

Submitted by Joel Ludwig

RC074

November 16, 2022

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: Support for Proposals 46-47 and proposals 49-54

Dear Alaska Board of Fisheries Members:

We are Bristol Bay Drift permit holders writing in strong support of proposals that would allow fishing in the general district and those that maintain permit stacking. Specifically, we are in favor of proposals 46-47 and proposals 49-54. We oppose proposals 42-44; these each seek to make changes to the dual permit program that fishermen have been using successfully for many years.

Proposals 42, 43 and 44 (in opposition):

Proposal 42-44 would disadvantage drift gillnet fishermen by not allowing individuals to exceed more than 150 fathoms of gear, eliminating the use of dual permits and the length of 200 fathoms of drift gillnet per permit in the Bristol Bay.

Allowing dual permits on vessels gives individuals the opportunity to take a step-up approach in the industry before investing in a Bristol Bay gillnet operation as well as continuing to give operations who depend on dual permits an opportunity to optimize their harvest. These proposals could increase the number of vessels in the water in a fishery that is already fully capitalized. Proposals to repeal provisions allowing operation of 200 fathoms from a vessel with two CFEC permit holders on board should not be considered.

Proposals 46 and 47 (in favor):

Proposal 46 and 47 would allow the owner of two CFEC drift gillnet permits to operate 200 fathoms of drift gillnet gear from a single vessel. Permit stacking will allow for more flexibility in the fishery without eliminating permits and can work as an adaptable system for actively engaged fishermen in Bristol Bay.

Proposals 49, 50, 51, 52, 53 and 54 (in favor):

Proposal 49 and 51 would allow ADF&G to open the General District when escapement goals have surpassed in the east side district, these include Naknek-Kvichak, Egegik, and Ugashik. Proposal 50 would give additional opportunity in the General District when escapement goals are achieved. Proposal 52 would open General District when all east side rivers have achieved the midway point of their escapement goals on July 17th or after. Proposal 53 would establish new General District lines from the Naknek section to Ugashik's north line and open General District on July 17th if escapement goals are achieved. Proposal 54 would initiate new boundary lines to

open up the areas between two neighboring districts that have achieved escapement goals and the 48-hour district transfer requirement has been waived.

Current regulations have implemented a system to allow fishing in terminal Bristol Bay districts associated with major river systems according to management plans. Each system is managed to ensure each escapement goal is met within a certain range barrier. Approving these proposals would implement a structured General District management plan to allow ADF&G more flexibility to optimize harvest under a variety of run scenarios. Proposals 49-54 should be considered.

We strongly support proposals 46-47 and 49-54 and ask that you adopt this regulatory change. We oppose proposals 42-44. Thank you for the opportunity to provide input.

Sincerely,

Bristol Bay Fishermen

Name	Vessel Name
Cameron Schille	F/V Double Bluff
Scott Burnfield	F/V Tommie O
Jeremy Jensen	F/V Audacity
Arthur Bloom	F/V Cape Clear
Larry Christensen	LYRA
Ronny Dean	F/V Bad Deal
James Johnson	F/V Blue Sky
KAVIK Anderson	F/V Katie Lady

Name	Vessel Name
Matthew Lakusak	Erial 69099

Name	Vessel Name
GREG PETERSON	VIKING DREAM
Anders Peterson	Viking Spirit
MARK PETERSON	F/V PREDATOR
Will Kogel	F/V Stella Mae

Name	Vessel Name
STEVEN LUDWIG	MATCH POINT
Craig Bachlund	Uncle Ron
Brian Green	Postman
Cooper Green	Postman
J.P. DeBoer	KAIA MARIE
KIRK EID	EQUINOX
Aaron Strassma	Avril Nicole
TRULS FINSDATEN	NET PEUFT
CHRIS BRAUN	Outlier
JEFFERY D. SONSTAD	SUSAN RENEE
Tim Olds	Lil Buddy

Name	Vessel Name
Justin Pleier	Alma Nauti
John Friis-Mikkelsen	Skagerak
Peder Thorstenson	RUBY GRACE
Wes Busby	ATZ Jack
Brady Boone	Dagga Bay
Filip Rentov	Early Times

Name	Vessel Name
Kooper + King	The Red Baron
William Phillips	
Joe Padua	Blue Sky
MR Steves	Humbling Day
John King	Karen K
Jim Smith	F/V Pintail
Kelly Miller	Misty M

Name	Vessel Name
Kurt Kieravik	Ragnarok
Nandy Kroetz	F/V Echoleen
Andrew Kroetz	F/V Parkman
James Rieck	F/V Best Made
Kelly Stier	F/V Honey Badger
Tarah White	F/V Thunder
Anna Mansley	F/V SYREN
ALEC JONES	F/V ZAMBORCHWI
Tara Hines	F/V Emerald Sea
Frances Kaul	F/V Janet Elaine
Cody Rice	F/V second wind
Westin Mackenzie	F/V Killer
Joe Mackenzie	F/V Westelly
Jordan Voldarschi	F/V Full Scale
Marc Ulewellyn	F/V Krink
Fritz Menish	F/V Gwendolyn Rose

Name	Vessel Name
Michael Dortschi	F/V Halberd
Walden G. Gathangal	FV 401-K
Fred Gathangal	F/V Alpentel
Garrett Pedlar	F/V KAIZEN

Name	Vessel Name
Kelly Kuss Kelly Kuss	Rain E Bay

Name	Vessel Name
John Fairbanks	SUMO
Erwin Stroogme	Emma Corine
Mikel Mathisen	Mentlake
Chanelen Collier	Red Rider
CLIFF Lewis	Ecola Anne

Name	Vessel Name
JARVYL POPE	401 K <P
Peter Arnesstad	Highball
Katie Arnesstad	OH School
Jeffrey Ludwig	F/V Skyview
JOSEPH JOHNSON JR	F/V PACIFIC DRIFTER
Maxwell Lukas	F/V ROED WARRIOR
Josif Reulov	F/V Trendsetter
Peter Ludwig	F/V Skyline

Name	Vessel Name
Ivan I. Basargin	Element
IVAN F. BASARGIN	TOP NOTCH
Gregory Basargin	Kryptonite
Daniel Basargin	Whiplash
Maksim Basargin	Uncharted
GAVRIIL BASARGIN	BOSS
TOSIF BASARGIN	STEALTH

Name	Vessel Name
Michael Capri	Corsair
Rex Capri	FLY Corsair