



PC61

Name: MICHAEL SCHOLS

Community of Residence: WITTMANN, ARIZONA

Comment:

Proposal 35 I oppose. 1. If this proposal did get changed from 100 feet to 300 feet of the offshore end of a set gillnet it would be devastating to drift gillnet fisherman. It is well documented that in certain years a huge majority of the salmon returning to Bristol Bay, do return in the very shallow water. Moving drift fisherman further offshore would create even a bigger allocation disadvantage. Please " see attached "sheets for Allocation of Bristol Bay drift and set net harvest for 2021 and 2022.

2. If this proposal did get changed, certain fishing district boundaries would have to be changed, causing ADF&G, Enforcement, and fishermen logistical nightmares.

3. It would be very, very, hard to gauge how far a person is off of a set gillnet at 300 feet, creating more hardship to drift fishermen.

Proposals 42,43, and 44. I oppose these proposals as I beleive we should continue with ths D permit system to get the fleet size reduced to the CFEC adopted optimun number of drift permits to 900-1400 based on a set of statutory standards.

Proposals 46 and 47 I strongly agree with. The drift and set net fleet has become super efficient in the last five years. By allowing one person to hold and fish two permits in their name would greatly help reduce the number of drift boats fishing. Less boats equals less nets in the water equals more fish for the people who are participating. It would help with safety, enforcement, and productivty for all involved.

Proposals 49-54 I strongly agree with. It just makes great sense to open up the general area to be fished after all escapment goals have been met. I do not think there are very many drift or set net fishermen in Bristol Bay who would oppose these proposals.

Proposal 55 I strongly agree with. It would make a very confusing matter simple for fishermen and enforcement.

Thank you for your time,

Michael Schols SEE ATTACHED



Table 6.—2021 Chinook salmon preliminary harvest data and 20-year average by district.

District	2001–2020 Average Chinook salmon harvest	2021 Chinook salmon harvest
Naknek-Kvichak	1,714	604
Egegik	784	318
Ugashik	996	358
Nushagak	34,632	4,103
To iak	4,970	725
Totals	43,096	6,108

Table 7.—Allocation of Bristol Bay drift and set gillnet harvest, 2021.

District	Drift gillnet percent of harvest allocated / <u>caught</u>	District set gillnet percent of harvest allocated / <u>caught</u>	Section set gillnet percent of harvest allocated / <u>caught</u>
Naknek-Kvichak	84% / 75%	16% / 25%	Naknek: 8% / 13% Kvichak: 8% / 12%
Egegik	86% / 84%	14% / 16%	—
Ugashik	90% / 87%	10% / 13%	—
Nushagak ^a	74% / 81 %	26% / 19%	Nushagak: 20% / 16% I ushik: 6% / 3%

^a Wood River Special Harvest Area harvest was entirely set gillnet and is included in the 19% listed above.



Table 6.—2022 Chinook salmon preliminary harvest data and 20-year averages by district.

District	2002–2021 Average Chinook salmon harvest	2022 Chinook salmon harvest
Naknek-Kvichak	1,714	1,129
Egegik	760	272
Ugashik	968	277
Nushagak	34,260	5,325
Togiak	4,956	1,371
Totals	42,658	8,374

Table 7.—Allocation of Bristol Bay drift and set gillnet harvest, 2022.

District	Drift gillnet percent of harvest allocated /caught	District set gillnet percent of harvest allocated /caught	Section set gillnet percent of harvest allocated /caught
Naknek-Kvichak	84% / 75%	16% / 25%	Naknek: 8% / 14% Kvichak: 8% / 11%
Egegik	86% / 79%	14% / 21%	—
Ugashik	90% / 89%	10% / 11%	—
Nushagak ^a	74% / 82 %	26% / 18%	Nushagak: 20% / 13% Igushik: 6% / 2% Wood River 3%

^a Wood River Special Harvest Area harvest was entirely set gillnet and is included in the 20% listed above.



PC62

Name: Scott Schumacher

Community of Residence: Livingston, MT

Comment:

I have guided sport fishermen in the region for 36 years. I am supporting Proposals 11,13, 18, 30, and 31 because I believe they can help increase king numbers (11&13) and improve the sport fishing quality in the Bristol Bay region.

I am opposing proposal 28 because it doesn't make much sense for the Nuyakuk river and Nushagak above the confluence. There is hardly any pressure in those areas, and the king spawning habitat is protected by the current regulation of no king fishing above Harris creek on the Nush and the season closure date. I'm not sure about the Mulchatna river portion as I have not guided there. If a regulation like this is made maybe it should be only for the Mulchatna.



PC63

Name: ROBERT SEID

Community of Residence: SAN DIEGO, CA

Comment:

Proposal #53

I support this proposal. It would greatly reduce the risk required to compete with such an "over the line" fishery. Once escapement goals are met, more space would allow for a more fair and equitable fishery for permit holders and their crew.



PC64

Name: Ryan Stomberg

Community of Residence: Portales, New Mexico

Comment:

STRONGLY OPPOSE: 43, 44

STRONGLY APPROVE: 47, 48, 49, 51-55



PC65

Name: Reid Ten Kley

Community of Residence: Vancouver, WA

Comment:

I support proposal 40 and wish to add this map in order to clarify this issue, and provide context regarding where the current GPS coordinates are, and where they are proposed to move to. SEE ATTACHED

I support proposal 35 for the reasons the author outlines, longer nets make it increasingly more likely for drift nets to become entangled in a setnet and I have often seen boats towing under full power to get off a setnet buoy which is dangerous for the setnet fishermen and can cause significant lost fishing time and damage to gear. Often times they become entangled due to extreme currents or wind which are very difficult to overcome with a 200 fathom net in a fishery such as Bristol Bay.

