

Bristol Bay Fishermen's Association

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

Dear Board of Fisheries Members:

The Bristol Bay Fishermen's Association (BBFA) supports Proposals 144 and 145 for the following reasons. Each of these proposals seek reasonable regulations to account for and control interceptions of Bristol Bay salmon stocks within the waters of the Outer Port Heiden Section and the open seaward waters of the Ilnik section.

These emerging and expanding mixed stock fisheries on Bristol Bay salmon, previously allowed by the BOF, now have catch history and should be tied by regulation to the burden of conservation for those impacted stocks of salmon destined for Bristol Bay.

What is new information for the discussions on this issue?

- 1) The processing capacity capabilities for Area M are expected to expand greatly for 2019. Peter Pan's new Port Moeller facility and Trident's and Silver Bay's new processing operations will be open for business this season. These expanded processing capabilities will provide for an exponential increase in processing capacity for the Area M fleet.

The Area M fleet operates without vessel length restrictions, unlike Bristol Bay's 32-foot limit, and use gillnets that are much greater in size and deeper in the water column, where encounters of chinook salmon are more likely. Also, the interceptions of mixed stocks of sockeye salmon will increase in these two Northern Districts in 2019, without a doubt.

- 2) The conservation of Chinook salmon has risen to new levels of concern with increased regulatory interventions throughout Alaska. The Bristol Bay Chinook salmon are also included in these concerns, as the BOF in 2018 waded into these issues and took actions. The catch of Chinook salmon in these Northern Districts must be identified, protected and addressed in regulations that bear the burden of conservation for these stocks.

Please take a close look at these two proposals 144 and 145 to see if they might provide some solutions for what we have requested.

BBFA was founded in 1966 and is an Alaska registered non-profit representing and funded by fishermen who own permits and operate on the waters of Bristol Bay.

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

Sincerely,

David Harsila
President