

November 29, 2018

RC 62

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK. 99811-5526

Dear Members:

Thank you so much for this opportunity to comment.

I was so very privileged to share the 2018 Bristol Bay salmon setnet season with my daughter and my grandson; I've been waiting for that day since my now 19-year old grandson was a baby. He is a fifth-generation family member to fish on the setnet site pioneered by his great-great grandmother, made possible by a setnet permit earned at original CFEC permit issuance by his grandfather. My daughter is fishing the permit we purchased from her great grandmother when I realized in the early 1990s that I was unable to run a profitable setnet operation with only one permit. My grandson will receive my permit when he is in a position to utilize it; however, he proudly enlisted in the Navy this fall and so will be unable to fish with us again until that commitment to serve our country is fulfilled. Both of my children grew up fishing with me on the family setnet sites in the Naknek Section of the Naknek-Kvichak District; when I had to seek other employment due to failed Kvichak runs in the late 1990s and early 2000s that precluded my participation in the fishery, my daughter took over our family setnet operations. For a number of years, my permit was latent (except to the extent necessary to maintain my setnet site lease) and was used instead as a crew license when my daughter and me hired out as drift net crew during some of the bad Kvichak years. Later, my daughter was able to utilize my permit thanks to permit stacking and after that regulation sunsetted, it was transferred to a crew member to maintain her operational viability. A couple of years ago, my daughter asked me if I'd like to fish with her again and I happily accepted. Both of our permits are safely back within our family. Whew! The point here is that our family operation is just that; our permits are not for sale; they will not be available for others to use. They may occasionally be latent, and they are not going to be eligible for new entrants, except as that occurs within our family unit, and they won't affect permit prices since they'll not be on the market. Our situation is not at all unique; most of the setnetters I know all along the Eastside beaches are similarly situated; they are simply trying to—ironically, as CFEC states in its November 20, 2018 memo to the board—improve the economics of their fishery, while helping to sustain fishery resources.

**I strongly support Proposal 27 to allow setnet stacking on the east side of Bristol Bay and the draft language presented in Bart Meyers' RC 25, with the addition of the word "spouse" in the list of family members in (D)(c).** You've heard all the pros and cons in 2012, 2015, and again now. The proponents offer compelling arguments about the desire to maintain multi-generational family operations that are economically viable. However, I believe that the opponents are being swayed by the flawed conclusions provided by the 2012 and 2015 CFEC reports presented to the board (Report 12-02 from November 2012 and Report 15-4N from November 2015). As every fisherman knows, there are two primary drivers in a fisherman's business decision making every season. These are run size and the price of fish. I was unable to find anything in either document that acknowledged either of those factors in the analyses of permit stacking. Sure, there are tables that talk about exvessel values, but I am unable to conclude from them that CFEC delved appropriately into the how run size and fish price affects a fisherman's decision whether

or not to fish any given season (latency), or that fish price—not permit stacking—is the primary driver of permit values. I wish I were wealthy enough to have a professional graph permit values against fish price and run size; it would no doubt provide interesting correlations that we didn't see in the CFEC reports. I would argue that viable fishing operations provide a great platform for new entrants in any fishery by providing good crew jobs and experience platforms. Please ask yourselves: does common sense fail to include fish price and run size as critical factors in the value of permits?

**I have another question for the board: if it's acceptable for Cook Inlet setnetters that hold two CFEC permits and fish additional gear as a result, why would it not also be acceptable for Bristol Bay setnetters to have the same opportunity?** I would be extremely interested to hear on the record any justifications for why Cook Inlet setnetters can stack, but Bristol Bay setnetters should not.

**I support ADF&G's Proposal 29 that limits mesh size for king salmon in the Naknek-Kvichak District.** Given the department's utilization of preseason announcements to limit mesh size to protect kings, this proposal simply streamlines management.

**I support Proposal 32 that extend the emergency order period duration of the late season in the Naknek-Kvichak District.** With run timing becoming so variable in recent years—particularly in the Kvichak River—extending the late season emergency order period duration would provide fishermen (and processors) with the ability to better respond to runs that come in late and provides more certainty for crew (and processors) so that the value of the fishery can be maximized in years that the resource justifies it.

**I support Proposal 174 clarifying use of SHAs in the Bay.** Use of the special harvest areas in the Naknek River has major impacts on setnetters. Additional uncertainty for stakeholders, managers, and enforcement because of unclear regulations adds insult to injury to an already very difficult situation.

**I oppose Proposal 37 that would decouple the Naknek and Kvichak for purposes of allocation.** While imperfect, the hard-won allocations in the Bay have generally served the intended purpose. I concur with ADF&G's assessment of Proposal 37 and would rather the department's resources be used for more and better data with which to manage the fishery than on a convoluted allocation scheme.

Having been intimately involved in the board process for over 30 years, you have my heartfelt gratitude. I know well the hours you invest in trying to make the best decisions possible for all stakeholders and the resource. Thank you!

Sincerely,



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