I support proposals 37, 37, and 38

The main advantage of a super long tow line is to enable fishing contrary to regulations where the drift boat lets the end of the net go dry in shallow water. According to current regulations drift nets and boats are meant to drift, not become stationary. This strategy of fishing is very productive, but often results in low-quality fish that are damaged due to excessively long sets (several hours), and exposed to extreme towing (in order to keep the net mostly wet). A reasonably long tow line as proposed in these three proposals would not hinder legal operation of a drift net.

Comment for Proposal 40



PC65

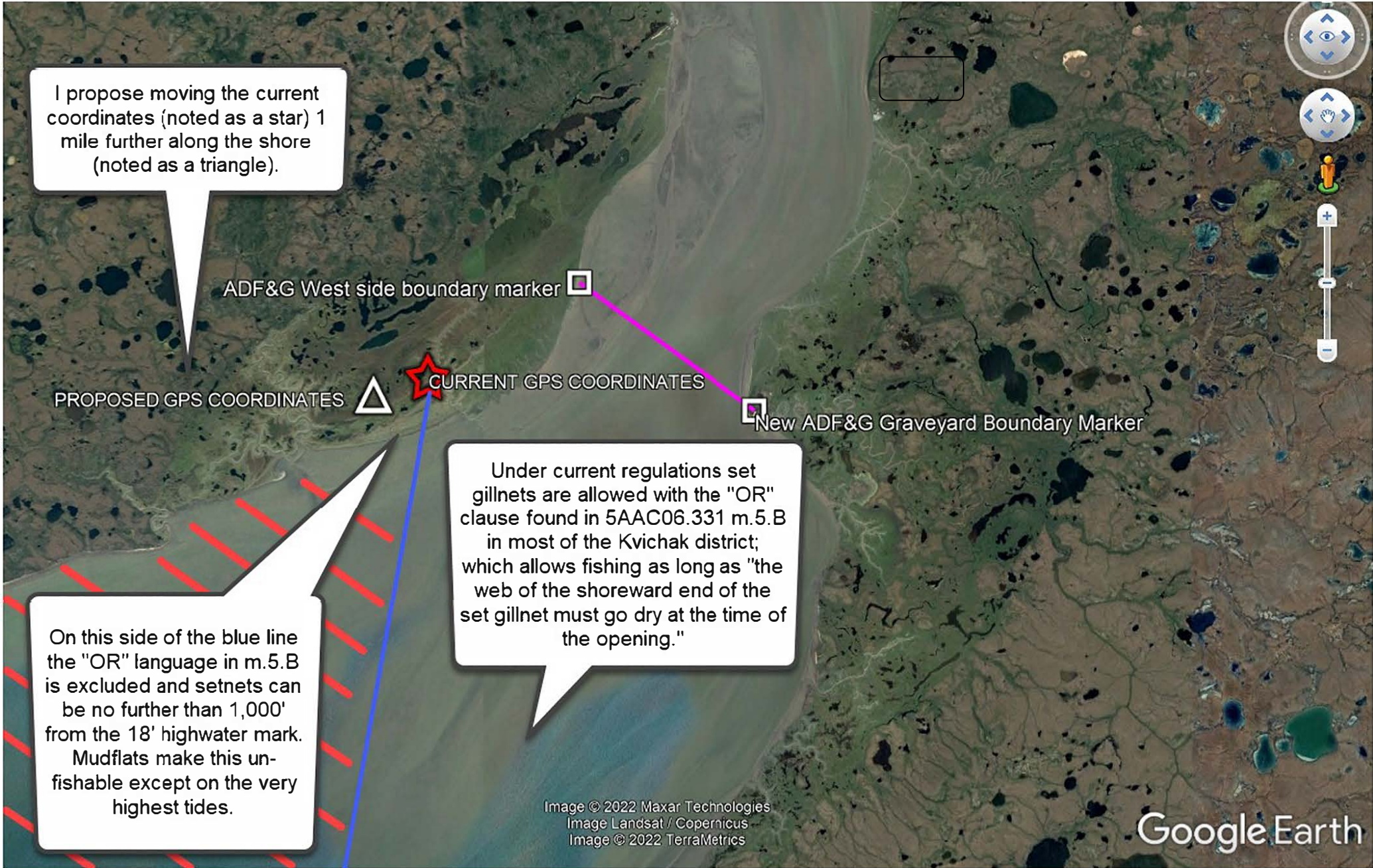


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Google Earth



Comments to the Board of Fish for BB finfish meeting by Ugashik Setnet Assoc.

The Ugashik Setnet Association is a vital and active association. We have held 6 meetings in 2022 and commonly get 40% of all Ugashik District setnet permit holders at our meetings. 65% of all setnet permits in the Ugashik District are dues paying members. Non-dues paying members are always included in our communications as well.

The Ugashik Setnet Association SUPPORTS proposal no. 15

We are in support of **proposal 15** to allow fishwheels to be used for subsistence in Ugashik Bay and River. The basket size can regulate the amount of fish caught, the fish would be higher quality than nets, and it would be a positive way to get young people interested in subsistence fishing.

The Ugashik Setnet Association SUPPORTS proposal no. 34

We would like to amend the proposal to use to stat areas as well as lat long to describe the area.

The following regulation would become 5 AAC 06.335 (d). (a) In the Ugashik Bay district, no drift gillnet may be operated within 1000 ft of the 18 ft high tide line on all waters **in stat areas 321-20, 321-30, 321-40, and in stat area 321-10 from approximately 57°37.23'N 157°69.95' W south to Smokey Point** during the regulatory season.

The Ugashik Setnet Association SUPPORTS proposal no. 35

Our members have experienced an increase in incidents of drift nets coming into contact with their set nets.

