RC-2

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON SUBSISTENCE, PERSONAL USE, SPORT, AND COMMERCIAL FINFISH REGULATORY PROPOSALS

FOR THE BRISTOL BAY AREA

ALASKA BOARD OF FISHERIES MEETING
DILLINGHAM, ALASKA

DECEMBER 4 – 12, 2006

The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Fisheries meeting, December 4 - 12, 2006 in Dillingham, Alaska and are prepared to assist the public and Board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final Department positions will be formulated after review of written and oral testimony presented to the Board.

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TABLE OF CONTENTS

PROP NO.	SUBJECT	PAGE
Summary of Department Positions on 2006 Bristol Bay proposals.		1
COMMITTEE A		6
7	Restrict participation in subsistence fisheries by seasonal sportfishing lodge residents.	7
8	Allow personal use salmon fishing from May 1 – May 15.	8
116	Prohibit retention of northern pike 30 inches in length and longer in Lake Kulik and the Chulitna River drainage.	10
117	Allow sport fishing in Brooks Lake year round.	11
118	Base sport fishery management on inseason fishery performance data.	12
119	Allow anglers to harvest one rainbow trout over 24 inches in the upper Nushagak.	14
120	Allow anglers to harvest one king salmon per year in the upper Nushagak River.	16
121	Recommend Talarik/Koktuli area be designated a fish refuge	18
122	Require anglers fishing the Alagnak River to use barbless hooks at all times.	19
251	Allow drift gillnet gear to harvest salmon for subsistence in the Togiak River.	21
252	Allow snagging, spear, arrow, or capture by bare hand in Lake Clark and its tributaries by Bristol Bay subsistence salmon permit holders.	22
253	Allow beach seine gear to take salmon in Lake Clark and its tributaries	24
COMMITTEE B: HERRING		28
9	Eliminate inseason management for gear specific allocation.	29
10	Change the allocation percentages for gillnet and purse seine from 30/70 to 35/65.	30
11	Change potential start date of the Togiak herring fishery from April 25 to April 15.	32
12	Change amount of time after closure that herring may be retained in a purse seine.	33
13	Allow holders of CFEC spawn on kelp permits to harvest the herring equivalent of the spawn on kelp quota	34
COMMITTEE C: GEAR, REGISTRATION, VESSELS		35
Gear		
14	Allow holder of two Bristol Bay drift gillnet permits to fish 200 fathoms gear, except in SHA's, and also not be subject to 48-hour transfer period.	36
15	Allow holder of two Bristol Bay drift gillnet permits to fish 200 fathoms of gear and owners of two set gillnet permits to fish them simultaneously	36
16	Prohibit operation of a drift gillnet when gillnet is grounded above water line or if vessel is grounded.	37

TABLE OF CONTENTS (Continued)

17 Remove regulation requiring lights to mark fishing nets....38
18 Remove requirement to mark ADF&G number on cork every 10 fathoms 39
19 Require removal of set gillnet gear during any drift gillnet commercial fishing period used to balance allocation....40
20 Require permit holders to report loss of any drift gillnet gear....41
21 Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas. 41
22 Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas 42
23 Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gear from a single vessel in special harvest areas. 43
24 Allow one person to have two active permits and to receive extra benefits or incentives including more time, area, gear. 44
25 Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas. 45
26 Allow 200 fathoms on a vessel with two permit holders only when no SHAs or restricted district boundaries are in effect....45
27 Allow a CFEC permit holder to own two Bristol Bay set gillnet permits 46
28 Provide additional fishing time for vessels fishing two drift gillnet permits....47

Registration

29 Prohibit fishermen who are not Togiak Bay area residents from fishing in the Togiak District 48
30 Create a super-exclusive salmon fishery in the Ugashik District. 48
31 Repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period 49
32 Repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period. 50
33 Allow two permit holders fishing from one drift gillnet vessel to be registered in more than one district, eliminate the transfer requirement and 48-hour waiting period 51
34 Eliminate 48-hour waiting period when switching gear types, require notifying the department. 51
35 Allow two permit holders fishing one gillnet vessel to be registered in more than one district, eliminate the transfer requirement and the 48-hour waiting period....52
36 Allow permit holders an opportunity to declare intent to transfer without declaring destination up front. 53
37 Allow permit holders an opportunity to declare intent to transfer without declaring destination up front 54
38 Require vessels to register to fish in a Bristol Bay district on or after June 23 54

Vessels

39 Eliminate the current 32-foot length restriction....55
40 Eliminate the current 32-foot length restriction....56
41 Eliminate the current 32-foot length restriction....56

TABLE OF CONTENTS (Continued)

42 Eliminate the current 32-foot length restriction....57
43 Eliminate the current 32-foot length restriction....58
44 Raise the 32-foot length restriction to 42 feet....59
45 Raise the 32-foot length restriction to 42 feet....59
46 Raise the 32-foot length restriction to 38 feet....60
47 Raise the 32-foot length restriction to 38 feet....61

Naknek River SHA Gear

64 Allow vessel to fish up to 75 fathoms of gillnet gear, with no more than 150 fathoms on board, in the Naknek River Special Harvest Area....62
65 Allow set gillnet running lines within 500 feet of 18-foot high tide mark in Naknek River Special Harvest Area to remain in water after each fishing period. 62
66 Require all set gillnet gear in the Naknek River Special Harvest Area be removed from the water when not fishing....63
67 Require all set gillnet gear in the Naknek River Special Harvest Area be removed from the water when not fishing....64

Egegik District Gear

75 Limit drift gillnets to 50 fathoms when Egegik River Special Harvest Area management plan is in effect. 64
76 Require the removal of all set gillnet gear during any drift gillnet only fishing periods....65
106 Require removal of set gillnet gear during set gillnet closures....66

COMMITTEE D: BOUNDARIES....68
58 Add more area to the Naknek River Special Harvest Area. 69
59 Add more area to the Naknek River Special Harvest Area. 70
68 Redefine the western boundary of the Egegik River Special Harvest Area 72
69 Redefine the western boundary of the Egegik River Special Harvest Area 74
70 Redefine the western boundary of the Egegik River Special Harvest Area 76
77 Redefine the Ugashik River Special Harvest Area, coordinate with Naknek River SHA Management Plan. 78
78 Restrict the Ugashik District boundaries. 78
79 Restrict the Ugashik District boundaries. 81
80 Restrict the Ugashik District boundaries. 83
107 Change the boundaries of the Nushagak District....85
108 Change the boundaries of the Nushagak District....87
109 Change the boundaries of the Nushagak District....87
110 Restrict the Ugashik District boundaries. 89
111 Redefine the Ugashik District Boundaries....91
112 Redefine the northern boundary of the Ugashik District. 93
113 Connect the eastern and southern boundary lines of the Igushik Section....95
114 Reduce Egegik District permanently to the LORAN - C “110 line”. 96

TABLE OF CONTENTS (Continued)

COMMITTEE E: MODIFICATION OF MANAGEMENT PLANS.....99
48 Restrict eastside fisheries to SHAs until Kvichak River sockeye salmon midpoint escapement goal is met. 100
50 Establish weekly schedule of three 12-hour fishing periods in Bristol Bay fishing districts excluding Togiak.....101
51 Allow fishing in the General District for up to 25% of the projected harvest.....102
52 Allow fishing in the General District once escapement goals have been reached.....103
60 Delay moving into the Naknek River Special Harvest Area, delay implementation of management plan based on days behind schedule. 104
61 Allow Naknek Section to remain open to drift and set gillnet gear when Kvichak Section closed. Naknek River Special Harvest Area open to set gillnet gear only. 105
62 Open Naknek River Special Harvest Area when Naknek or Kvichak sections open. 106
63 Allow both gears to fish at the same time in the Naknek River Special Harvest Area.....107
71 Redefine boundaries of Egegik River Special Harvest Area as LORAN-C "130 line".....108
72 Egegik River Special Harvest Area in effect for season when Naknek-Kvichak or Ugashik District is closed. 110
73 Give a 12-hour notice prior to opening or closing the Egegik River Special Harvest Area.....111
74 Define western boundary of Egegik District as LORAN-C "135 line," until July 2.....112
81 Place an optimum escapement goal of 100,000 sockeye salmon for Alagnak River 114
84 Prohibit commercial gillnet fisheries in the Alagnak River Special Harvest Area.....114
85 Open the Alagnak River Special Harvest Area to set gillnet gear only.....115
86 Open the Alagnak River Special Harvest Area to set gillnet gear only.....116
96 Change Naknek-Kvichak District management, close Kvichak 5 years. 117
97 Change current biological escapement goals for Kvichak River to optimum escapement goals 118
98 Change current biological escapement goals for Kvichak River to optimum escapement goals 119
100 Allow separate but equal periods for set and drift gillnet gear groups during directed Chinook salmon fishing periods. 119
101 Create regulations and areas for permit holders interested in taking tourists on commercial fishing vessels. 120
102 Change boundaries of Nushagak District after July 5 if preseason forecast for Kvichak insufficient to provide for 40% exploitation rate. 121
105 Define western boundary of Egegik District as LORAN-C "110 line, set western boundary of Egegik River Special Harvest Area as Goose Point-Bishop Creek line.....123
115 Add 12 hours to weekly fishing period in Kulukak Section of Togiak District 125

COMMITTEE F: ALLOCATION.....126
49 Establish individual fishing quotas based on historical harvest records. 127

TABLE OF CONTENTS (Continued)

53 Provide equal time for both set and drift gillnet gear in Naknek River Special Harvest Area. 127
54 Provide equal time for both set and drift gillnet gear in Naknek River Special Harvest Area 128
55 Alternate commercial fishing periods between set and drift gillnet gear when fishing in Naknek River Special Harvest Area 129
56 Alternate commercial fishing periods between set and drift gillnet gear when fishing in Naknek River Special Harvest Area 130
57 Alternate commercial fishing periods between set and drift gillnet gear when fishing in the NRSHA after escapement goal of 800,000 sockeye salmon reached 131
82 Allocate 84% of catch in the Alagnak River Special Harvest Area to drift gillnet gear with remaining 16% allocated to set gillnet gear. 131
83 Allocate 84% of catch in the Alagnak River Special Harvest Area to drift gillnet gear with remaining 16% allocated to set gillnet 132
87 Eliminate allocation of sockeye salmon between drift and set gillnet gear in Naknek/Kvichak District and SHA 133
88 Eliminate allocation of sockeye salmon between drift and set gillnet gear in Naknek/Kvichak District and SHA 134
89 Require that the set gillnet fleet would fish one tide in the Naknek River Special Harvest Area for every two tides the drift gillnet fleet fished 135
90 Change Naknek-Kvichak District allocation plan to 67% drift gillnet and 33% set gillnet with set gillnet percentage evenly distributed between Naknek and Kvichak Sections. Naknek River Special Harvest Area harvest would be split 67% drift and 33% set gillnet gear 135
91 Change allocation for Naknek-Kvichak District and Naknek River SHA based on average harvest by gear group from 1997 to present. 136
92 Require drift and set gillnet gear in Naknek-Kvichak District and Naknek River SHA to fish alternating tides. Delete allocation percentages for the Naknek-Kvichak District and the NRSHA from regulation. 137
93 Open Kvichak Section to set gillnet gear when Naknek Section open for drift or set gillnets. Open Naknek/Kvichak District when preseason projections show a surplus Kvichak River sockeye salmon. If Kvichak forecast projects less than one million surplus fish, restrict set gillnet gear in Kvichak Section to 25 fathoms of gillnet. Allow additional set gillnet periods to achieve 8% allocation 138
94 Allocate catch on daily basis in Naknek River Special Harvest Area based on number of set and drift gillnet participants 139
95 Limit drift gear to three fishing periods or less in Naknek River Special Harvest Area before a set gillnet period is allowed 140
99 Change end of accounting period for allocations from July 17 to July 12 140
103 Allow 200 fathoms of drift gillnet gear to enable drift fleet to catch up on allocation if behind by 2%. Allow both gear groups to fish concurrently if drift fleet is less than 200 vessels. Rescind allocation plan if drift fleet unable to catch up after three tides 141
104 Change the allocation accounting period to June 1 until the escapement goal is met. 142

TABLE OF CONTENTS (Continued)

OTHER PROPOSALS
260 Modify Adak pollock fishery start date 143

Summary of Department Positions on 2006 Bristol Bay proposals.

	Proposal #	Dept Position	Issue
Committee A	**7**	**N**	Restrict participation in subsistence fisheries by seasonal sportfishing lodge residents
	8	**N**	Allow personal use salmon fishing from May 1 – May 15
	116	**S**	Prohibit retention of northern pike 30 inches in length and longer in Lake Kulik and the Chulitna River drainage
	117	**S**	Allow sport fishing in Brooks Lake year round
	118	**N**	Base sport fishery management on inseason fishery performance data
	119	**O**	Allow anglers to harvest one rainbow trout over 24 inches in the upper Nushagak
	120	**N**	Allow anglers to harvest one king salmon per year in the upper Nushagak River
	121	**None**	Recommend Talarik/Koktuli area be designated a fish refuge
	122	**O**	Require anglers fishing the Alagnak River to use barbless hooks at all times
	251	**N**	Allow drift gillnet gear to harvest salmon for subsistence in the Togiak River.
	252	**N/O**	Allow snagging, spear, arrow, or capture by bare hand in Lake Clark and its tributaries by Bristol Bay subsistence salmon permit holders
	253	**N**	Allow beach seine gear to take salmon in Lake Clark and its tributaries
Committee B	**9**	**N**	Eliminate inseason management for gear specific allocation
	10	**N/O**	Change the allocation percentages for gillnet and purse seine from 30/70 to 35/65.
	11	**S**	Change potential start date of the Togiak herring fishery from April 25 to April 15
	12	**S**	Change amount of time after closure that herring may be retained in a purse seine
	13	**N**	Allow holders of CFEC spawn on kelp permits to harvest the herring equivalent of the spawn on kelp quota
Committee C	**14**	**N/O**	Allow holder of two Bristol Bay drift gillnet permits to fish 200 fathoms gear, except in SHA's, and also not be subject to 48-hour transfer period.
	15	**N**	Allow holder of two Bristol Bay drift gillnet permits to fish 200 fathoms of gear and owners of two set gillnet permits to fish them simultaneously
	16	**S**	Prohibit operation of a drift gillnet when gillnet is grounded above water line or if vessel is grounded
	17	**O**	Remove regulation requiring lights to mark fishing nets
	18	**O**	Remove requirement to mark ADF&G number on cork every 10 fathoms
	19	**N**	Require removal of set gillnet gear during any drift gillnet commercial fishing period used to balance allocation
	20	**S**	Require permit holders to report loss of any drift gillnet gear
	21	**N**	Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas
	22	**N**	Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas
	23	**N/O**	Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas
	24	**N/O**	Allow one person to have two active permits and to receive extra benefits or incentives including more time, area, gear
	25	**N**	Allow two Bristol Bay drift gillnet permits to fish 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas.

N = Neutral S= Support O = Oppose NA = No Action
N/S = Neutral on Allocative Aspects but Support N/O = Neutral on Allocative Aspects but Oppose

Summary of Department Positions on 2006 Bristol Bay proposals (continued).

	Proposal #	Dept Position	Issue
Committee C (continued)	**26**	**N**	Allow 200 fathoms on a vessel with two permit holders only when no SHAs or restricted district boundaries are in effect
	27	**N**	Allow a CFEC permit holder to own two Bristol Bay set gillnet permits
	28	**N/O**	Provide additional fishing time for vessels fishing two drift gillnet permits
	29	**N**	Prohibit fishermen who are not Togiak Bay area residents from fishing in the Togiak District
	30	**N/O**	Create a super-exclusive salmon fishery in the Ugashik District
	31	**N**	Repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period
	32	**N**	Repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period
	33	**N/O**	Allow two permit holders fishing from one drift gillnet vessel to be registered in more than one district, eliminate the transfer requirement and 48-hour waiting period
	34	**N**	Eliminate 48-hour waiting period when switching gear types, require notifying the department
	35	**N/O**	Allow two permit holders fishing one gillnet vessel to be registered in more than one district, eliminate the transfer requirement and the 48-hour waiting period
	36	**N/O**	Allow permit holders an opportunity to declare intent to transfer without declaring destination up front
	37	**N/O**	Allow permit holders an opportunity to declare intent to transfer without declaring destination up front
	38	**N**	Require vessels to register to fish in a Bristol Bay district on or after June 23
	39	**N**	Eliminate the current 32-foot length restriction
	40	**N**	Eliminate the current 32-foot length restriction
	41	**N**	Eliminate the current 32-foot length restriction
	42	**N**	Eliminate the current 32-foot length restriction
	43	**N**	Eliminate the current 32-foot length restriction
	44	**N**	Raise the 32-foot length restriction to 42 feet
	45	**N**	Raise the 32-foot length restriction to 42 feet
	46	**N**	Raise the 32-foot length restriction to 38 feet
	47	**N**	Raise the 32-foot length restriction to 38 feet
	64	**N**	Allow vessel to fish up to 75 fathoms of gillnet gear, with no more than 150 fathoms on board, in the Naknek River Special Harvest Area
	65	**N/O**	Allow set gillnet running lines within 500 feet of 18-foot high tide mark in Naknek River Special Harvest Area to remain in water after each fishing period
	66	**N**	Require all set gillnet gear in the Naknek River Special Harvest Area be removed from the water when not fishing
	67	**N**	Require all set gillnet gear in the Naknek River Special Harvest Area be removed from the water when not fishing
	75	**N/O**	Limit drift gillnets to 50 fathoms when Egegik River Special Harvest Area management plan is in effect
	76	**N**	Require the removal of all set gillnet gear during any drift gillnet only fishing periods
	106	**N**	Require removal of set gillnet gear during set gillnet closures

N = Neutral S= Support O = Oppose NA = No Action
N/S = Neutral on Allocative Aspects but Support
N/O = Neutral on Allocative Aspects but Oppose

Summary of Department Positions on 2006 Bristol Bay proposals (continued).

	Proposal #	Dept Position	Issue
Committee D	**58**	**N/O**	Add more area to the Naknek River Special Harvest Area
	59	**N/O**	Add more area to the Naknek River Special Harvest Area
	68	**N/O**	Redefine the western boundary of the Egegik River Special Harvest Area
	69	**N/O**	Redefine the western boundary of the Egegik River Special Harvest Area
	70	**N/O**	Redefine the western boundary of the Egegik River Special Harvest Area
	77	**N/O**	Redefine the Ugashik River Special Harvest Area, coordinate with Naknek River SHA Management Plan
	78	**N/O**	Restrict the Ugashik District boundaries
	79	**N/O**	Restrict the Ugashik District boundaries
	80	**N/O**	Restrict the Ugashik District boundaries
	107	**N/O**	Change the boundaries of the Nushagak District
	108	**N/O**	Change the boundaries of the Nushagak District
	109	**N/O**	Change the boundaries of the Nushagak District
	110	**N/O**	Restrict the Ugashik District boundaries
	111	**N/O**	Redefine the Ugashik District Boundaries
	112	**N**	Redefine the northern boundary of the Ugashik District
	113	**S**	Connect the eastern and southern boundary lines of the Igushik Section
	114	**N/O**	Reduce Egegik District permanently to the LORAN - C “110 line”
Committee E	**48**	**N/O**	Restrict eastside fisheries to SHAs until Kvichak River sockeye salmon midpoint escapement goal is met
	50	**N/O**	Establish weekly schedule of three 12-hour fishing periods in Bristol Bay fishing districts excluding Togiak
	51	**N/O**	Allow fishing in the General District for up to 25% of the projected harvest
	52	**N/O**	Allow fishing in the General District once escapement goals have been reached
	60	**N/O**	Delay moving into the Naknek River Special Harvest Area, delay implementation of management plan based on days behind schedule
	61	**N/O**	Allow Naknek Section to remain open to drift and set gillnet gear when Kvichak Section closed. Naknek River Special Harvest Area open to set gillnet gear only
	62	**N**	Open Naknek River Special Harvest Area when Naknek or Kvichak sections open
	63	**N/O**	Allow both gears to fish at the same time in the Naknek River Special Harvest Area
	71	**N/O**	Redefine boundaries of Egegik River Special Harvest Area as LORAN-C “130 line”.
	72	**N/O**	Egegik River Special Harvest Area in effect for season when Naknek-Kvichak or Ugashik District is closed
	73	**N**	Give a 12-hour notice prior to opening or closing the Egegik River Special Harvest Area
	74	**N/O**	Define western boundary of Egegik District as LORAN-C “135 line,” until July 2.
	81	**N**	Place an optimum escapement goal of 100,000 sockeye salmon for Alagnak River
	84	**N/O**	Prohibit commercial gillnet fisheries in the Alagnak River Special Harvest Area
	85	**N**	Open the Alagnak River Special Harvest Area to set gillnet gear only
	86	**N**	Open the Alagnak River Special Harvest Area to set gillnet gear only

N = Neutral S= Support O = Oppose NA = No Action
N/S = Neutral on Allocative Aspects but Support
N/O = Neutral on Allocative Aspects but Oppose

Summary of Department Positions on 2006 Bristol Bay Proposals (continued).

	Proposal #	Dept Position	Issue
Committee E (continued)	**96**	**N/O**	Change Naknek-Kvichak District management, close Kvichak 5 years
	97	**N**	Change current biological escapement goals for Kvichak River to optimum escapement goals
	98	**N/O**	Change current biological escapement goals for Kvichak River to optimum escapement goals
	100	**N/S**	Allow separate but equal periods for set and drift gillnet gear groups during directed Chinook salmon fishing periods
	101	**N**	Create regulations and areas for permit holders interested in taking tourists on commercial fishing vessels
	102	**N/O**	Change boundaries of Nushagak District after July 5 if preseason forecast for Kvichak insufficient to provide for 40% exploitation rate
	105	**N/O**	Define western boundary of Egegik District as LORAN-C "110 line, set western boundary of Egegik River Special Harvest Area as Goose Point-Bishop Creek line
	115	**N**	Add 12 hours to weekly fishing period in Kulukak Section of Togiak District
Committee F	**49**	**O**	Establish individual fishing quotas based on historical harvest records
	53	**N**	Provide equal time for both gear types in the NRSHA.
	54	**N**	Provide equal time for both gear types in the NRSHA.
	55	**N**	Alternate commercial fishing periods between set and drift gillnet gear when fishing in Naknek River Special Harvest Area
	56	**N**	Alternate commercial fishing periods between set and drift gillnet gear when fishing in Naknek River Special Harvest Area
	57	**N**	Alternate commercial fishing periods between set and drift gillnet gear when fishing in the NRSHA after escapement goal of 800,000 sockeye salmon reached
	82	**N**	Allocate 84% of catch in the Alagnak River Special Harvest Area to drift gillnet gear with remaining 16% allocated to set gillnet gear
	83	**N**	Allocate 84% of catch in the Alagnak River Special Harvest Area to drift gillnet gear with remaining 16% allocated to set gillnet
	87	**N**	Eliminate allocation of sockeye salmon between drift and set gillnet gear in Naknek/Kvichak District and SHA
	88	**N**	Eliminate allocation of sockeye salmon between drift and set gillnet gear in Naknek/Kvichak District and SHA
	89	**N**	Require that the set gillnet fleet would fish one tide in the Naknek River Special Harvest Area for every two tides the drift gillnet fleet fished
	90	**N**	Change Naknek-Kvichak District allocation plan to 67% drift gillnet and 33% set gillnet with set gillnet percentage evenly distributed between Naknek and Kvichak Sections. Naknek River Special Harvest Area harvest would be split 67% drift and 33% set gillnet gear
	91	**N**	Change allocation for Naknek-Kvichak District and Naknek River SHA based on average harvest by gear group from 1997 to present
	92	**N/O**	Require drift and set gillnet gear in Naknek-Kvichak District and Naknek River SHA to fish alternating tides. Delete allocation percentages for the Naknek-Kvichak District and the NRSHA from regulation

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N/S = Neutral on Allocative Aspects but Support
N/O = Neutral on Allocative Aspects but Oppose

Summary of Department Positions on 2006 Bristol Bay Proposals (continued).

	Proposal #	Dept Position	Issue
Committee F	**93**	**N/O**	Open Kvichak Section to set gillnet gear when Naknek Section open for drift or set gillnets. Open Naknek/Kvichak District when preseason projections show a surplus Kvichak River sockeye salmon. If Kvichak forecast projects less than one million surplus fish, restrict set gillnet gear in Kvichak Section to 25 fathoms of gillnet. Allow additional set gillnet periods to achieve 8% allocation
(continued)	**94**	**N**	Allocate catch on daily basis in Naknek River Special Harvest Area based on number of set and drift gillnet participants
	95	**N**	Limit drift gear to three fishing periods or less in Naknek River Special Harvest Area before a set gillnet period is allowed
	99	**N**	Change end of accounting period for allocations from July 17 to July 12
	103	**N**	Allow 200 fathoms of drift gillnet gear to enable drift fleet to catch up on allocation if behind by 2%. Allow both gear groups to fish concurrently if drift fleet is less than 200 vessels. Rescind allocation plan if drift fleet unable to catch up after three tides
	104	**N**	Change the allocation accounting period to June 1 until the escapement goal is met
ACR	**260**	**S-2**	Modify Adak pollock fishery starting date.

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COMMITTEE A : SUBSISTENCE/SPORT/PERSONAL USE
(12 Proposals)

COMMITTEE A : SUBSISTENCE/SPORT/PERSONAL USE (12 Proposals)

PROPOSAL 7 - 5 AAC 01.335. Limits on Participation in Subsistence Finfish Fisheries. [Repealed 5/15/93]

PROPOSED BY: Nushagak Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit individuals from subsistence fishing while residing at a sportfishing lodge, unless the lodge is the year-round residence of the individual.

WHAT ARE THE CURRENT REGULATIONS? Any Alaska resident, regardless of where they live, may obtain a subsistence permit for harvesting salmon in the Bristol Bay Area. No permits are required for subsistence fishing for other finfish. AS 16.05.415 lists the conditions that an individual must meet to be considered an Alaska resident.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Individuals who are seasonal residents of sport fishing lodges would be prohibited from subsistence fishing while living at the lodge.

BACKGROUND: The department has no information on subsistence salmon harvests by seasonal residents of sport fishing lodges. In 2005, of 1,076 Bristol Bay subsistence permit holders, 929 were residents of Bristol Bay communities (86%) and 147 were residents of other Alaska communities (14%). Similarly, in 2004, Bristol Bay residents held 85% of the subsistence salmon permits and other Alaska residents held 15%. In 2005, Bristol Bay community residents harvested 93% of the Bristol Bay Area subsistence salmon harvest (119,789 of 128,811 salmon), and other Alaska residents harvested 7% (9,022 salmon). In 2004, Bristol Bay residents accounted for 94% of the Bristol Bay subsistence salmon harvest.

As defined in Alaska statue (AS 16.05.940[32]), subsistence uses are "noncommercial, customary and traditional uses" by state residents for "direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making or selling of handicraft articles out of nonedible by-products of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption." Also, under 5 AAC 01.010(d), it is unlawful to buy or sell subsistence-taken fish, their parts, or their eggs, unless otherwise specified in regulation or for the sale of handicrafts made out of the skin or nonedible by-products of fish taken for personal or family consumption.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.

2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The Alaska Board of Fisheries has found that all finfish stocks of the Bristol Bay Management Area support customary and traditional subsistence uses (5 AAC 01.336(1))

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence use? The Alaska Board of Fisheries has established a range of 157,000 to 172,171 salmon as the amount reasonably necessary for subsistence for the entire Bristol Bay Management Area, including 55,000 to 65,000 Kvichak River drainage sockeye salmon (excluding salmon stocks of the Alagnak River).

5. Do the regulations provide a reasonable opportunity for subsistence use? The Alaska Board of Fisheries will need to make this finding as it deliberates on this proposal.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is an Alaska Board of Fisheries determination. The harvestable surplus for these stocks exceeds documented levels of subsistence harvests.

PROPOSAL 8 - 5 AAC 77.2XX. Bristol Bay Personal Use Salmon Fishery.

PROPOSED BY: Corrine A. Olson

WHAT WOULD THE PROPOSAL DO? The proposal would create a personal use salmon opening in the Bristol Bay Area from May 1 through May 15.

WHAT ARE THE CURRENT REGULATIONS? Current regulations include personal use salmon fisheries for the Nushagak District (5 AAC 77.280) and the Naknek River (5 AAC 77.285). These personal use regulations were established in the early 1980s, when Bristol Bay subsistence permits were only issued to Bristol Bay Area residents, to provide noncommercial net fishing opportunities to other Alaska residents. However, at present, all Alaskans are eligible to participate in existing Bristol Bay subsistence salmon fisheries after obtaining a subsistence fishing permit. From May 1 through May 15, subsistence fishing for salmon is open continuously in most of the Bristol Bay Area, except in all commercial salmon districts, from May 1 through May 31, where

subsistence fishing for salmon is permitted from 9:00 a.m. Monday until 9:00 a.m. Friday.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A personal use salmon fishery would be permitted that duplicates subsistence fishing opportunities in current regulations.

BACKGROUND: The intent of this proposal is unclear. Opportunities to harvest salmon in Bristol Bay for subsistence use are available to all Alaskans under current regulations. Present personal use fishery regulations for the Nushagak District and the Naknek River are generally more restrictive than subsistence fishing regulations for these areas. When these regulations were created, there were restrictions on participation in the subsistence fishery based on residency, but these restrictions are no longer in place. As a result, the present need for any personal use salmon fishing regulations for Bristol Bay is questionable.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.

