

CEDARBROOK
LODGE

Greetings,

I'm Joel Ludwig

Longtime B. Bay Fisherman. Started in 1977.

With Hardwork, Sacrifice, + Discipline,

I was able to achieve the goal of a B. Bay Boat + Permit.

My 3 Children with the same recipe have all been able to achieve the same goal.

I also serve on the Board of Directors of Silver Bay Seafoods Naknek. I represent 300 Fisherman/Owners.

Additionally, I am a member of BBR Insurance Pool since inception. The Pool has 350 members of Bristol Bay Fisherman.



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I respectfully request that Board take action on the following Proposals:

Proposal 35	Oppose	Setnet 100' to 300'
Proposals 42, 43, 44	Oppose	Eliminate Permit Stacking
Proposals 46, 47	Approve	Permit Stacking
Proposals 49-54	Approve	General District
Proposal 55	Approve	Line Adjustment

I'm the author of Proposal 49. Which gives ADF+G the authority to open a General District, once Escapement Goals have been achieved.

The problem is due to admitted lack of Funds + Manpower of Enforcement. Once Enforcement leaves, A Fishery of Line Violations begins.

Law Abiding Fishermen Lose Income, and the Risk Takers take over the fishery to their gain of ill gotten Income.



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The positive effects of an approved General District.
Are the following;

- Eliminates illegal Fishing
- Creates more opportunity for Fleet
- Creates more opportunity for Local Watershed Fleet
- Provides more Fish to Large, Med, & Small Processors
- Improves Quality of Harvest
- Spreads out Fleet which might help with
Marine Mammal Problem
- Generates More State + Local Taxes

There is overwhelming support for Proposals 49-54
by the B. Bay Fleet. Concerns by opposition can
easily be Remedied.

In Regards to Proposals 46-47

The majority of the Fleet I'm associated with
wants your Approval.



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The Positive effect of the Boards approval include;

- Achieves CFEC optimum number of Drift Permit goal of 900-1400
- Reduces the amount of gear in the Water.
6yr Ave. 2016-21 26,500 Fathoms or 139,000 Feet or $\div 5280'$
30 miles of net.
- Reduces Fleet Size 6yr Ave 2016-21 = 180 Vessels
- ADF+G can provide more Fishing Opportunity due to less gear & Fleet Size
- Permit Stacking will Help mitigate the issue of Nushagak Chinook.
- Reduces the Congested Fishing
- Improves Quality Standards to Compete in World Markets

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- Improves Fishermans Capital Investment Security.

With Financing available from Processors, Local, State, Federal + Private Lending institutions.

Combined with Hardwork, Sacrifice, + Discipline
Anyone can achieve the goal of the
Bristol Bay Fishery.

Thank you

Table 10.—Daily district registration of drift gillnet permit holders and dual vessel registration, by district, Bristol Bay, 2021.

