

PROPOSAL 23

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

Clarify that the holder of two drift gillnet limited entry permits may operate up to 150 fathoms of drift gillnet gear, as follows:

New language:

(h) A person who holds two Bristol Bay drift gillnet CFEC permits may not operate both permits concurrently, on the same vessel, in a “D” configuration. A permit holder may only operate up to 150 fathoms of drift gillnet gear using a single CFEC permit and may not employ a second CFEC permit held by the same individual to operate additional drift gillnet gear.

What is the issue you would like the board to address and why? Additional clarity to existing regulation is requested for the circumstances in which one vessel utilizing a “D” configuration is able to operate 200 fathoms of drift gillnet gear under section 5 AAC 06.333. By adding to existing regulations as proposed, the role of single and ownership of two Bristol Bay drift gillnet permits will be clarified and fully outlined for the fleet.

The Bristol Bay Drift Fleet has taken measures through the Board of Fisheries to create a “D” permit configuration which has achieved lasting benefits to both captains and permit holders, and added a measure of gear reduction. Allowing single owner permit stacking would erode the benefits of the “D” configuration, especially to existing crew, “D” permit holders, and new entrants into the fishery.

An SO3T permit has a value which goes up and down directly in line with the economic health of the fishery. Allowing single owner permit stacking would change this relationship, raise permit values, create barriers to entry, and eventually result in an undue consolidation of the fleet.

The Board of Fisheries has taken up the issue of permit stacking for a decade’s worth of meetings, expending several days of discussion each meeting, while consistently arriving at the same decision. Regardless, every cycle new proposals are put in and the Board is required to consider them. An addition to the existing regulation which allowed for 200 fathoms of gear allocated to a vessel is needed to clarify that this benefit cannot be achieved by a single permit holder.

When the Alaska Legislature created the allowance for an individual to own two permits in 2006 they explicitly included language disallowing extra gear. It was made clear this was done as a gear

reduction effort. The move to allow an individual to own two permits was done in conjunction with a Southeast buyback program and was not intended to allow an individual to fish more gear.

PROPOSED BY: Katherine Carscallen, Susie Jenkins-Brito, Bronson Brito, Mark Schwantes, Robert Heyano, Patricia Treydte, Reba Temple (EF-F18-109)

PROPOSAL 24

5 AAC 06.331. Gillnet specifications and operations, and 5 AAC 06.333. Requirement and specification for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow the holder of either two set gillnet or two drift gillnet limited entry permits to operate more gear than the holder of a single limited entry permit, as follows:

The ability to stack and own 2 permits, fish together on one vessel for Drift Net Fishers and 2 permits for Set Net Fishers.

What is the issue you would like the board to address and why? The ability to stack own and fish two (2) limited entry permits in one name for either Drift or Set Gill net fishing. This would help the fishery towards the optimum number of fishers and boats previously identified. This would reduce risk for vessel owners who fish 2 permits already who have to have 2 permit holders on the vessel. This will give the vessel owner and permit holder all of the responsibility. This would give all Fishers the chance to operate with 2 permits or maintain 1 permit. Cook Inlet has approved stacking of permits in a single name.

PROPOSED BY: Bruce Skolnick (EF-F18-017)

PROPOSAL 25

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

Allow an individual holding two drift gillnet limited entry permits to operate up to 200 fathoms of drift gillnet gear, as follows:

Adopt and allow one person owning two permits the extra compliment of gear up the 50 fathoms, equaling a total of 200 fathoms per vessel.

What is the issue you would like the board to address and why? Under the current regulation 5 AAC 06.333, the option of "permit stacking" is only allowed for two separate permit holders. I recommend the Alaska Board of Fisheries amend the current regulation under 5 AAC 06.333 to include individuals owning two Bristol Bay Salmon drift permits the same access of "permit stacking" as two separate permit holders.

