

Duncan Fields
Fields & Sons
P.O. Box 25
Kodiak, Alaska 99615

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Via: email <House.Fisheries@akleg.gov>

Chairman Stutes & Committee members
House Fisheries Committee
State Capital
Juneau, Ak 99801

Re: House Bill 117

Dear Chairman Stutes and Committee members:

My family has set gillnetted for salmon at the same location on Kodiak Island since 1961. My grandchildren, the 4th generation, are now participating in our fishing operation. For 65 years our family has worked together (cooperatively) to pick the fish from our nets and to deliver those fish to a tender vessel. Our fish have always been co-mingled from multiple nets as permit holders and crew picked (took) the fish out of our nets. Most often, a single permit holder stamped the ticket for each delivery. The permit holder and use of card would change from delivery to delivery. All permit holders with gear being fished were always either working the nets (on the water) or at our cabin location providing shore support. Since we have fished this way for 65 years, we understood the “unit of gear” delivery requirement in 5AAC 39.130 was the gear that our family was cooperatively fishing as a “unit”.

The recent interpretation/emphasis by AWT that “unit of gear” would require each set gillnet permit holder to keep separate all fish from that permit holder’s net(s) and that each permit holder must take those fish to the tender and each permit holders stamp a delivery ticket creates significant hardship for my family and threatens the family set gillnet cooperative fishing way of life throughout Alaska.

HB-117 would maintain the status-quo for salmon set gillnet fishermen working cooperatively. We would be able to co-mingle fish from several nets and then deliver with on one permit card.

Additional details would be worked out by the Alaska Board of Fisheries. **My family and I strongly support HB-117.**

The Committee may hear concerns that HB-117 somehow “expands” set gillnet cooperative fishing opportunities or “opens the door” for abuses. However, since most participants in the set gillnet fisheries in Alaska have understood for decades that set gillnet fish from cooperative fishing operations could be co-mingled and delivered on one permit card, implementing HB-117 would neither expand fishing opportunities nor change the status quo.

Set gillnet fishing is one of only a few land based commercial fisheries in Alaska. As such, it has many unique characteristics that should be reflected in our understanding of fishing regulations and the need for HB-117.

For example:

1. Safety: Set gillnet skiffs often work together on the same net, especially in rough weather and exposed locations to be near each other if a problem occurs and then move from net to net (permit to permit). Co-mingling fish is a necessary safety precaution. Safety is not an abstract concern. Over the years we've been set gillnetting on Kodiak Island. I can think of several deaths due, at least in part, to bad weather as well as many skiffs swamped and near deaths.
2. Capacity: Set gillnet skiffs are small and do not have the capacity, especially with totes and putting fish on ice, to keep fish obtained from each individual permit holder's net separate. This also goes for holding skiff capacity as well. Holding skiffs are used to keep fish for up to 24 hours between tender visits. Most holding skiffs do not have the room to keep separate iced fish totes for each permit holder. A requirement to keep fish separate is, simply stated, an impractical or impossible expectation.
3. Labor: Not all set gillnets fish evenly, frequently one net will have a "hit" that requires the efforts of more than one skiff to clean the net. Other skiffs come from their work on other nets (permits) to help out. Not having this flexibility to co-mingle fish by helping clean another permit holders net(s) would cause significant delays, inefficiencies, lower fish quality and loss of fishing opportunity.
4. Costs: Taking the time for each permit holder to sign each delivery ticket for cooperative fishing operations would cripple operational functioning and efficiency. It takes about 10 minutes to fill out a fish delivery ticket and deliveries are often made two or three times a day. If 5 permits are being fished cooperatively, the time needed to fill out fish tickets goes from 30 minutes to 150 minutes, that's 2 ½ hours just filling out paper work. When fishing, even an hour of lost time can mean no rest during an 18–20-hour day. With all fishing costs going up and the exvessel price for salmon static, set gillnet operations need to be as efficient as possible.
5. Exclusion of multi-generational permit holder participants: Set gillnet fishing, unlike boat salmon fisheries, allows older permit holders to contribute to the fishing operation by cooking, doing gear work and/or watching grand children while other permit holders are out on the water. Younger permit holders, as young as 6 years old, are also active in the fishery -- up to their abilities. Expecting land support permit holders, young and old or mothers that are pregnant or with young children to be on the water and present every time a tender delivery is made creates great hardship – especially in adverse weather or late at night. If HB-117 is not passed, fewer permit holders will be able to participate in the fishery, effectively eliminating many extended families from the fishery. Sustaining these types of multi-generational participation in the fishery is good for the fishery and for Alaska.

Very Truly Yours

Duncan Fields