spit that runs perpendicular to Clark's Point beach. It has the same issue as the proposal writer's issue: "short fishing time due to the lack of water." Short fishing due to lack of water is not a new issue.

Proposal 63 will create the following complications.

1. It will intersect Jordan Jeffery's shore lease with my family's (Brent Wetter) shore lease.
2. If this proposal passes and Robert Weavener is allowed to extend out 250 feet, it will prevent us from applying to extend our lease seaward 250 feet because it will completely isolate Jordan Jeffery's shore lease. See the attached map.

Proposal 63 gives an advantage to six (6) sites and creates a disadvantage for three (3) sites.

The solution is to leave the situation as it is. Vote no on Proposal 63.

Proposal 42 & 43 – I strongly oppose.

We are a setnet fishery with set sites. The Nushagak is a big district; we need district registrations. Passing proposal 42 and 43 will benefit those who do not follow the rules.

Proposal 45-53 – I oppose.

Gear stacking has been proven to put local participants at a disadvantage. We need as many local participants as possible, and gear stacking reduces local involvement.



Proposal 61 & 62 – I oppose.

Even though I am an Ekuk setnet fisher, I respect the fishing areas negotiated in year's past. Drift fishers gave up fishing areas in upper districts to create new setnet areas. Increasing the distance drift fishers must maintain off the end of a setnet reduces fishing areas for drift fishers. This is not right, and not in the spirit of the long hard negotiating sessions that took place between setnet and drift fishers in the past.

In my opinion, these proposals will not prevent gear entanglement.

When considering these proposals, I ask the Board to respect the history of past agreements and negotiations between set and drift fishers. I ask you to consider how your decisions will affect local participation in the fishery.

Thank you for taking the time to participate on the Board and working on behalf of all of us who fish in Bristol Bay.

Sincerely,

A handwritten signature in blue ink that reads "Diane Wetter".

Diane Wetter

907 843-1432



State of Alaska

User Guide Support Recorders Office ASGDC Visiting Alaska SDMI

Natural Resources > IRM GPU > Alaska Mapper > Map Selection > Land Estate Map (public)

Switch to Lite Mapper

Logout (Logged in as: public)

Tools Layers Legend

Base Map
OpenStreetMap

Map Functions

Navigation Tools

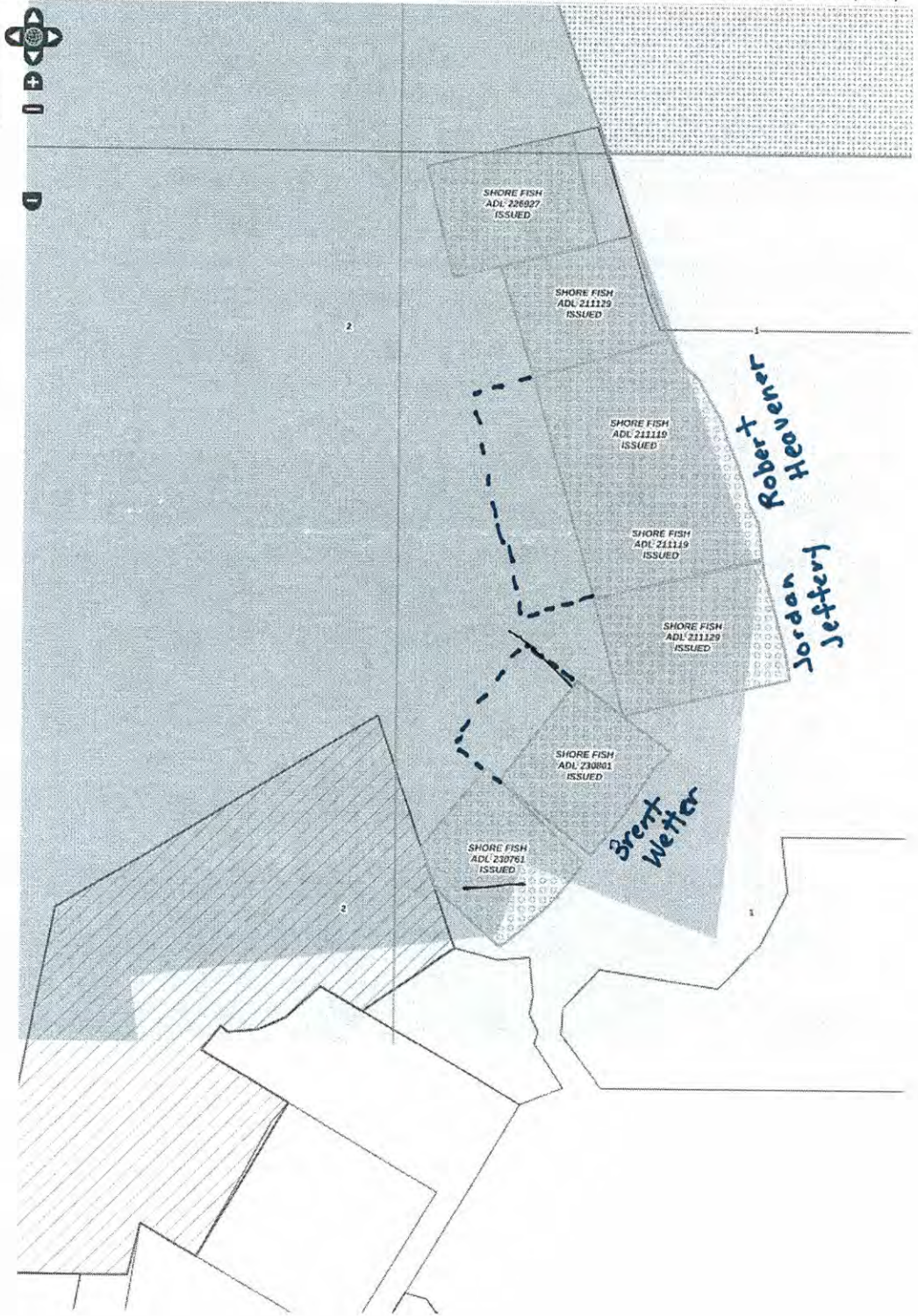
Query by Feature (none)

Feature Modify / Other

Run Query Partial

Map Info
Mouse position (DD):
Lat: 58.82245N
Long: 158.54587W

Map Center Township
TWP Links (S016S056W)



100 m
300 ft