

## BEFORE THE ALASKA BOARD OF FISHERIES

## FOR THE NOVEMBER 2018 MEETING AT DILLINGHAM

Opposition to Elimination of 32-Foot Rule Proposal, No. 30**1. Proposal Promotes Race For Bigger Boats And Overcapitalization**

Allowing bigger boats into the fishery will cause overcapitalization of the fishery. Practically everything that has to be replaced or repaired on a bigger boat will cost more (i.e. engine replacement, shafts, props, RSW, etc.). Bigger boats will result in more expenses and waste of resources. We should not be figuring out ways to increase expenses for fishing operations. We should be figuring out ways to increase profits, so fishermen have more take-home pay.

Allowing bigger boats would likely set off a race to own bigger boats. To keep up, fishermen will necessarily pay substantial amounts for bigger boats and create more debt, causing economic distress to the fishery.

On a related subject bigger boats will likely set the wheels in motion for future Board meetings at which the Board will be asked to reduce the number of permits to another optimum level. Bigger boats will have higher expenses. To justify the higher expenses, those fishermen will want more fish to pay those expenses and will want to get those fish from other fishermen.

**2. Proposal Promotes Race for Fish**

With bigger boats, fishermen will want to fill their boats with fish. There won't be enough fish to fill the capacity of the bigger boats. The present fleet of 32-footers can already catch more than 100% of the run. The race for fish will be on. There will be increased competition on the fishing grounds. There will be increased demands on Fish and Game from frustrated fishermen who aren't catching enough fish during the season. As mentioned above, there will be more Board meetings to figure out how to accommodate the increased capacity of the fishing fleet.

**3. Quality Can Already Be Achieved With 32-Footers**

Quality can already be achieved with 32-foot boats. The quality problem is not due to the length of a 32-footer. The quality problem for drift netters is due to long sets, round hauling, improper fish handling, compressing fish, holding fish too long, not chilling fish, fish pumps on tenders, and canning fish.

Increasingly more 32-foot boats have RSW and slush systems and achieve quality with both systems. The obstacle to an RSW system has little to do with the capacity of a 32-footer, but rather everything to do with the cost of installation and maintenance. Show an RSW company the money, and the RSW company will show anybody a unit that will work on any 32-footer.

The processors also help obtain quality by requiring delivery every 8-12 hours. Similarly, Fish and Game assists quality with shorter fishing periods (i.e. 4 hours) that result in fish being delivered to the processor.

**4. Quality Is Being Addressed By Private Industry and Fishermen**

Quality is being addressed by the Bristol Bay Economic Development Corporation, Bristol Bay Regional Seafood Development Association, processors, and fishermen. In 2017, 73% of drift

fleet deliveries were chilled.<sup>1</sup>

Market prices are doing an effective job of pushing every fisherman to focus on quality. In 2018, fishermen received an estimated \$1.45/lb. for chilled/floated sockeyes (\$1.25 base price plus .15 for chilling and .05 for floating bonuses.<sup>2</sup>)

## 5. Quality Depends On Individual Fishermen, Not Bigger Boats

As stated above, quality is a function of many factors such as long sets, handling fish properly, compressing fish in the holds, chilling, and so forth. A bigger boat does not mean that any of these factors will be addressed. It still comes down to how these factors are addressed by individual fishermen.

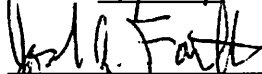
## 6. Implicit Claim that 32 Foot Boat Is Unsafe and that 42 Foot Boat Is Safe in Bristol Bay Is Not Supported By Facts

The proposal's implicit claim that a 32 foot boat is unsafe, and that a 42 foot boat is safe, in Bristol Bay is not supported by any facts. All boats regardless of length have had accidents, injuries, and death. 32 foot boats in Bristol Bay have a long track record of relative safeness. No facts have been presented that the 32 foot length caused the accidents, etc., or that a 42 foot boat would have not resulted in the same accident, etc. Certainly 42 foot boats have had accidents, etc. Indeed, a good argument can be made that a 42 foot boat--especially one designed for deep water with a deep keel or V-hull-- would be more dangerous in the shallows and sand bars in Bristol Bay. Also, using a bigger boat in another fishery likely requires a round trip for many around the peninsula or down the chain to Unalaska at a distance of hundreds of miles with the risk of bad weather, break downs, etc.

## 7. Infrastructure Changes in Bay Communities Will Require Time and Money

Bigger boats will require changes for boat hauling, harboring, and storage in Bay communities. Boat haulers will need bigger trailers. Boat storage spaces will have to be enlarged. Boat harbors will have to create special areas for bigger boats, and likely are too small now to accommodate a lot of bigger boats and likely will require expensive expansion projects.

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<sup>1</sup> [www.bbrsda.com](http://www.bbrsda.com), Executive Summary, Bristol Bay Sockeye Market Report, Spring 2018, Wink & Consulting, at p. 2.

<sup>2</sup> ADF&G, 2018 Bristol Salmon Season Summary, [www.adfg.alaska.gov/static/applications/DCFnewsrelease/989536277.pdf](http://www.adfg.alaska.gov/static/applications/DCFnewsrelease/989536277.pdf), at p. 2, and my own chilling bonus..