Under the current regulation, two Bristol Bay drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate 200 fathoms of drift gillnet gear. In 2002, the Alaska Legislature passed House Bill 286, amending Alaska Statute 16.43.140 (c). This law allows individuals the ability to concurrently hold two salmon limited entry permits in the same permit

fishery. House 46 Bill 251 provided the Alaska Board of Fisheries the authority to grant fishing privileges to the second permit held by an individual, otherwise known as permit stacking.

PROPOSED BY: Abe Williams (EF-F18-039)

PROPOSAL 26

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

Allow the owner of two drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear from a single vessel, as follows:

This proposal would allow the owner of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel.

What is the issue you would like the board to address and why? Currently, the full benefit of permit stacking (“D” Permits) is not being realized. We will fall short of the potential improvement in quality and reduction of vessels (Optimum Number Study). Bristol Bay drift permit holders and crews will benefit because there will be fewer vessels and less gear per permit giving more opportunity for the remaining vessels and fishermen.

PROPOSED BY: Kurt Johnson (HQ-F18-048)

PROPOSAL 27

5 AAC 06.331. Gillnet specifications and operations.

Allow the holder of two set gillnet limited entry permits in the Naknek-Kvichak, Egegik, and Ugashik districts to operate 100 fathoms of set gillnet gear, as follows:

5 AAC 06.331 (U). Gillnet specifications and operations.

(U) In the Naknek-Kvichak, Egegik, and Ugashik districts, a CFEC permit holder who holds two Bristol Bay set gill net permits may stack those permits and operate additional set net gear as described in this subsection. The CFEC permit holder may not operate more than four set gillnets. A single set gillnet may not exceed 50 fathoms in length, and the aggregate length of the set gillnets operated by the CFEC permit holder may not exceed 100 fathoms. The buoys must be marked as specified in 5 AAC 06.334 and 5 AAC 39.280 with both of the CFEC permit holders’ five-digit permit numbers followed by the letter “S.” All identifiers must be displayed in a manner that is plainly visible, unobscured, and in a color that contrasts with the background.

What is the issue you would like the board to address and why? Setnet operations in the Naknek-Kvichak, Egegik and Ugashik districts are predominantly multigenerational family operations. Over time, in order to maintain economic viability, two or more permits have been purchased and operated in these operations. Over time, as parents age and aren't consistently physically able to work the sites every year or as children grow up and need to miss a summer due to college, one or more permit holders may be unable to fish every season. The ability to stack setnet permits would enable these longtime family fishing operations to maintain economic

sustainability and remove the risk and expense of potentially losing the permit by transfer outside of the family to a crew member. For the most part, these permits are not going to be sold outside of the family operation because their value to these families is in the ability to pass them along to the next generation and not in their resale value. There isn't a legitimate justification for disallowing the stacked use of permits in a family operation since disallowing them isn't going to result in more permits being available for purchase in the public marketplace. Or by allowing stacking the permits value would raise significantly-that didn't happen. And now as stacking is permitted by only the one user group. After researching why the West side of the bay doesn't like set gillnet stacking-it sounds like one person has abused the situation-one person.

PROPOSED BY: Eddie Clark

(EF-F18-032)

PROPOSAL 28

5 AAC 06.331. Gillnet specifications and operations.

Allow commercial fishing for salmon, with set net gear only, within the section of the Kvichak River that borders Levelock Village land, as follows:

5 AAC 06.331. Gillnet specifications and operations

(new) within the Kvichak Section, along the west bank of the Kvichak River adjacent to the land of the village of Levelock, from the southern point, 59.10321 N, 156.8661 W to the northern point, 59.11478 N, 156.85106 W, near Levelock Creek.

(A) set gillnet gear may be operated only as follows:

(1) a set gillnet may not exceed 25 fathoms in length;

(2) a set gillnet may not be set or operated within 300 feet of another set gillnet;

(4) a set gillnet must be operated in a substantially straight line perpendicular to the nearest bank of the Kvichak River;

(5) all gear and equipment associated with set gillnet fishing in this area must be removed from the water when it is not being used to fish in the this area;

(B) Sockeye salmon harvested within this area shall be tallied against the 8% set net allocation for the Kvichak Section.