2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The Alaska Board of Fisheries has found that all finfish stocks of the Bristol Bay Management Area support customary and traditional subsistence uses (5 AAC 01.336(1))

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence use? The Alaska Board of Fisheries has established a range of 157,000 to 172,171 salmon as the amount reasonably necessary for subsistence for the entire Bristol Bay Management Area, including 55,000 to 65,000 Kvichak River drainage sockeye salmon (excluding salmon stocks of the Alagnak River). There are no specific findings for the remaining districts.

5. Do the regulations provide a reasonable opportunity for subsistence use? The board will need to make this finding as it deliberates on this proposal.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is an Alaska Board of Fisheries determination. The harvestable surplus for these stocks exceeds documented levels of subsistence harvests.

PROPOSAL 116 - 5 AAC 67.022. Special provisions for seasons, bag limits, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Nushagak Advisory Committee

WHAT WOULD THE PROPOSAL DO? Adoption of this proposal would prohibit retention of northern pike 30 inches in length and longer in Lake Kulik and the Chulitna River drainage including the waters of Lake Clark within one-mile of the Chulitna River. Anglers would have the opportunity to harvest 5 northern pike less than 30 inches in length per day in these drainages.

WHAT ARE THE CURRENT REGULATIONS? The current bag and possession limit for northern pike in Lake Kulik and the Chulitna River drainage is 5 per day, 1 of which may be over 30 inches in length.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED? Adoption of this proposal would eliminate the sport harvest of northern pike 30 inches in length or longer, thereby protecting large pike from overharvest and maintaining historical size compositions.

BACKGROUND: During the 1997 Alaska Board of Fisheries meeting, the Board reduced the bag limit of northern pike from 10 per day, 10 in possession to 5 per day, 5 in possession only 1 fish over 30 inches. Northern pike are native to watersheds throughout Bristol Bay, however locations that consistently produce trophy northern pike are rare. Large northern pike are important in maintaining the size structure of their populations by preying on small pike. A reduction in large pike can reduce the self-regulatory effect of cannibalism resulting in an abundant population of small pike. If small pike become more abundant growth rates can slow and it is difficult for large pike to recover.

Department sampling in the Chulitna River drainage during 2006 documented that 20 percent of the fish sampled were longer than 30 inches and four percent were longer than 40 inches. Department sampling in Kulik Lake during 1997 and 2004 found that 28 percent of the fish sampled were longer than 30 inches and one percent were longer than 40 inches. The proportion of large fish in these systems is similar to proportions of large pike found in waters well known for large pike in the interior of Alaska. The harvest of northern pike in Lake Kulik and the Chulitna River drainage have averaged 53 and 8 fish, respectively, from 1996 through 2005. The size composition of harvested northern pike is unknown.

DEPARTMENT COMMENTS:
The department **SUPPORTS** this proposal for the conservation of northern pike 30 inches and longer and to maintain historical size compositions and the opportunity to catch trophy northern pike in Bristol Bay.

COST ANALYSIS:
The department does not believe that approval of this proposal may result in an additional direct cost for a private person to participate in the fishery.

PROPOSAL 117 - 5 AAC 67.022. SPECIAL PROVISIONS FOR SEASONS, BAG LIMITS, POSSESSION, AND SIZE LIMITS, AND METHODS AND MEANS IN THE BRISTOL BAY AREA.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO?
Adoption of this proposal would allow sport fishing in Brooks Lake year round while Brooks River and all flowing waters, including Brooks Lake and Naknek Lake waters within a quarter mile of all inlet and outlet streams in the drainage, would remain closed to sport fishing from April 10 to June 7. From June 8 through October 31, non-retention of rainbow trout would apply to waters of the Brooks River including Brooks Lake and Naknek Lake within a quarter mile of the Brooks River. In waters where retention is allowed, seasonal bag and possession limits would apply.

WHAT ARE THE CURRENT REGULATIONS?
Waters in the Brooks River drainage including all of Brooks Lake and Naknek Lake within a one-quarter mile radius of the outlet of Brooks River are closed to all sport fishing April 10 through June 7. From June 8 through October 31, rainbow trout may not be possessed or retained in these waters. From November 1 through April 9, the bag and possession limit for rainbow trout is 5 fish, of which only one may be over 20 inches in length.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED?
Adoption of this proposal would provide the opportunity to sport fish in Brooks Lake year round while still protecting spawning rainbow trout in the flowing waters of the drainage.

BACKGROUND:
During the 1979 Board of Fisheries meeting the Board adopted a fishing closure from April 10 to June 7 for the Brooks River and Naknek Lake within a quarter mile of radius of the outlet of Brooks River to protect spawning rainbow trout. It was not specified that only flowing waters would be closed and the closure was applied to the entire Brooks River drainage, including Brooks Lake. In addition, from June 8 to October 31, rainbow trout may not be possessed or retained and, from November 1 to April 9, the daily bag and possession limit for rainbow trout is five fish, of which only one may be over 20 inches long. A radio telemetry study of rainbow trout in the Brooks River did not indicate that rainbow trout spawn in Brooks Lake and no lake spawning of rainbow trout has been documented in Bristol Bay.

DEPARTMENT COMMENTS:
The department **SUPPORTS** this proposal. The current regulation unnecessarily restricts sport fishing opportunity in Brooks Lake. The intent of the current regulation was to protect spawning rainbow trout. This can be accomplished with the continued closure of all flowing waters including waters in lakes within a quarter mile radius from inlet and outlet streams in the Brooks River drainage.

COST ANALYSIS:
The department does not believe that approval of this proposal may result in an additional direct cost for a private person to participate in the fishery.

PROPOSAL 118 - 5 AAC 67.025. KVICHAK RIVER DRAINAGE SOCKEYE SALMON MANAGEMENT PLAN.

PROPOSED BY: George Riddle and Nanci Morris Lyon

WHAT WOULD THE PROPOSAL DO?
The proposal seeks changes to the management plan that would prevent the department from reducing bag and possession limits for sport caught sockeye salmon based on the preseason forecast and prior to collecting biological data from the current salmon season. The sport fishing season would open under normal bag and possession limits that might be modified later, based on inseason fishery performance data.

The proposal further suggests that because the total sport harvest of sockeye salmon in the Iliamna drainage is small, fishing closures should be employed as needed. Adopting the intent of this proposal would require the department to base management actions on inseason escapement and escapement projections to determine whether it is necessary to implement restrictions outlined in the Kvichak Drainage Sockeye Salmon Management Plan. Restrictions to the sockeye salmon sport fishery based on the preseason forecast would not occur.

WHAT ARE THE CURRENT REGULATIONS?
Current regulations for salmon (excluding king salmon) in the Kvichak River drainage, excluding the Alagnak River drainage, is 5 fish per day, 5 in possession, with no size limit, of which only two fish may be coho salmon.

The Kvichak River Drainage Sockeye Salmon Management Plan (5 AAC 67.025) provides guidelines to the department to minimize allocation conflicts between sport and subsistence users of the sockeye salmon resource. If the escapement is projected inseason to be two million sockeye (red) salmon or more, the plan directs the department to manage the Kvichak River recreational fishery using existing sport fishing regulations. However, if the escapement is projected inseason to be less than two million sockeye salmon, the bag limit is decreased from 5 fish per day and 5 in possession to 2 fish per day and 2 in possession. Additionally, four areas of the Kvichak River drainage are

closed to sport fishing for sockeye salmon to eliminate the potential for conflict between sport and subsistence fisheries.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED?

The Kvichak drainage sockeye salmon sport fishery would begin the fishing season with general bag and possession limits in place. Reductions in bag and possession limits would be imposed by emergency order if inseason projections, excluding the preseason forecast, indicate an escapement of less than 2 million sockeye salmon.

BACKGROUND:

The Kvichak River sockeye salmon stock was found to be a Stock of Yield Concern during the January 2001 Board of Fisheries meeting following poor sockeye salmon returns in 1999 and 2000. In response to the Stock of Yield Concern designation, the Board of Fisheries adopted 5 AAC 67.025 Kvichak River Drainage Sockeye Salmon Management Plan.

During the December 2003 Board of Fisheries meeting, several regulation changes were adopted concerning the Naknek/Kvichak District. The Kvichak sockeye salmon stock was elevated from a Stock of Yield Concern to a Stock of Management Concern due to the recent chronic inability to meet escapement goals. With this action came the stipulation that if the Kvichak River run is forecasted to be less than 30% above the minimum biological escapement goal (BEG), commercial fishing will begin in the Special Harvest Areas of Naknek, Egegik and Ugashik Rivers (5 AAC 06.360 (h)).

Commercial harvests in the Naknek/Kvichak District have declined in recent years from an average of approximately 5.7 million (1966 to 1995) to an average of approximately 1.4 million (1996 to 2005). Moreover, commercial fishing was restricted in the Naknek-Kvichak District at some point each year since 1996, forcing the fishery into the Naknek River Special Harvest Area. In accordance with the management plan, additional restrictions were placed on the sport fishery by emergency order in 2001, 2002, 2003, and 2006. During 2002 and 2006, the restrictions were implemented preseason based on forecasts that were less than 2.0 million fish. The decision in 2006 to issue an emergency order based on the low forecast allowed the department to publish the bag limit change in the regulation summaries. The 2006 emergency order was rescinded on July 11 coinciding with the escapement count surpassing 2.0 million sockeye salmon.

Historically, the Bristol Bay commercial salmon fleet harvests roughly half of the annual Kvichak River sockeye salmon run and, until 1995, the subsistence fishery took an average of nearly 75,000 fish annually, or about 1% of the total run. Since 1995, the annual subsistence harvest has declined to less than 60,000. This decline is not thought to be related entirely to run strength. Kvichak River sockeye salmon sport harvests ranged between 1,500 and 5,000 fish per year until 1984 when nearly 5,500 fish were taken.

After 1984, estimates of the sport harvest ranged from 612 sockeye salmon in 1986 to nearly 23,614 in 1989. From 2001 through 2005, the annual sport harvest averaged 3,850 sockeye salmon from the Kvichak drainage. The highest estimate of sport harvest amounted to approximately 2% (1989) of the total Kvichak River sockeye salmon harvest. At these harvest levels, the sport fishery does not jeopardize the department's ability to manage for sustained yield.

Kvichak River sockeye salmon stocks are managed to achieve a minimum biological escapement goal (BEG) of 2 million fish to 6 million in off-peak years and 6 million to 10 million in pre-peak and peak years. Preseason total run forecasts for Kvichak drainage sockeye salmon during 2004, 2005, and 2006 were, 13.2 million, 2.3 million, and 1.9 million, respectively. Kvichak drainage sockeye salmon escapements during 2004, 2005, and 2006 were 5.5 million, 2.3 million, and 3.1 million, respectively.

DEPARTMENT COMMENTS:
The Department is **NEUTRAL** in regards to this proposal as it is allocative in nature. Any increase in escapement resulting from preseason implementation versus inseason implementation of this particular sport fishery restriction would be very minor and would not be measurable. The primary benefit of issuing emergency orders preseason is that regulations under which the department feels it is appropriate to begin the season can be accurately captured in the regional sport fishing regulation summaries that are printed in early spring. Subsequent restrictions or liberalizations to the fishery could occur through standard emergency order and news release protocols. The department has managed all of the Kvichak River sockeye salmon fisheries more conservatively in recent years due to the fact that this stock has been designated as a Stock of Concern since 2001.

COST ANALYSIS:
The department does not believe that approval of this proposal may result in an additional direct cost for a private person to participate in the fishery.

PROPOSAL 119, PAGE 83: 5 AAC 67.022. SPECIAL PROVISIONS FOR SEASONS, BAG, POSSESSION, AND SIZE LIMITS, AND METHODS AND MEANS IN THE BRISTOL BAY AREA.

MODIFY NUSHAGAK RIVER DRAINAGE RAINBOW TROUT BAG LIMIT

PROPOSED BY: Don Duncan

WHAT WOULD THE PROPOSAL DO?
Adoption of this proposal would allow anglers to harvest one rainbow trout over 24 inches per year in the Nushagak River from its confluence with Harris Creek upstream to the mouth of the Chichitnok River. (The proposal book erroneously referenced the Naknek River drainage instead of the Nushagak River drainage).

WHAT ARE THE CURRENT REGULATIONS?

Currently, fishing for rainbow trout above Harris Creek is open year-round. From the confluence with Harris Creek upstream to the mouth of the Chichitnok River, no retention of rainbow trout is allowed year-round, all rainbow trout caught must be released immediately, and only unbaited, single-hook, artificial lures may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED?

Adoption of this proposal would increase harvest opportunity for large rainbow trout in the Nushagak River from its confluence with Harris Creek upstream to the mouth of the Chichitnok River.

BACKGROUND:

Surveys conducted by the department in 1998 and 2006 found no fish over 24 inches in this area. In these surveys, 241 and166 rainbow trout were sampled, respectively. Of the fish sampled in 1998, two fish reached a total length of 20 inches. In 2006, 9 were over 20 inches and two reached a total length of 23 inches. The average sizes of fish sampled were 14.4 inches and 15.5 inches in 1998 and 2006, respectively. Size distributions of rainbow trout were found to be statistically similar in 1998 and 2006.

In February of 1990, the Alaska Board of Fisheries adopted regulations implementing the Southwest Alaska Rainbow Trout Management Plan. The overriding philosophy of this plan is one of conservative wild stock management. Conservative wild stock management does not necessarily preclude limited harvest of rainbow trout. However, maximum yield principles that emphasize harvest are not implemented. Additionally, under a philosophy that emphasizes wild trout management, mitigating losses of wild stocks by enhancement or stocking is not considered a desirable management alternative. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is inevitable, but by managing the area's wild rainbow trout stocks conservatively, the potential for serious long-term resource problems is minimized. From a social perspective, conservative wild stock management is consistent with the wishes and desires of most of the public presently using the resource. Based on the criteria in the plan, in 1990 the Nushagak River from Harris Creek upstream was designated a catch and release special management area for rainbow trout.

In March 2003, the Board of Fisheries adopted 5 AAC 75.222 Policy for the Management of Sustainable Wild Trout Fisheries (policy), and 75.220 Statewide Management Standards for Wild Trout (plan). The policy provides principles and criteria to ensure conservation, sustainability, and optimal sustained yield and benefits for wild trout, and provides direction to the Board of Fisheries and the department as to how those principles and criteria are to be applied in the regulatory process. The plan ensures conservative management of wild trout fisheries while recognizing existing plans and policies that guide management of wild trout on a regional basis. The plan allows the Board to adopt regulations that deviate from the plan as necessary to address sustainability or optimal sustained yield issues, establish special management areas, or liberalize harvest opportunities in specific water bodies under other criteria.

DEPARTMENT COMMENTS:
The department **OPPOSES** this proposal. According to the Policy for the Management of Sustainable Wild Trout Fisheries (5 AAC 75.222) the department is charged with managing wild trout stocks in a manner that assures optimal sustained yield. In the face of uncertainty, wild trout stocks will be managed conservatively including prior identification of undesirable outcomes and of measures that will avoid undesirable outcomes and correct them promptly. Opening this area to the harvest of rainbow trout over 24 inches would put additional harvest pressure on a segment of the population that is already very small. This segment is also desirable to retain for reasons specified in the management plan including genetic and phenotypic characteristics of a population. The department has no data that verifies fish in this size range occur in the specified area but does not doubt their limited existence. If this proposal was adopted, the few specimens that do occur would be culled out of the population and would decrease the opportunity for anglers to encounter rainbow trout of this size in the future.

COST ANALYSIS:
The department does not believe that approval of this proposal may result in an additional direct cost for a private person to participate in the fishery.

PROPOSAL 120, PAGE 84: 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

MODIFY UPPER NUSHAGAK RIVER KING SALMON SEASON

PROPOSED BY: Don Duncan

WHAT WOULD THE PROPOSAL DO?
Adoption of this proposal would allow anglers to harvest one king salmon annually in the Nushagak River upstream from Harris Creek to the confluence of the Chichitnok River with a yearly bag limit of one king salmon.

WHAT ARE THE CURRENT REGULATIONS?
This section of the Nushagak drainage is closed to king salmon fishing year-round and is limited to unbaited, single-hook, artificial lures for all other species, year-round.

Management of the Nushagak king salmon fisheries is governed by the Nushagak-Mulchatna King Salmon Management Plan (5 AAC 06.361) which was adopted by the Alaska Board of Fisheries (BOF) in January of 1992, and amended in January of 1995, November of 1997, January of 2001, and December of 2003. The purpose of this management plan is to ensure biological spawning escapement requirements of king salmon into the Nushagak – Mulchatna river system. A king salmon sport fishery guideline harvest level of 5,000 fish has been established by the plan when the in-river return is projected to be less than 75,000 fish. Additionally, the sport fishery closes if

escapement projections fall below 40,000 fish. During each year the plan has been in place, the king salmon spawning escapement has exceeded 40,000 fish.

King salmon fishing in the Nushagak drainage is open below the confluence with the Iowithla River from May 1 through July 31 and from the confluence with the Iowithla River to the confluence with Harris Creek from May 1 through July 24. Bag limits include a daily and possession limit of two fish over 20 inches, only one over 28 inches and an annual limit of four king salmon. King salmon less than 20 inches may be kept at a daily and possession limit of five fish and these fish do not count toward the annual limit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED?

Adoption of this proposal would result in additional opportunity to harvest king salmon in the Nushagak drainage. King salmon harvested in this area would count toward the 5,000 fish guideline harvest level currently taken downstream of Harris Creek. In recent years the sport fishery has shown an ability to reach this guideline harvest level in areas currently open to harvest. Although adoption of this proposal would open additional areas to king salmon harvest, due to geographic distance, it is unlikely that there would be a significant shift of effort from below Harris Creek to areas upstream of Harris Creek.

BACKGROUND:

Prior to the closure of this area in 1997, this section of the Nushagak River was open for king salmon fishing from January 1 through July 24, with limits of 3 per day, 3 in possession, only two more than 28 inches; and a gear restriction of single-hook artificial lures from June 8 through October 31. The Nushagak-Mulchatna King Salmon Management Plan (5 AAC 06.361) now addresses allocation of this resource among users. Currently, the king salmon resource is considered fully utilized. The 5,000 king salmon sport fishery guideline harvest level can and has been taken in the portions of the drainage currently open to harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** to this proposal since it is primarily allocative in nature. The department does not support adding additional enforcement and management complexity to king salmon bag and possession regulatory language for the Nushagak River drainage through establishment of different limits for the river based on catch location.

One of the significant benefits associated with the Nushagak king salmon sport fishery is a regulatory package that provides stability to the fishery and maintains the harvest within Board established limits. The king salmon closure above Harris Creek likely serves as a disincentive to development that could increase angling effort and harvest potential in the drainage. The objectives of the current Management Plan of providing a 40,000 to 65,000 fish spawning escapement and maintaining the sport harvest below the 5,000 fish guideline harvest level, when required by the management plan, have been achieved to date.

COST ANALYSIS:

The department does not believe that approval of this proposal may result in an additional direct cost for a private person to participate in the fishery.

PROPOSAL 121. PAGE 85. 5 AAC XX.XXX.

PROPOSED BY: George Matz

WHAT WOULD THE PROPOSAL DO? This proposal seeks a recommendation from the Board of Fisheries (Board) to the Legislature to establish a refuge area that includes Lower Talarik Creek, Upper Talarik Creek and the Koktuli River.

WHAT ARE THE CURRENT REGULATIONS? AS 16.05.251 (a) authorizes the Board to "adopt regulations it considers advisable in accordance with AS 44.62 (Administrative Procedures Act) for (1) setting apart fish reserve areas, refuges, and sanctuaries in the waters of the state over which it has jurisdiction, subject to the approval of the legislature;"

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED? Any recommendation from the Board to the Legislature would be subject to Legislative adoption. The effect of the Legislature creating a fish refuge will depend on the resulting Legislation. If the Legislature established a fish refuge similar to Special Areas currently in statute, ADF&G permitting authority would apply for certain activities unless the Legislature provided otherwise. If the Board recommends, and the Legislature subsequently adopts, provisions (1) – (6) identified in the proposal, the resulting statute would require the Board to establish policy for managing the refuge and create a citizens advisory committee to develop a management plan. The statute would also require the department to manage the refuge based on that policy and/or management plan.

BACKGROUND: The Board has not yet utilized its authority under AS 16.05.251 (a)(1).

The Legislature has created 32 State Game Refuges, State Game Sanctuaries, and Fish and Game Critical Habitat Areas under AS 16.20, Articles 1, 2 and 5. Associated statutes describe the areas and their purpose and contain provisions that directly authorize or restrict land use, access, and activities. The statutes also provide direction to Department of Natural Resources, ADF&G and other agencies. Statutes for many of the 32 Special Areas, for example, require ADF&G to adopt a management plan.

Regulations found in 5 AAC 95.400 – 5 AAC 95.999 describe activities for which ADF&G permits are required, provide application procedures to the public, and provide permitting procedures and standards to ADF&G. These regulations also adopt existing Special Area management plans by reference, and, for two State Game Refuges, specifically authorize or restrict use activities.

The Board of Game approved regulations in 5 AAC 92.063-066. These regulations contain permit provisions for access to the three State Game Sanctuaries.

DEPARTMENT COMMENTS: The department has **NO POSITION** on whether or not the Board should approve this proposal. However, should the Board pursue this proposal or otherwise recommend that a refuge be established, we have the following comments:

- Action by the Legislature should clearly identify specific activities that are and are not allowed in the refuge, and provide clear guidance to ADF&G, ADNR, and other appropriate agencies with respect to managing resource use and development.
- The Board should consult with Department of Law with respect to the Board's authority to develop policy for managing the refuge before including provisions (4) – (6) as proposed.

COST STATEMENT: The adoption of this proposal is not expected to add any direct cost for a private person to participate in this fishery.

PROPOSAL 122, PAGE 86: 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

ALAGNAK RIVER HOOK RESTRICTION

PROPOSED BY: Michael Struznik

WHAT WOULD THE PROPOSAL DO?
Adoption of this proposal would require anglers fishing the Alagnak River to use barbless hooks at all times.

WHAT ARE THE CURRENT REGULATIONS?
The current bag and possession limit for king salmon 20 inches or longer on the Alagnak River is 3 per day, 3 in possession, only 1 over 28 inches and an annual limit of 5 from May 1 through July 31. For king salmon less than 20 inches in length the bag and possession limit is 10 per day, 10 in possession, with no annual limit from May 1 through July 31. Additionally, only unbaited, single hook, artificial lures may be used year round. Current regulations allow the use of barbed hooks at all times.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED?
Anglers would be required to use barbless hooks when fishing the Alagnak River. The catch of king salmon may be reduced slightly.

BACKGROUND:
Of the sport fisheries in Bristol Bay, the Alagnak River has the 3rd highest catch of king salmon. The 2001-2005 average catch and harvest of king salmon has been 4,505 and 660 kings respectively. The sport catch since 1997 had declined which corresponded to a

decrease in effort. The current trend indicates that overall sport effort in the Alagnak River is increasing. King salmon escapement has been monitored by aerial survey since 1970. The average escapement count from 1970 to 2005 has been 5,083 with above average counts documented during the mid 70s, mid 90s, 2001, and 2003-2005.

During the winter of 2005 the Board of Fisheries created the Alagnak River Special Harvest Area (ARSHA), which allowed commercial set net fishing in the lower Alagnak River. In 2006, the Board expanded the fishery to include drift gear. These actions were in response to unusually large sockeye salmon escapements in the drainage and restricted commercial fishing in the Naknek/Kvichak district due to low escapements to the Kvichak River. It is not possible to separate the commercial harvests by river of origin for fishing that occurs in the districts, however numbers are available for the ARSHA. In 2005 and 2006 reported harvest was 209 and 68 king salmon, respectively, for the ARSHA.

DEPARTMENT COMMENTS:

The Department **OPPOSES** this proposal. Although data for barbed versus barbless hook mortality in Pacific salmon is inconclusive, a review of all known studies, completed in Idaho in 1995, found "…no demonstrated biological basis for barbless hook restrictions in artificial flies and lure fisheries for non-anadromous trout…" (Schill and Scarpella 1995). Further, "…implementation of barbless hook restrictions for such fisheries appears to be a social issue." A second drawback of implementing a barbless hook regulation without biological justification assumes there is no cost to the agency for enacting such regulation, but this may not be the case. Schill and Kline (*1997*) estimate that 75% of barbless hook violations on two Idaho waters with such requirements were made by individuals who usually comply with the regulations but occasionally forget to flatten their barbs down. …In Idaho, 20% of all angling violations or 534 tickets and warnings were written for barbless hook violations in 1994 (T. McArthur, unpublished data)" (Schill and Scarpella 1995).

Additionally, a minimum sustainable escapement goal of 2,700 king salmon in the Alagnak River was recommended by the Bristol Bay escapement goal committee in 2003 with a desire to maintain an average aerial escapement index of 5,000 fish. This minimum sustainable escapement goal has been exceeded each of the last 5 years and the recent 5-year average escapement exceeds 5,000. Therefore, there are currently no conservation concerns for Alagnak drainage king salmon.

The adoption of barbless hook regulations would bring significant social costs with no biological gains to counterbalance these costs. If the proposal is adopted, it will be necessary to define "barbless hook" in regulation.

COST ANALYSIS:

The department believes that approval of this proposal may result in some additional direct cost for a private person to participate in the fishery if they have to purchase barbless hooks.

PROPOSAL 251: 5 AAC 01.320. Lawful Gear and Gear Specifications.

PROPOSED BY: Twin Hills Village Council, Twin Hills

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of drift gillnet gear to harvest salmon for subsistence purposes in the Togiak River.

WHAT ARE THE CURRENT REGULATIONS? Current state regulations provide for subsistence fishing with set gillnets and spears (except in tributaries) in the Togiak River. Fishing in the river is allowed at any time and additional opportunity, including use of drift gillnets, is allowed in the waters of the commercial fishing district during commercial openings. There is no limit on the number of fish harvested for subsistence in the Togiak River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Holders of Bristol Bay subsistence salmon permits would be allowed to harvest salmon in the Togiak River with drift gillnet gear, in addition to set gillnets and spears.

BACKGROUND: A similar proposal (FP-07-05) was submitted by the Twin Hills Traditional Council for consideration by the Federal Subsistence Board at its January 2007 meeting. During its October 2006 work session, the Alaska Board of Fisheries decided to develop a board-generated proposal in order to address this topic during the December state regulatory meeting for Bristol Bay. The goal is to provide an opportunity for broader public input on the potential benefits that the use of drift gillnets would provide to subsistence fishers, potential problems associated with allowing drift and gillnets in the Togiak River, and the history and extent of use of drift gillnets in the Togiak River.

The recent (1995 – 2004) 10-year average subsistence salmon harvest in the Togiak District is 4,352 salmon and the recent (1985-2004) 20-year average is 4,929 salmon; the harvest in 2005 was 4,448 salmon. Most subsistence permits are issued to residents of Togiak and Twin Hills (44 of 45 permits issued in 2005; 98%).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department is concerned that use of drift gillnets would be extremely effective if allowed to occur in the upper portion of the Togiak River, which is clear water. If the proposal is adopted, consideration should be given to limiting use of drift gillnets to below the river's confluence with the Gechiak River. This is consistent with the draft federal staff recommendation to the Federal Subsistence Board.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.

2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The Alaska Board of Fisheries has found that all finfish stocks of the Bristol Bay Management Area support customary and traditional subsistence uses (5 AAC 01.336(1))

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence use? The Alaska Board of Fisheries has established a range of 157,000 to 172,171 salmon as the amount reasonably necessary for subsistence for the entire Bristol Bay Management Area, including 55,000 to 65,000 Kvichak River drainage sockeye salmon (excluding salmon stocks of the Alagnak River). There are no specific findings for the Togiak District.

5. Do the regulations provide a reasonable opportunity for subsistence use? The Alaska Board of Fisheries will need to make this finding as it deliberates on this proposal.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is an Alaska Board of Fisheries determination. The harvestable surplus for these stocks exceeds documented levels of subsistence harvests.

PROPOSAL 252 5 AAC 01.320. Lawful Gear and Gear Specifications.

PROPOSED BY: Lake Clark Subsistence Resource Commission

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of snagging, spear, arrow, or capturing salmon by bare hand by holders of Bristol Bay subsistence salmon permits in Lake Clark and its tributaries.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be harvested under state regulations using set gillnets with no limit on the amount harvested. A permit is required. Federal regulations are more restrictive and allow only residents of "resident zone" communities or of Lake Clark National Park itself to harvest salmon with a net for subsistence use in waters within the outer boundaries of the park/preserve, including Lake Clark. Resident zone communities include Iliamna, Lime Village, Newhalen, Nondalton, Pedro Bay, and Port Alsworth.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All holders of Bristol Bay subsistence salmon permits would be allowed to harvest salmon in Lake Clark by the use of snagging, spear, arrow, or capturing by hand, in addition to set gillnets.

BACKGROUND: A similar proposal (FP07-06) was submitted by the Lake Clark Subsistence Resource Commission for consideration by the Federal Subsistence Board at its January 2007 meeting. The preliminary federal staff recommendation, as presented at the October 2006 meeting of the Bristol Bay Regional Advisory Council is to support the proposal with modification to allow only use of spears and bow and arrow (in addition to set gillnet). During its October 2006 work session, the Alaska Board of Fisheries decided to develop a board-generated proposal in order to address this topic during the December state regulatory meeting for Bristol Bay. The goal is to provide an opportunity for broader public input on the potential benefits that the use of these harvest methods would provide to subsistence fishers, concerns about conservation and enforcement issues, and the history and extent of use of these proposed harvest methods in the Lake Clark area.

The recent (1995-2004) 10-year average harvest of sockeye salmon in the Kvichak District is 47,496 salmon; the recent 20-year average (1985-2004) is 59,793 salmon. The 2005 harvest was 48,263 salmon. In 2005, 96% of the subsistence harvest was taken of residents of communities within the Kvichak River watershed (46,185 of 48,263 sockeye salmon).