Date	Naknek-Kvichak		Egegik		Ugashik		Nushagak		Togiak ^a	
	Total	Dual	Total	Dual	Total	Dual	Total	Dual	Total	Total ^b
6/1	0	0	6	0	0	0	1	0	0	7
6/2	3	0	12	0	1	0	1	0	1	18
6/3	3	0	12	0	1	0	1	0	1	18
6/4	3	0	13	0	1	0	1	0	1	20
6/5	3	0	17	1	1	0	2	0	2	25
6/6	3	0	17	1	1	0	2	0	2	25
6/7	3	0	17	1	1	0	2	0	2	26
6/8	3	0	17	1	1	0	2	0	3	26
6/9	3	0	20	2	1	0	4	0	3	31
6/10	3	0	39	2	1	0	4	0	3	50
6/11	5	0	41	2	1	0	5	0	3	57
6/12	5	0	44	2	3	1	7	0	5	64
6/13	8	1	47	2	5	2	7	0	5	73
6/14	8	1	54	4	7	3	7	0	6	82
6/15	12	1	76	9	12	5	13	2	6	119
6/16	19	1	99	15	14	6	15	2	6	156
6/17	21	1	129	23	14	6	25	4	9	200
6/18	32	2	171	33	15	6	43	7	11	276
6/19	35	2	193	39	11	4	60	10	15	315
6/20	43	3	304	76	13	5	71	12	16	447
6/21	53	6	316	79	17	7	79	12	16	482
6/22	65	7	343	85	37	14	110	17	17	574
6/23	67	5	347	87	34	13	208	38	19	676
6/24	68	5	366	92	34	12	308	60	20	802
6/25	74	6	383	92	42	15	745	200	26	1,270
6/26	94	7	396	93	50	19	815	222	26	1,381
6/27	163	17	415	96	59	20	860	232	26	1,523
6/28	201	26	411	96	76	23	839	225	26	1,554
6/29	214	26	410	96	80	24	800	215	27	1,531
6/30	263	36	422	101	93	27	757	197	27	1,562
7/01	303	45	441	106	105	32	742	188	27	1,618
7/02	335	53	429	102	131	43	746	186	27	1,670
7/03	358	62	421	102	128	42	741	184	29	1,678
7/04	375	67	398	95	131	43	734	181	30	1,668
7/05	383	70	388	92	136	44	739	180	30	1,677
7/06	395	74	384	91	150	49	736	180	31	1,696
7/07	411	80	370	88	150	49	723	176	31	1,685
7/08	420	81	345	83	150	48	736	179	31	1,683
7/09	452	90	335	81	154	48	673	160	32	1,647
7/10	464	92	312	73	156	48	644	150	33	1,609
7/11	516	108	285	66	178	54	451	100	33	1,463
7/12	542	114	293	69	205	64	395	92	33	1,470
7/13	657	139	293	70	273	81	381	87	35	1,639
7/14	692	144	295	73	305	90	364	82	35	1,691
7/15	670	141	312	77	334	98	344	75	35	1,695
7/16	671	140	317	78	351	102	337	73	35	1,702
Average ^c	292	53	333	79	117	37	491	66	26	1,259

Note: Total permit sum includes dual boat registrations.

^a Dual boat registration is not permitted by regulation in Togiak District.

^b Total does not include permits in transfer status.

^c Seasonal averages calculated for June 16–July 16.

Dual Permits 235 x 100 Fathoms = 23,500 Fathoms ÷ 150 Fathoms =
 156 → 150 Fathom Nets³⁴ or Vessels removed from Fishery

Table 10.—Daily district registration of drift gillnet permit holders and dual vessel registration, by district, Bristol Bay, 2020.