(2) a CFEC permit holder may not use more than one gillnet to take salmon at any one time.

What is the issue you would like the board to address and why? Allow for the commercial harvest of salmon, with set net gear only, within the section of the Kvichak River that borders Levelock Village land.

This proposal area includes only the west bank of the Kvichak River from (59.10321 N, 156.8661 W), near the south end of the town, to the northern banks of Levelock, near Levelock Creek (59.11478 N, 156.85106 W). This area would provide up to 16 commercially regulated set net sites, each separated by a distance of 300 feet from each other. We consider this proposal a logical scenario because it is based on the harvesting salmon that have escaped the traditional fisheries in the Naknek-Kvichak District and are also in excess of subsistence needs and targeted escapement requirements. If this proposal is accepted, it would provide opportunities for new fishers or retired

fishers, to establish or reestablish themselves as Bristol Bay commercial fishermen and it would tend to bring commercial fishing permits back to Alaska residents.

Additionally, residents could participate in this fishery without a massive outlay of resources because they would not need a fully planned operation as to boats and motors. The community and the fish processing plant can work with the fisherman/participants by letting them use the machinery/equipment, supplies, ice machine, etc. This community and fish-processing plant support would be available to assist all the commercial fishers participating in this fishery and the fishery in the Alagnak River Special Harvest Area. This relationship amongst the community, Levelock fish-processing plant, and fisherman would benefit all involved and contribute to a viable, self-sustaining community.

The processing plant in Levelock will provide services with buying the fisherman's harvest, and provide them with profitable returns. We will have economic growth and a re-established workforce in Bristol Bay area. We plan to expand our plant soon with adequate freezer equipment. Currently, we have the capacity to process up to 12,000 pounds of fish per day with the freezing system we have now. However, we plan to increase our capacity of processing and freezing up to 35,000 lbs. per day. We have other projects like IKURA Salmon Roe projects that's coming in the near future. In addition to providing a viable fishery to residents, this proposal would also provide new opportunities to residents to obtain a commercial fishing permit and fish in their traditional fishing locations. Our long-term goal is to achieve sustainability of a fish processing plant that will provide employment and much needed income to the residents in the area. We are especially focused at the youth and elders. We believe that through employment at our plant and fishery, we are instilling in them responsibility, ambition, and a way of life, a sense of worth and value. Our plans for the plant and the nearby fisheries are for the long term. But first and foremost, we would value this proposed fishery to harvest fish for a profitable commercial fishing grounds.

We respectfully request the Alaska Board of Fisheries, to pass this proposal. It would allow fisherman alternative routes to harvest salmon, which are excess to the Kvichak River targeted escapement goal and have escaped the traditional Naknek- Kvichak District commercial fisheries. The results of the passage of this proposal would also provide added benefits such as providing employment opportunities to residents in the area, as well as, facilitating the transfer of commercial fishing permit buy backs from nonresidents to the residents of Bristol Bay Alaska.

Another option for the BOF to consider is to make this section, as described above, a special harvest area.

PROPOSED BY: Levelock Village Council (HQ-F18-049)

PROPOSAL 29

5 AAC 06.331. Gillnet specifications and operations.

Establish mesh size restrictions for the conservation of king salmon in the Naknek-Kvichak and Ugashik Districts, as follows:

5 AAC 06.331 is amended to read:

...

(a)(1) gillnet mesh size may not exceed five and one-half inches during periods established by emergency order for the protection of king salmon; **in the Naknek-Kvichak and Ugashik districts gillnet mesh size also may not exceed five and one-half inches from June 1 through July 22;**

...

What is the issue you would like the board to address and why? These gillnet mesh size restrictions have been implemented using emergency order authority every fishing season since the early 1990s in the Naknek-Kvichak District and since about 2008 in the Ugashik District. The Alaska Department of Fish and Game plans to continue to use these mesh size restrictions for the protection of king salmon. This would codify long standing management practice and eliminate the repetitive use of emergency orders to establish mesh size restrictions.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F18-020)