We agree with all the points stated in Proposal #35;

- Safety risks have become more serious as more boats fish shallow waters.
- Setnetters are bearing the brunt of the fisheries change towards more jet boats.
- There is a lack of reasonable recourse with enforcement as incidents are too difficult to document.
- Setnetters are the ones who end up with economic loss due to gear entanglements and lost fishing time.

We agree that being able to estimate if a drift net will come within 100' of the set net is too difficult. It is almost impossible for set netters to document these infractions well enough for



enforcement to have what they need to cite delinquent drift boats. Increasing the distance between the outside end of a set net to a drift net from 100' to 300' will give everyone more leeway, reduce the number of incidences and make it more possible to document the incident so that the regulation is enforceable.

The Ugashik Setnet Association SUPPORTS proposal number 36.

Using long towlines allows drift boats to anchor their nets in the mud in shallow water making them stationary while the boat is out in water deep enough to allow maneuvering and the ability to tow the net off into deeper water so it doesn't go dry.

Ideally this activity would be curtailed by enforcement since it is illegal for a drift net to be stationary. Since there is not enough enforcement to cover all areas, this regulation will help reduce this problem.

The Ugashik Setnet Association SUPPORTS proposal number 37.

Using long towlines allows drift boats to anchor their nets in the mud in shallow water making them stationary while the boat is out in water deep enough to allow maneuvering and the ability to tow the net off into deeper water so it doesn't go dry.

Ideally this activity would be curtailed by enforcement since it is illegal for a drift net to be stationary. Since there is not enough enforcement to cover all areas, this regulation will help reduce this problem.

The Ugashik Setnet Association OPPOSES proposal number 46.

Permit stacking (having two permits in one persons name) was looked at thoroughly by the BOF for the set net fleet in Bristol Bay during recent board cycles and was denied.

The same rational should apply to the drift fleet. We oppose drift net permit stacking.

The Ugashik Setnet Association OPPOSES proposal number 47.

Permit stacking (having two permits in one name) was looked at thoroughly by the BOF for the set net fleet in Bristol Bay during recent board cycles and was denied.

The same rational should apply to the drift fleet. We oppose drift net permit stacking.



2525 Blueberry Road, Suite 205 · Anchorage, Alaska 99503 Phone (907) 338-7611 · Fax (907) 338-7659
Email: manager@ugashikvillage.com

November 11, 2022

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
dfg.bof.comments@alaska.gov
Submitted via online portal & email

Dear Chairman Carlson-Van Dort,

I am writing to you on behalf of Ugashik Village Traditional Village.

The commercial fishing industry in the Village of Ugashik has had active participants in the fishery and have fished the Ugashik River since the late 1930's. The Ugashik Traditional Village Council is in strong support of this proposal and feel that if passed, it would be in the best interests of the fishery, its participants, and the State of Alaska.

Background: For the past four fishing seasons, an extensive mudbank has developed along the inshore end of the area where we fish and set our gillnets. This mudbank impedes us from fishing to our best potential. As a result we have less functional fishing time. Of course, this impacts the capacity of fish we can harvest. Currently our offshore distance limitation is six hundred feet from the 18-foot-high tide mark. Due to the mudbank, this limitation precludes us from fishing the full extent of our allowable gear, and diminishes the efficiency of the fishing time we're allowed. As a result, we are losing an estimated 20% of our harvest potential due to less hours of available fishing time because our nets are not in the water.

In 2016 the BOF adopted the "Criteria for Board Deliberations on Commercial Set Gillnet Proposals Impacted by Coastal Erosion" (2016-238-FB) which outlines the criteria that the board will consider and weigh when deliberating on a proposal related to set gillnet sites impacted by coastal erosion. We feel that our situation in Ugashik Village clearly fits Criteria #1 which states that "*issues that arise from land that has either eroded or accreted through natural or artificial causes contiguous to the leasehold*" need to be taken into consideration when the Board deliberates on these types of situations.



2525 Blueberry Road, Suite 205 · Anchorage, Alaska 99503 Phone (907) 338-7611 · Fax (907) 338-7659
Email: manager@ugashikvillage.com

Proposal 33: To address this issue, we would like to propose that the maximum offshore distance be increased from 600 feet from the 18-foot high tide mark to 800 feet from the 18-foot high tide mark. Increasing the offshore distance will enable the set gillnets in Ugashik Village to fish more effectively by allowing us to meet the historic amount of time that our nets can be in the water, and determined by the tides of the day.

The eleven sites currently fishing in this area would all have the ability to fish farther offshore negating any allocative effects potentially arising from this solution. This is an area that is only open to set gillnets, drift gillnets are not a legal type of gear. At the time of the submittal of this proposal ten out of the eleven sites concur that the maximum offshore distance should be amended by the board to 800 feet from the 18-foot high tide mark.

Feel free to contact me directly should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Steven Alvarez". The signature is written in a cursive, flowing style.

Steven Alvarez
Tribal Administrator/Manager
Ugashik Traditional Village
907.338.7694 Direct
manager@ugashikvillage.com



PC68

Name: David Vardy

Community of Residence: Stanwood

Comment:

Proposal 40: Strongly Opposed. Drift fishermen would be losing the ability to fish the bank in that area as it would be littered with set net cans and buoys and anchors. Drifters should not lose any additional beach opportunities under any circumstances.

Proposal 42: Strongly Opposed. Repealing the D/Dual regulation would create a much larger carbon footprint for the fishery and likely reduce fishing time as there would be much more net in the waters of Bristol Bay quickly absorbing district fish build-up. The Nushagak suffers foregone harvest issues due to allocation management rather than a lack of nets in the water. Imagine the 2022 run in the Nushagak with even more vessels pushing the south line out to even farther than .5 NM OVER the district line due to congestion with the current lack of trooper enforcement because that's exactly what adding boats and nets would do under the same circumstances. Bristol bay has become a much more tame fishery with the D/dual regulation. Repealing it would result in 80's/90's era recklessness and lawlessness.