Sockeye salmon escapements in this area have been very low in some recent years, especially 2000 through 2003 when Kvichak River drainage sockeye salmon escapement goals were not met. Amounts reasonably necessary for subsistence, as determined by the Alaska Board of Fisheries, were not met in the drainage in those years. During poor return years, people do need to fish harder in the Lake Clark area and may also obtain fish from other areas. It appears that in some years, poor runs affect the ability to achieve amounts reasonably necessary for subsistence uses, although other factors also influence harvest levels and participation in the subsistence fishery. It is not clear what part, if any, the use of only set gillnets plays and whether additional gear types are necessary to provide for continued subsistence uses or to provide a reasonable opportunity for subsistence uses.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the portion of this proposal concerning the use of spears. The department notes that the use of spears is allowed under state regulations in some other parts of the Bristol Bay Area, such as the Togiak River (but not its tributaries) and along a portion of the west shore of Naknek Lake in September. Consideration should be given to allowing this gear in other portions of the Kvichak District where it has been traditionally used and where such use is consistent with sound management and conservation principles. The use of spears for subsistence salmon fishing by communities of the Kvichak/Iliamna Lake/Lake Clark area has been documented in the ethnographic literature.

The department is **OPPOSED** to the portions of this proposal concerning the use of bow and arrow, snagging, and hand capture. The department is unaware of any information about customary and traditional uses of these harvest methods. The department is concerned that the proposed usage of snagging and bows and arrows creates biological, social, and enforcement problems. For example, the injury rate for fish from snagging

may be high, and sport anglers and subsistence harvesters fish in some of the same areas. Allowing hand capture also presents significant social and conservation issues, creating enforcement problems. Hand capturing salmon would require people to walk or run across spawning grounds to come within arm's reach of the fish. This would violate state law against molesting salmon, may result in decreased spawning success depending on the frequency of occurrence, and possibly damage redds. This is not consistent with principles of sound management and conservation of fish and wildlife resources. If there is a method of hand capture that does not involve disturbing spawning salmon and walking or running on redds, such a method should be brought to the attention of the Alaska Board of Fisheries at the December regulatory meeting.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.

2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The Alaska Board of Fisheries has found that all finfish stocks of the Bristol Bay Management Area support customary and traditional subsistence uses (5 AAC 01.336(1))

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence use? The Alaska Board of Fisheries has established a range of 157,000 to 172,171 salmon as the amount reasonably necessary for subsistence for the entire Bristol Bay Management Area, including 55,000 to 65,000 Kvichak River drainage sockeye salmon (excluding salmon stocks of the Alagnak River).

5. Do the regulations provide a reasonable opportunity for subsistence use? The Alaska Board of Fisheries will need to make this finding as it deliberates on this proposal.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is an Alaska Board of Fisheries determination. The harvestable surplus for these stocks exceeds documented levels of subsistence harvests.

PROPOSAL 253 - 5 AAC 01.320. Lawful Gear and Gear Specifications.

PROPOSED BY: Lake Clark Subsistence Resource Commission

WHAT WOULD THE PROPOSAL DO? This proposal would allow for the use of beach seine gear to take salmon in Lake Clark and its tributaries.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be harvested under state regulations using set gillnets with no limit on the amount harvested. A permit is required. Federal regulations are more restrictive and allow only residents of "resident zone" communities or of Lake Clark National Park itself to harvest salmon with a net for subsistence in waters within the outer boundaries of the park/preserve, including Lake Clark. Resident zone communities include Iliamna, Lime Village, Newhalen, Nondalton, Pedro Bay, and Port Alsworth.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All holders of Bristol Bay subsistence salmon permits would be allowed to harvest salmon in Lake Clark with beach seines, in addition to set gillnets.

BACKGROUND: A similar proposal (FP07-07) was submitted by the Lake Clark Subsistence Resource Commission for consideration by the Federal Subsistence Board at its January 2007 meeting. The preliminary federal staff recommendation is to support the proposal with the modification to limit use of beach seines to Lake Clark, recognizing that there is no fishing within 300 feet of a stream mouth used by salmon. During its October 2006 work session, the Alaska Board of Fisheries decided to develop a board-generated proposal in order to address this topic during the December state regulatory meeting for Bristol Bay. The goal is to provide an opportunity for broader public input on the potential benefits that the use of beach seines would provide to subsistence fishers, concerns about conservation and enforcement, and the history and extent of use of beach seines in the Lake Clark area.

The recent (1995-2004) 10-year average harvest of sockeye salmon in the Kvichak District is 47,496 salmon; the recent 20-year average (1985-2004) is 59,793 salmon. The 2005 harvest was 48,263 salmon. In 2005, 96% of the subsistence harvest was taken of residents of communities within the Kvichak River watershed (46,185 of 48,263 sockeye salmon).

Sockeye salmon escapements in this area have been very low in some recent years, especially 2000 through 2003 when Kvichak River drainage sockeye salmon escapement goals were not met. Amounts reasonably necessary for subsistence, as determined by the Alaska Board of Fisheries, were not met in the drainage in those years. During poor return years, people do need to fish harder in the Lake Clark area and may also obtain fish from other areas. It appears that in some years, poor runs affect the ability to achieve amounts reasonably necessary for subsistence uses, although other factors also influence harvest levels and participation in the subsistence fishery. It is not clear what part, if any, the use of only set gillnets plays and whether additional gear types are necessary to provide for continued subsistence uses or to provide a reasonable opportunity for subsistence uses.

There is documentation of use of seining as a traditional method for subsistence in this area, including Lake Clark and Iliamna Lake.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. At this time, only use of set gillnets is allowed in the Lake Clark drainage for the harvesting of salmon. Beach seine gear does have some advantages over set gillnets because it allows users to be more selective, reduce waste somewhat, and is not likely to increase the harvest. However, if allowed in spawning tributaries, beach seine gear is more likely to harvest groups of fish spawning in the same location. Given the management concern designation for Kvichak sockeye, a blanket provision allowing beach seine harvest may be inconsistent with sound principles of fish and wildlife management and conservation, depending on the level, pattern, and area of use. The draft federal staff analysis recommends limiting use of beach seines to the lake, recognizing there is a prohibition on fishing within 300 feet of a stream mouth used by salmon. Lake Clark is known to have shoreline spawning populations that may be of concern, but it is uncertain if beach seining would be very effective in the lake.

Use of seining as a traditional method for subsistence fishing by communities of the Kvichak/Iliamna Lake/Lake Clark area has been documented in the ethnographic literature. Consideration should be given to allowing seining in other portions of the Kvichak District where it has been traditionally used and where such use is consistent with sound management and conservation principles.

In other areas of the state, where beach seining is legal in freshwater for subsistence fishing, fishermen often use gillnets as beach seines. Therefore, it should not be expected that approval of beach seines will eliminate concerns about loss of gillnets and ghost fishing. If it is not the intent to allow gillnets to be used as seines, but require people to obtain real beach seines, then a clear and specific set of beach seine specifications will need to be adopted.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.

2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The Alaska Board of Fisheries has found that all finfish stocks of the Bristol Bay Management Area support customary and traditional subsistence uses (5 AAC 01.336(1))

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence use? The Board has established a range of 157,000 to 172,171 salmon as the amount reasonably necessary for subsistence for the entire Bristol Bay Management Area, including 55,000 to 65,000 Kvichak River drainage sockeye salmon (excluding salmon stocks of the Alagnak River).

5. Do the regulations provide a reasonable opportunity for subsistence use? The Alaska Board of Fisheries will need to make this finding as it deliberates on this proposal.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is an Alaska Board of Fisheries determination. The harvestable surplus for these stocks exceeds documented levels of subsistence harvests.

Committee B: HERRING (5 Proposals)

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PROPOSAL 9 - 5 AAC 27.865(b)(8). Bristol Bay Herring Management Plan.

PROPOSED BY: Roseleen Moore

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate inseason management for gear specific herring allocation goals that requires the department to hold one gear type back if the other gear type gets too far ahead on harvesting their share of the quota.

WHAT ARE THE CURRENT REGULATIONS? The current regulations require the department to maintain the harvest percentages at 30% gillnet and 70% purse seine during the season until both gear types have harvested 80% of the preseason quota.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the fishery would no longer close for one gear type to allow the other gear type to "catch up" on their allocation percentage.

BACKGROUND: The current language is the product of several modifications since the original regulation was adopted in 1980.

- In 1980, paragraph (b) contained the following "intent" language: "It is desirable to try to insure that neither gear group is totally disadvantaged." This was followed by the allocative mechanism: "When the total reported harvest reaches 20,000 metric tons, if one gear type has less than 6,000 tons, the other gear type shall close for 24 hours." This language directed the department to adjust fishing time inseason by closing the gear type that was ahead in harvest based on tonnage (This is approximately a 3:1 seine to gillnet harvest ratio, and was an attempt to preserve a portion of harvest for the gillnet group).
- At the 1982 BOF meeting, while the intent language remained unchanged, the allocative mechanism was changed to fishing time instead of tonnage as follows: (b)(2) "When any single seine opening is less than 24 hours long, the opening for gillnets shall be three times that allowed for seines." (b)(3) "When any single seine opening is 24 hours or more, the opening for gillnets shall be equal to the opening for seines." (This again attempts to maintain an inseason 3:1 ratio, since seine openings were generally less than 24 hours.)
- In 1985, along with the intent language, (b)(2) and (b)(3) were retained; and the BOF added (b)(7) as follows: "When a purse seine fishing period is one hour or less, the gillnet fishing period must be for at least five hours." This additional language used a 5:1 ratio for gillnet fishing time as the inseason allocative mechanism.
- In 1988, the BOF adopted language that did not specify an inseason ratio. The BOF directed the department to "manage for the removal of 25% of that surplus

by the gillnet fleet and 75% by the purse seine fleet." The department applied this allocation, based on past management practices and continuity from manager to manager, as an inseason ratio.

- In 2001, the BOF changed the allocation percentages to 30% for gillnet and 70% for purse seine and added (b)(8) "To maintain those percentages inseason, the commissioner shall make adjustments to fishing periods and fishing areas by emergency order." This clarified the way the allocation was to be applied by managers.
- In 2003, the BOF added to (b)(8) "After the gillnet fleet and purse seine fleet have harvested at least 80 percent of each gear group's allocation, the commissioner may allow either fleet to harvest its remaining allocation without further restrictions." This change allowed the gear groups to be uncoupled after 80 percent of the harvest had been taken by each gear group.

There are several factors complicating this issue: the size of the quota, the price of herring, available processing capacity, the costs of tendering and processing, and the willingness of permit holders to participate. Currently, processing companies determine the fleet size by offering markets to a limited number of vessels of both gear types. The permit holders that have a market also exert pressure on the companies to refrain from adding additional fleet, increasing competition. Some companies try to manage their fleets to harvest at the 30/70 ratio while some companies do not. Even if a company plans to bring enough fleet to harvest the appropriate ratio of each gear type, there can be breakdowns, accidents or permit holders that choose not to participate. For the last two years, one company bought only purse seine caught fish. When one company buys less than 30% gillnet caught fish, the other companies must buy more than 30%, reducing the amount of purse seine fish they can buy. Additionally, it is possible that if one gear type is unable to harvest its share of fish, then the fishery will be closed without the entire quota being harvested. This uncertainty in an ever more marginal fishery creates difficulties for all segments of the fishery.

It is unclear whether processing companies would spend the money on tenders to support both gillnet and purse seine fleets if there were no pressure to maintain an inseason harvest percentage, or if they would allocate processing capacity for one gear type over another.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 10 - 5 AAC 27.865(b)(8). Bristol Bay Herring Management Plan.

PROPOSED BY: Kenneth Wilson

WHAT WOULD THE PROPOSAL DO? This proposal would change the herring allocation percentages for gillnet and purse seine from 30/70 to 35/65.

WHAT ARE THE CURRENT REGULATIONS? The current regulations require the department to maintain the harvest percentages at 30% gillnet and 70% purse seine during the season until both gear groups have harvested 80% of their preseason quota.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it is possible that the seine fleet may have to be held back more frequently or for a longer duration while the gillnet fleet catches up on harvest share.

BACKGROUND: The current language is the product of several modifications since the original regulation was adopted in 1980.

- In 1980, paragraph (b) contained the following "intent" language: "It is desirable to try to insure that neither gear group is totally disadvantaged." This was followed by the allocative mechanism: "When the total reported harvest reaches 20,000 metric tons, if one gear type has less than 6,000 tons, the other gear type shall close for 24 hours." This language directed the department to adjust fishing time inseason by closing the gear type that was ahead in harvest based on tonnage (This is approximately a 3:1 seine to gillnet harvest ratio, and was an attempt to preserve a portion of harvest for the gillnet group).
- At the 1982 BOF meeting, while the intent language remained unchanged, the allocative mechanism was changed to fishing time instead of tonnage as follows: (b)(2) "When any single seine opening is less than 24 hours long, the opening for gillnets shall be three times that allowed for seines." (b)(3) "When any single seine opening is 24 hours or more, the opening for gillnets shall be equal to the opening for seines." (This again attempts to maintain an inseason 3:1 ratio, since seine openings were generally less than 24 hours.)
- In 1985, along with the intent language, (b)(2) and (b)(3) were retained; and the BOF added (b)(7) as follows: "When a purse seine fishing period is one hour or less, the gillnet fishing period must be for at least five hours." This additional language used a 5:1 ratio for gillnet fishing time as the inseason allocative mechanism.
- In 1988, the BOF adopted language that did not specify an inseason ratio. The BOF directed the department to "manage for the removal of 25% of that surplus by the gillnet fleet and 75% by the purse seine fleet." The department applied this allocation, based on past management practices and continuity from manager to manager, as an inseason ratio.
- In 2001, the BOF changed the allocation percentages to 30% for gillnet and 70% for purse seine and added (b)(8) "To maintain those percentages inseason, the commissioner shall make adjustments to fishing periods and fishing areas by emergency order." This clarified the way the allocation was to be applied by managers.

- In 2003, the BOF added (b)(8) "After the gillnet fleet and purse seine fleet have harvested at least 80 percent of each gear group's allocation, the commissioner may allow either fleet to harvest its remaining allocation without further restrictions." This change allowed the gear groups to be uncoupled after 80 percent of the harvest had been taken by each gear group.

In two of the last three years, fishing time for the purse seine fleet was curtailed while the drift gillnet fleet fished to reach their allocation goal. Increasing the gillnet share of the allocation will make it more likely that this measure needs to be taken in the future. Closures for either gear group make it less likely that the entire quota will be harvested as the herring are of commercial quality for a limited amount of time. Additionally, increasing the harvest percentage of the more selective gillnet gear type does raise some biological concerns. The drift gillnet fleet uses large mesh nets to target the older, larger and more fecund herring. Harvesting an increased proportion of this group with a selective gear type could have biological impacts to the population.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility that may prevent the harvest of the entire quota.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 11 - 5 AAC 27.810(a),(b),(c). Fishing Seasons and Periods for Bristol Bay Area.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would change the earliest starting date of the Togiak herring fishery from April 25 to April 15.

WHAT ARE THE CURRENT REGULATIONS? The current regulations restrict the Togiak herring season to between April 25 and June 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the Togiak herring season could begin April 15 if commercial quality herring were available for harvest.

BACKGROUND: In 2003, the first harvest for the Togiak herring fishery occurred on April 25. It is conceivable that commercial quality herring could be on the grounds and available for harvest prior to April 25. Changing the start date would allow the department to open the fishery prior to April 25 if commercial quality herring were available.

DEPARTMENT COMMENTS: The department submitted this proposal, and **SUPPORTS** it. The department views this proposal as housekeeping.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 12 - 5 AAC 27.832(c). Seine Specifications and Operations for Bristol Bay.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would change the amount of time after the closure of a herring fishing period during which herring may be retained in a purse seine.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow herring to be retained in a purse seine for not more than 36 hours after the closure of a herring fishing period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, purse seine permit holders would not be allowed to hold herring for more than 18 hours after the closure of a period.

BACKGROUND: In 1992, approximately 20,000 tons of herring were harvested in 20 minutes. At the time, there was not sufficient processing or tendering capacity for this volume of fish and many sets were held for several days while the fish matured or until processing capacity became available. The current regulation was adopted after that season so that fish would not be held for long periods of time. Currently, most processing companies and permit holders minimize holding time as much as possible. During years with smaller quotas, it is possible that a processing company might try to harvest a larger amount of herring on the last opening of the season than they would otherwise be able to harvest, by taking advantage of the current long holding time. This could allow a processor to return empty tenders to a held set to buy more fish. This could complicate management as the amount of quota remaining to be harvested becomes smaller. Reducing the holding time to 18 hours would allow the department to more precisely manage the Togiak herring fishery.

DEPARTMENT COMMENTS: The department submitted this proposal, and **SUPPORTS** it.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 13 - 5 AAC 27.834. Togiak District Herring Spawn on Kelp Management Plan.

PROPOSED BY: Togiak Traditional Council

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holders of current CFEC spawn-on-kelp permits to enter an agreement with a selected herring sac roe fisherman or processor to harvest the herring equivalent of the spawn-on-kelp quota.

WHAT ARE THE CURRENT REGULATIONS? The Togiak District herring spawn-on-kelp harvest may not exceed 350,000 pounds. This is equivalent to 1,500 short tons of herring. If there is no market for the spawn-on-kelp quota, 50% may be reallocated to the sac roe fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Spawn-on-kelp permit holders would be at least partially compensated for their spawn on kelp despite the absence of a market for the product. Currently, the income from spawn on kelp is redirected away from spawn-on-kelp permit holders to other user groups.

BACKGROUND: Although the exvessel value for Togiak spawn on kelp peaked at $510,000 in 1996, there has been no fishery in seven of the last 10 years. Local residents own the majority of the spawn-on-kelp permits, which must be renewed at an annual cost of $75. In 2003, the board adopted a regulation allowing reallocation of up to 50% of the herring equivalent of the unharvested spawn on kelp to the sac roe fleet.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

COMMITTEE C: Gear, Vessels, Registration, (41 Proposals)

COMMITTEE C: Gear, Vessels, Registration, (41 Proposals)

PROPOSAL 14 - 5 AAC 06.331. Gillnet specifications and operations, and 5 AAC 06.33X. Holder of multiple permits.

PROPOSED BY: Erick Sabo

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas. Additionally, the permit holder would not be subject to the 48-hour transfer period when changing district registration.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. Currently, all permit holders must register to fish in a fishing district. If a permit holder chooses to change districts, they must submit a transfer form and wait 48 hours before fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, an additional 50 fathoms of drift gillnet gear would be allowed when the owner of two current drift gillnet permits operates them from the same vessel. Adoption of this proposal would also waive the 48-hour district transfer notification period for the holder of multiple permits.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted by the Alaska Board of Fisheries (BOF) allowing the use of 200 fathoms of gear when two permit holders were on the vessel and the vessel was marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional record keeping that would be required by this proposal and is concerned that adoption of this proposal would further complicate the registration and re-registration process.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 15 - 5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of gear and owners of

two set gillnet permits to fish and operate them simultaneously. Adoption of this proposal would also require an amendment of 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. Current regulation limits set gillnet operations to no more than two nets and the aggregate length may not exceed 50 fathoms. Additionally, there are restrictions in place regarding the maximum distance that set gillnet gear may be fished relative to shore.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, permit holders would be able to fish two full compliments of set gillnet gear simultaneously. It is unclear whether the intent of this proposal is to allow for the gear to be fished in one unit or if it would be divided into two standard sized sections. This proposal would allow an additional 50 fathoms of gear to be used when an individual that owns two current drift gillnet permits operates them from the same vessel.

BACKGROUND: The legal limit of gear for set gillnet permit holders is 50 fathoms. The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the vessel and the vessel was marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. However, the department has concerns that elongating an individual's set gillnet gear could have a significant impact on the catches of adjacent set gillnet permit holders as well as drift gillnet permit holders. It should also be noted that increasing the legal length of gear can negatively affect the quality of fish. Additionally, there are restrictions in place regarding the maximum distance that set gillnet gear may be fished relative to shore. This maximum distance may be exceeded by doubling the legal amount of gear used at each site.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 16 - 5 AAC 06.331 Gillnet Specifications and Operations

PROPOSED BY: Kenneth Wilson

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit operation of a drift gillnet when any part of the gillnet is grounded above the water line or any part of the vessel operating the net is grounded.

WHAT ARE THE CURRENT REGULATIONS? The current regulation prohibits the practice of grounding while continuing to operate drift gillnet gear in the special harvest areas for Ugashik, Wood, Egegik, and Naknek Rivers.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, commercial salmon fishing with a drift gillnet, while grounded, would be prohibited in all fishing districts within Bristol Bay.

BACKGROUND: This is a longstanding issue. Regulatory definition is specific as to what constitutes drifting. However, enforcement relies on intent **(5 AAC 38.105 (d) (3))** which is a statewide definition, while another definition specific to the special harvest areas in Bristol Bay **(5 AAC 06.331 (r))** deals with just grounded vessels regardless of intent. Outside the special harvest areas, the intent of the operator comes into play. This proposal would make the practice illegal regardless of intent in all Bristol Bay Area waters.

The following is input from the Department of Public Safety:
1) There is no "enforceable" regulation currently in place to prevent grounding in the districts within the Bristol Bay Area;
2) Fisherman are aware that the current grounding regulation is not enforceable when in the districts due to the language in **(5 AAC 06.331 (r))** which pertains only to the special harvest areas;
3) Grounding occurs in the districts, and is very prevalent in the Egegik and Naknek districts;
4) Fisherman with jet boats who can operate in shallow waters and use sandbars to hold nets in position have an unfair advantage;
5) When fishing is restricted to "in river" special harvest areas there are very few violations for grounding as the fleet knows that the "in river grounding regulation" is very clear about the practice;
6) Passing of a bay-wide regulation against grounding would make the fishery fair for everyone.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 17 - 5 AAC 06.331(q). Gillnet specifications and operations.

PROPOSED BY: Roseleen Moore

WHAT WOULD THE PROPOSAL DO? This proposal would remove the regulation requiring the use of lights to mark the end points of fishing nets.

WHAT ARE THE CURRENT REGULATIONS? Lights must be used on gillnets during nighttime operation.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Nighttime operations of gillnets are inherently dangerous and would be even more so without lights to easily recognize working gear. Additionally, net lights prevent conflicts between gear types. For example, without this regulation, drift gillnet operators might not see a fishing set gillnet and might interfere with a set gillnet operation.

BACKGROUND: Both the State of Alaska and the United States Coast Guard require the nighttime marking of objects that might present a hazard to navigation. Although these lights may be difficult to maintain, they are essential to the safety of fishing operations in Bristol Bay. Additionally, net lights assist in enforcement operations and can help with identifying and retrieving lost gear.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Net lights are essential for conducting a safe and orderly fishery.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 18 - 5 AAC 06.334(a)(2). Identification of gear.

PROPOSED BY: Roseleen Moore

WHAT WOULD THE PROPOSAL DO? This proposal would remove the requirement to mark drift gillnets with the ADF&G number on at least one cork every 10 fathoms.

WHAT ARE THE CURRENT REGULATIONS? Current regulations require drift and set gillnet operators to mark one cork, every 10 fathoms, along the cork line with the operator's five digit CFEC permit number.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, individual drift gillnet operators would no longer be required to mark corks on gillnets with the CFEC permit number making it more difficult to enforce violations of closed waters, closed periods, and exceeding gear limits.

BACKGROUND: This regulation is used by enforcement personnel to identify drift and set gillnets being fished illegally in closed waters, during closed periods, and gillnets that are in excess of gear limits.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. This proposal would make it more difficult to enforce violations of closed waters, closed periods, and exceeding gear limits.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 19 - 5 AAC 06.331. Gillnet Specifications and Operations

PROPOSED BY: Todd Granger

WHAT WOULD THE PROPOSAL DO? This proposal would require the removal of all set gillnet gear from the water during drift gillnet commercial fishing periods throughout Bristol Bay. This proposed regulation would only apply to fishing periods used to balance allocation.

WHAT ARE THE CURRENT REGULATIONS? The current regulations provide for the removal of the set gillnet when drift gillnet only commercial periods are allowed. An exception to this is in the Naknek River Special Harvest Area (NRSHA), where only buoys and anchors are allowed to remain in the water during drift gillnet periods. This change was made in the NRSHA because allowing set gillnet gear to remain in the water hampered the ability of the drift gillnet fleet to fish near shore. As a result, the ability to manage the escapement into the Naknek River and allocation between gear groups was impacted.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, commercial set gillnet fishers would have to remove all gear, bouys, anchors, and running lines, during drift gillnet fishing periods that are specifically targeted at balancing allocation.

BACKGROUND: The author of this proposal references **16.10.055** as the regulation supporting the need for adopting this proposal. The regulation cited deals with interference or damage to the fishing gear of another permit holder. The presumption in this case is that drift gillnetters can cause damage to gear associated with operating a set gillnet and not the actual set gillnet, which is not operational during a drift gillnet only period. Vessel operators are responsible for the safe operation of those vessels, which includes avoiding obstacles while operating fishing gear. In most cases the need to allow drift gillnetters unhindered access to the areas occupied by set gillnetters (i.e. waters near the beach) in order to control escapement is not necessary.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 20 - 5 AAC 06.331. Gillnet Specifications and Operations.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would require permit holders to report the loss of some or all of a gillnet.

WHAT ARE THE CURRENT REGULATIONS? There are no regulations requiring a lost gillnet to be reported.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would be able to track the amount of gillnet lost and determine if gillnet loss is a significant problem.

BACKGROUND: There have been recent instances of self-reporting and third-party-reporting of lost set and drift gillnets in Bristol Bay. The extent of the problem is unknown but there is concern among some permit holders that intentional and unintentional loss of gillnets may be a problem. Lost nets can continue fishing long after they are lost. Any net can foul a propeller and disable a vessel, but a lost net may be more difficult to see. Without a requirement for reporting lost net, there is no way to track how much net is lost or how and where it is lost.

DEPARTMENT COMMENTS: The department submitted this proposal, and **SUPPORTS** it.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 21 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Charles W. Treinen

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of gear to be used when an individual that owns two current drift gillnet permits operates them from the same vessel.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 22 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Bristol Bay Reserve

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel except in special harvest areas.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of gear to be used when an individual that owns two current drift gillnet permits operates them from the same vessel.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 23 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Konrad Schaad

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel in special harvest areas.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. Permit holders may not fish 200 fathoms in special harvest areas. In the Naknek River Special Harvest Area and the Wood River Special Harvest Area the maximum amount of drift gillnet gear is 75 fathoms. In the Alagnak River Special Harvest area, legal gear for drift permit holders is 50 fathoms. When the Egegik and Ugashik District Boundaries are reduced, the maximum amount of drift gillnet gear is 150 fathoms. In the Ugashik River Special Harvest Area no more than 50 fathoms of drift gillnet gear may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of drift gillnet to be used in the Egegik and Ugashik reduced district boundaries when a permit holder that owns two current drift gillnet permits operates them from the same vessel. It would allow for 125 additional fathoms of drift gillnet gear in the Naknek River Special Harvest Area and the Wood River Special Harvest Area when a permit holder that owns two current drift gillnet permits operates them from the same vessel. It would allow 150 extra fathoms of drift gear in the Ugashik River Special Harvest Area and the Alagnak River Special Harvest Area when a permit holder that owns two current drift gillnet permits operates them from the same vessel.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly. The regulation allowing two permit holders operating from the same vessel to fish 200 fathoms of gear did not apply to special harvest areas. Permit holders are currently allowed to fish less gear in the special harvest areas because of the congested nature of these fisheries and potential user conflict and waste issues. Additionally, there may be an increased risk of navigational hazards and safety concerns particularly in the “inriver” special harvest areas. In 2005, the BOF increased the legal compliment of drift gear in the NRSHA from 50 fathoms to 75 fathoms.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the use of additional fishing gear in

special harvest areas due to their confined and congested nature. The use of additional gear in special harvest areas will likely lead to user conflicts, waste, and safety concerns.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 24 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Dominic Lee

WHAT WOULD THE PROPOSAL DO? This proposal would allow one person to have two active permits and to receive extra benefits including more time, area, gear or any other incentives.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. Currently, permit holders are not required to notify the department that they may be fishing two permits from one vessel. This allows two permit holders fishing from the same vessel to continue fishing, without interruption in order to reregister, as long as one of the permits is registered to the current vessel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of gear to be used when a permit holder that owns two current drift gillnet permits operates them from the same vessel. This proposal would require the department to track vessels operating with two permits in order to determine which vessels would be allowed the additional incentives for enforcement purposes. This would introduce additional registration paperwork and could delay fishermen from continuing to fish if they have boat problems and want to fish dual permits from another vessel. Additionally, the department would have to separately consider the catch per unit of effort of the dual permit fleet when making management decisions. The department would require further instruction from the BOF regarding specific incentives and when to use them.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was passed that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly. The Alaska House of Representatives passed House Bill 251 in June of 2006 allowing the BOF to make regulations regarding the use of two permits.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional and undefined

incentives of this proposal in that such changes would further complicate enforcement, registration, and management.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 25 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Peter Thompson

WHAT WOULD THE PROPOSAL DO? This proposal would allow the holder of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gear from a single vessel except in special harvest areas.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently. Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of gear to be used when a permit holder that owns two current drift gillnet permits operates them from the same vessel.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 26 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Geoff Wyman

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of 200 fathoms on a vessel with two permit holders only when no special harvest areas (SHAs) are in effect or restricted district boundaries are in effect.