Date	Naknek-Kvichak		Egegik		Ugashik		Nushagak		Togiak		Total ^b
	Total	Dual	Total	Dual	Total	Dual	Total	Dual	Total ^a		
6/1	0	0	3	0	0	0	1	0	0	4	
6/2	5	1	17	1	1	0	12	4	1	36	
6/3	5	1	18	1	1	0	14	5	1	41	
6/4	5	1	18	1	2	0	15	5	3	44	
6/5	5	1	20	1	2	0	15	5	4	46	
6/6	5	1	20	1	2	0	15	5	4	46	
6/7	5	1	21	1	2	0	15	5	4	47	
6/8	5	1	23	1	2	0	15	5	4	50	
6/9	11	1	34	3	7	0	27	5	5	85	
6/10	11	1	37	3	7	0	33	5	6	100	
6/11	12	1	43	4	7	0	35	5	12	111	
6/12	12	1	46	5	7	0	37	5	14	116	
6/13	14	1	50	6	8	1	42	6	14	128	
6/14	25	1	74	7	8	1	42	6	14	163	
6/15	25	1	102	15	8	1	46	8	14	196	
6/16	35	1	136	26	12	3	65	11	15	265	
6/17	39	1	146	27	12	3	78	11	17	294	
6/18	40	1	147	27	12	3	96	14	19	315	
6/19	57	1	177	33	8	1	112	17	20	378	
6/20	61	1	196	39	8	1	152	26	24	442	
6/21	67	1	223	43	8	1	175	30	25	499	
6/22	80	6	266	55	8	1	201	33	26	585	
6/23	112	14	277	54	8	1	270	45	30	698	
6/24	131	15	271	53	8	1	335	57	31	776	
6/25	181	24	300	60	14	3	528	110	31	1,054	
6/26	270	48	329	67	25	7	697	168	31	1,354	
6/27	350	74	393	88	29	9	682	160	33	1,488	
6/28	389	85	408	92	30	9	675	159	34	1,537	
6/29	434	99	410	92	31	9	677	160	35	1,588	
6/30	459	103	431	96	29	8	676	160	36	1,632	
7/01	466	104	440	100	30	8	662	156	37	1,635	
7/02	473	105	446	101	34	8	636	145	37	1,626	
7/03	495	114	450	102	37	9	589	128	37	1,608	
7/04	511	120	462	107	42	10	540	110	37	1,592	
7/05	518	120	500	121	47	10	479	101	37	1,581	
7/06	531	123	529	134	48	10	478	101	37	1,625	
7/07	544	126	573	140	48	10	488	105	39	1,692	
7/08	548	126	570	141	50	10	484	102	39	1,694	
7/09	550	126	567	141	44	7	466	96	42	1,670	
7/10	558	129	556	136	46	7	437	86	43	1,640	
7/11	589	139	516	124	48	7	360	62	43	1,557	
7/12	616	148	471	115	61	13	299	53	44	1,491	
7/13	696	172	482	115	91	23	294	52	44	1,607	
7/14	715	175	483	115	144	34	282	47	44	1,668	
7/15	722	177	480	116	158	37	282	47	44	1,686	
7/16	722	176	474	114	174	40	279	46	44	1,684	
Average ^c	386	86	391	89	43	10	402	84	35	1,257	

Note: Total permit sum includes dual boat registrations.

^a Dual boat registration in not permitted by regulation in Togiak District.

^b Total does not include permits in transfer status.

^c Seasonal averages calculated for June 16–July 16.

Dual Permits 269 x 100 Fathoms = 26,900 Fathoms ÷ 150 Fathoms
 179 ~ 150 Fathom Nets or Vessels removed from Fishery

Table 10.--Daily district registration of drift gillnet permit holders and dual vessel registration, by district, Bristol Bay, 2019.

Date	Nalaeek-Kvichak		Egegik		Ugashik		Nushagak		Togiak ^a	
	Total	Dual	Total	Dual	Total	Dual	Total	Dual	Total	Total
6/1			1	0						
6/2	1		6	1			3			10
6/3	1		6	1			3			10
6/4	2	2	6	1			11	2		19
6/5	2	2	8	1			12	2	3	25
6/6	3	2	8	1	2	0	13	2	4	30
6/7	3	2	12	2	2	0	13	2	4	34
6/8	3	2	13	2	2	0	14	2	4	36
6/9	3	2	15	3	3	0	14	2	4	39
6/10	3	2	15	3	4	0	14	2	4	40
6/11	3	2	21	5	5	0	22	2	5	56
6/12	3	2	40	9	5	0	25	2	5	78
6/13	4	3	49	11	5	0	35	3	5	98
6/14	7	5	70	15	5	0	43	5	5	130
6/15	8	9	82	16	7	1	60	9	5	162
6/16	8	9	85	17	7	1	61	9	5	166
6/17	10	10	123	26	7	1	65	10	6	211
6/18	19	17	177	40	11	1	101	17	7	315
6/19	21	23	198	46	11	1	124	23	9	363
6/20	24	34	210	44	12	1	183	34	13	442
6/21	30	156	228	46	12	1	632	156	14	916
6/22	31	187	340	75	13	1	758	187	14	1,156
6/23	32	200	377	85	16	2	819	200	17	1,261
6/24	120	207	359	77	17	2	861	207	20	1,377
6/25	194	203	368	79	20	4	849	203	24	1,455
6/26	234	210	385	85	26	5	856	210	25	1,526
6/27	322	205	394	88	26	5	840	205	28	1,610
6/28	328	200	408	89	28	5	829	200	32	1,625
6/29	327	200	428	94	36	6	833	200	32	1,656
6/30	334	201	450	103	41	7	834	201	33	1,692
7/01	337	200	449	102	45	8	834	200	34	1,699
7/02	342	200	450	103	45	8	832	200	36	1,705
7/03	346	203	452	103	49	10	840	203	37	1,724
7/04	354	201	453	104	46	9	827	201	38	1,718
7/05	361	198	452	104	47	10	814	198	39	1,713
7/06	377	190	456	105	50	11	792	190	39	1,714
7/07	387	184	460	107	54	12	763	184	39	1,703
7/08	406	179	452	104	55	12	740	179	39	1,692
7/09	440	164	450	103	55	12	699	164	40	1,684
7/10	462	126	441	102	62	14	592	126	42	1,599
7/11	501	100	430	102	69	17	522	100	42	1,564
7/12	609	92	427	102	77	18	481	92	42	1,636
7/13	639	81	467	119	89	22	414	81	42	1,651
7/14	656	72	456	119	89	22	358	72	42	1,601
7/15	691	51	563	150	81	22	284	51	42	1,661
7/16	742	41	617	162	65	15	250	41	44	1,718
Average ^b	312	140	387	90	41	9	603	140	30	1,373

