

Record Comment regarding Proposal 57 - Repeal set and drift gillnet allocations in the Naknek-Kvichak District

Comment from the Kvichak Setnetters' Association (KSA)
11/30/22

The KSA Strongly Opposes Proposal 57

Dear Board of Fish Members,

The KSA would like to add more information and bring to light untrue statements made in Proposal 57 that wish to repeal set and drift gillnet allocations in the Naknek-Kvichak District. Allocation is an important tool to give setnetters in the Kvichak a fair share of the Sockeye resource. The Kvichak river is at the end of Bristol Bay and fish have to get around driftnets in the Ugashik and Egegik districts as well as Naknek/Kvichak drifters to make it our nets near the mouth of the Kvichak River. The allocation spread of 84% drift catch vs. 8% Naknek Set and 8% Kvichak Set allows the managers to close fishing to drifters if setnetters are not getting their fair share of the resource due to how effective a large fleet of drifters fishing in one district can be at stopping the run.

Proposal 57 states: "Until several years ago the allocation between percentages was kept close. Then the percentage of Set Allocation started to rise, to as much as **30%** several years ago. In 2021 the Set percentage reached **47%**". This is misleading. In 2021, the final Kvichak Set allocation was 12% and the Naknek River was 13% for a total of 25% set, and 75% drift allocation (See spreadsheet on next page). Historically the Kvichak set allocation came in low at 6% from 1993-2002, and 7% from 2003-2012. The recent 10 year average of 10% Kvichak set allocation from 2013-2022 seems to be attributed to the huge Nushagak runs and less drift pressure in the Naknek/Kvichak district.

It is true that since 2017, the setnet fleet in the Naknek/Kvichak sections have caught a slightly higher percentage than their allotted allocation, but this is likely attributed to the massive run sizes in the Nushagak District and large runs in Egegik beginning in 2017 that lured a sizeable amount of drift boats to those districts early in the season and away from the Naknek/Kvichak. The smaller numbers of drift boats in the Naknek/Kvichak meant that more fish passed through and into setnets than usual.

Due to the earlier run timing of the Nushagak and Egegik districts, the typical strategy for many drift boats is to catch the peak run time in other districts before coming late to the Naknek Kvichak to catch yet another peak run and load up again. Once the large fleet of 700-800 drifters show up and gobble up the run in the Kvichak district, the size of our catch is often dismal. Allocation allows managers to keep the Kvichak Setnetters

open in setnet only openers early in the season to get a head start on our allocation before our fishing dramatically slows due to drift pressure. In the early season, it might be typical for kvichak allocation to reach much higher percentages but by the end of the season, it usually comes close to the allocation goals.

We've included some sample docs below that show the number of drifters fishing in each district throughout the season. Two graphs showing vessel registration per district per day from 2021 compared to 2013. In 2013, note that vessels numbers in the Naknek/Kvichak were much higher and remained through the season, resulting in under allocation for the Kvichak Setnetters at 7%, contrasted to the 2021 season where Kvichak setnetters caught more than their allotted allocation (12%). There seems to be a direct correlation between high setnet catch allocations and lack permit registration in the district.

We urge the Board to take **NO ACTION ON PROPOSAL 57**. Thank you for your service and we appreciate the opportunity to participate in this process.

Sincerely,

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KSA Board Members:

Corey Arnold - President
Aaron Schrier - VP
Eric Meyer - Treasurer
Billie Delaney - Secretary
Eike TenKley
Tiel Smith
Shayan Rohani

The Kvichak Setnetters' Association (KSA) is an organization that was developed to represent set net fishermen of the Kvichak section of the Naknek/Kvichak district. We work to ensure that set net fishers in the Kvichak section are given fair access to sockeye bound for the Kvichak River. Due to the nature of our district and our location at the end of Bristol Bay, we have unique needs and perspectives on the effective management of our salmon.

Naknek/Kvichak Historical Escapement and Allocation 2013-2022

Information compiled by the Kvichak Setnetters Association from ADF&G Season Summaries and Post Season Area Management Reports

	Total Inshore Run Naknek Kvichak	Total Harvest (million fish)	% of run above or below forecast	Kvichak Escapement	Alagnak Escapement	Naknek Escapement	Final Allocation Drift	Final Allocation Kvichak Set	Final Allocation Naknek Set
Allocation Goal							84%	8%	8%
2022	21.99	14.23	6% above	4.22	1.66	1.91	75%	11%	14%
2021	19.7	8.99	16 % above	4.7	3.2	2.79	75%	12%	13%
2020	24.6	14.12	30% above	4.03	2.39	4.11	80%	8%	12%
2019	17.46	11.35	13% above	2.37	0.82	2.91	77%	10%	13%
2018	16.81	8.61	1% above	4.40	1.58	2.21	71%	12%	17%
2017	15.21	8.11	2% Below	3.16	2.04	1.9	72%	16%	12%
2016	21.39	13.46	8% Below	4.46	1.78	1.69	83%	9%	8%
2015	31.34	16.3	14% above	7.34	5.77	1.92	84%	8%	8%
2014	19.66	13.73	87% above	4.46	added to Kvi	1.47	83%	8%	9%
2013	8.91	4.79	13% Below	2.09	1.09	0.94	84%	7%	9%
2013-2022 Average							78.5%	10%	11.5%
2003-2012 Average							83%	7%	10%
1993-2002 Average							80%	6%	14%

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 ^b
	Total	Dual	Total	Dual	Total	Dual	Total	Dual	Total		
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.

Table 13.–Daily district registration of drift gillnet permit holders by district, Bristol Bay, 2013.

Date	Naknek-Kvichak		Egegik		Ugashik		Nushagak		Togiak ^a	Total
	total	dual	total	dual	total	dual	total	dual	total	
6/25	471	31	369	36	362	48	354	53	35	1,591
6/26	487	74	379	64	328	94	359	57	39	1,592
6/27	489	79	372	67	277	83	363	58	49	1,550
6/28	505	79	378	64	231	67	369	58	53	1,536
6/29	559	83	385	70	234	49	371	62	53	1,602
6/30	601	100	399	73	235	49	372	60	53	1,660
7/01	608	113	399	78	227	49	359	61	54	1,647
7/02	610	115	399	78	215	47	339	58	57	1,620
7/03	622	115	395	78	217	43	326	52	58	1,618
7/04	634	117	390	80	216	44	319	49	58	1,617
7/05	661	119	379	77	219	44	316	48	58	1,633
7/06	669	127	380	75	206	45	313	48	63	1,631
7/07	641	130	361	76	208	43	319	48	70	1,599
7/08	635	122	358	70	206	43	324	50	73	1,596
7/09	645	119	366	68	186	44	338	49	75	1,610
7/10	668	120	346	70	176	41	263	50	79	1,532
7/11	703	128	332	71	177	40	241	37	79	1,532
7/12	786	137	331	69	181	41	245	33	80	1,623
7/13	793	148	334	69	201	42	248	36	81	1,657
7/14	792	146	332	73	212	47	245	37	81	1,662
7/15	794	145	337	70	205	48	251	35	81	1,668
7/16	810	144	337	71	207	46	252	36	81	1,687
Average	645	113	366	70	224	50	313	49	64	1,612

Note: Total permit sum includes dual boat registrations.

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