WHAT ARE THE CURRENT REGULATIONS? Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. This regulation does not apply to special harvest areas or districts with reduced boundaries.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an additional 50 fathoms of gear to be used when the owners of two current drift gillnet permits operates them from the same vessel, all fishing districts are fishing their full boundaries, and SHAs are not in effect.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly. This regulation does not apply in special harvest areas or districts with reduced boundaries.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 27 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Roland Briggs

WHAT WOULD THE PROPOSAL DO? This proposal would allow a CFEC permit holder to own two Bristol Bay set gillnet permits.

WHAT ARE THE CURRENT REGULATIONS? Permit holders may own more than one permit but they may not fish them concurrently.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is currently legal to own two Bristol Bay gillnet permits (set or drift). However, they may not both be fished in the same year. This proposal as written, would not change any current regulation.

BACKGROUND: When commercial salmon fishing went to a limited entry system, an individual could only own one permit. However in 2003, a regulation was passed allowing individuals to own multiple permits as long as they are not fished in the same year. House Bill 251 was passed in 2006 to enable the BOF to make regulations regarding the use of two permits.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. It should be noted that regulations already exist that allow an individual to own two Bristol Bay set gillnet permits but they cannot be fished in the same year.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 28 - 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Todd Granger

WHAT WOULD THE PROPOSAL DO? This proposal would require the department to provide additional scheduled fishing time for vessels fishing two drift gillnet permits.

WHAT ARE THE CURRENT REGULATIONS? Current regulation limits the length of drift gillnet gear to no more than 150 fathoms per vessel unless two permit holders are on board the vessel and it is marked accordingly, in which case, 200 fathoms of gear may be used. Currently, permit holders are not required to notify the department that they may be fishing two permits from one vessel. This allows two permit holders fishing from the same vessel to continue fishing, without interruption in order to reregister, as long as one of the permits is registered to the current vessel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require the department to track vessels operating with two permits in order to determine which vessels would be allowed the additional incentives for enforcement purposes. This would introduce additional registration paperwork and could delay fishermen from continuing to fish if they have boat problems and want to fish dual permits from another vessel. Additionally, the department would have to separately consider the catch per unit of effort of the dual permit fleet when making management decisions. The department would require further instruction from the BOF regarding specific incentives and when to use them.

BACKGROUND: The legal limit of gear for drift gillnet vessels was 150 fathoms for over 20 years until 2003 when a proposal was adopted that allowed for the use of 200 fathoms of gear when two permit holders were on the same vessel and the vessel was marked accordingly. The Alaska House of Representatives passed House Bill 251 in June of 2006 allowing the BOF to make regulations regarding the use of two permits.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional and undefined incentives of this proposal in that such changes would further complicate enforcement, registration, and management.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 29 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Diane Abraham

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit fishermen who are not Togiak Bay area residents from fishing in the Togiak District during the Bristol Bay salmon season.

WHAT ARE THE CURRENT REGULATIONS? Currently CFEC permit holders registered before 9:00 a.m. July 17, to fish in the Nushagak, Naknek-Kvichak, Egegik, or Ugashik Districts may not take salmon in the Togiak District from June 1 to July 24. The department may waive the requirement after 9:00 a.m. July 21 if the department projects that the Togiak River escapement will exceed 150,000 before 9:00 a.m. July 24. Current regulations do not restrict permit holders based on their primary residence.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, permit holders who do not reside in the Togiak Bay area would not be permitted to fish for salmon in the Togiak District.

BACKGROUND: In the last 20 years, the Togiak River escapement has achieved or exceeded the sockeye salmon biological escapement goal (BEG) every year except 1989. Therefore, the presence of non-resident permit holders in Togiak Bay does not appear to affect the department's ability to achieve adequate sockeye escapement.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. However, the department is concerned that in 7 of the last 20 years, the Togiak River escapement has exceeded the upper end of the BEG. With the likelihood of a reduced fleet, it may be even more difficult to restrain sockeye escapement to within the desired range.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 30 - 5 AAC 06.370. Registration and Re-registration

PROPOSED BY: Lower Bristol Bay Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would create a super-exclusive salmon fishery in the Ugashik District from June 1 to July 24.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow for unlimited transfer between the Ugashik and other Bristol Bay districts throughout the season, subject to waiting period regulations in effect at the time of the transfer. An exception occurs in the Togiak District where a permit holder registered to fish in the district before 9:00 a.m. July 17 may not fish in any other Bristol Bay district. A permit holder registered before 9:00 a.m., July 17 in any other Bristol Bay district may not fish in the Togiak District from 9:00 a.m. June 1 to 9:00 a.m. July 24 unless the department projects escapement in excess of 150,000 sockeye salmon. In that case, the transfer limitations may be waived.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would limit the number of fishers in the Ugashik District to those that would be willing to fish there for the entire season. Once registered in Ugashik District, fishers would be prohibited from transferring to another district and fishers registered in other districts would be prohibited from transferring into the Ugashik District from June 1 to July 24.

BACKGROUND: Sockeye salmon runs to the Ugashik District can be temporally compressed. It is common for a surge of 500,000 or more fish to enter the district on a single tide making Ugashik one of the more unpredictable management areas within Bristol Bay. A super-exclusive designation would likely result in reduced fleet size in the Ugashik District. The result may be a fishing fleet that is unable to slow down the peak surges when they occur, increasing the likelihood of exceeding the sockeye salmon escapement goal range of 500,000 to 1.2 million.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility in the Ugashik District, which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 31 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period.

WHAT ARE THE CURRENT REGULATIONS? Currently, an individual that holds both set and drift gillnet permits must notify the department that they wish to switch from one gear type to another. Individuals that wish to switch gear types must wait 48 hours

before fishing with the new gear type. They are allowed to continue fishing with the current gear during the 48-hour waiting period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, permit holders could switch between gear types without waiting or notification. This could create the potential for abuse by allowing a permit holder to fish both gear types simultaneously. This would be illegal but difficult to enforce.

BACKGROUND: According to CFEC, at the end of 2005 there were 22 individuals that owned both drift and set gillnet permits for Bristol Bay.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is not opposed to reducing the waiting period between switching gear types, but is concerned that without any waiting period, a permit holder could fish both gear types at the same time.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 32 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would repeal regulations regarding holders of both set and drift gillnet permits switching from one gear type to another, including the 48-hour waiting period.

WHAT ARE THE CURRENT REGULATIONS? Currently, an individual that holds both set and drift gillnet permits must notify the department that they wish to switch from one gear type to another. Individuals that wish to switch gear types must wait 48 hours before fishing with the new gear type. They are allowed to continue fishing with the current gear during the 48-hour waiting period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, permit holders could switch between gear types without waiting or notification. This could create the potential for abuse by allowing a permit holder to fish both gear types simultaneously. This would be illegal but difficult to enforce.

BACKGROUND: According to CFEC, at the end of 2005 there were 22 individuals that owned both drift and set gillnet permits for Bristol Bay.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is not opposed to reducing the waiting period between switching gear types but is concerned that without any waiting period a permit holder could fish both gear types at the same time.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 33 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Konrad Schaad

WHAT WOULD THE PROPOSAL DO? This proposal would allow two permit holders fishing from the same drift gillnet vessel to be registered in more than one district at a time and would eliminate the 48-hour waiting period for the vessel.

WHAT ARE THE CURRENT REGULATIONS? Currently, a drift gillnet vessel may only be registered in one district at a time, must reregister to fish in a different district, and wait 48 hours prior to fishing in the new district. Also, a drift vessel with two permit holders on board may fish an additional 50 fathoms of gear when both permits are registered for the same district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it would allow a vessel with two permit holders registered in different districts on board to go between the two (potentially all 5) districts without transferring or waiting 48 hours.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay salmon fishery. They are not needed for biological or management reasons.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional record keeping that would be required if this proposal is adopted and is concerned that it would further complicate the registration and re-registration process.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 34 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Roland Briggs

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the 48-hour waiting period when switching from one gear type to another but would still require notification of the department.

WHAT ARE THE CURRENT REGULATIONS? Currently, an individual that holds both set and drift gillnet permits must notify the department when they wish to switch from one gear type to another. Individuals that wish to switch gear types must wait 48 hours before fishing with the new gear type. They are allowed to continue fishing with the current gear during the 48-hour waiting period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, permit holders could switch between gear types without a waiting period. In theory, permit holders could fish both gear types at the same time simply by delivering with one gear type, notifying the department they were switching and then delivering with the other gear type. This could create the potential for abuse by allowing a permit holder to fish both gear types simultaneously. This would be illegal but difficult to enforce.

BACKGROUND: According to CFEC, at the end of 2005 there were 22 individuals that owned both drift and set permits for Bristol Bay.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is not opposed to reducing the waiting period between switching gear types but is concerned that without any waiting period a permit holder could fish both gear types at the same time.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 35 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Konrad Schaad

WHAT WOULD THE PROPOSAL DO? This proposal would allow two permit holders fishing from the same drift gillnet vessel to be registered in more than one district at a time and would eliminate the 48-hour waiting period for the vessel.

WHAT ARE THE CURRENT REGULATIONS? Currently, a drift gillnet vessel may only be registered in one district at a time, must reregister to fish in a new district, and wait 48 hours prior to fishing in the new district. Also, a drift vessel with two permit holders on board may fish an additional 50 fathoms of gear when both permits are registered for the same district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it would allow a vessel with two permit holders registered in different districts on board to go between the two (potentially all 5) districts without transferring or waiting 48 hours.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay fishery. They are not needed for biological or management reasons.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional record keeping that would be required if this proposal is adopted and is concerned that it would further complicate the registration and re-registration process.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 36 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Ed Hisaw

WHAT WOULD THE PROPOSAL DO? This proposal would allow permit holders a one-time opportunity to declare their intent to transfer but wait until then end of the 48-hour transfer period before declaring the district to which they intend to transfer.

WHAT ARE THE CURRENT REGULATIONS? Currently, a drift gillnet vessel or any drift or set permit may only be registered in one district at a time, must reregister to fish in a new district, and wait 48 hours prior to fishing in the new district. This re-registration process is required for every transfer and the district they are transferring to must be declared at the beginning of the transfer period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it would allow a vessel or permit holder to wait until the end of the 48-hour transfer period one time per year before declaring the district they are transferring to.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay fishery. They are not needed for biological or management reasons.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional record keeping that would be required if this proposal is adopted and is concerned that it would further complicate the registration and re-registration process. This proposal would require the department to keep track of the initiation of a transfer, the second contact when the destination was declared, and whether or not a permit holder has used their transfer option for the season.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 37 - 5 AAC 06.370. Registration and Re-registration.

PROPOSED BY: Ed Hisaw

WHAT WOULD THE PROPOSAL DO? This proposal would allow permit holders the opportunity to declare their intent to transfer but wait until the end of the 48-hour transfer period before declaring the district they intend to transfer to.

WHAT ARE THE CURRENT REGULATIONS? Currently, a drift gillnet vessel or any drift or set permit may only be registered in one district at a time and must reregister to fish in a new district, and wait 48 hours prior to fishing in the new district. This re-registration process is required for every transfer and the district they are transferring to must be declared at the beginning of the transfer period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, it would allow a vessel or permit holder to wait until the end of the 48 hour transfer period before declaring the district they are transferring to.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay fishery. They are not needed for biological or management reasons.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the additional record keeping that would be required if this proposal is adopted and is concerned that it would further complicate the registration and re-registration process. This proposal would require the department to keep track of the initiation of a transfer and the second contact when the destination was declared.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 38 - 5 AAC 06.370. Registration and Re-registration

PROPOSED BY: Darryl F. Pope

WHAT WOULD THE PROPOSAL DO? This proposal would require vessel owners to register to fish in a Bristol Bay district on or after June 23.

WHAT ARE THE CURRENT REGULATIONS? The current regulations require a permit holder to register in a district before taking salmon in Bristol Bay. Once registered, re-registration and a 48-hour waiting period are required in most circumstances before the permit holder can transfer to another district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, permit holders would be allowed free movement among the districts in Bristol Bay until June 23.

BACKGROUND: The district registration and re-registration regulations have long been a part of the Bristol Bay fishery. They are not needed for biological or management reasons.

Since there is no limit to the number of times a permit holder can transfer between districts, training of crew and testing of equipment can be accomplished early in the season when the volume of fish is low. The permit holder may then transfer and wait the 48-hour transfer period when more information becomes available.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 39 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Erick Sabo

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 40 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Charles W. Treinen

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 41 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Larry Christensen

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 42 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Todd Granger

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic

efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 43 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Roseleen Moore

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, there would be a maximum vessel length of 45 feet or there would be no length restriction for drift gillnet vessels in Bristol Bay.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 44 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Lower Bristol Bay Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would raise the current maximum 32-foot length restriction on Bristol Bay commercial salmon fishing vessels to 42 feet.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the maximum length for commercial salmon fishing vessels in Bristol Bay would be 42 feet.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 45 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: John Webb

WHAT WOULD THE PROPOSAL DO? This proposal would raise the maximum length restriction on Bristol Bay commercial salmon fishing vessels to 42 feet.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted the maximum length for commercial salmon fishing vessels in Bristol Bay would be 42 feet.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 46 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: John J. Burns

WHAT WOULD THE PROPOSAL DO? This proposal would raise the length restriction on Bristol Bay commercial salmon fishing vessels to 38 feet.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted the maximum length for commercial salmon fishing vessels in Bristol Bay would be 38 feet.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot

afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 47 - 5 AAC 06.341. Vessel Specifications and operations.

PROPOSED BY: Darryl F. Pope

WHAT WOULD THE PROPOSAL DO? This proposal would raise the length restriction on Bristol Bay commercial salmon fishing vessels to 38 feet.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define a maximum length of 32 feet for any vessel engaged in the drift gillnet commercial fishery in Bristol Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted the maximum length for commercial salmon fishing vessels in Bristol Bay would be 38 feet.

BACKGROUND: The legal vessel length has been 32 feet since 1949 though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Justifications in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality because the increased size would allow installation of refrigeration systems or increased capacity for icing/cooling of fish. It should be noted that allowing vessel size to increase may set up a disparity between fishers that can afford to increase capitol outlay and those that cannot afford the cost of acquiring a larger vessel. Since larger vessels may have a competitive advantage, fishers with fewer monetary resources may be priced out of the fishery.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery unless they choose to increase the length of their fishing vessel.

PROPOSAL 64 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Dave Hansen

WHAT WOULD THE PROPOSAL DO? This proposal would allow a vessel to fish with up to 75 fathoms of gillnet gear and to have no more than 150 fathoms on board in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS? The current regulation states that no more than 75 fathoms of drift gillnet may be used to take salmon and that no vessel may have more than 150 fathoms of drift gillnet on board in the NRSHA. Under the current regulation, a permit holder can already do what the proposal seeks to accomplish.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, nothing would change.

BACKGROUND: The BOF changed the 50 fathom restriction to 75 fathoms during the March 2006 meeting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 65 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Eike Smith

WHAT WOULD THE PROPOSAL DO? This proposal would allow set gillnet running lines to remain in the water after each fishing period within 500 feet of the 18-foot high tide mark in the Naknek River Special Harvest Area.

WHAT ARE THE CURRENT REGULATIONS? Current regulations require that all running lines must be removed from the water at the end of each fishing period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, running lines would remain in the water during drift gillnet fishing periods.

BACKGROUND: At the March, 2006 BOF meeting, the current regulation requiring the removal of set gillnet running lines at the end of each fishing period was adopted.

When fishing in the Naknek River Special Harvest Area (NRSHA), the commercial sockeye harvest is allocated to drift and set gillnet users, 84% and 16%, respectively. Also, when the NRSHA is open to commercial fishing, the department manages for an optimal escapement goal (OEG) of 800,000 to 2,000,000 sockeye salmon to the Naknek River. In addition, the drift gillnet and set gillnet fisheries open separately. Prior to 2006, when the set gillnet fleet was not fishing, all set gillnet gear associated with fishing within 500 feet of shore was allowed to remain in the water. With running lines and buoys spaced 150 feet apart, the drift gillnet fleet was unable to effectively fish the shoreline. Sockeye salmon migrating within this area were able to pass though the fishery, adding to the escapement and also requiring additional fishing periods for the drift gillnet fleet to harvest their allocation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the obstruction of the nearshore areas in the NRSHA by set gillnet running lines, limiting access to those areas by the drift gillnet fleet. The department would support the removal of set gillnet running lines prior to the following drift gillnet opening in place of the current regulatory language that reads, "at the end of each fishing period."

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 66 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Mitch Kink

WHAT WOULD THE PROPOSAL DO? This proposal would require all gear used during set gillnet fishing in the Naknek River Special Harvest Area (NRSHA) to be removed from the water when not fishing.

WHAT ARE THE CURRENT REGULATIONS? Currently, only set gillnet permit holders fishing beyond 500 feet from the 18-foot high tide mark must remove all gear from the water at the end of a fishing period. Within 500 feet of the 18-foot high tide mark, only the running lines must be removed.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, all gear associated with set gillnet fishing would have to be removed from the water when not fishing.

BACKGROUND: During the March, 2006 BOF meeting, the BOF adopted the current regulation which allows drift gillnet boats to fish near shore to harvest sockeye salmon migrating in this corridor.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The removal of all set gillnet gear from the water when not fishing is not necessary for the management of this fishery.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 67 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Kurt Johnson

WHAT WOULD THE PROPOSAL DO? This proposal would require all gear used during set gillnet fishing in the Naknek River Special Harvest Area (NRSHA) to be removed from the water when not fishing.

WHAT ARE THE CURRENT REGULATIONS? Currently, only set gillnet permit holders fishing beyond 500 feet from the 18-foot high tide mark must remove all gear from the water at the end of fishing. Within 500 feet of the 18-foot high tide mark, only the running lines must be removed.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, all gear associated with set gillnet fishing would have to be removed from the water when not fishing.

BACKGROUND: During the March, 2006 BOF meeting, the BOF adopted the current regulation which allows drift gillnet vessels to fish near shore to harvest sockeye salmon migrating in this area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The removal of all set gillnet gear from the water when not fishing is not necessary for the management of this fishery.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 75 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Mitch Kink

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the allowable unit of drift gillnet gear to 50 fathoms when the Egegik River Special Harvest Area

Management Plan is in effect. One hundred and fifty fathoms of gillnet would be allowed on a vessel.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow a total of 150 fathoms of net on board a vessel when the special harvest area is in effect for the Egegik District. The 150 fathoms is a combination of gear being fished and that aboard the vessel. The entire compliment is legal to fish.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effect of this proposal would be to reduce the amount of the allowable drift gillnet gear by 2/3 when the Egegik River Special Harvest Area (ERSHA) is in effect. This gear reduction will decrease the effectiveness of the fleet in this area.

BACKGROUND: This proposal came before the BOF in 1997 although with different justification. Then, the issue was the perception that drift gillnetters were catching more fish than set gillnetters. In fact, set gillnet harvest proportion increased when the district was confined to the special harvest area. The focus of this proposal is to align the allowable gear for the ERSHA with other special harvest areas in order to presumably reduce interception of Kvichak River sockeye salmon.

Sockeye salmon runs to the Egegik River are characterized by a short run timing (about one month), large pulses of fish into the district during the peak of the run, and recent run sizes of 8 – 12 million. Managing this fishery within the escapement goal range requires tide by tide evaluation and corresponding fishery announcements. This becomes an increasingly difficult task when the fishery is confined to the ERSHA and would be further complicated by a reduction of gear to 50 fathoms.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the reduction of gillnet gear in this area which may result in overescapement and lost harvest opportunity.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 76 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Myra J. Olsen

WHAT WOULD THE PROPOSAL DO? The proposal would require the removal of all set gillnet running lines from the water during any Egegik River Special Harvest Area, drift gillnet only, fishing period.

WHAT ARE THE CURRENT REGULATIONS? The current regulations provide for the removal of only the set gillnet during drift gillnet fishing periods.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, commercial set gillnet fishers would have to remove all gear, buoys, anchors, running lines, etc., during fishing periods when only drift gillnet gear is allowed.

BACKGROUND: Within the Egegik District, single gear openings are generally used to adjust gear allocation percentages. This happens infrequently and unless done early in the season or when abundance levels are high, is not very effective at achieving the balance. The periods of highest abundance are generally near the peak of run entry and managers are reluctant to deploy a segment of the available fishing fleet because of the potential for overescapement. While removal of set gillnet gear to allow the drift fleet access to the nearshore area is an option if needed to control escapement, it seems an unnecessary burden to place on the set gillnet gear group. Generally, it is not necessary.

Within the Naknek River Special Harvest Area (NRSHA), only buoys and anchors are allowed to remain in the water during drift gillnet periods. This is primarily because of the small size of the NRSHA and the higher potential of exceeding the escapement goal range when fishing is limited to the NRSHA. The gear associated with set gillnets impedes fishing in a significant portion of the NRSHA. This reduced the effectiveness of the drift gillnet gear group in the NRSHA to harvest large pulses of fish entering the river. This is not true for the ERSHA because fish can be effectively targeted by the drift gillnet fleet before they reach the interior portions of the district.

In addition, it is legal for subsistence fishers to use set gillnet gear during drift gillnet openings and requiring removal of all set gillnet gear may impact subsistence opportunity.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 106 - 5 AAC 06.365. Egegik District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Larry Christensen

WHAT WOULD THE PROPOSAL DO? The proposal would require the removal of all set gillnet gear from the water during set gillnet closures.

WHAT ARE THE CURRENT REGULATIONS? The current regulations provide for the removal of only the set gillnet when drift gillnet only commercial periods are allowed. An exception to this is in the Naknek River Special Harvest Area (NRSHA), where only buoys and anchors are allowed to remain in the water during drift gillnet periods. This change was made in the NRSHA because allowing set gillnet gear to remain in the water hampered the ability of the drift gillnet fleet to fish near shore. As a result the ability to manage the escapement into the Naknek River and allocation between gear groups was impacted.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, commercial set gillnet fishers would have to remove all gear, bouys, anchors, and running lines, during set gillnet closures.

BACKGROUND: The author of this proposal references 16.10.055. Interference With Commercial Fishing Gear, as the regulation supporting the need for adopting this proposal. The regulation cited deals with interference or damage to the fishing gear of another permit holder. The presumption in this case is that drift gillnetters can cause damage to gear associated with operating a set gillnet and not the actual set gillnet. Vessel operators are responsible for the safe operation of those vessels, which includes avoiding obstacles while operating fishing gear. In most cases the need to allow drift gillnetters unhindered access to the areas occupied by set gillnetters (i.e. waters near the beach) in order to control escapement is not necessary.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The removal of all set gillnet gear from the water when not fishing is not necessary for the management of this fishery.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

COMMITTEE D: Boundaries (17 Proposals)

COMMITTEE D: Boundaries (17 Proposals)

PROPOSAL 58 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

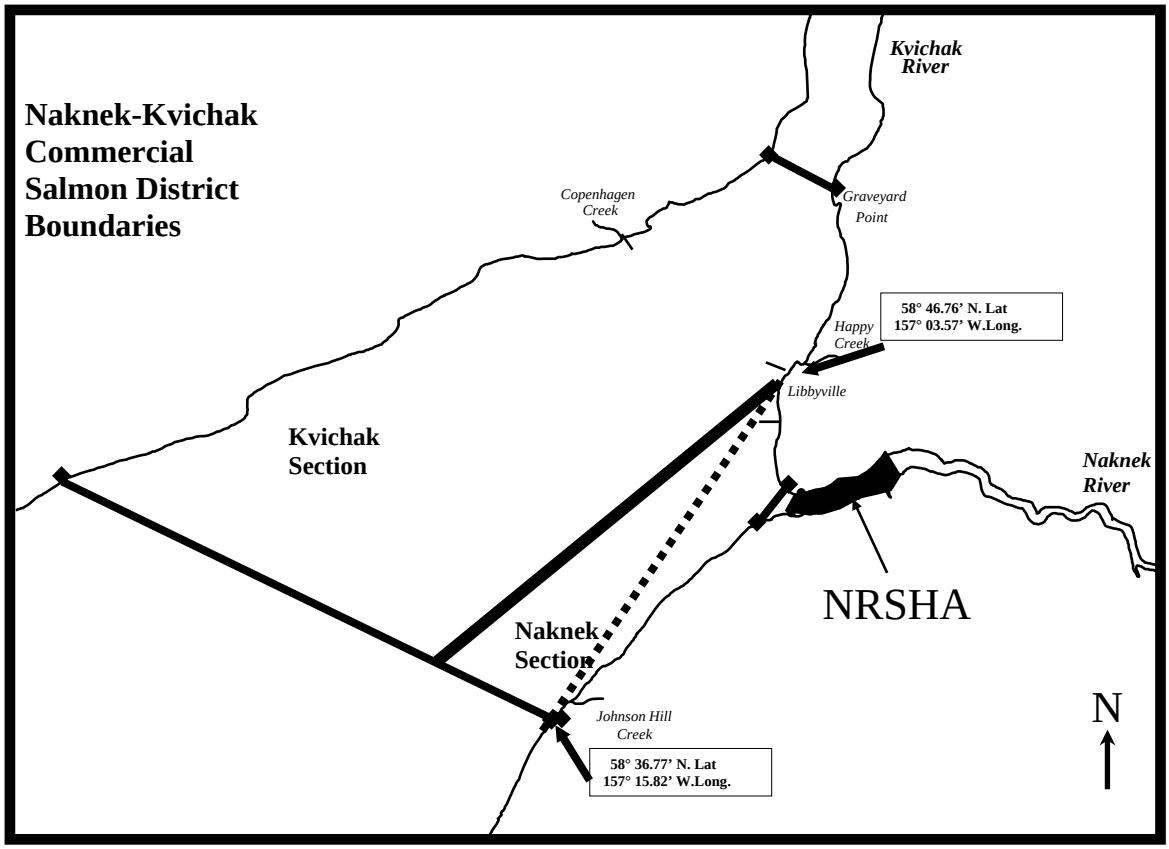
PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would add more area to the Naknek River Special Harvest Area (NRSHA) including areas of known interception of Kvichak River sockeye salmon as shown in scale pattern analysis studies conducted by the department in the 1980s and 1990s.

WHAT ARE THE CURRENT REGULATIONS? See attached map for current and proposed areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would add significant area to the NRSHA.

BACKGROUND: The goal of this plan is to achieve Kvichak River sockeye salmon spawning escapement goals, while providing opportunities to harvest Naknek River salmon stocks that are in excess of spawning goals. Thus, on or after June 27, when the Kvichak River escapement is one or more days behind the historical run curve, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA for both gear groups. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal, the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the proposed expansion of the NRSHA which includes areas of known interception of Kvichak River sockeye salmon as shown in scale pattern analysis studies conducted by the department in the 1980s and 1990s.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 59 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

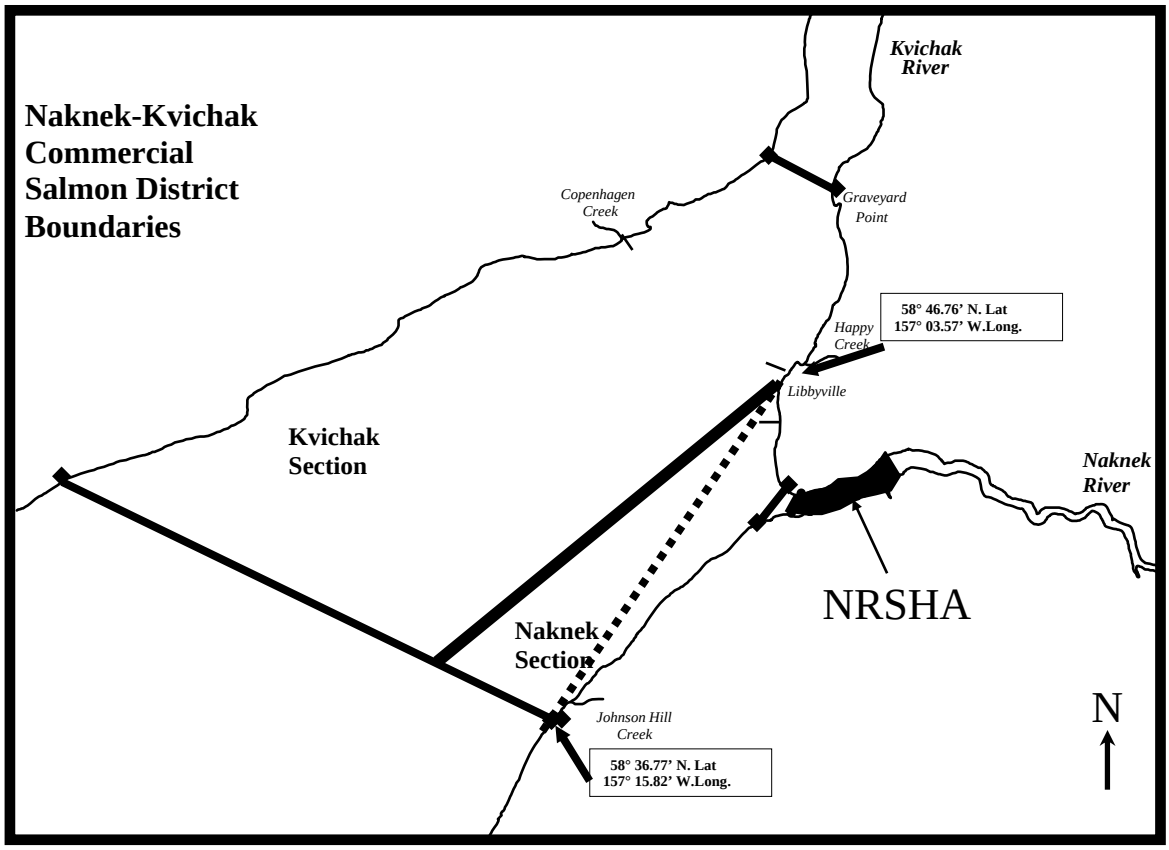
PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would add more area to the Naknek River Special Harvest Area (NRSHA) including areas of known interception of Kvichak River sockeye salmon as shown in scale pattern analysis studies conducted by the department in the 1980s and 1990s.