The author of proposal 42 also notes that the implementation of the D/Dual regulation was due to 35-40 cent prices that fishermen received for their catch over 20 years ago in the years 2000-2001. It should be noted that in 2015, our processors graced us fishermen with a 50 cent base price. In 2020 we were again presented with a low base price of 70 cents. When we experience price crashes in the bay, it should be noted that when calculated for CPI the figures from 2000 to 2015/2020 are not far off. The argument against the Dual permit regulation when correlated with ex-vessel price is a moot point and the author of this proposal clearly has not considered the ramifications nor have they completed their due-diligence.

The author of proposal 42 should have taken some time to compare the limited entry to the system that is in place in Washington State where the crab buyers own too many permits and you are actually in many cases forced to lease from them AND sell to them under stipulations of the lease.

Proposal 44: Strongly Opposed due to being poorly written and for the same reasons as stated above in responses to Proposal 42.

Proposal 45: Strongly Opposed. This particular proposal makes zero sense and would be impossible to adapt to the overwhelmingly successful management structure that most of our biologists have implemented over the last boon of 50+ million fish runs.

Proposals 46 AND 47: Strongly Approve. Every Dual vessel removes 50 fathoms of gear from the waters of Bristol Bay per Dual boat. This improves our carbon footprint and sets a clear example of our fisheries stance on keeping the waters of Bristol Bay Clean in our long going battle against Pebble Mine.



It should also be noted that the crews benefit greatly from D/Dual vessels which if I am not mistaken, was one of the reasons for original implementation. Many dual permit holders jump onto vessels after negotiating a lease fee AND a crew share percentage. The non permit holding deckhands benefit from a higher vessel gross which in turn rewards them with a larger payday if one believes that a Dual boat brings in a higher catch which I am sure we can all agree on and in all likelihood back up with CFEC data.

I completely agree with the proposer(s).

Proposals 49 & 51-55: Strongly Agree with the proposals and urge the board to approve one of these measures. It is quickly becoming the wild wild west in the late season when the SOA withdraws the trooper enforcement from the fishery. This is the highest valued fishery in the state and we can't depend on our enforcement to be adequately funded or given clear orders on what we the fishermen require to protect our interests when harvesting salmon in the latter parts of July every season.

The clear and rational solution is to remove the line fishery from the equation once these east side districts have met their escapement goals. It is a very simple set of proposals and the board can pick and choose their favorite form the hand-full of variants which have been presented to them.

Every participating vessel should be able to fish the east side districts without battling an invisible line when the enforcement is gone and the lines are run by literal gangs of boats (some numbering close to 20 vessels) that just immediately cork off anyone that interrupts their mafia style approach to bullying and upping the risk associated with the reward by simply setting over the line further and further. This is a massive issue that needs to be addressed immediately and the board has the perfect opportunity to fix one of the greatest problems this fishery currently faces with respect to inclusion and opportunity for all fishers.

With regard to fish taxation in respect to the proposals and the individual districts, I believe it would be easiest to simply tax the resource based on tender delivery locations within the river systems as normal and perhaps even restrict deliveries to the existing terminals (within district boundaries). I can't imagine for instance, that someone fishing in Egegik would run to Naknek to deliver their fish, however, I could imagine the opposite in order to avoid a chum by-catch on their fish ticket. A simple fix for this or any other trickery associated with the worry of altered resource taxation would be to use historical catch/tax data for the previous 5-10 years in each district in order to develop a baseline on the tax averages for late season fishing which would allow all cities to receive their typical fish taxes based on share of catch.

These proposals will greatly benefit everyone that fishes the east side in the late season. Drifters will be able to efficiently fish the beach lines outside of the terminal where set netters leave their screw anchors attached to un-lighted corks even long after they have quit fishing for the season (North line EGK all of the way to Coffee Pt.). This is an issue that I will address in the next round of proposals) which are a navigational hazard as well as a hinderance to anyone that wants to fish shallow without causing hundreds if not thousands of dollars of damage to their gear.



PC69

Name: Linda Vardy

Community of Residence: Stanwood Wa

Comment:

43 & 44 strongly oppose

47,48,49,51,52,53,54,55 strongly support



PC70

Name: Timothy Vardy

Community of Residence: Stanwood , Wa.

Comment:

43 44 strongly oppose

47 48 49 51 52 53 54 55 Strongly support



Chair Carlson-Van Dort and Members of the Board,

My name is Erik Velsko and I have been a permit holder in the Bristol Bay drift gillnet fishery since 2005, fishing a leased vessel my first season until purchasing my own in 2006. I am a lifelong Alaskan that has participated in many state and federal fisheries over the last twenty years. The Board has a number of proposals on the table for the Bristol Bay Finfish cycle and my support and opposition is as follows:

I would like to support proposals 36, 37 and 38 for Bristol Bay Finfish listed under the Gear Specifications and Operations; Vessel Specifications and Operations.

The Bristol Bay drift gillnet fishery has changed significantly over the last several seasons with an explosive growth of shallow-draft jet boats. As the shallow-water aspect of the fishery has further developed, stakeholders have noticed changes in fishing patterns and styles. Currently, the Bristol Bay drift fishery has no maximum towline length. Increased competition in shallow water has created a minority of vessels using excessively long towlines to execute their fishing operations. It is not uncommon to see vessels with towlines over 1000' or more.

Proposals 36, 37 and 38 seek to reign in the unlimited towline length, and create some stability in the current regulations. Proposals 36 and 37 call for a maximum length of 100' while proposal 38 calls for a maximum length of 150'. In some instances, longer towlines may be warranted in the Bristol Bay drift fishery in heavy weather or when the tidal conditions are such that a vessel needs the extra length in towline to transit to deeper water and retrieve his/her net. I believe the reasonable number falls somewhere between 100'- 300'. The Board may need to use their own discretion in arriving at a maximum towline length based on public testimony and other comments. Standard units of measurement of shackles of fishing gear in the Bristol Bay fishery are 25 fathoms, 37.5 fathoms and 50 fathoms, and the Board may wish to base maximum towline length on one of these units.

