

Good morning Mr. Chairman and members of the Board, ADF&G staff, and public. My name is Gene Sandone. I live in Wasilla, AK and I am representing Bristol Bay Economic Development Corporation (BBEDC).

**PROPOSAL 209 – 5 AAC 39.212. Forage Fish Management Plan.**

- This proposal would add Pacific herring to the fish species listed as “forage fish” in the Forage Fish Management Plan.
- BBEDC agrees with the Department’s position to **OPPOSE** this proposal.
- Pacific herring were intentionally omitted from the Forage Fish Management Plan when it was adopted because ongoing herring fisheries were already regulated to provide for sustainable and beneficial uses.
- The board addressed this same proposal in 2013 and the proposal failed.

**PROPOSALS 210 and 211 – 5 AAC 39.212. Forage Fish Management Plan.**

- Proposal 210 would prohibit directed fisheries on forage fish species for the purpose of fish meal production.
- Proposal 211 would prohibit the production of fish meal from whole forage fish.
- BBEDC agrees with the Department’s position to **OPPOSE** these proposals.
- The board does not have authority to regulate the types of products produced from commercially taken fish.
- and these proposals unnecessarily restrict market opportunity should new fish meal markets be developed.

Adoption of all or any of these 3 proposals would add regulatory complexity and confusion without conferring any additional management or conservation benefits relative to status quo.

**PROPOSAL 212 – 5 AAC 39.115. Designation of salmon net registration area.**

- This proposal would repeal or modify regulations requiring fishermen who hold salmon net permits for more than one area to annually designate a single area where they intend to fish.
- **BBEDC OPPOSES this proposal.**
- We urge the Board to review the BACKGROUND comments in the RC2, staff comments, with regard to the history of previous attempts to repeal or modify this regulation.
- BBEDC is opposed to this proposal because
  1. It would make it difficult for a person to acquire a permit and enter a fishery because this proposal would create additional competition and demand for available permits with a probable increase in the price of a permit.
    - This would be counterproductive to current efforts to retain and increase the number of Bristol Bay watershed residents who own and fish Bristol Bay gillnet permits.

2. It would have the tendency to bring in latent permits to the fishery and increase the fleet size.
  - In Bristol Bay the number of permits currently participating in the drift gillnet fishery is already over the optimal number permits being fished. Adoption of this proposal would tend to exacerbate this problem; and
3. It may result in an extremely mobile and efficient fleet that can move from registration area to registration area to capitalize on each area's salmon run. This was the situation prior to statehood and we rather not go back to those types of fisheries which benefited relatively few fishers.