WHAT ARE THE CURRENT REGULATIONS? See attached map for current and proposed areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would add significant area to the NRSHA.

BACKGROUND: The goal of this plan is to achieve Kvichak River sockeye salmon spawning escapement goals, while providing opportunities to harvest Naknek River salmon stocks that are in excess of spawning goals. Thus, on or after June 27, when the Kvichak River escapement is one or more days behind the historical run curve, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA for both gear groups. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal, the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the proposed expansion of the NRSHA which includes areas of known interception of Kvichak River sockeye salmon as shown in scale pattern analysis studies conducted by the department in the 1980s and 1990s.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 68 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would redefine the western boundary of the Egegik River Special Harvest Area (ERSHA) as a line from Goose Point to Bishop Creek.

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the ERSHA as shown in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing area for the Egegik District would be reduced, excluding the north beach section of set gillnet sites in the district.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Further reduction of the district may result in the following: 1) processor limits on fish deliveries, 2) excess escapement above the BEG range, 3) quality of escapement issues associated with a large escapement on a single tide followed by nearly continuous fishing in order to stay within the escapement range, 4) cleanup fisheries followed by the development of line fisheries within a fishing period, and 5) exclusion of the north beach section of set gillnet sites.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

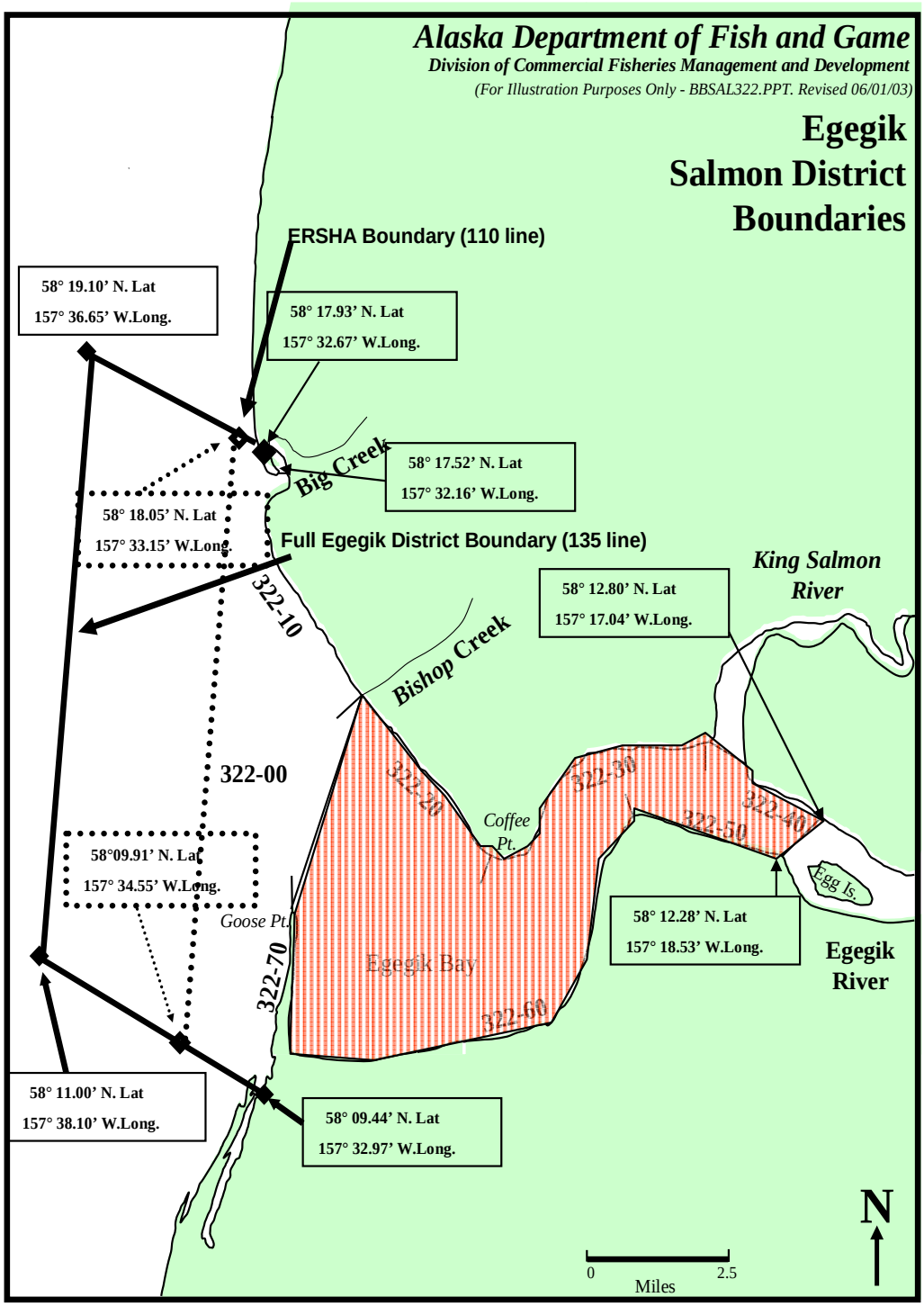


Figure 1. Map of Egegik District

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 69 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would redefine the western boundary of the Egegik River Special Harvest Area (ERSHA) as a line from Goose Point to Bishop Creek.

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the ERSHA as shown in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing area for the Egegik District would be reduced, excluding the north beach section of set gillnet sites in the district.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Further reduction of the district may result in the following: 1) processor limits on fish deliveries, 2) excess escapement above the BEG range, 3) quality of escapement issues associated with a large escapement on a single tide followed by nearly continuous fishing in order to stay within the escapement range, 4) cleanup fisheries followed by the development of line fisheries within a fishing period, and 5) exclusion of the north beach section of set gillnet sites in the district.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

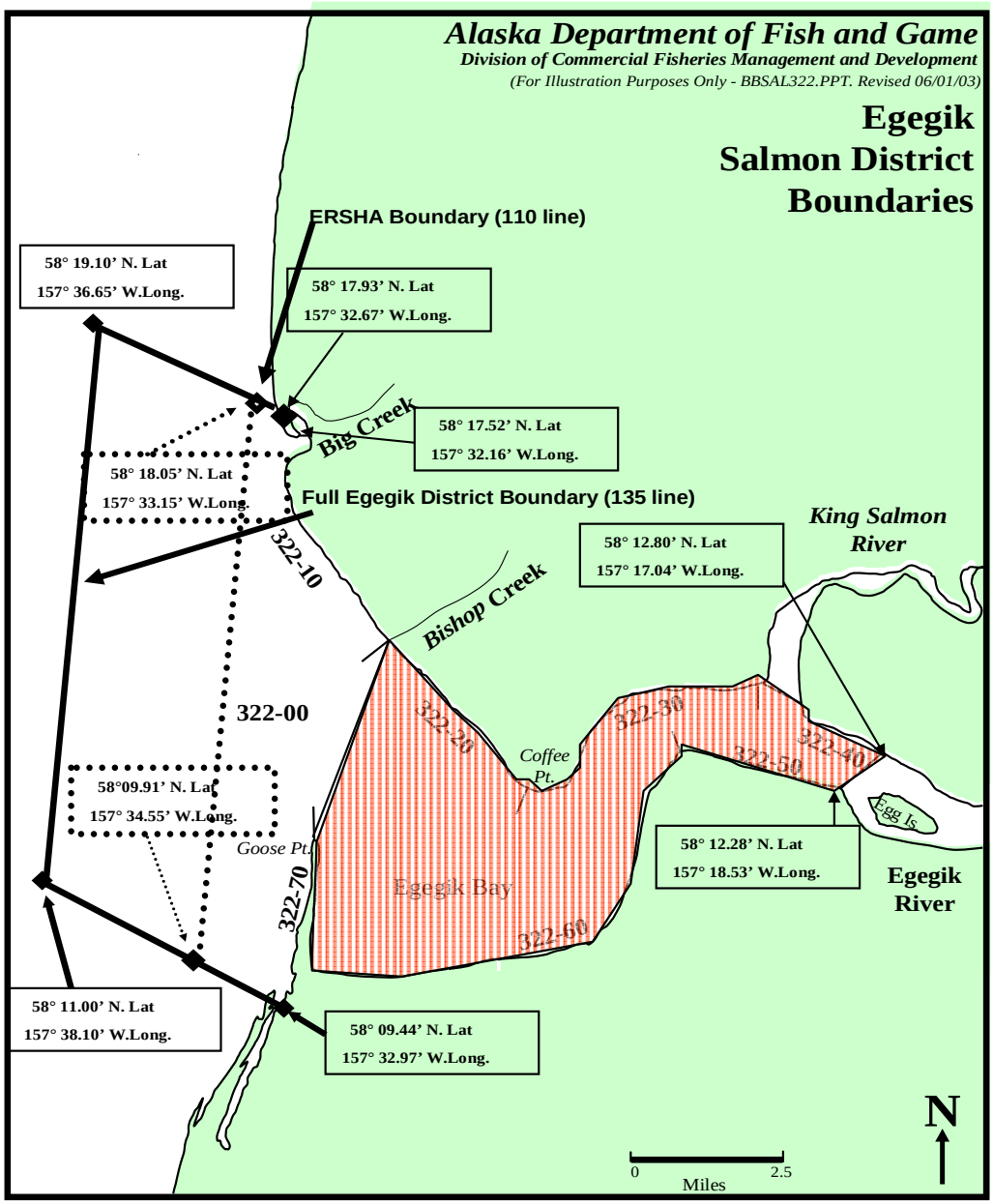


Figure 1. Map of Egegik District

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 70 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Darryl F. Pope

WHAT WOULD THE PROPOSAL DO? This proposal would redefine the western boundary of the Egegik River Special Harvest Area (ERSHA) as a line from Goose Point to Bishop Creek.

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the ERSHA as shown in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing area for the Egegik District would be reduced, excluding the north beach section of set gillnet sites in the district.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Further reduction of the district may result in the following: 1) processor limits on fish deliveries, 2) excess escapement above the BEG range, 3) quality of escapement issues associated with a large escapement on a single tide followed by nearly continuous fishing in order to stay within the escapement range, 4) cleanup fisheries followed by the development of line fisheries within a fishing period, and 5) exclusion of the north beach section of set gillnet sites in the district.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

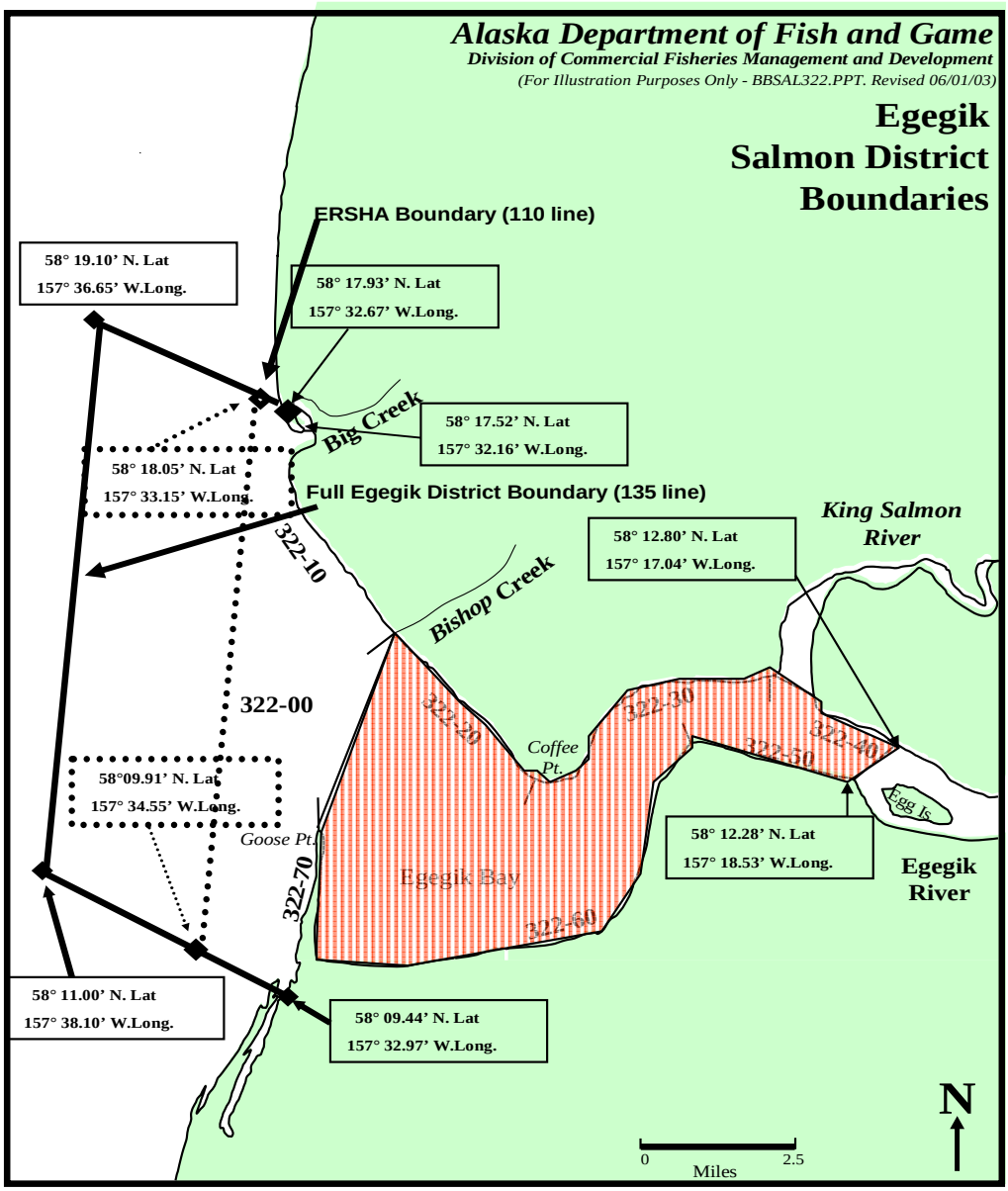


Figure 1. Map of Egegik District

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 77 - 5 AAC 06.357. Ugashik River Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would redefine the area of the Ugashik River Special Harvest Area (URSHA). The proposal would restrict the Ugashik District to the URSHA prior to June 23 when the Naknek River Special Harvest Area Management Plan is in effect.

WHAT ARE THE CURRENT REGULATIONS? The regulations cited pertain to an in river section between the main district and the section in front of Ugashik Village. This special harvest area is used to prevent over escapement.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced prior to June 23. Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area (NRSHA) is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the Ugashik River District as shown in Figure 1.

BACKGROUND: The regulation cited is actually designed to prevent over escapement in the Ugashik River by allowing the URSHA, which is inriver and upstream of the Ugashik District, to be opened to commercial fishing. This is a milling area where fish will hold, prior to moving upriver.

In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 78 - 5 AAC 06.357. Ugashik River Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would restrict the Ugashik District to boundaries within a line drawn from Smokey Point to the South Spit on the western end, and to the current upstream boundary.

WHAT ARE THE CURRENT REGULATIONS The current regulations define the western end of the full district as an offshore line drawn from Cape Greig to Cape Menshikof. If the Naknek River Special Harvest Area (NRSHA) is in effect, the district boundaries are slightly smaller until June 29 when they revert to the full district. The current regulations define the boundaries of the Ugashik River District as shown in Figure 2.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced prior to June 23. Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon.

BACKGROUND In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

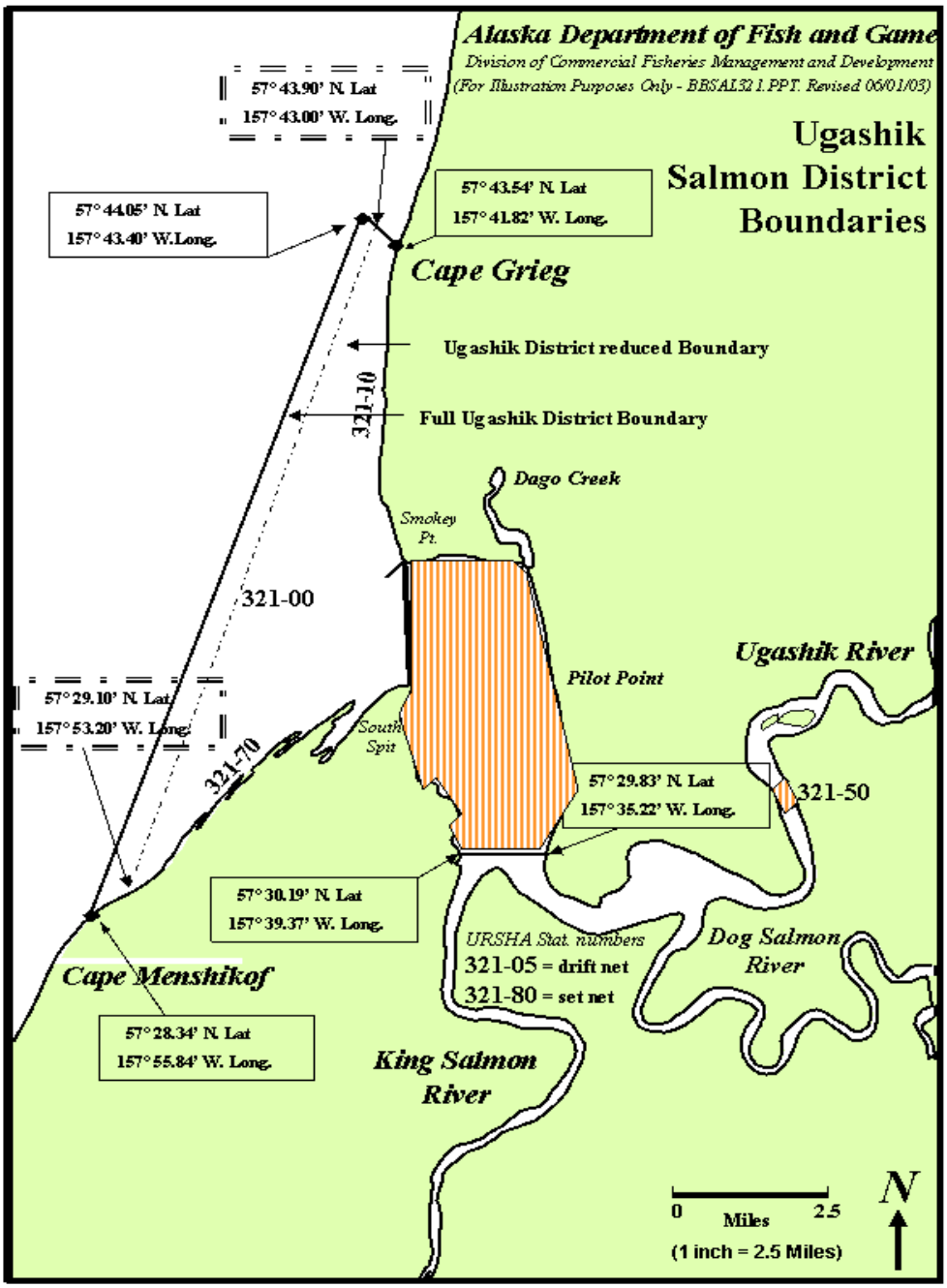


Figure 2. Map of Ugashik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 79 - 5 AAC 06.357. Ugashik River Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would restrict the Ugashik District to boundaries within a line drawn from Smokey Point to the South Spit on the western end, and to the current upstream district boundary.

WHAT ARE THE CURRENT REGULATIONS The current regulations define the western end of the full district as an offshore line drawn from Cape Greig to Cape Menshikof. If the Naknek River Special Harvest Area (NRSHA) is in effect, the district boundaries are slightly smaller until June 29 when they revert to the full district. The current regulations define the boundaries of the Ugashik River District as shown in Figure 2.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced prior to June 23. Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon.

BACKGROUND In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

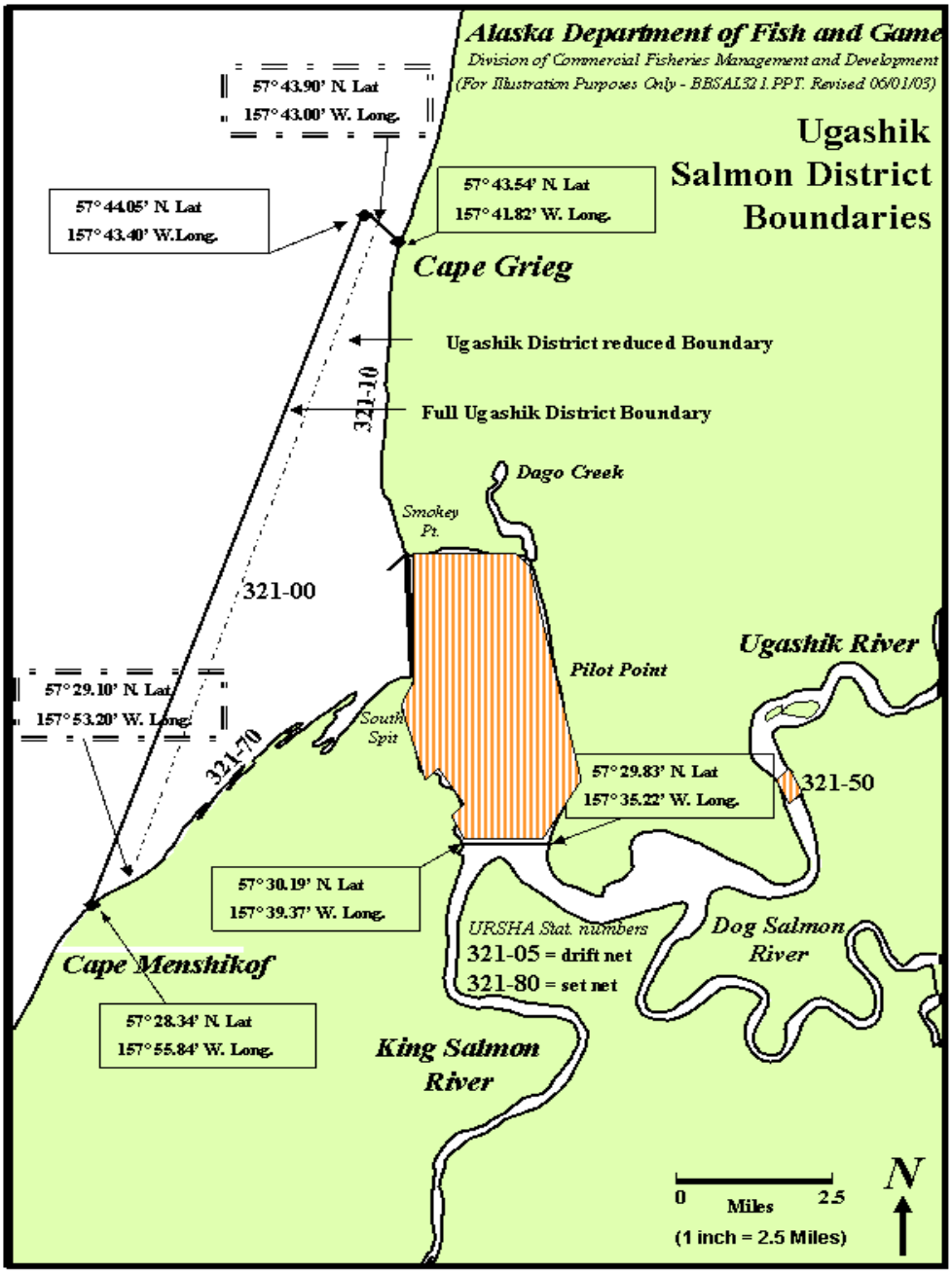


Figure 2. Map of Ugashik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 80 - 5 AAC 06.357. Ugashik River Special Harvest Area Management Plan.

PROPOSED BY: Naknek/Kvichak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would restrict the Ugashik District to boundaries within a line drawn from Smokey Point to the South Spit on the western end, and to the current upstream boundary.

WHAT ARE THE CURRENT REGULATIONS The current regulations define the western end of the full district as an offshore line drawn from Cape Greig to Cape Menshikof. If the Naknek River Special Harvest Area (NRSHA) is in effect, the district boundaries are slightly smaller until June 29 when they revert to the full district. The current regulations define the boundaries of the Ugashik River District as shown in Figure 2.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced prior to June 23. Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon.

BACKGROUND In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

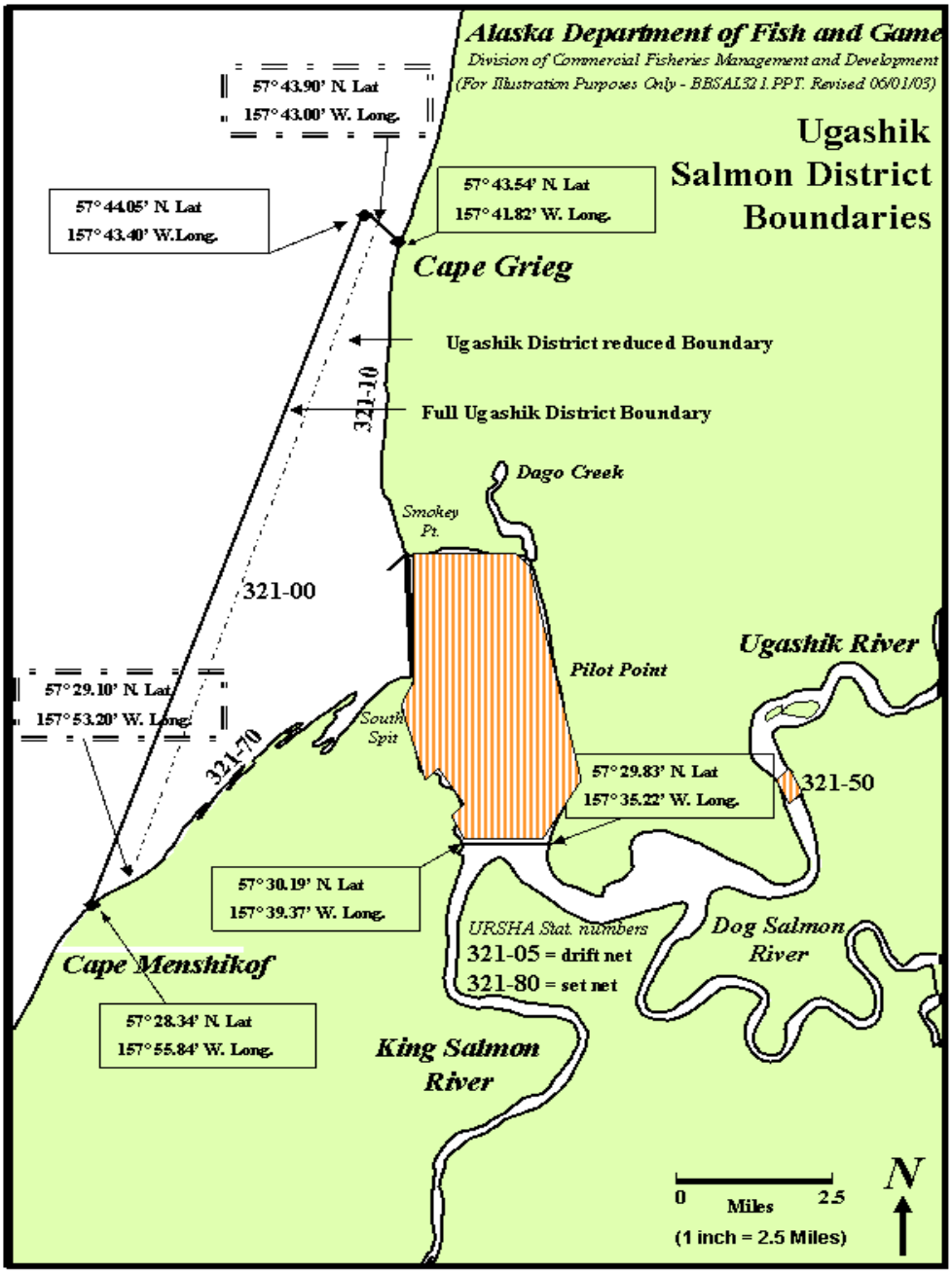


Figure 2. Map of Ugashik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 107 - 5 AAC 06.200(a). Fishing Districts, Subdistricts, and Sections.