The three main problems the Bristol Bay fishery has experienced with the allowance of an unlimited towline length are grounds pre-emption, safety and quality of fish. The footprint of a vessel with a full 150 or 200 fathoms coupled with a towline in excess of 1000' takes up a disproportionate amount of fishable grounds as vessels fishing around them must stay clear of the 2000' feet of area that the long towline, the net and the vessel encompass. Furthermore, the use of excessively long towlines exacerbates the act of anchoring drift gillnets in shallow water, and allowing the vessel to transit to deeper water while the net is stationary. Anchoring of a drift gillnet on the bottom is already a violation, and adoption of a maximum towline length would help aid in remedying this reality.

There is a significant safety factor to be considered when excessively long towlines are employed by vessels. Generally, small size line (3/8"-9/16" high tensile strength line) is used in order to be accommodated on a gillnet drum for these towlines. When a vessel is 800'-1200' from his/her net it can be extremely hard for vessels traveling and/or fishing in the vicinity to see where the towline and net are. The pace of the Bristol Bay salmon fishery lends itself to



long hours and tired vessel operators, and it's only a matter of time before serious injuries will result from a transiting vessel close-lining a long towline that is difficult to see in poor visibility.

The last problem to note is that the use of an excessively long towline perpetuates poor quality of fish. The fishing method used while employing the use of a long towline seeks to anchor the net shallow and let the net accumulate with fish while the vessel maintains enough draft to stay afloat. The net is then towed out of the shallow water, and cleared. Although, quality concerns don't necessarily arise as issues that the Board address, I believe it still warrants mentioning and must be taken into consideration.

I would like to also support proposals 49-54 in regards to a General District Salmon Management Plan listed under Registration and Re-registration; Time and Area; Area and District Descriptions. There are a few different ways to structure a general district and I believe the Board has enough information from previous Board action and current cycle proposals to make an educated decision. When escapement goals are met in the eastside districts it only makes sense to relax the regulatory lines and allow the fleet to spread out to maximize harvest in the late season and help in curbing over-escapement of river systems.

I would like to support Proposal 55 in regards to aligning the Naknek Section southern boundary line with Naknek-Kvichak District southern boundary line. On any given season there are a number of vessels that confuse the two lines as there are regularly Naknek only and Naknek/Kvichak openings during the same day.

I would like to oppose part (b) of Proposal 35 (5 AAC 06.335) in regards to extending the offshore distance between operation of set and drift gillnet gear from 100' to 300'. This aspect of Proposal 35 seeks to push the drift gillnet fishermen further outside of historically productive areas. In certain areas of Bristol Bay there are steeper sloping banks that lend themselves to productive and legal drift gillnet fishing. Increasing the offshore distance between set and drift gillnet gear will only increase the potential for over-escapement, and erode access to historic drift gillnet fishing grounds.

I want to thank the Board for their time and commitment in managing the productive Bristol Bay salmon fishery.

Regards,

Erik Velsko



PC72

Name: pat vermillion

Community of Residence: Dillingham, Ak

Comment:

I approve of measures that encourage a healthy King Salmon and Chum Salmon escapement on all Bristol Bay Waters. We cannot afford to risk losing our King and Chum salmon, which are our current trends. It would appear that proposal 11,12, and 13 offer more protections for these salmon to reach their escapement. If the board feels that this would help protect our salmon runs then I approve of 11, 12, and 13.

I approve of proposal 18. The use of salmon eggs for bait, or chumming is a bad precedent. It causes increased catch rates, and deep hooked fish of both salmon and fish predators, that correlates to a higher sport fishing impact on our endangered King salmon. This would also outlaw chumming with eggs throughout Bristol Bay which would be fantastic. Chumming alters migration patterns of egg predators (trout, dolly varden, char, grayling), drastically increases catch rates of egg predators, affects other fisherman not using eggs in the area, and challenges the concept of "fair chase". Fisherman are also introducing foreign eggs into the fisheries, a possible route for disease to spread between rivers. Anyone who has seen a rainbow trout or dolly varden caught on a 3/0 king salmon hook covered in eggs knows that it kills these smaller fish.

I approve of proposal 20 mostly because of the single hook barbless aspect as it reduces our impact on our fisheries. I am not opposed to gear fisherman. If I could rewrite this I would get rid of the "fly only" portion of this proposal.

I strongly disapprove of proposal 28. These fisheries close before King salmon start to spawn on the Nushagak, so there is no "excess amounts of pressure on the spawning areas for Chinook salmon". The Upper Nushagak, and Nuyakuk Rivers see extremely light King salmon fishing pressure, but it is still very important to our sport fisherman. Right now these mentioned areas are zones where fisherman can fish without the crowds of the lower Nushagak. If you close these areas you will concentrate the fisherman even more as they will have no choice to fish with the crowds, or just not come to Alaska. (Our knowledge does not include the Mulchatna so the above comments are for the Nuyakuk and the small section of the upper Nushagak mentioned in this proposal. This is our home water (Nuyakuk) and we fish it daily for trout, and for a very limited amount of salmon fishing. This proposal would have a drastic affect on our operation).

Proposal 28 is not a management tool as the impact is so small, our guess from our experience would be maybe 20-30 Kings are caught annually on the Nuyakuk and upper Nushagak zones. All with single hook no bait operations, and no harvest. If we need to protect the King Salmon please do it drainage wide, or pick a tool that will be more effective.



I approve of proposal 29. The King run on the Togiak needs to be protected as it has gotten so small. If the board feels like this would help protect the Togiak King run then yes please approve it.

