

Alaska Board of Fisheries  
Bristol Bay Finfish Meeting  
December 2-8, 2015

Bronson Brito and Susie Jenkins-Brito  
Dillingham, AK

Dear Chairman Kluberton and Members of the Board:

Our family lives and works year round in the Bristol Bay community of Dillingham and are active participants in the Bristol Bay salmon fisheries. We own a drift fishing operation, the F/V Sea Breeze, with Bronson being a permit holder for the last decade and a third generation Bristol Bay fisherman. We also own and operate a marine welding business focused on improving the drift fleet. We are invested in raising our children to become commercial fishermen who understand and practice a subsistence lifestyle. Fishing for our family is certainly an economic endeavor, but, as many who fish understand, it is not merely a business but a lifestyle in which we annually participate— even when outcome is sure to be a low (or no) profit margin.

In reviewing and commenting on the following proposals we feel strongly in our role as advocates for local Bristol Bay resident's access to the fishery prosecuted outside of our front door. With the steady out migration of permits from our region, and the widening gap between the outside and local fleets capability, an equitable fishery is the goal in our approach to the proposed regulatory changes.

**Proposals 22 & 23 - Support** these proposal are in regards to allowing the village of Port Heiden's inclusion into the Bristol Bay Management Area and eliminating the interception fisheries especially the Outer Port Heiden district. With the inclusion of the Cinder River, Inner and Outer Port Heiden sections into the Bristol Bay Management Area T local residents of Bristol Bay would be able to access a fishery that occurs directly outside of their community and allow the fish whose stocks originated within Bristol Bay to be targeted by permit holders who have permitted access to these stocks.

**Proposal 24 - Oppose as Written** - We support only the inclusion of Cinder River, Inner and Outer Port Heiden Districts into Bristol Bay, but NOT the Ilnik or the Three Hills Sections.

**Proposal 25 - Oppose** - This proposal would NOT eliminate line fishing, it would simply move the line and lengthen the districts. We agree with the Department's comments in regards to this proposal.

**Proposal 26 - Oppose** - This proposal would essentially create a General District and any language that would allow for fishing on stocks in a non-terminal nature will not be supported by our family.

**Proposal 27 & 28 & 29 - Neutral**

**Proposal 220 - Oppose** - This proposal is impractical and would be unsafe for many fishers in rough weather; we agree with the Department's comments in regards to this proposal.

**Proposal 221 - Oppose as written - Amend as follows:**

Support as written for the Togiak District ONLY.

In the other Districts, especially in the Naknek/Kvichak and Nushagak Districts, floating processors when anchored inside the district boundaries are large barriers to the drift fleet and would be better positioned outside of the fishing grounds. Tenders, ice barges, transporters and other vessels for fleet assistance have a need to park within the fishing grounds for convenience and safety but floating processors should be mandated to be anchored only outside of the districts.

**Proposals 30, 71, 72, 73, 74, 76, 80, & 91 - Support** with the confirmation of GPS Coordinates by ADF&G staff— not through anecdotal public provided information.

**Proposals 31, 32, 33, 35, 36, 37, 38, 39, & 40 - Oppose as Written - Amended as follows:**

**We understand the Departments management difficulties and therefore propose requiring district registration upon fishing and moving between districts on the Eastside but continue to waive the 48 hour transfer period prior to June 25th. The existing Nushagak regulations would not be impacted.**

We currently participate in the Eastside fisheries prior to June 25 as they are allowed under regulation and move back to the Nushagak District once district registration is required. These proposals seek to eliminate early fishery opportunity without the 48 hour transfer period when many vessels are not yet ready to enter the fishery or the catch is not substantial enough to entice entrance. This “free week” is a good opportunity to work out boat, gear, and crew bugs and provide additional income in some seasons.

**Proposal 34 - Oppose** - A 12 hour transfer period between districts would essentially be as if there was no transfer period, faster vessels would likely move between districts far more frequently thus widening the gap between the fleets capabilities to harvest fish. Allocation, management and escapement would all be much more difficult for the Department to regulate.

**Proposal 42 & 43- Oppose** - These proposals could jeopardize the gear of other set gillnet permit holders who are not present at their site, and we agree with the comments put forth by the Nushagak AC and BBEDC.

**Proposal 44 - Support** - District exclusivity is intended to protect the Villages of Togiak and Twin Hills as well as other fishers who prosecute their season solely within the Togiak district, the current regulation should apply to both permits and vessels.

**Proposals 45 - 53 - Permit Stacking - Oppose** Permit stacking is not in the best interest of Watershed residents or anyone who wishes to enter into the Bristol Bay fishery. It would artificially inflate permit prices, reduce access to available permits, reduce number of available permits, and would increase one fisher’s harvest-ability inequitably. Allowing any increase in



gear in dual drift operations over 200 fathoms would be unsafe and inadvisable. We do not wish to see any change in current regulation regarding the stacking of permits in either drift or set operations.

**Proposal 54 - Oppose** - Current management practices are sufficient and we agree with ADF&G's comments in regards to this proposal.

**Proposal 55 - Oppose** - This concept has already been thoroughly vetted by the Board in 2012 and at the 2015 Statewide BOF Meeting and no new information is provided to be deliberated on.

**Proposal 56 - Support Conditionally** - Alagnak River inseason escapement project would need to be reinstated.

**Proposal 57 - Oppose** Current Management Plan is sufficient.

**Proposal 58 - Oppose** Current Boundary lines protect Kvichak River sockeye when Kvichak section is closed, a change in the boundary line risks catch of Kvichak river stock.

**Proposal 59 & 60 - Neutral**

**Proposal 61 - Oppose** - Current regulations are adequate.

**Proposal 62 - Oppose** - Current regulations are sufficient in protecting set gillnet operations. We agree with the Nushagak AC & BBEDC's comments in this regard.

**Proposal 63 - Support the concept needs further definition for this specific fishing area.**

**Proposal 64 - Oppose as written and Oppose as amended by Nushagak AC** - Fishing the incoming tide is certainly preferable, the Department understands this already, however mandating openers based on tide cycle ties the Departments hands when escapement, announcement times or tide schedules could allow for additional fishing time, stating "to the extent practicable" is a grey area for management and fishers to argue and is better omitted from regulatory language.

**Proposal 65 - Support** - This regulation's intent was understandable, however the reduction in mesh size we do not feel is adequate protection for the Nushagak salmon stocks. The smaller mesh size may reduce overall catch of larger fish but does not stop these fish from hitting the net and either getting caught as dropouts or ripping up the gear. If the goal is to reduce Nushagak stocks from being caught the most logical approach is to move into the Wood River Special Harvest Area.

**Proposal 66 & 67 - Support as outlined in BBEDC's comments**

**Proposal 219 - No Action based on what is suggested in Proposals 66 & 67**

**Proposal 68 - OPPOSE** - This is an essential management tool for the protection of Nushagak salmon stocks, allows for the harvest of Wood River salmon stocks, and prevents over-escapement to the Wood River. Eliminating this fishing area would be detrimental to the fleet's capability to harvest Wood River bound sockeye while protecting Nushagak River sockeye.

**Proposal 69 - Support** - This is a logical approach to management of the WRSOA for both gear types.

**Proposal 70 - Oppose** - The 3:1 ratio for Drift and Set operations is our desired approach to WRSOA management.