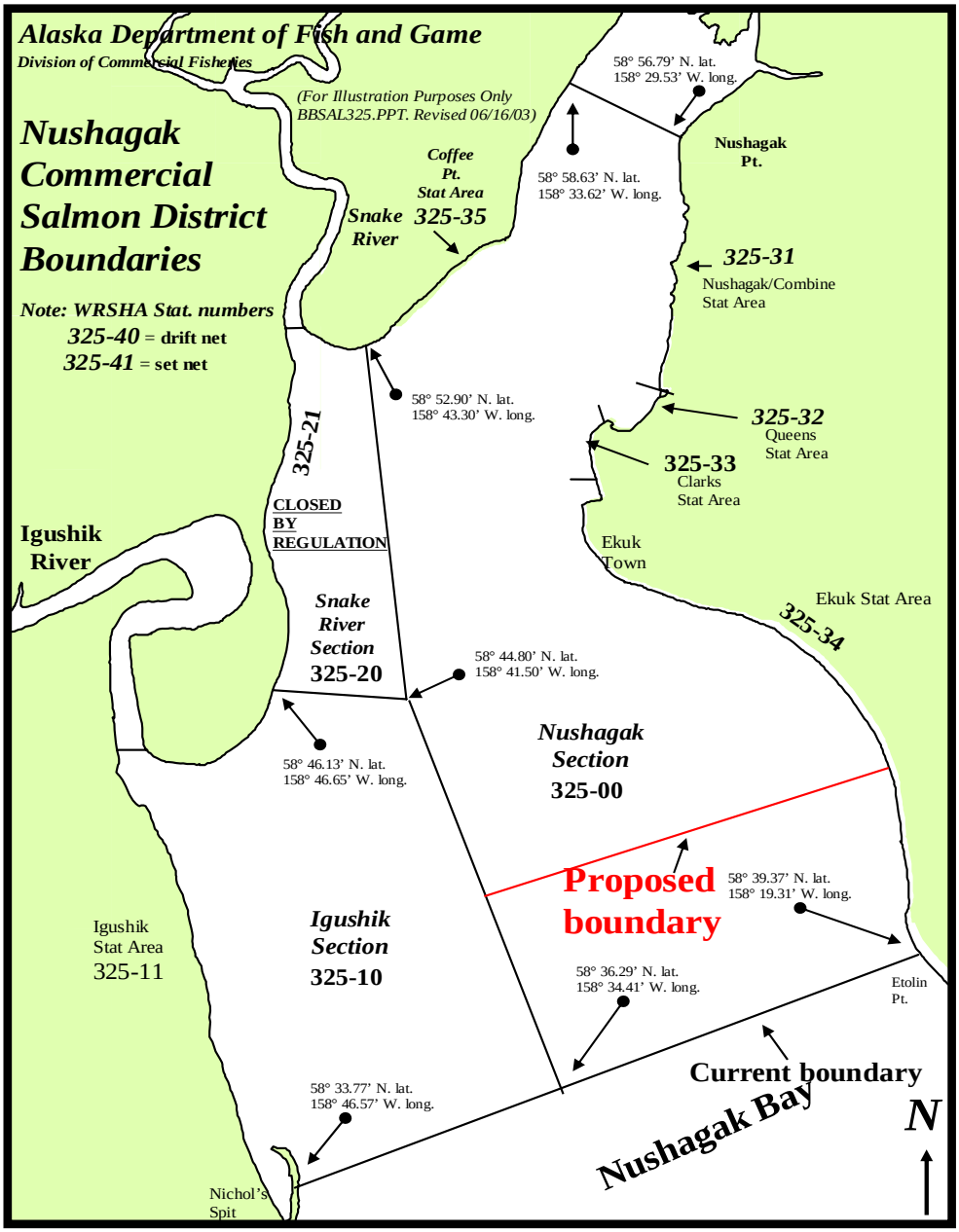
PROPOSED BY: Igiugig Village Council

WHAT WOULD THE PROPOSAL DO? This proposal would change the boundaries of the Nushagak District.

WHAT ARE THE CURRENT REGULATIONS? The current south line for the Nushagak District is from Etolin Point to Nichols hills.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted the Nushagak District would be significantly reduced and many set gillnet permit holders would be displaced from their historical fishing areas.

BACKGROUND: The department is currently sampling commercial harvest for genetic stock analysis to determine the origin of fish caught in each district. Without more specific knowledge of stock composition of the Nushagak District harvest, it is impossible to determine whether this proposal would reduce exploitation of Kvichak stocks. This proposal would dramatically reduce the size of the Nushagak District and would displace many set gillnet permit holders from their traditional fishing areas.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 108 - 5 AAC 06.200(a). Fishing Districts, Subdistricts, and Sections.

PROPOSED BY: Igiugig Village Council

WHAT WOULD THE PROPOSAL DO? This proposal would change the boundaries of the Nushagak District.

WHAT ARE THE CURRENT REGULATIONS? The current south line for the Nushagak District is from Etolin Point to Nichols hills.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the Nushagak District would be reduced and many set gillnet permit holders would be displaced from their historical fishing areas. It is difficult to say what the exact impact would be because the proponent only asks for the boundary to be changed and does not propose a new line.

BACKGROUND: The department is currently sampling commercial harvest for genetic stock analysis to determine the origin of fish caught in each district. Without more specific knowledge of stock composition of the Nushagak District harvest, it is impossible to determine whether this proposal would reduce exploitation of Kvichak stocks. This proposal would dramatically reduce the size of the Nushagak District and would displace many set gillnet permit holders from their traditional fishing areas.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department believes that approval of this proposal would not result in an additional cost for a private person to participate in this fishery.

PROPOSAL 109 - 5 AAC 06.200(A). FISHING DISTRICTS, SUBDISTRICTS, AND SECTIONS.

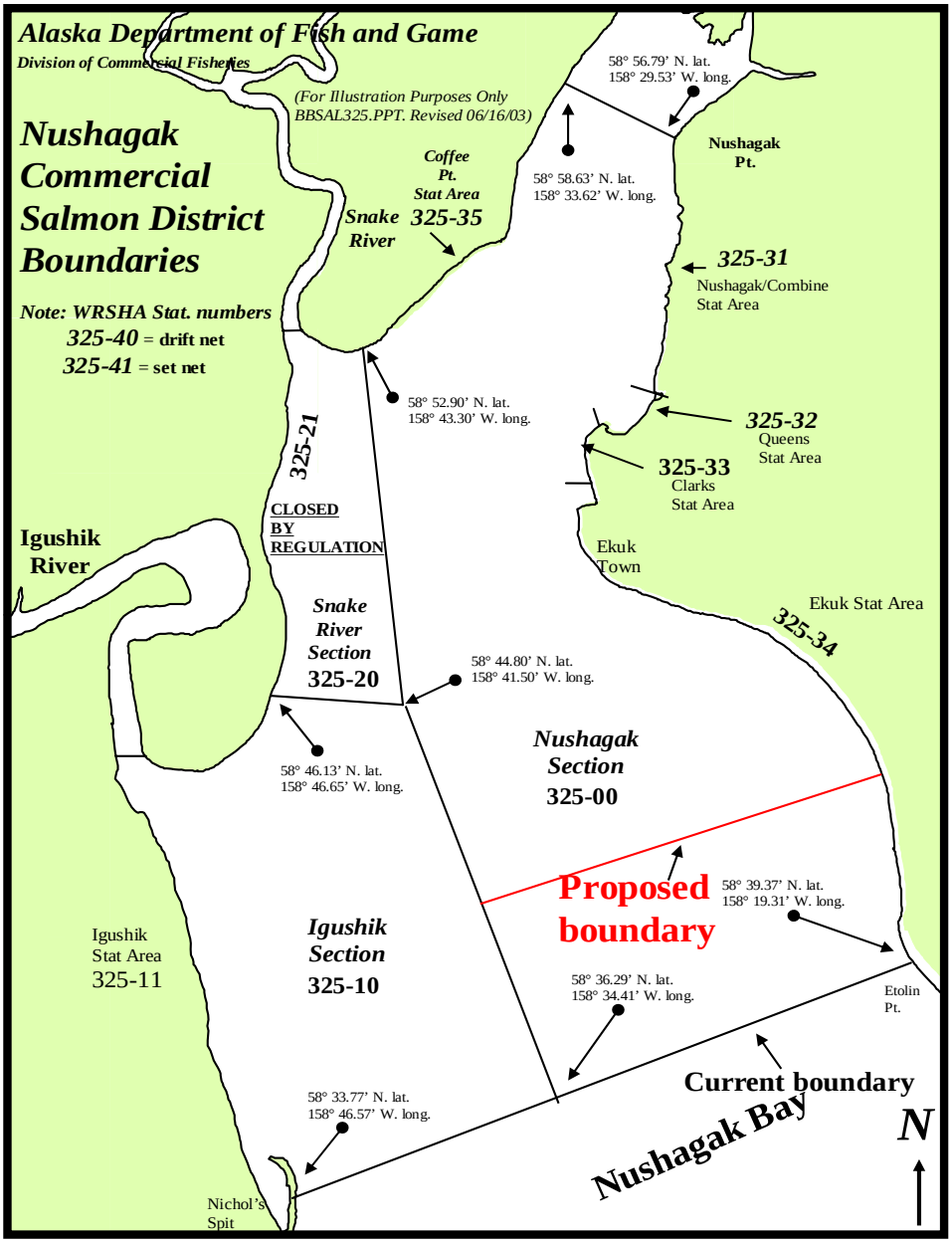
PROPOSED BY: Randolph Alvarez

WHAT WOULD THE PROPOSAL DO? This proposal would change the boundaries of the Nushagak District.

WHAT ARE THE CURRENT REGULATIONS? The current south line for the Nushagak District is from Etolin Point to Nichols hills.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the Nushagak District would be significantly reduced and many set gillnet permit holders would be displaced from their historical fishing areas.

BACKGROUND: The department is currently sampling commercial harvest for genetic stock analysis to determine the origin of fish caught in each district. Without more specific knowledge of stock composition of the Nushagak District harvest, it is impossible to determine whether this proposal would reduce exploitation of Kvichak stocks. This proposal would dramatically reduce the size of the Nushagak District and would displace many set gillnet permit holders from their traditional fishing areas.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 110 - 5 AAC 06.200. Fishing Districts, Subdistricts and Sections.

PROPOSED BY: Chris Cameron

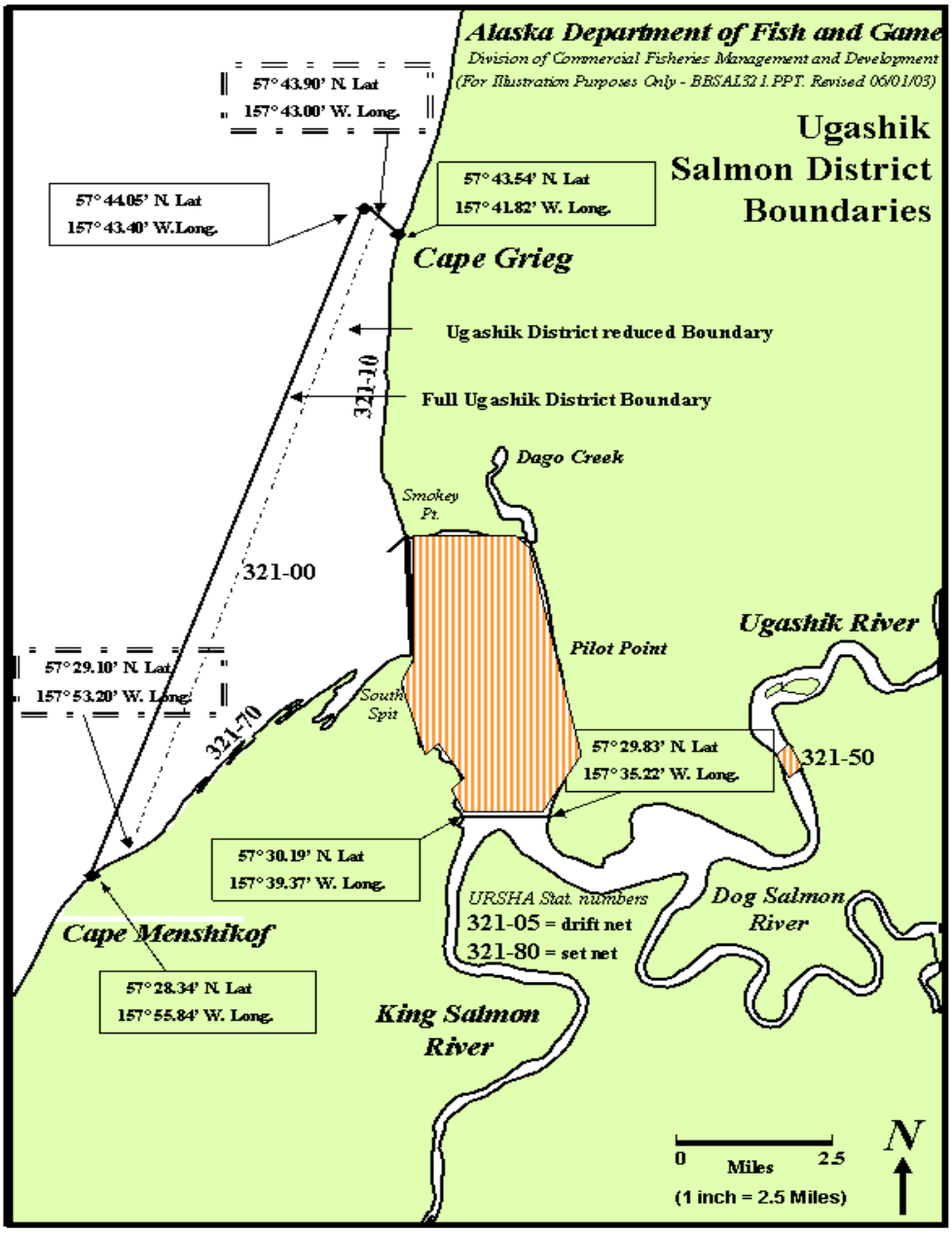
WHAT WOULD THE PROPOSAL DO? This proposal would restrict the Ugashik District to boundaries within a line drawn from Smokey Point to the South Spit on the western end, and to the current upstream boundary.

WHAT ARE THE CURRENT REGULATIONS The current regulations define the western end of the district as an offshore line drawn from Cape Greig to Cape Menshikof. If the Naknek River Special Harvest Area (NRSHA) is in effect, the district boundaries are slightly smaller until June 29 when they revert to the full district. The current regulations define the boundaries of the Ugashik River District as shown in figure 2a.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced prior to June 23.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 111 - 5 AAC 06.200. Fishing districts, subdistricts and sections.

PROPOSED BY: Darryl F. Pope

WHAT WOULD THE PROPOSAL DO? The proposal would redefine the Ugashik District Boundaries. The description defines the western boundary as "South of a line Between South Spit and Smokey point". This line essentially runs north to south and the area to the south of the line is dry land. The other district boundary is described as a line "upstream" of what is the current upper boundary of the district. It is assumed that the author meant to define the waters inside the lines described.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define the western end of the full district as an offshore line drawn from Cape Greig to Cape Menshikof. If the Naknek River Special Harvest Area (NRSHA) is in effect, the district boundaries are slightly smaller until June 29 when they revert to the full district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Ugashik District fishing area would be substantially reduced. Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the Ugashik River District as shown in Figure 2.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Further reduction of the district may result in the following: 1) processor limits on fish deliveries, 2) excess escapement above the BEG range, 3) quality of escapement issues associated with a large escapement on a single tide followed by nearly continuous fishing in order to stay within the escapement range, 4) cleanup fisheries followed by the development of line fisheries within a fishing period, and 5) exclusion of the north beach section of set gillnet sites in the district.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

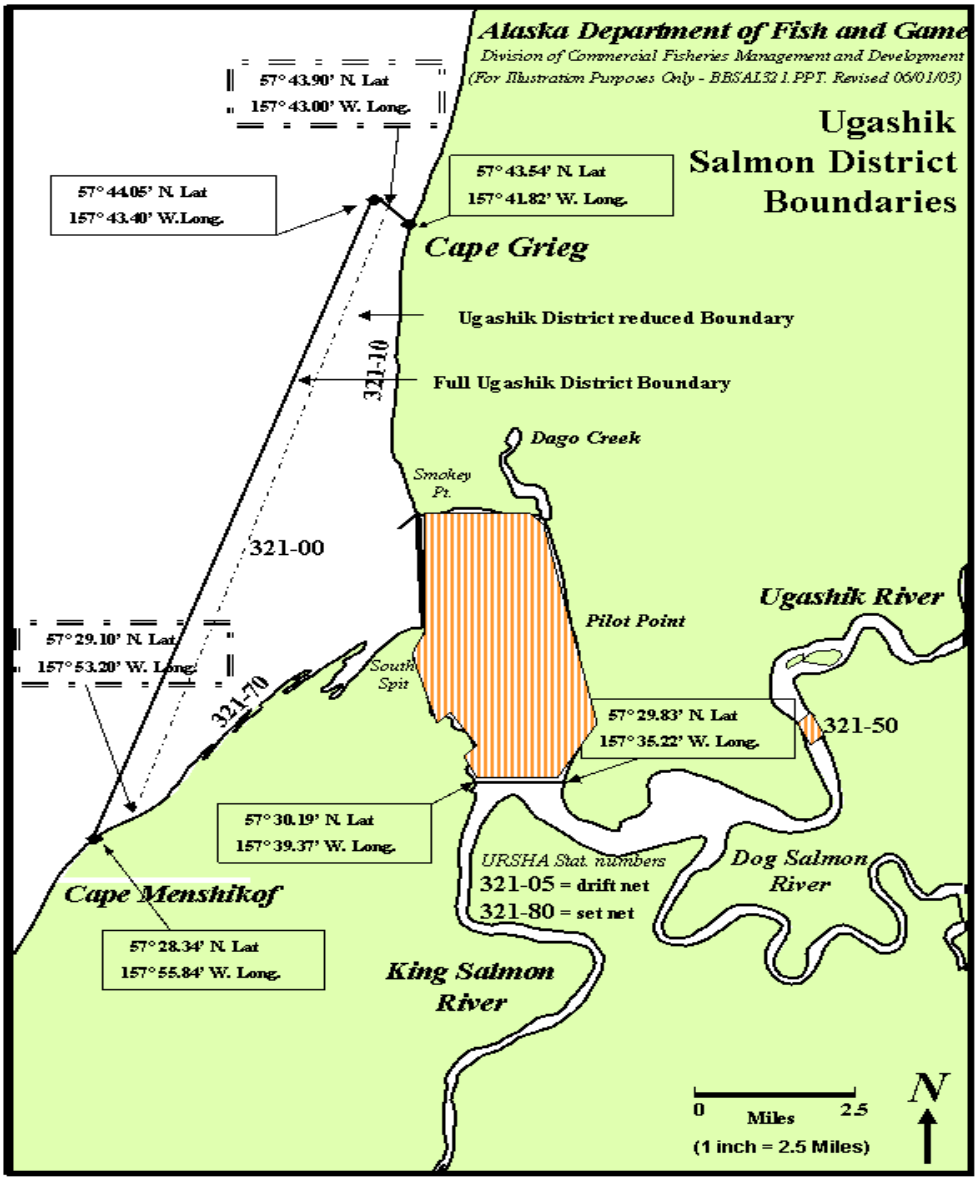


Figure 2. Map of Ugashik District

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 112 - 5 AAC 06.200. Fishing districts, subdistricts and sections.

PROPOSED BY: Roland Briggs

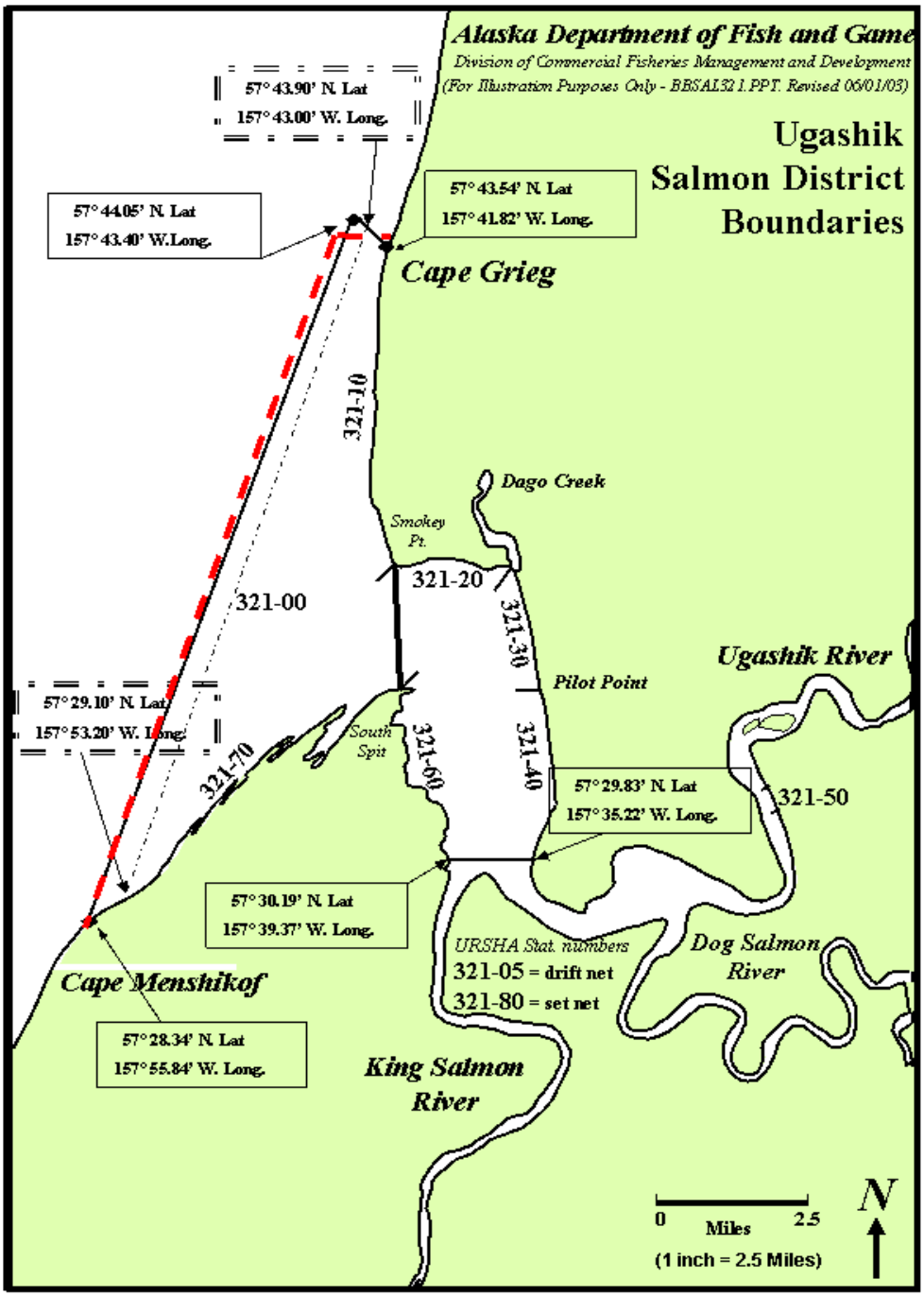
WHAT WOULD THE PROPOSAL DO? This proposal would redefine the northern boundary of the Ugashik District.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define the district beginning at Cape Greig, along a line to a point to the northwest of Cape Greig defined by Lat/ long coordinates, then to a point south on Cape Menshikof also defined by lat/long coordinates. (Figure 2).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the outer boundaries on the northern end of the district would be defined by a line perpendicular to the beach. The size of the district would be essentially the same.

BACKGROUND: The current northern boundary is at an angle to the beach. The proposed boundaries would be presumably easier for fishers to plot.

There are set gillnet permit holders who fish this boundary area and they may be affected by the proposed change.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 113 - 5 AAC 06.200(a)(1). Fishing Districts, Subdistricts, and Sections.

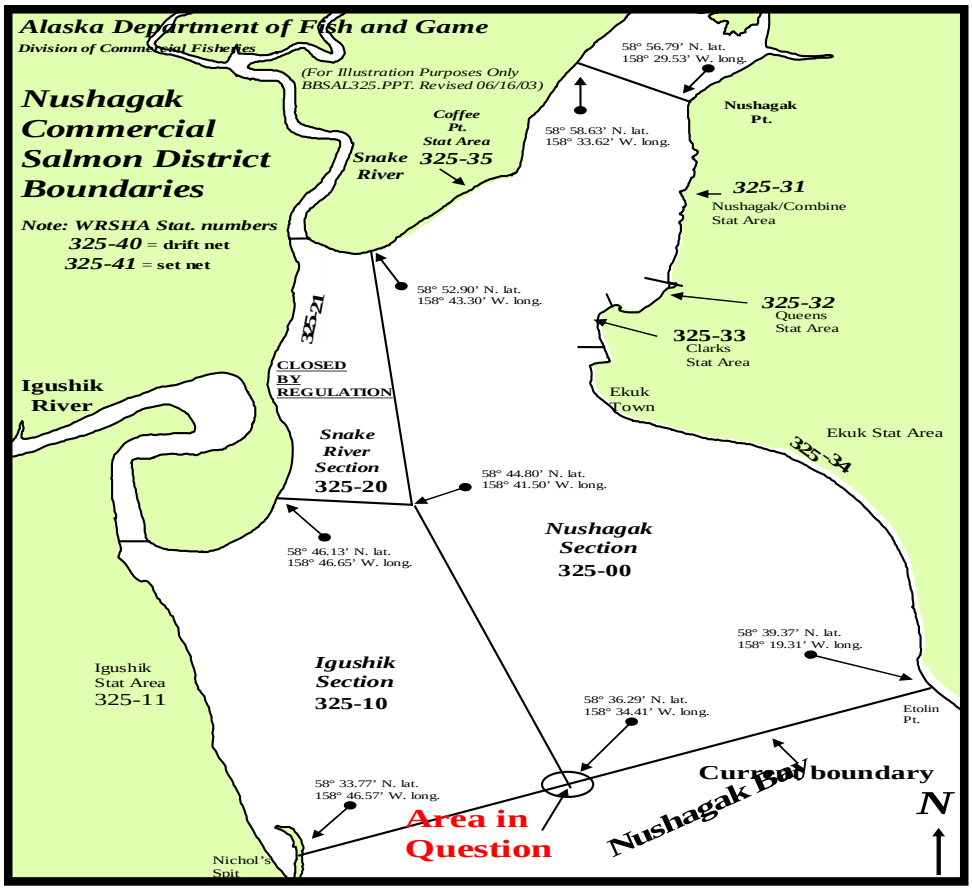
PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would connect the eastern boundary line of the Igushik Section with the southern boundary line of the Igushik Section.

WHAT ARE THE CURRENT REGULATIONS? The current east boundary line for the Igushik Section is approximately 50 feet short of the south boundary line, leaving a small wedge shaped area open in front of the Igushik Section.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the Igushik Section east line would extend southward so that it crosses the south line and delineates the entire Igushik Section as intended.

BACKGROUND: The board converted boundaries from LORAN to GPS at the 2003 BOF meeting and a rounding error left a small area open at the south end of the Igushik Section, inadvertently.



DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. The department views this proposal as housekeeping.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 114 - 5 AAC 06.200. Fishing districts, subdistricts and sections.

PROPOSED BY: Lake Iliamna Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the area of the Egegik District permanently to the LORAN - C "110 line".

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the Egegik District and Egegik River Special Harvest Area as shown in figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing area for the Egegik District would be reduced permanently to the area currently designated as the Egegik River Special Harvest Area (ERSHA).

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

LORAN-C is no longer used by the department to define boundaries.

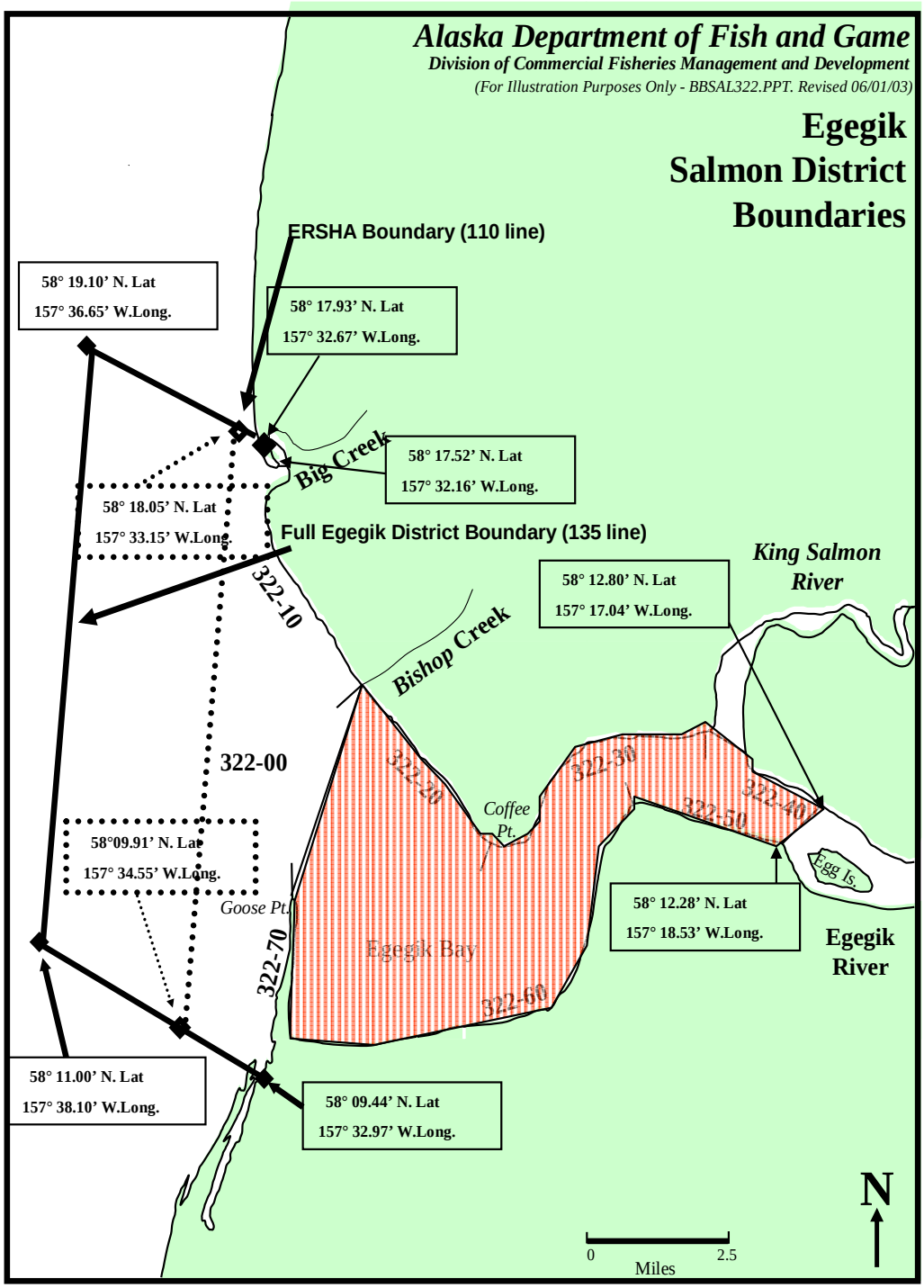


Figure 1. Map of Egegik District

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

COMMITTEE E: Modification of Management Plans

(24 Proposals)

COMMITTEE E: Modification of Management Plans, (24 Proposals)

PROPOSAL 48 - 5 AAC 06.355. Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Karl R. Hellberg

WHAT WOULD THE PROPOSAL DO? This proposal would restrict all eastside Bristol Bay fisheries (Ugashik, Egegik, and Naknek/Kvichak) to their special harvest areas until the Kvichak River sockeye salmon midpoint escapement goal is met. The proposal would also acknowledge in regulation that there is interception of Kvichak River sockeye salmon stocks in areas outside the special harvest areas in all eastside districts.