I have spent the last 32 years sport fishing and guiding in Bristol Bay. We run the Royal Coachman Lodge, and Copper River Lodge. We strongly believe the board should manage these fisheries for the long term health of all 5 salmon runs and feel the above comments work towards that goal.

Please email me if you would like more comments.



PC73

Name: Sam Volk

Community of Residence: Anchorage, AK

Comment:

I strongly oppose a few of these proposals. First off, I do not think that the minimum distance between set and drift gillnet gear should be extended. If anything, this just gives set netters an advantage and more room to fish. I think the 100' of clearance should remain the rule. If anything, that rule should be enforced more heavily, but the distance should not be extended.

Second, I disagree with the proposals to limit the length of drift net tows. Mainly because I do not think it is fair to specifically target portions of the fleet with specific rules. Second, I run a run of the mill prop boat, and often use much more than 100ft of tow line. If it's stormy, we often let out more than 100' and drift on the leeward side of the net. This extra tow line allows us to maintain a safe distance from the net and lower the chance of fouling gear while taking a nap.

Finally, I STRONGLY OPPOSE the introduction of permit stacking. I think the fishery is hard enough to get into for the younger population, or those living in the local area with less economic opportunity. If permit stacking was introduced, I fear all of the permits would migrate towards the highest producers, until all the highest catcher boats owned the permits, and there was no way to buy into a limited entry fishery. Many a deckhand has gotten their start by first buying a permit, saving the extra money they make from an increased crew share, then buying a boat. Permit stacking would create a huge barrier of entry into the fishery.



Fish Alaska magazine
10421 VFW Rd, Suite 102
Eagle River, AK 99577

11/11/22

RE: Comments on Proposals 18 and 29

To whom it may concern,

This public comment addresses Proposals 18 and 29.

Proposal 18

I object to this proposal because it is overreaching and too generalized. Certain techniques that employ salmon eggs for bait can result in deep hook placement, while others do not. The temporary restriction of salmon eggs as bait is a management practice that can be used in certain occasions when needed, but I object to the ban of salmon eggs as bait as a permanent policy.

Proposal 29

Sport anglers are taking an active role in king salmon conservation on the Togiak River. In my recent 2022 visit to Togiak River Lodge, I witnessed proactive conservation practices: advocating that anglers catch-and-release big kings and especially strive to let all hens go, practicing best catch-and-release practices to help reduce catch-and-release mortality and to employ fishing techniques that reduce mortality. The owners of Togiak River Lodge are doing an admirable job of advocating for king salmon conservation.

I object to this proposal because it puts the onus of conservation on the sportfishing angler only, rather than spread across all user groups. Compared to many popular king salmon fisheries across Alaska, the Togiak experiences very little sportfishing pressure.

If further conservation mechanisms are to be put in place, I would advocate the increase in limits on king salmon from 20 to 28 inches to reduce harvest on big kings.

Thank you for considering my comments.

Respectfully,

Marcus Weiner
Publisher / Founder
Fish Alaska magazine



My name is Geffrey Werning and I am a set net fisherman in the Naknek/Kvichak District. I have fished both the East and West side of the Kvichak and currently hold sites that would be irreparably and permanently harmed by the passage of proposal 40. I currently hold the site lease ADL 231006 and **I would like to oppose Proposal 40.**

This proposal boils down to a deceptive attempt to gain territory and take new fishing grounds. The assumption that there is a problem that needs solved is misleading. When I began fishing on the West side in 2013 there were, and still are, the exact same number of lease holdings in the area being discussed.

1. The current regulation allows for approximately 2.25 miles of territory that is made available by the “shoreward end must go dry at the time of the opening” provision. This allows for the potential of roughly 39 fishing sites available.
2. Only 4 leased sites are being fished each season farther than 1,000 feet out. This leaves 35 net locations open for alternate opportunity. That is 89% of the area made available by the current regulation.
3. The areas available are proven productive by experienced fisherman each year. I have fished the areas said to be virtually un-fishable; there are times this area is far more productive than my own sites. To call the area unproductive or un-fishable is a fabrication. Just because anchors must be employed instead of running lines, it is not rendered un-fishable.

The attached map (referenced from alaska.gov Mapper) shows:

1. Current leases in red boxes.
2. Black line refers to the district boundary at the river mouth.
3. Blue line shows currently underutilized site locations/fishing opportunity.
4. Orange line is the current boundary.
5. Green line is the proposed new territory.
6. All referenced distances and site availability was figured using the measure tool on alaska.gov Mapper and figured based on site spacing defined in the ADF&G regulation book.

The current regulation was a group effort in 1985 involving the Alaska State Troopers, displaced West side set net fisherman and the drifters who traditionally fished the cut-bank on Albert Channel. The silting in and creation of the giant mud flat rendered the fishing sites on the west side un-fishable if adhering to the 1,000 foot regulation. This event occurred in the 1980's not recent years. The troopers helped find a workable solution at the fish board meeting. Using the Un-named Creek as a division line was agreed to be fair for both types of gear. It allows 2.25 miles of fishing opportunity to set net and 2 miles preserved for drift fishing on the bank. It also established a permanent, visible monument to define the boundary.

The mudflat has changed very little since the time of the last regulation change in 1985. This is not conjecture, but first hand knowledge from the last remaining fishermen that was involved in the 1985 modification. The Proposers state that “this section of the district has developed a massive mudflat” as reason for altering the regulation. Please



consider denying this proposal simply on this claim. This concern was addressed in 1985 to correct the exact situation being argued now.