Note: Total permit sum includes dual boat registrations.

^a Dual boat registration is not permitted by regulation in Togiak District.

^b Seasonal averages calculated for June 16–July 16.

Dual Permits 379 × 100 Fathoms = 37,900 Fathoms ÷ 150 Fathoms

252 → 150 Fathom Nets⁴³ or Vessels removed from Fishery

Appendix A2.--Salmon entry permit registration by gear and residency, Bristol Bay, 2001--2021.

Year	Drift net ^a						Set net ^a						Total Drift and set ^b
	Resident	Non- resident	Drift total	Permits fished	% Fished	Interim use	Resident	Non- resident	Set total	Permits fished	% Fished	Interim use	
2001	958	925	1,883	1,566	82	24	729	281	1,010	834	82	2	2,893
2002	945	933	1,878	1,183	62	16	717	289	1,006	680	67	2	2,884
2003	923	944	1,867	1,389	74	7	713	288	1,001	714	71	1	2,868
2004	912	948	1,860	1,426	77	3	703	286	989	797	81	1	2,849
2005	895	967	1,862	1,526	82	3	688	300	988	829	84	1	2,850
2006	893	966	1,859	1,567	84	1	683	302	985	844	86	0	2,844
2007	881	981	1,862	1,621	87	1	672	311	983	836	85	0	2,845
2008	887	976	1,863	1,636	88	0	678	302	980	850	87	0	2,843
2009	864	999	1,863	1,642	88	0	674	307	981	855	87	0	2,844
2010	866	997	1,863	1,731	93	0	672	311	983	861	88	0	2,846
2011	1005	857	1,862	1,747	94	0	660	321	981	878	90	0	2,843
2012	849	1,013	1,862	1,740	93	0	654	325	979	883	90	0	2,841
2013	862	1,000	1,862	1,709	92	0	646	332	978	854	87	0	2,840
2014	848	1,015	1,863	1,751	94	0	636	341	977	881	90	0	2,840
2015	834	1,030	1,864	1,744	94	0	639	336	975	885	91	0	2,839
2016	826	1,038	1,864	1,715	92	0	637	336	973	858	88	0	2,837
2017	842	1,021	1,863	1,728	93	0	635	337	972	881	91	0	2,835
2018	838	1,025	1,863	1,735	94	0	634	336	970	879	91	0	2,833
2019	840	1,022	1,862	1,767	95	0	632	333	965	893	93	0	2,827
2020	825	1,037	1,862	1,724	93	0	627	337	964	841	87	0	2,826
2021	832	1,030	1,862	1,753	94	0	612	352	964	870	90	0	2,826
20-Year Avg.	880	985	1,864	1,632	88	3	666	316	982	842	86	0	2,846
2001--2010 Avg.	902	964	1,866	1,529	82	6	693	298	991	810	82	1	2,857
2011--2020 Avg.	857	1,006	1,863	1,736	93	0	640	333	973	873	90	0	2,836

^a Allowable permit gear: 150 fathoms for drift and 50 fathoms for set.^b Includes interim use permits.