WHAT ARE THE CURRENT REGULATIONS? Currently, if the preseason forecast for Kvichak River sockeye salmon is less than 30 percent above the minimum biological escapement goal, the commissioner may, by emergency order, close the Naknek/Kvichak District and open the NRSHA to drift and set gillnets. When the Naknek/Kvichak District is closed to commercial fishing, Egegik District will be reduced to the Egegik River Special Harvest Area, and Ugashik District will be restricted to the reduced boundaries until June 29. In addition, when the preseason forecast for the Kvichak River sockeye salmon run does not provide for an exploitation rate of greater than 40 percent, from June 16 to June 23 no more than 48-hours of commercial fishing will be permitted in Ugashik District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, regardless of Kvichak run strength, all eastside fisheries would be managed in the special harvest areas until the Kvichak River sockeye salmon midpoint escapement goal is met. Typically, fisheries are managed so the point goals are achieved towards the end of the run. Under the proposal, significant pressure would be placed on the department to meet the Kvichak River escapement goal earlier in the run, allowing the fleet to fish in the larger districts earlier than is current practice. As a result, aggressive fishing may be necessary late in the run, to keep from exceeding escapement goals.

BACKGROUND: On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to

the NRSHA. When fishing in the NRSHA, Egegik District is restricted to the Egegik River Special Harvest Area until the Naknek/Kvichak District opens. Furthermore, when the preseason forecast for the Kvichak river sockeye salmon run does not provide for an exploitation rate of greater than 40-percent, the Ugashik District outside boundaries are reduced and from June 16 - 23, and only 48 hours of commercial fishing is allowed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 50 - 5 AAC 06.320. Fishing periods

PROPOSED BY: Neil C. Armstrong

WHAT WOULD THE PROPOSAL DO? This proposal would set a weekly schedule of three 12-hour fishing periods (36-hrs/week) for commercial salmon fishing in Bristol Bay fishing districts excluding Togiak, between June 25 and July 17.

WHAT ARE THE CURRENT REGULATIONS? The current regulations provide for commercial fishing periods set by Emergency Order (E.O.) between June 1 and July 17 in the Bristol Bay Eastside Districts and from June 1 to September 30 in the Nushagak District. Generally after July 17, a weekly schedule of 9:00 am, Monday to 9:00 am, Friday is in effect in all Bristol Bay districts until September 30. This schedule can be adjusted by E.O. in each district according to sockeye salmon abundance. In the Togiak District commercial fishing is generally conducted on a weekly schedule from June 1 to September 30 which varies by section and can be adjusted by the department depending on abundance.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the E.O. period for Bristol Bay salmon fisheries would change from the current June 1 to July 17 window, to one from June 1 to June 25. Beginning June 25, a three-day-per-week schedule would be implemented for a total of 36-hours of fishing time per week.

BACKGROUND: Bristol Bay sockeye salmon runs peak around July 4 on average. Days of peak sockeye salmon abundance can number into the millions of fish, for the entire bay. Bay-wide daily harvests of over a million fish are common. These harvest events cannot be predicted and thus cannot be adequately harvested using a predetermined fishing schedule. Attainment of escapement and allocation objectives could be severely impacted under a fixed fishing schedule.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 51 - 5 AAC 06.356. Fishing periods.

PROPOSED BY: Charles W. Treinen

WHAT WOULD THE PROPOSAL DO? The proposal would allow fishing in the General District for up to 25% of the projected harvest in a given year.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow fishing in terminal Bristol Bay districts associated with major river systems according to management plans. Each system is managed to achieve a spawning escapement goal within an established range. In addition, the department attempts to manage harvest by gear group to achieve allocation targets established by the board, which vary by district. The General District Management Plan (5 AAC 06.356) was adopted in 2004 specifically to provide additional harvest opportunity for an expected large run. The plan had a sunset clause that expired in December, 2004.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Fishing would be allowed in the General District to harvest fish before they reach terminal areas.

BACKGROUND: The General District concept creates difficulties in the management of Bristol Bay fisheries. Difficulties arise in allocating fish caught in the General District to the river of origin because of the mixed stock nature of the harvest and delivery patterns of fishers within the district. The premise that runs are compressed and that processing capacity is overwhelmed during the peak was not the case in 2006 when the run was above forecast, late, and protracted. Bay-wide harvest was approximately 28 million fish with few limits placed on deliveries. In 2005, limits were in effect from around July 7 until near the end of the season and the harvest was approximately 24.5 million fish.

Additionally, the department does not manage on pre-season projections. This proposal is based on the assumption that an annual projected harvest would be available. The department does not have the ability to accurately forecast salmon runs or harvests.

Furthermore, the Bristol Bay Commercial Drift and Set Gillnet Sockeye Salmon Management and Allocation Plan (5 AAC 06.355), developed by the board, instructs the department to manage Bristol Bay sockeye salmon fisheries terminally using run strength information developed in season. The plan directs that these stocks will be managed as they return to districts associated with major river systems under the following priorities: 1) achievement of biological escapement goals, 2) maintaining genetic diversity, and 3)

providing a harvestable surplus of salmon to users. The board expressed the intent that harvest of any surplus continue to take place in traditional areas and that it should be allocated between user (gear) groups, while recognizing that interceptions of stocks from adjacent areas will occur. The board further directed the department to minimize the interception to the extent practical without compromising the objectives.

The department submitted an ACR to address the General District Management Plan sunset clause at the October, 2005 BOF work session. The board chose not to extend the plan at that time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the concept of the General District because of the non-terminal nature of the fishery and the resulting implications to management.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 52 - 5 AAC 06.356. Fishing periods.

PROPOSED BY: Chris Cameron

WHAT WOULD THE PROPOSAL DO? The proposal would allow fishing in the General District once escapement goals have been reached in all Bristol Bay systems.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow fishing in terminal Bristol Bay districts associated with major river systems according to management plans. Each system is managed to achieve a spawning escapement goal within an established range. In addition, the department attempts to manage harvest by gear group to achieve allocation targets established by the board, which vary by district. The General District Management Plan (5 AAC 06.356) was adopted in 2004 specifically to provide additional harvest opportunity for an expected large run. The plan had a sunset clause that expired in December, 2004.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Fishing would be allowed in the General District to harvest fish before they reach terminal areas.

BACKGROUND: The General District concept creates difficulties in management of Bristol Bay fisheries. Difficulties arise in allocating fish caught in the General District to the river of origin because of the mixed stock nature of the harvest and delivery patterns of fishers within the district. The premise that runs are compressed and that processing capacity is overwhelmed during the peak was not the case in 2006 when the run was late and protracted. Bay wide harvest was approximately 28 million fish with few limits placed on deliveries. In 2005, limits were in effect from around July 7 until near the end of the season and the harvest was approximately 24.5 million fish.

Additionally, the department does not manage on pre-season projections. This proposal is based on the assumption that an annual projected harvest would be available. The department does not have the ability to accurately forecast salmon runs nor harvests.

Furthermore, the Bristol Bay Commercial Drift and Set Gillnet Sockeye Salmon Management and Allocation Plan (5 AAC 06.355) developed by the board instructs the department to manage Bristol Bay sockeye salmon fisheries terminally using run strength information developed in season. The plan directs that these stocks will be managed as they return to districts associated with major river systems under the following priorities: 1) achievement of biological escapement goals, 2) maintaining genetic diversity, and 3) providing a harvestable surplus of salmon to users. The board expressed a desire to see that harvest of any surplus continue to take place in traditional areas and that it should be allocated between user (gear) groups, while recognizing that interceptions of stocks from adjacent areas will occur. The board further directed the department to minimize the interception to the extent practical without compromising the objectives.

The department submitted an ACR to address the General District Management Plan sunset clause at the October, 2005 BOF work session. The board chose not to extend the plan at that time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the concept of the General District because of the non-terminal nature of the fishery and the resulting implications to management.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 60 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal would delay the trigger point for closing the Naknek/Kvichak District and moving into the Naknek River Special Harvest Area (NRSHA) to avoid the harvest of sockeye salmon bound for the Kvichak River by nine days (from June 27 to July 5). This proposal would also delay the implementation of the NRSHA management plan based on the number of days behind schedule for reaching the escapement goal (from one or more days behind to three or more days behind).

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the

fishery is restricted to the NRSHA. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, exploitation of Kvichak River sockeye stocks would increase and achievement of the sockeye salmon escapement goal for the Kvichak River would be unlikely during years of weak runs (2.0 – 3.5 million).

BACKGROUND: The BOF classified Kvichak River sockeye salmon as a stock of yield concern in 2000 and a stock of management concern in 2003. At each of these BOF regulatory meetings, the trigger points at which the fishery is restricted to the NRSHA were tightened to minimize the harvest of Kvichak River sockeye salmon stocks elsewhere. Prior to 2000, when the Kvichak River sockeye run was projected to be two or more days behind its escapement goal curve, the drift gillnet fleet went into the NRSHA and the set gillnet fleet stayed out in the district but was restricted to 25 fathoms of gear. Under this plan, when the Kvichak River sockeye run was projected to be two or more days behind the escapement curve (July 4, 1996; July 9, 1997; July 7, 1998; July 11, 1999; and July 3, 2000), the minimum escapement goal was met only once, in 1999.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to any change to the current regulation that would result in an increase in exploitation on Kvichak River sockeye salmon. This proposal would result in less restrictive management than was in place from 1996 – 2000. The minimum escapement goal for the Kvichak River was met only once during this period.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 61 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal would allow the Naknek Section to remain open to commercial fishing with drift and set gillnet gear when the Kvichak Section is closed to commercial fishing. The Naknek River Special Harvest Area (NRSHA) would open to set gillnet gear only.

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the

fishery is restricted to the NRSHA. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, exploitation of Kvichak River sockeye salmon stocks would increase and achievement of the sockeye salmon escapement goal for the Kvichak River would be unlikely during years of weak runs (2.0 – 3.5 million).

BACKGROUND: The BOF classified Kvichak River sockeye salmon as a stock of yield concern in 2000 and a stock of management concern in 2003. At each of these BOF regulatory meetings, the trigger points were tightened to assist in minimizing the harvest of Kvichak River sockeye salmon stocks elsewhere. Prior to 2000, when the Kvichak River sockeye run was projected to be two or more days behind its escapement goal curve, the drift gillnet fleet went into the NRSHA and set gillnet fleet stayed outside but was restricted to 25 fathoms of gear. Under this plan, when the Kvichak River sockeye run was projected to be two or more days behind the escapement curve (July 4, 1996; July 9, 1997; July 7, 1998; July 11, 1999; and July 3, 2000), the minimum escapement goal was met only once, in 1999.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to any change to the current regulation that would result in an increase in exploitation on Kvichak River sockeye salmon. This proposal would result in less restrictive management than was in place from 1996 – 2000. The minimum escapement goal for the Kvichak River was met only once during this period.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 62 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Karl R. Hellberg

WHAT WOULD THE PROPOSAL DO? This proposal would open the Naknek River Special Harvest Area (NRSHA) to commercial fishing whenever the Naknek or Kvichak Sections were open to commercial fishing.

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA. In addition, when the preseason forecast for the

Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the NRSHA would be open to commercial fishing whenever either or both sections in the Naknek-Kvichak District are open. Subsistence users would be competing with commercial users in the district and in the NRSHA. Currently, when the NRSHA is open to commercial fishing, the Naknek Section is open to subsistence fishing so users can fish without the commercial fishery if they wish. If all areas are open to commercial fishing, subsistence users will have to compete with the commercial users at all times. In addition, Chinook salmon and other salmon species of lower abundance would be harvested at a higher rate due to the extra area allowed for commercial fishing; this may put them at risk.

BACKGROUND: Currently, the NRSHA is only open when the Naknek/Kvichak District is closed to commercial fishing.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department has biological as well as subsistence management concerns if this proposal is adopted.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 63 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Donald Mack

WHAT WOULD THE PROPOSAL DO? This proposal would allow both gear groups to fish at the same time in the Naknek River Special Harvest Area (NRSHA). Fishing periods would begin earlier in the flood tide and allocation goals would presumably not apply to the NRSHA.

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to the NRSHA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, both set and drift gillnet fleets would fish at the same time in the

NRSHA and there would be no allocation goals for the user groups. Also, the fishing periods would begin earlier in the flood tide than is the current practice.

BACKGROUND: Prior to 1998, when the Kvichak River sockeye run was two or more days behind the escapement goal curve, the drift gillnet fleet went into the NRSHA and the set gillnet fleet was restricted to 25 fathoms of gear (down from 50 fathoms) and stayed outside in the District. If it was determined the Kvichak River sockeye escapement goal was not going to be met, the set gillnet fleet was moved into the NRSHA. When both gear groups were in the NRSHA, they fished at the same time and the allocation percentages did not apply. The outcome from this situation was that only the first few set gillnet sites caught fish and a line fishery developed quickly for the drift gillnet fleet.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to defining in regulation, the tide stage at which fisheries will open.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 71 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? The proposal would redefine the boundaries of the Egegik District as the LORAN-C "130 line".

WHAT ARE THE CURRENT REGULATIONS? The current regulations define the boundaries of the Egegik District as described in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the district boundaries would stay at the LORAN-C "130 line" regardless of the Kvichak River sockeye salmon forecast or run.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

LORAN-C is no longer used by the department to define boundaries.

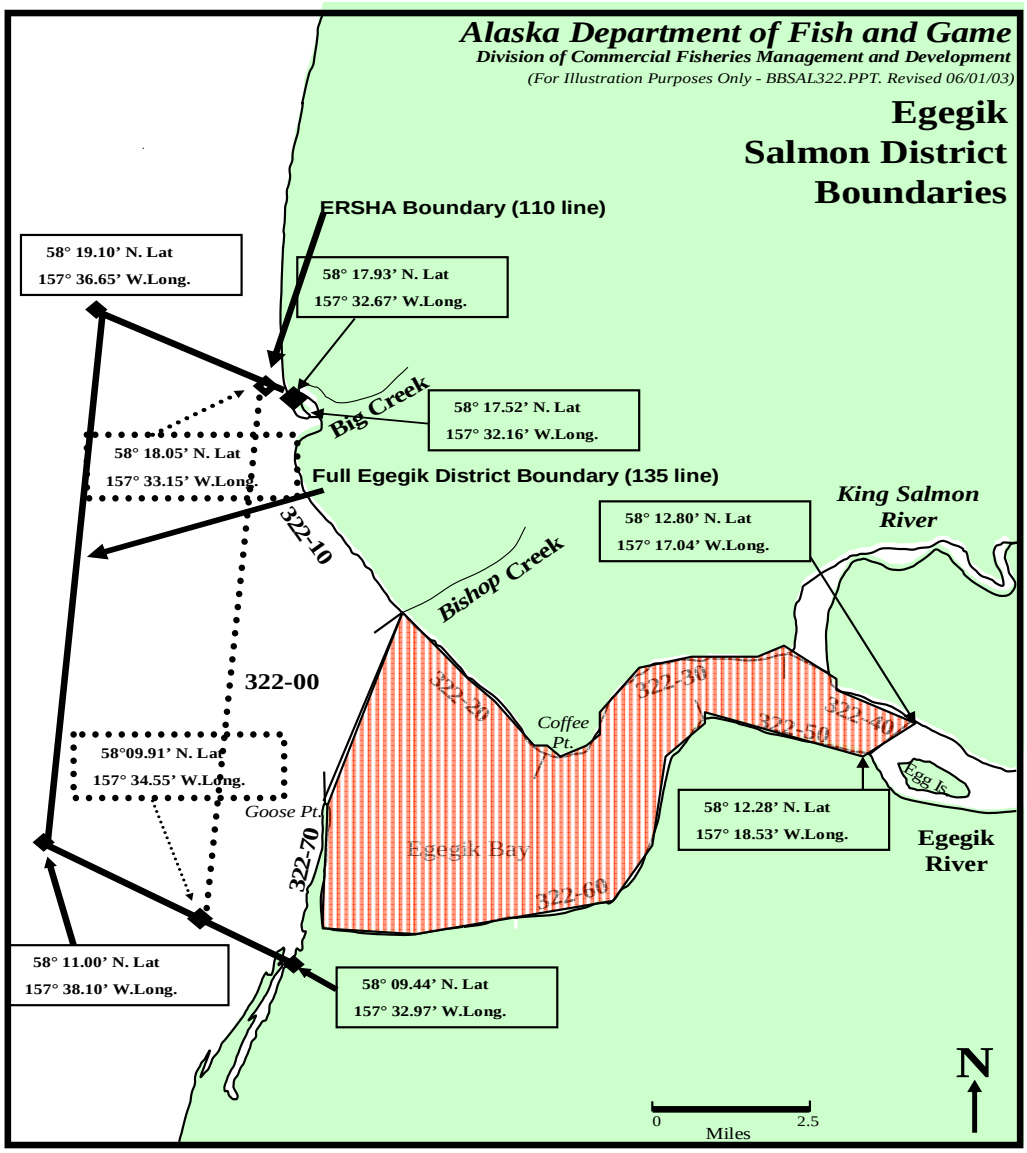


Figure 1. Map of Egegik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to any change in Egegik District boundaries that would result in an increase in exploitation on Kvichak River sockeye salmon stocks. Kvichak River sockeye salmon are a stock of management concern. East side districts have been reduced under certain circumstances in order to minimize interception of Kvichak River sockeye.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 72 - 5 AAC 06.359 Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Karl R. Hellberg

WHAT WOULD THE PROPOSAL DO? This proposal would place the Egegik River Special Harvest Area (ERSHA) in effect for an entire season when the Naknek-Kvichak or Ugashik District is closed because the total season escapement is projected preseason to be below the lower end of the escapement goal range.

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area (NRSHA) is in effect for the conservation of Kvichak River sockeye salmon. Additionally, the ERSHA is employed if the Ugashik District is closed to fishing because the total season escapement is projected to be below the lower end of the escapement goal range. Eastside districts return to their normal boundaries if the Naknek-Kvichak fishery is allowed outside the NRSHA. The Egegik District returns to its normal boundaries if the Ugashik District reopens.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Egegik District would be reduced to the ERSHA based on the preseason projection. The department would not have the ability to return to the full Egegik District boundaries if low Naknek-Kvichak or Ugashik District projections are incorrect.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that triggered the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Further reduction of the district may result in the following: 1) processor limits on fish deliveries, 2) excess escapement above the BEG range, 3) quality of escapement issues associated with a large escapement on a single tide followed by nearly continuous fishing in order to stay within the escapement range, 4) cleanup fisheries followed by the development of line fisheries within a fishing period, and 5) exclusion of the north beach section of set gillnet sites in the district.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to linking a season-long district boundary reduction to a preseason forecast.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 73 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Karl R. Hellberg

WHAT WOULD THE PROPOSAL DO? This proposal would have the department attempt to give a 12-hour notice prior to opening or closing the Egegik River Special Harvest Area (ERSHA).

WHAT ARE THE CURRENT REGULATIONS? The current regulation stipulates that the department will attempt to give a 48-hour notice prior to opening or closing the ERSHA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the department would have to attempt to give a 12-hour notice before activating the ERSHA.

BACKGROUND: The 48-hour notification is meant to allow permit holders to transfer without penalty, out of the Egegik District if the district is to be reduced to the ERSHA. The 48-hour advance notification corresponds with the re-registration, 48-hour waiting period.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. However, a reduction in notification time would not allow permit holders registered in Egegik District the opportunity to transfer to another district before fishing is restricted to the ERSHA.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 74 - 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Peter Thompson

WHAT WOULD THE PROPOSAL DO? This proposal would define the western boundary of the Egegik District as the LORAN-C "135 line," which is the current district line, until July 2.

WHAT ARE THE CURRENT REGULATIONS? The current regulations define the Egegik District and Egegik River Special Harvest Area (ERSHA) boundaries as shown in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the ERSHA could not be activated until July 2.

BACKGROUND: The Naknek River Sockeye Salmon Special Harvest Area Management Plan and the Egegik River Sockeye Special Harvest Area Management Plan provide for conservative management in the event of an expected poor run to the Kvichak River.

LORAN-C is no longer used by the department to define boundaries.

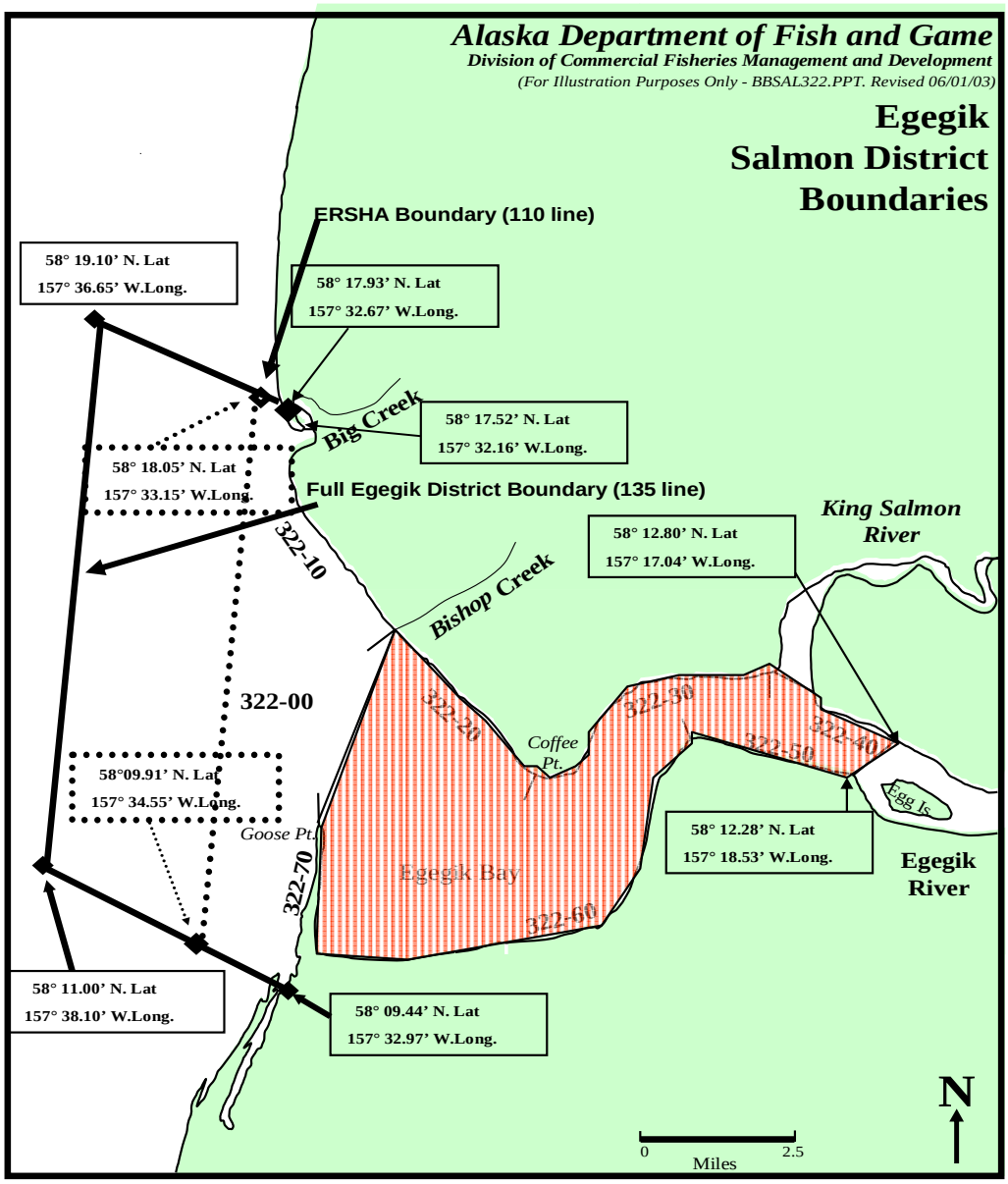


Figure 1. Map of Egegik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to any change in ERSHA boundaries that would result in an increase in exploitation on Kvichak River sockeye salmon stocks. Kvichak River sockeye salmon are a stock of management concern. East side districts have been reduced under certain circumstances in order to minimize interception of Kvichak River sockeye.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 81- 5AAC 06.373. Alagnak River Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal would put into place an optimum escapement goal (OEG) of 100,000 sockeye salmon for the Alagnak River in order to prevent commercial fishing restrictions in the Naknek/Kvichak District based solely on the Alagnak River escapement.

WHAT ARE THE CURRENT REGULATIONS? There is currently no OEG for the Alagnak River. In the Review of Salmon Escapement Goals in Bristol Bay, 2006, the existing biological escapement goal (BEG) is 170,000-200,000 aerial survey units. The recommendation is for a change to a sustainable escapement goal (SEG) minimum threshold of 320,000 sockeye salmon, based on tower counts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, there would be no change in management practices. The department is not seeking a change in the historic escapement pattern of the Alagnak River and does not intend to actively manage the Kvichak or Naknek Sections based on the escapement of the Alagnak River.

BACKGROUND: From 1977 to 2000, aerial surveys of the spawning grounds were the only way the department estimated escapement and observed spawner distribution for the Alagnak River. With the installation of counting towers in 2001 with aerial surveys for comparisons, the department has derived an SEG minimum threshold for the Alagnak River of 320,000 tower counts.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department has concerns that the reduction of the Alagnak River escapement goal by approximately 2/3 may have impacts on future production.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 84 - 5AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Karl Storath

WHAT WOULD THE PROPOSAL DO? This proposal would not allow a commercial fishery for set or drift gillnet gear for any reason in the Alagnak River Special Harvest Area (ARSHA) for the purpose of conserving Alagnak River Chinook salmon.

WHAT ARE THE CURRENT REGULATIONS? When the Naknek/Kvichak District is closed due to a poor sockeye run to the Kvichak River and a strong run is occurring to the Alagnak River, a commercial set and drift gillnet fishery at the mouth of the Alagnak River is allowed. During the first four periods, there is equal fishing time for both gear groups. If one gear group harvests more than 50% above the other gear group, alternating fishing periods are no longer required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, during a closure of the Naknek-Kvichak District commercial fishery to conserve Kvichak River sockeye salmon stocks, there would be no opportunity to harvest Alagnak River sockeye salmon that are surplus to escapement needs.

BACKGROUND: The Kvichak Section has been closed or restricted significantly since 1996. However, improvement in the Kvichak sockeye salmon run has been seen over the last three years. During the years the N/K District has been closed, historic high escapements to the Alagnak River have occurred. At the BOF meeting in March of 2005, the board defined the ARSHA and authorized a commercial set gillnet fishery which harvested 260,000 sockeye salmon during that season. In March of 2006, the BOF authorized both gear groups to fish in the ARSHA and a total of 57,000 sockeye were harvested. Very few Chinook salmon are harvested during these short periods. During the 2005 season, 209 Chinook were harvested and in 2006, only 68 Chinook were harvested.

Alagnak River sockeye salmon escapement based on tower estimates:

Year	2001	2002	2003	2004	2005	2006
Esc.	615,162	766,962	3,676,146	5,396,592	4,219,026	1,773,966

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. However, the department is **OPPOSED** to the limitation of management flexibility resulting in lost harvest opportunity.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 85 - 5AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Kvichak Setnetters Association

WHAT WOULD THE PROPOSAL DO? This proposal would open the Alagnak River Special Harvest Area (ARSHA) to set gillnet gear only.

WHAT ARE THE CURRENT REGULATIONS? When the Naknek/Kvichak District is closed due to a poor sockeye run to the Kvichak River and a strong run is occurring to the Alagnak River, a commercial set and drift gillnet fishery at the mouth of the Alagnak River is allowed. During the first four periods, there is equal fishing time for both gear groups. If one gear group harvests more than 50% above the other gear group, alternating fishing periods are no longer required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, only set gillnet gear would be allowed in the ARSHA. This was the original regulation adopted by the board in 2005.

BACKGROUND: The Kvichak Section has been closed or restricted significantly since 1996. However, improvement has been seen over the last three years. During the years the N/K District has been closed, large escapements to the Alagnak have occurred.

Year	2001	2002	2003	2004	2005	2006
Esc.	615,162	766,962	3,676,146	5,396,592	4,219,026	1,773,966

During the BOF meeting in March, 2005, the board defined the ARSHA and authorized a commercial set gillnet fishery which harvested 260,000 sockeye salmon. In March of 2006, the BOF authorized both gear groups to fish in the ARSHA and a total of 57,000 sockeye were harvested.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 86 - 5AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Michael Struznik

WHAT WOULD THE PROPOSAL DO? This proposal would open the Alagnak River Special Harvest Area (ARSHA) to set gillnet gear only.