With this understood, the question is, what are the sponsors really looking for? A land grab of the most productive fishing. In recent years, both East side site holders, and new permits to the district moved into the west side. The proposed new territory is easier to fish and is the most premium mile on Albert channel; I would fish there if legally allowed. Many have fished beyond the boundary. Some would heed the rule when informed of the law, but many continued to poach fish beyond 1,000 feet out. This practice of illegal catch has continued into the 2022 season. These fisherman would pass up available and legal fishing to move onto the cut bank.

The fish on the West Side run differently than on the East side. I typically do not see good fishing until the East side has been catching for several days sometimes a week. I do not have the chance to seek "Alternate Fishing Opportunity" on the East side while tending empty nets waiting for fish to show up. To allow this change would accommodate 16 new fishing sites put in priority in front of mine. These fisherman would have the opportunity to fish high water on their East side leases and then fish low water on the West-side when fishing becomes productive. **I do not have anywhere to fish at high water, or any alternative location to fish the East side.** When the fish run the west side, the water current flow is such that fish run close to the bank. My nets (number 3 & 4 in priority from the boundary line) catch about a third as many fish as the gentleman fishing the 1st and 2nd position. Allowing 16 more nets would have a catastrophic effect on the production and value of my long established lease sites. This is further supported when drift fishing is allowed in district. On drift openings, just 5 boats on the bank upstream effectively shuts off my catch. Luckily, they do not fish until escapement goals have been reached toward the later part of the season. 16 set net sites, fished all season, will devastate my ability to provide for my family.

The proposers stated that the current boundary is an "arbitrary reference point". This could not be farther from the truth. It is the result of negotiations led by Alaska Troopers, drifters and set-netters. It is located at a physical, visible monument that does not require GPS to locate. The suggested change would move the boundary to a spot in no man's land on a long mud flat. In a conversation with Sergeant David Bump (SW Region King Salmon Post), he agreed that there was a problem with fishing over the line. His concern was enforceability due to the ambiguity of only having one point of reference. His suggestion was a "housekeeping Change" adding a second physical point of reference to create a clear "line". Moving the current location from a permanent creek to an arbitrary point on a mud flat would be contrary to his recommendation. Utilizing a second point, such as a line from the current point at the Un-named creek to the Libbyville Dock (Libbyville Dock is already the current boundary of this regulation on the East side) would actually help law enforcement concerns as opposed to make it even more unclear.



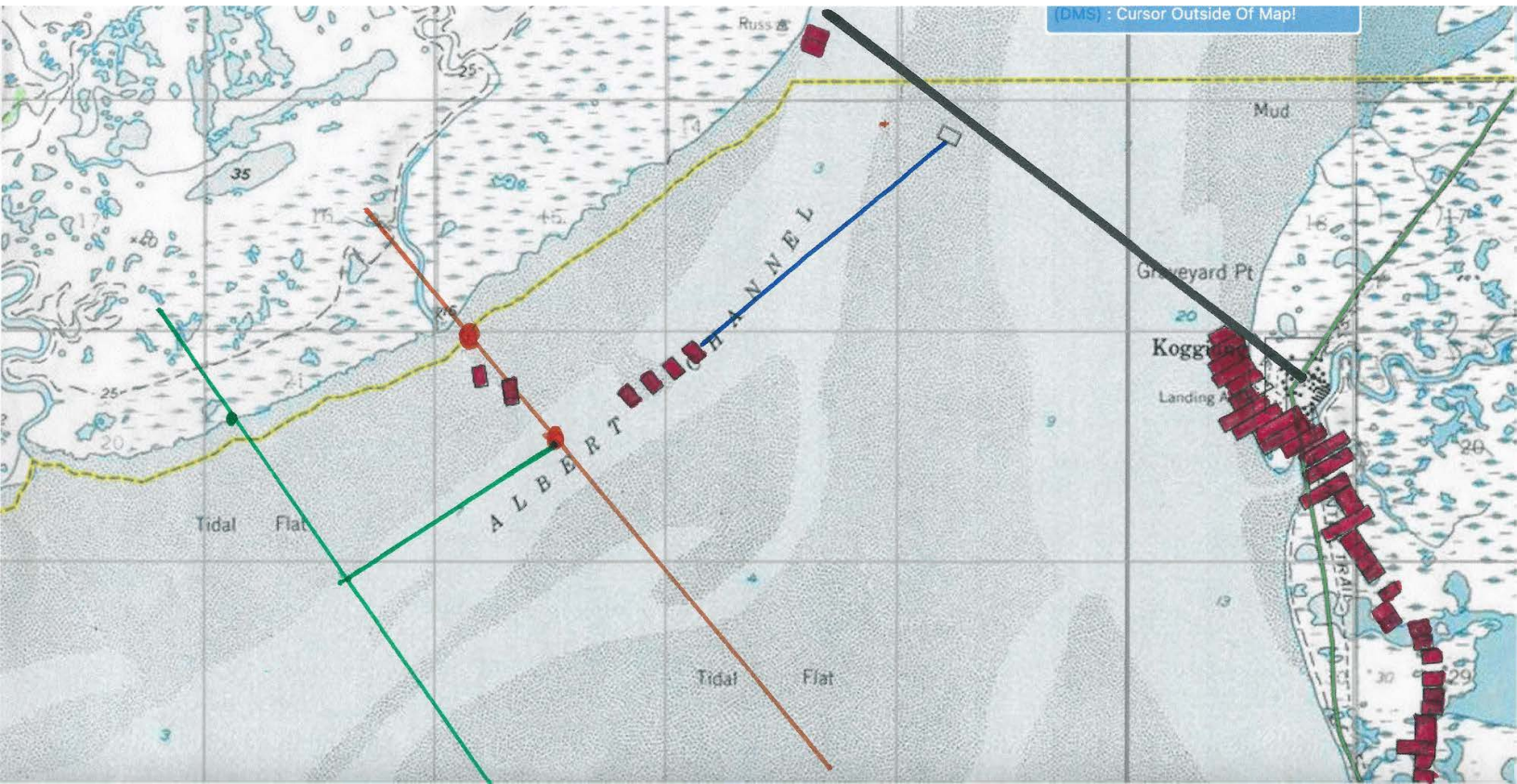
The "Graveyard Point" area of the Kvichak section has been restricted by processor limits for as long as I have been fishing. Low draft tenders, capable of servicing the shallow channels around Graveyard are very hard to find. While other areas can catch with no limits, we find ourselves restricted by tender capacity divided equally amongst the number of permits fishing in the area. During peak fishing, it is the norm to pull gear early in the tide because permit limits have been satisfied. A select few fishers in the Graveyard area have pooled effort into groups that have greater capacity to deliver. Their increase in delivery capability has fed the desire for "Alternate fishing opportunity". By allowing more effort and providing no protection from new permit migration, there will be a certain negative effect on those fisherman not involved in these large co-op style permit pools. Small operations, often represented by local and native fishers would feel the biggest squeeze on an already stressed area.