20yr Average 105 Difference

Appendix A9.—Commercial sockeye salmon catch, in percent, by gear type and district, Bristol Bay, 2001–2021.

Year	Naknek-Kvichak								Nushagak						Togiak		Total	
	Setnet Sec.			NRSHA ^a		Egegik		Ugashik		Setnet Sec.			WRSHA ^b					
	Drift	Nak	Kvi	Drift	Set	Drift	Set	Drift	Set	Drift	Nush	Igushik	Drift	Set	Drift	Set		
2001	✓ 82	16	2	74 ^c	26 ^c	86	14	✓ 80	20	77	18	5	–	–	66	34	80	20
2002	✓ –	–	–	64 ^c	36 ^c	✓ 85	15	✓ 88	12	77	22	1	67	33	62	38	79	21
2003	91	9	0	65 ^c	35 ^c	✓ 81	19	✓ 89	11	83	15	2	–	–	63	37	79	21
2004	✓ 79	11	10	88	12	86	14	✓ 88	12	84	15	1	–	–	55	45	79	21
2005	–	–	–	81	19	✓ 82	18	✓ 87	13	84	14	2	–	–	56	44	66	34
2006	86	8	5	81	19	✓ 84	16	✓ 88	12	87	11	2	–	–	53	47	85	15
2007	✓ 82	12	6	80	12	✓ 84	16	92	8	80	17	3	–	–	59	41	81	19
2008	✓ 81	12	7	–	–	✓ 85	15	92	8	79	16	5	–	–	60	40	82	18
2009	✓ 80	12	9	–	–	✓ 85	15	✓ 87	13	76	20	4	–	–	60	40	82	18
2010	✓ 81	10	9	–	–	✓ 84	16	90	10	78	17	6	71	29	61	39	82	18
2011	84	10	7	–	–	✓ 83	17	✓ 87	13	76	16	7	–	–	60	40	81	19
2012	85	7	8	–	–	✓ 83	17	90	10	✓ 67	27	6	45	55	67	33	73	27
2013	84	9	7	–	–	✓ 85	15	90	10	78	17	5	–	–	65	35	84	16
2014	✓ 83	9	8	–	–	89	11	✓ 82	18	✓ 73	16	7	–	–	58	42	82	18
2015	84	8	8	–	–	✓ 81	19	91	9	✓ 69	22	9	–	–	50	50	81	19
2016	✓ 83	8	9	–	–	✓ 82	18	91	9	✓ 67	22	11	–	–	56	44	81	19
2017	✓ 70	17	13	–	–	87	13	92	8	76	18	4	–	–	56	44	80	20
2018	✓ 71	17	12	84	16	✓ 80	20	✓ 78	22	82	13	2	–	100	51	49	81	19
2019	✓ 77	14	9	–	–	✓ 81	19	✓ 66	34	78	18	3	–	100	49	51	79	21
2020	✓ 80	12	8	–	–	86	14	✓ 74	26	✓ 69	26	3	100	–	47	53	79	21
2021	✓ 75	13	12	–	–	✓ 84	16	✓ 87	13	84	13	3	–	100	44	56	81	19
2001–2010 Avg.	✓ 83	11	6	76	23	✓ 84	16	✓ 88	12	81	17	3	69	31	60	41	80	21
2011–2020 Avg.	✓ 80	11	9	84	16	✓ 84	16	✓ 84	16	74	20	6	73	85	56	44	80	20
Allocation ^d	84	8	8	84	16	86	14	90	10	74	20	6	NA	NA	NA	NA	NA	NA

Note: Cells with an en dash (–) indicate no data.

^a Naknek River Special Harvest Area (NRSHA), Naknek-Kvichak District; allocation plan enacted in December 2003.

^b Wood River Special Harvest Area (WRSHA), Nushagak District.

^c NRSHA prior to allocation plan; fishing periods were alternated between gear types.

^d The Alaska Board of Fisheries enacted an allocation plan in 1998; it was reviewed in December 2003.