Finally, please consider these summary points:

1. **They are asking for alternate not displaced opportunity.**
2. **There is no current shortage of fishing grounds under current rules.**
3. **There has been no significant change to the topography/mud flat since 1985.**
4. **It creates additional ambiguity, decreasing law enforcements effectiveness.**
5. **It would cripple my ability to provide for myself and my family. Please do not allow regulation changes that would negatively impact the current leaseholders in the area.**

Please vote No! Doing nothing harms no one, voting yes has too many negative consequences!

Thank you for your consideration,
Geff Werning
970.443.2286
gwerning@gmail.com





PC76

Name: bruce Whiting

Community of Residence: everett, WA

Comment:

I totally support proposal Numbers: 46, 47, 49, 50, 51, 52, 53, 54, 55, 56



PC77

Name: Jack Wilson

Community of Residence: Everett, WA

Comment:

Dual Permitting("D" Permit) since its inception and resultant practice is Inequal Treatment by its creation of an excluded class.

Allowing of D-permitting needs to be immediately eliminated.

No reason other than the argument of vessel availability - which the market shows to be a saturated market of available viable vessels created by the influx of new vessels amounting to at least 10 per year the last 5 years, exists that should not justify the repeal of the regulation within one year, and thereby require individual boats for each permit for the 2024 season.



PC78

Name: Kevin Wilson

Community of Residence: Tacoma, Washington

Comment:

Prop 34- I firmly oppose proposition 34. I believe that the premise that some gillnetters are ignoring the current regulations requires an increased distance between gear and a near complete ban on gillnetting in shallow water in specifically the Ugashik district is flawed. If gillnetters are allegedly breaking the current laws it would seem more enforcement would be the solution not an expansion of fishing area for setnetters. I believe this proposal is intended to greatly decrease fishing area for gillnetter and provide an unfair advantage to set netters in the Ugashik district. I believe this is not only unfair but also unnecessary. According to the ADF&G 2022 Run Summary, Ugashik set netters harvested 11 percent of the district catch while their allocation is only 10 percent. If they are catching more than they are allocated, I do not see the necessity to grant them special fishing privileges. Additionally, why should Ugashik set netters be entitled to special protections that are not granted to set netters operating in other districts? Dago Creek is an important fishing area for both set netters and gillnetters. I believe the current arrangement does require some awareness and caution when operating during fishing periods but is safe and maximized fishing opportunities for both gear types. Some simple cooperation and communication on the water is all that is required to keep Dago navigable and safe. A drift net ban is completely unjustified.

Prop 35- I firmly oppose prop 35. Again, I think that if the alleged problem is that driftnetters are not adhering to the 100ft rule then the solution should be more enforcement focus on this issue not an expansion of the distance. As the proposal says there have only been 8 citations given during the last 5 years, which does not seem to indicate this is a regular occurrence. If enforcement makes it more of a priority and citations for such offenses increases dramatically then perhaps a change in the rules is warranted but to preemptively make a rule change which eliminates so much potential fishing area for one gear type seems premature and unjust. If it is indeed a safety issue that would indicate that the set netter is very close to their net and should be able to capture/report the incident. I completely understand and support the current buffer zone. Set netters should not be impeded by gillnets and I think the current regulations support that as is with no increase necessary.

Prop 36-38: I oppose proposition 36-38. I believe that limits on towline length are unnecessary at this time. Fishing in shallow water, often on ebbing tides, is part of the Bristol Bay fishery. Allowing fishermen the ability to determine the length of their tows allows them to prevent them from running aground with their net out which is both illegal and dangerous. Additionally, it allows deeper draft boats the ability to safely fish in shallow water that would only be available to jet boats if the proposed towline limits were enacted. I believe we already have several regulations that punish misuse of a long towline ie anchoring the net or going dry with your net out so additional regulation is unnecessary.



Prop 42-45: I oppose the elimination of the D permit regulation. I believe the D permit helps all participants in the fishery by removing nets from the water. Even if you choice not to fish a D permit you are benefiting because there is less boats on the water and less competition. Given how profitable the fishery has been recently a removal of the D system would cause a huge increase in the number of boats fishing and amount of gear in the water.

Prop 46: I am in favor of allowing permit stacking. I think that the more boats fishing with D permits the more profitable the fishery is for all participants. It is much like a permit buyback but it is solely funded by the fishermen wishing to fish an additional 50f of gear.

Prop 49-54: I am in favor of opening the Eastside general district management area after all rivers reach their upper end escapement goals. I think that if the state cannot afford to enforce the boundaries late season, which is currently what is happening, it creates a terrible situation that only benefits a few fishermen that have no problem breaking the law. It puts everyone else at a disadvantage for no reason. As long as the fish taxes are accurately collected and the rivers have reached their goals I see no downside to this rule change. I strongly support it and think it would make for a much more equitable and fair end of the season.