WHAT ARE THE CURRENT REGULATIONS? When the Naknek/Kvichak District is closed due to a poor sockeye run to the Kvichak River and a strong run is occurring to the Alagnak River, a commercial set and drift gillnet fishery at the mouth of the Alagnak River is allowed. During the first four periods, there is equal fishing time for both gear groups. If one gear group harvests more than 50% above the other gear group, alternating fishing periods are no longer required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, only set gillnet gear would be allowed in the ARSHA. This was the original regulation adopted by the board in 2005.

BACKGROUND: The Kvichak Section has been closed or restricted significantly since 1996. However, improvement has been seen the last three years. During the years the N/K District has been closed, large escapements to the Alagnak have occurred.

Year	2001	2002	2003	2004	2005	2006
Esc.	615,162	766,962	3,676,146	5,396,592	4,219,026	1,773,966

During the BOF meeting in March of 2005, the board defined the ARSHA and authorized a commercial set gillnet fishery which harvested 260,000 sockeye salmon. In March of 2006, the BOF authorized both gear groups to fish in the ARSHA and a total of 57,000 sockeye were harvested. Very few Chinook salmon are harvested during these short periods. During the 2005 season, 209 Chinook were harvested and in 2006, only 68 Chinook were harvested.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 96 - 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Donald Mack

WHAT WOULD THE PROPOSAL DO? This proposal would delete the Naknek-Kvichak District and Naknek River Special Harvest Area (NRSHA) allocation percentages and ask for an array of management options including staggered tides, alternating tides, or simultaneous fishing by both gear groups. It would also require the Kvichak Section to be closed to commercial fishing for five years, continuation of the Alagnak River Special Harvest Area fishery, confinement of the drift fleet to the Naknek Section only and limiting the NRSHA to set gillnet gear only.

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the department projects that the sockeye salmon escapement into the Naknek River will exceed 800,000 fish and the Kvichak River escapement is one or more days behind schedule for reaching its escapement goal, the Naknek/Kvichak District is closed and the fishery is restricted to the NRSHA. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal the district is closed and all commercial fishing is restricted to the NRSHA. The NRSHA is only open when the Naknek/Kvichak is closed to commercial fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the Kvichak Section would be closed to commercial fishing for five years eliminating any fishing opportunity. Allowing the drift gillnet fleet in the Naknek Section would result in the harvest of Kvichak stocks at a much higher rate than if both gear groups were in the NRSHA. Moving the set gillnet fleet into the NRSHA permanently would conflict with subsistence users.

BACKGROUND: No additional information is needed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of the proposal. The department is **OPPOSED** to restrictions on management flexibility that affect the department's ability to manage for escapement and allocation goals. The department is **OPPOSED** to any change to the current regulation that would result in an increase in exploitation on Kvichak River sockeye salmon.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 97 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal seeks to set optimum escapement goal (OEG) ranges for the Kvichak River sockeye salmon, depending on run size.

WHAT ARE THE CURRENT REGULATIONS? The department has two sets of escapement goals for sockeye salmon in the Kvichak River; one for off-cycle years and another for the peak year. The department is recommending that both sets of escapement goals be defined as sustainable escapement goals (SEG) instead of BEG. The current escapement goal ranges of 2,000,000 to 10,000,000 for off-cycle years and 6,000,000 to 10,000,000 for the peak year would remain unchanged. There is no OEG for the Kvichak River sockeye salmon at this time.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would change nothing at this time.

BACKGROUND: The Kvichak River sockeye salmon is a stock of management concern.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 98 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Konrad Schaad

WHAT WOULD THE PROPOSAL DO? This proposal would place an optimum escapement goal (OEG) on the Kvichak River that is significantly lower than the current minimum biological escapement goal (BEG) of 2 million sockeye salmon in off-cycle years.

WHAT ARE THE CURRENT REGULATIONS? The department has two sets of escapement goals for sockeye salmon in the Kvichak River; one for off-cycle years and another for the peak year. The department is recommending that both sets of escapement goals be defined as sustainable escapement goals (SEG) instead of BEG. The current escapement goal ranges of 2,000,000 to 10,000,000 for off-cycle years and 6,000,000 to 10,000,000 for the peak year would remain unchanged. There is no OEG for the Kvichak River sockeye salmon at this time.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it could slow the recovery of the Kvichak River sockeye salmon which currently is demonstrating substantial improvement in production and escapement.

BACKGROUND: The Kvichak River is a stock of "management concern". The Kvichak Section set gillnet fleet has, over the life of the allocation plan, harvested an average of five percent of the eight percent allocation. The regulations state that surplus fish will be allocated 84% for drift gillnet, 8% for Kvichak Section set gill net, and 8% for Naknek Section set gillnet, but in only four of the last 10 years were there surplus fish to allocate from the Kvichak River. To help assure the escapement of Kvichak River sockeye salmon, the board has restricted all eastside users to smaller areas.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to increasing the exploitation rate on a stock of concern in off-cycle years which may have impacts on the recovery of Kvichak River sockeye salmon stocks. In addition, the potential reduction of the Kvichak River off-cycle year escapement goal by 25 – 50% may have impacts on future production.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 100 - 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Nushagak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would allow for separate but equal length periods for set and drift gillnet gear groups during directed Chinook salmon fishing periods in the Nushagak District.

WHAT ARE THE CURRENT REGULATIONS? The current regulations specify the accounting period for allocation percentages is from June 1 until July 17 and that the department may announce separate periods for the purpose of sockeye allocation only. If there are no concerns with the harvest ratio of sockeye between gear groups, then set and drift periods are concurrent. Directed Chinook fishing periods are concurrent because there is no allocation goal for Chinook.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would be able to manage directed Chinook openings for the maximum benefit of both gear groups.

BACKGROUND: The board went to great lengths to adopt a sockeye salmon allocation plan. Prior to allocation plans, set and drift gillnet gears were managed concurrently. To avoid the appearance of making allocation decisions, the department makes directed Chinook periods concurrent for both drift and set gillnets. This can result in the drift gillnet periods ending at low tide or during ebb tide which is much less efficient and can result in higher expenses and poorer quality fish. Participants are forced to return against the tide to deliver fish, or must wait several more hours to get to the dock because of low tide. Unlinking fishing periods for set and drift gillnet for directed Chinook openings would minimize expense and maximize opportunity for these gear groups. Additionally, very few set gillnet permit holders participate in the early directed Chinook periods. Thus, the drift gillnet fleet is limited by the requirements of the allocation plan as it is currently written.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department **SUPPORTS** management flexibility that allows the consideration of fish quality and economics.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 101 - 5 AAC 06.XXX. Dude Fishing.

PROPOSED BY: Fritz Johnson

WHAT WOULD THE PROPOSAL DO? This proposal would create regulations and areas for permit holders interested in taking tourists on commercial fishing vessels.

WHAT ARE THE CURRENT REGULATIONS? There are no specific regulations or areas set aside for taking tourists on commercial fishing vessels.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unclear how adoption of this proposal might change the status quo. There could be conflict between subsistence users and commercial vessels in this area. Typically subsistence fishing is completed prior to July 15.

BACKGROUND: The new law allowing for short term crewmember licenses has created an opportunity for permit holders to give tourists a commercial fishing experience. The length restriction of 32 feet for vessels in Bristol Bay and distances to the fishing districts are impediments to permit holders taking advantage of this opportunity. This proposal would allow interested permit holders to develop a day-trip type charter for tourist oriented commercial fishing.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 102 - 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

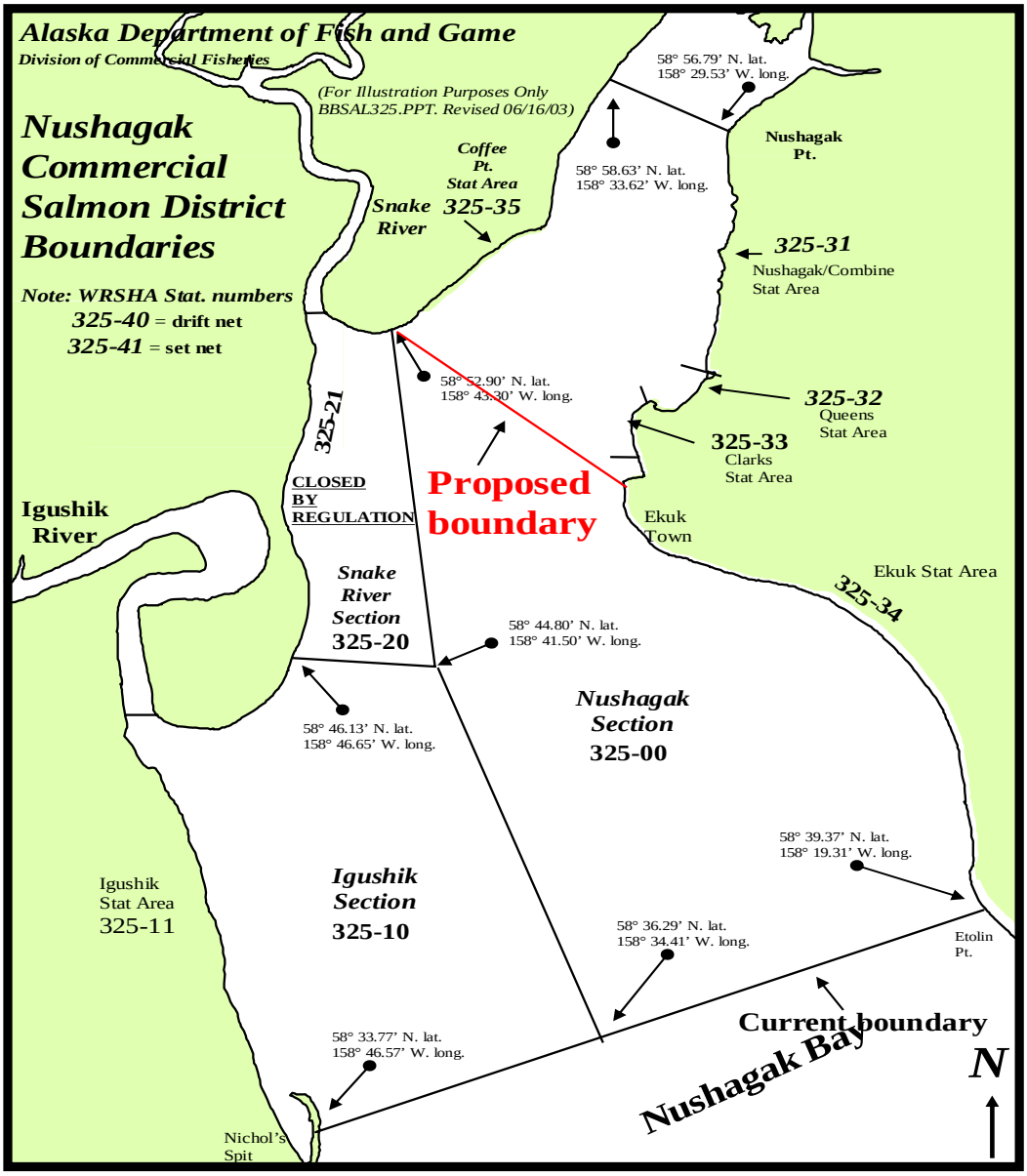
PROPOSED BY: Darryl F. Pope

WHAT WOULD THE PROPOSAL DO? This proposal would change the boundaries of the Nushagak District after July 5 if the preseason forecast for the Kvichak River was insufficient to provide for a 40% exploitation rate.

WHAT ARE THE CURRENT REGULATIONS? The current regulations do not tie Nushagak District boundaries to Kvichak River escapement or run projections.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the Nushagak District would be significantly reduced in years when the preseason forecast for the Kvichak is small.

BACKGROUND: The department is currently sampling commercial harvest for genetic stock identification analysis to determine the origin of fish caught in each district. Without more specific knowledge of stock composition of the Nushagak District harvest, it is impossible to determine whether this proposal would reduce exploitation of Kvichak sockeye salmon stocks. This proposal would dramatically reduce the size of the Nushagak District and would displace many set gillnet permit holders from their traditional fishing areas.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 105 - 5 AAC 06.365. Egegik District Commercial Set and Drift Gillnet Sockeye Salmon Management and Allocation Plan.

PROPOSED BY: Chris Cameron

WHAT WOULD THE PROPOSAL DO? This proposal would define the western boundary of the Egegik District as the LORAN-C "110 line" and set the western boundary of the Egegik River Special Harvest Area (ERSHA) to a line from Goose Point to Bishop Creek.

WHAT ARE THE CURRENT REGULATIONS? Present regulations provide for area reductions in all eastside Bristol Bay fishing districts when the Naknek River Special Harvest Area is being used for the conservation of Kvichak sockeye salmon. The current regulations define the boundaries of the Egegik District and the ERSHA as shown in Figure 1.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing area for the Egegik District and the ERSHA would be reduced.

BACKGROUND: In January, 2001, the board established provisions in the Naknek River Sockeye Salmon Special Harvest Area Management Plan (5 AAC 06.360) that would trigger the inriver fishery (NRSHA) as early as June 27. The board also took measures to minimize the interception of stocks bound for other districts. When the NRSHA is in effect, the Egegik District area is reduced and the Ugashik District area is also reduced until June 29.

Recent advancements in genetic stock identification techniques developed by the department are being used to determine district of origin of fish harvested in Bristol Bay. The baseline and first year of field collections have been completed.

LORAN-C is no longer used by the department to define boundaries.

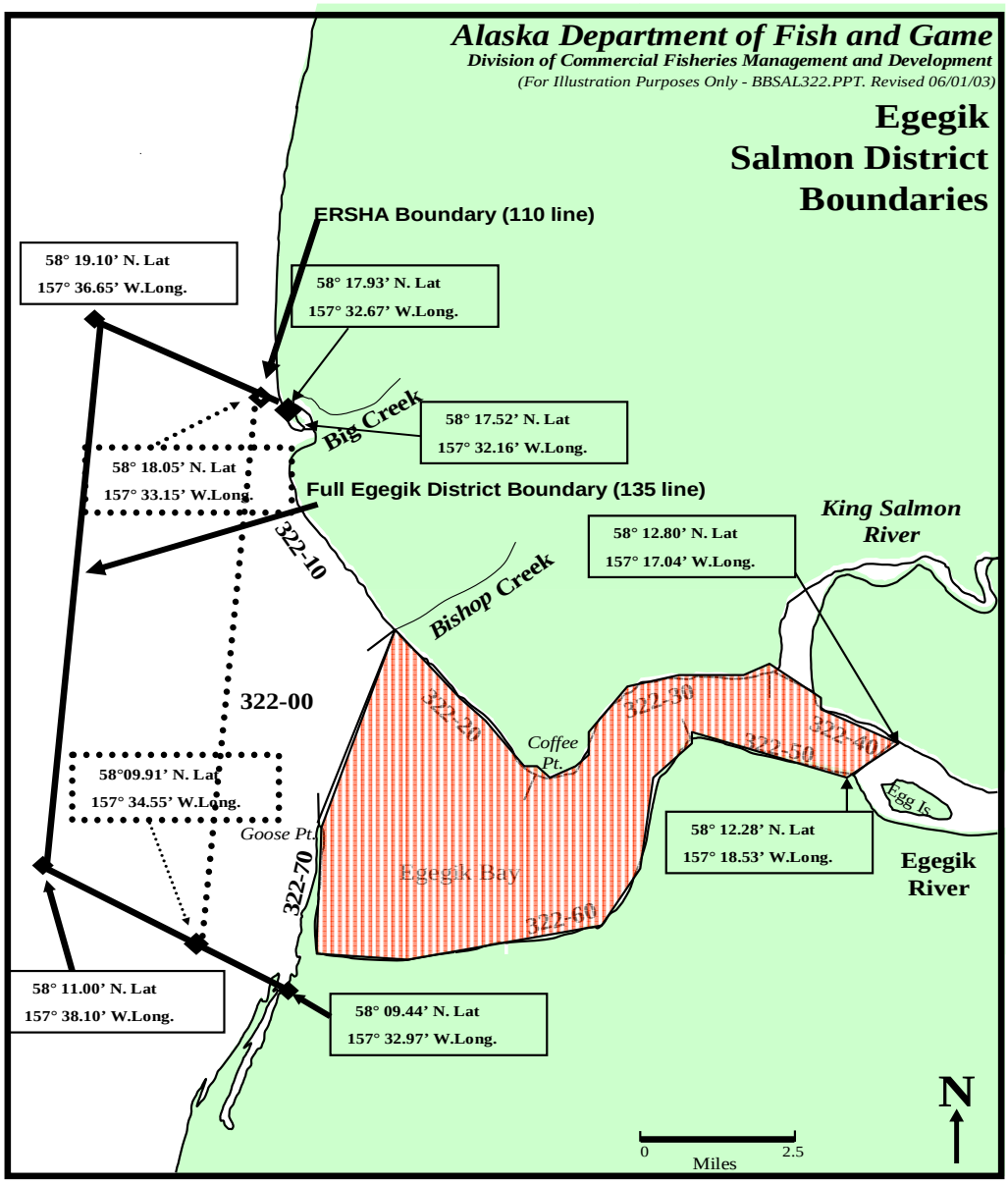


Figure 1. Map of Egegik District.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement and allocation goals.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 115 - 5 AAC 06.320. Fishing periods.

PROPOSED BY: Togiak Traditional Council

WHAT WOULD THE PROPOSAL DO? This proposal would add 12 hours to the weekly fishing period in the Kulukak Section of the Togiak District.

WHAT ARE THE CURRENT REGULATIONS? Currently in the Togiak District, salmon may be taken in the Kulukak Section from 9:00 a.m. Monday to 9:00 a.m. Thursday.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Since the full schedule is most often not used due to biological concerns, adding an additional 12 hours to the fishing schedule would not change the management strategy for the Kulukak River. The department currently has the flexibility to extend or reduce the fishing schedule based on fish abundance and fishing pressure.

BACKGROUND: In the late 1980s fishing effort from the Togiak River Section shifted to the Kulukak Section. Local knowledge suggests that a significant amount of the harvest in the Kulukak Section is bound for the Togiak River and being intercepted in the Kulukak Section. This shift in effort also resulted in increased fishing pressure in the Kulukak Section. The much smaller Kulukak and Kanik River stocks are more susceptible to overexploitation with the increased fishing pressure. The department has reduced the regularly scheduled fishing period by 24 hours for the last 7 years. The department has attempted to respond to the desires of locals to fish more in the Kulukak Section. This summer, the full schedule in the Kulukak Section was used during the first three weeks of June, the first week of July, and then from July 31 through the remainder of the season. There was a significant increase in effort during those weeks with an influx of many people who do not normally fish in Kulukak. This year, tender support to Kulukak was far more limiting than the department's management strategy. Processors only bought fish from Kulukak from June 19th to July 26th including only 2 weeks of full schedule fishing in Kulukak.

In 2006, the department collected baseline genetics samples from the Togiak and Kulukak River systems. This may allow managers to determine the extent of interception of Togiak Stocks in the Kulukak section.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. This proposal's objective can already be met within the current regulations and the department believes it should have the flexibility to adjust fishing time as needed based on inseason information.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

COMMITTEE F: Allocation, (20 Proposals)

COMMITTEE F: Allocation, (20 Proposals)

PROPOSAL 49 - 5 AAC 06.355. Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Neil C. Armstrong

WHAT WOULD THE PROPOSAL DO? This proposal would establish individual fishing quotas (IFQs) based on historical harvest records.

WHAT ARE THE CURRENT REGULATIONS? Currently, the Bristol Bay salmon fishery is a limited entry fishery that is open and competitive among the limited entry permit holders. There are gear specific allocations between the two gear types in four of the five Districts.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department cannot accurately predict how many fish will return to a district in a given year and therefore would have difficulty establishing a meaningful IFQ for each permit holder. Additionally, under an IFQ system, temporal distribution of harvest is problematic as permit holders would tend to harvest their IFQ as soon as possible. Overexploitation of early segments of the salmon run would be the likely outcome.

BACKGROUND: IFQs have been used in fisheries where the total allowable catch is set preseason, is not based on inseason escapement information, and generally does not change during the season.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Due to the unpredictable variability of wild salmon runs, the department does not believe the IFQ model is well suited to Bristol Bay salmon fisheries.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 53 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Doug McRae Sr.

WHAT WOULD THE PROPOSAL DO? This proposal would provide equal fishing time for both the set and drift gillnet gear groups when fishing in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages for the NRSHA are 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, fishing time for set gillnet gear would increase from approximately 1 out of every 5 periods to every other period.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear. From 2001-2003 the allocation was by alternating tides.

	Percentages		
Year	NRSHA Drift	NRSHA Set	Allocation plan
2001	74	26	alternate periods
2002	64	36	alternate periods
2003	65	35	alternate periods
2004	88	12	84% drift/16% set
2005	81	19	84% drift/16% set
2006	80	20	84% drift/16% set
Average	76	24	

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 54 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Doug G. McRae Jr.

WHAT WOULD THE PROPOSAL DO? This proposal would provide equal fishing time for both the set and drift gillnet gear groups when fishing in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages for the NRSHA are 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, fishing time for set gillnet gear would increase from approximately 1 out of every 5 periods to every other period.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear. From 2001-2003 the allocation was by alternating tides.

Year	Percentages NRSHA Drift	NRSHA Set	Allocation plan
2001	74	26	alternate periods
2002	64	36	alternate periods
2003	65	35	alternate periods
2004	88	12	84% drift/16% set
2005	81	19	84% drift/16% set
2006	80	20	84% drift/16% set
Average	76	24	

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 55 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: George Wilson

WHAT WOULD THE PROPOSAL DO? This proposal would alternate the commercial fishing periods between set and drift gill net gear groups when fishing in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages for the NRSHA are 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, fishing time for set gillnet gear would increase from approximately 1 out of every 5 periods to every other period.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear. From 2001-2003 the allocation was by alternating tides.

Year	Percentages NRSHA Drift	NRSHA Set	Allocation plan
2001	74	26	alternate periods
2002	64	36	alternate periods
2003	65	35	alternate periods
2004	88	12	84% drift/16% set
2005	81	19	84% drift/16% set
2006	80	20	84% drift/16% set
Average	76	24	

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 56 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Kvichak Set netters Association

WHAT WOULD THE PROPOSAL DO? This proposal would alternate the commercial fishing periods between set and drift gill net gear when fishing in the NRSHA.

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages for the NRSHA are 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, fishing time for set gillnet gear would increase from approximately 1 out of every 5 periods to every other period.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to a straight 84 % drift gillnet gear to 16% set gillnet gear. From 2001-2003 the allocation was by alternating tides.

	Percentages		
Year	NRSHA Drift	NRSHA Set	Allocation plan
2001	74	26	alternate periods
2002	64	36	alternate periods
2003	65	35	alternate periods
2004	88	12	84% drift/16% set
2005	81	19	84% drift/16% set
2006	80	20	84% drift/16% set
Average	76	24	

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 57 - 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Curt Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would alternate the commercial fishing periods between set and drift gill net gear when fishing in the NRSHA after the minimum escapement goal of 800,000 sockeye salmon is met for the Naknek River.

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages for the NRSHA are 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, fishing time for set gillnet gear would increase from approximately 1 out of every 5 periods to every other period after the minimum escapement goal for the Naknek River is met.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear. From 2001-2003 the allocation was by alternating tides.

	Percentages		
Year	NRSHA Drift	NRSHA Set	Allocation plan
2001	74	26	alternate periods
2002	64	36	alternate periods
2003	65	35	alternate periods
2004	88	12	84% drift/16% set
2005	81	19	84% drift/16% set
2006	80	20	84% drift/16% set
Average	76	24	

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 82 - 5AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Dominic Lee

WHAT WOULD THE PROPOSAL DO? This proposal would allocate 84% of the catch in the Alagnak River Special Harvest Area (ARSHA) to the drift gillnet gear group with the remaining 16% allocated to the set gillnet gear group.

WHAT ARE THE CURRENT REGULATIONS? When the Naknek/Kvichak District is closed due to a poor sockeye run to the Kvichak River and a strong run is occurring to the Alagnak River, a commercial set and drift gillnet fishery at the mouth of the Alagnak River is allowed. During the first four periods, there is equal fishing time for both gear groups. If one gear group harvests more than 50% above the other gear group, alternating fishing periods are no longer required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would provide for a predominately drift gillnet fishery on the Alagnak River as it has on the Naknek River.

BACKGROUND: Kvichak River sockeye salmon have been listed as a stock of concern since 2000. During the years the Naknek-Kvichak District has been closed to conserve Kvichak sockeye salmon stocks, large escapements to the Alagnak have occurred. The following are the escapements in the Alagnak River since 2001,

Year	2001	2002	2003	2004	2005	2006
Esc.	615,162	766,962	3,676,146	5,396,592	4,219,026	1,773,966

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 83 - 5AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Kurt Johnson

WHAT WOULD THE PROPOSAL DO? This proposal would allocate 84% of the catch in the Alagnak River Special Harvest Area (ARSHA) to the drift gillnet gear group with the remaining 16% allocated to the set gillnet gear group.

WHAT ARE THE CURRENT REGULATIONS? When the Naknek/Kvichak District is closed due to a poor sockeye run to the Kvichak River and a strong run is occurring to the Alagnak River, a commercial set and drift gillnet fishery at the mouth of the Alagnak River is allowed. During the first four periods, there is equal fishing time for both gear groups. If one gear group harvests more than 50% above the other gear group, alternating fishing periods are no longer required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would provide for a predominately drift gillnet fishery on the Alagnak River as it has on the Naknek River. In addition, it could potentially increase the Chinook salmon harvest in the fishery.

BACKGROUND: Kvichak River sockeye salmon have been listed as a stock of concern since 2000. During the years the Naknek-Kvichak District has been closed to conserve Kvichak sockeye salmon stocks, large escapements to the Alagnak have occurred. The following are the escapements in the Alagnak River since 2001,

Year	2001	2002	2003	2004	2005	2006
Esc.	615,162	766,962	3,676,146	5,396,592	4,219,026	1,773,966

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal .

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 87- 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: South Naknek Village Setnetters

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the allocation of sockeye salmon between drift gillnet gear and set gillnet gear in the Naknek/Kvichak District and in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS. The harvest allocation of sockeye salmon in the Naknek/Kvichak District is currently set at 84% for drift gillnet gear and 16% for set gillnet gear. The set gillnet allocation is further divided; 8% for Naknek Section and 8% for Kvichak Section. When fishing in the NRSHA, the harvest is allocated 84% for drift and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, both gear groups would fish at the same time in the NRSHA and in the Naknek-Kvichak District.

BACKGROUND: The BOF determined in 1997, that it would allocate the surplus fish in the Naknek/Kvichak District 84% for drift gillnet gear and 16% for set gillnet gear. That allowed the department to fish the gear groups separately or at the same time when fishing in the district depending on the current allocation percentages. While in the NRSHA, the department is directed to fish the gear groups separately and to allocate the harvest 84% for drift and 16% for set gillnet gear. When managing for the 84/16

allocation in the NRSHA, the periods are typically distributed as five drift gillnet periods for each set gillnet period.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. If the allocation plan is removed, the department would need guidance from the board on future management of the gear groups.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 88- 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: South Naknek Village Setnetters

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the allocation of sockeye salmon between drift gillnet gear and set gillnet gear in the Naknek/Kvichak District and in the Naknek River Special Harvest Area.

WHAT ARE THE CURRENT REGULATIONS? The harvest allocation of sockeye in the Naknek/Kvichak District is currently set at 84% drift gillnet gear and 16% set gillnet gear. The set allocation is further divided 8% Naknek Section and 8% Kvichak Section. When fishing in the NRSHA the harvest is allocated 84% drift 16% set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, both gear groups would fish at the same time in the NRSHA and in the Naknek-Kvichak District.

BACKGROUND: The BOF determined in 1997, that it would allocate the surplus fish in the Naknek/Kvichak District 84% for drift gillnet gear and 16% for set gillnet gear. That allowed the department to fish the gear groups separately or at the same time when fishing in the district depending on the current allocation percentages. While in the NRSHA, the department is directed to fish the gear groups separately and to allocate the harvest 84% for drift and 16% for set gillnet gear. When managing for the 84/16 allocation in the NRSHA, the periods are typically distributed as five drift periods for each set period.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. If the allocation plan is removed, the department would need guidance from the board on future management of the gear groups.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 89 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Vince Webster

WHAT WOULD THE PROPOSAL DO? This proposal would require that for every two tides the drift gillnet fleet fished, the set gillnet fleet would fish one tide in the Naknek River Special Harvest Area (NRSHA).

WHAT ARE THE CURRENT REGULATIONS? The harvest allocation goal for the NRSHA is 84% for drift gillnet gear and 16% for set gill net gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would increase the fishing time for set gillnet gear from approximately one out of every six tides to one out of three tides.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 90 - 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Donald Mack

WHAT WOULD THE PROPOSAL DO? This proposal would change the Naknek-Kvichak District allocation to 67% for drift gillnet gear and 33% for set gillnet gear. The set gillnet percentage would be evenly distributed between Naknek Section (16.5%) and Kvichak Section (16.5%). When fishing in the Naknek River Special Harvest Area (NRSHA) the harvest would be split 67% for drift and 33% for set gillnet gear.

WHAT ARE THE CURRENT REGULATIONS? The allocation for the Naknek-Kvichak District is 84% for drift gillnet gear and 16% for set gill net gear. The set gillnet allocation is distributed evenly between Naknek Section (8%) and Kvichak Section (8%).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would increase the fishing time for the set gillnet gear group and decrease the fishing time for the drift gillnet gear group. Under the proposed plan the two gear groups would receive roughly equal fishing time on a one to one tide basis in

the NRSHA. However, in the Naknek-Kvichak District it may be impossible to maintain this allocation without allowing large escapements up the rivers.

BACKGROUND: The allocation plan was developed in 1997, and has been unchanged in the Naknek/Kvichak District, but changes have occurred in the NRSHA. The NRSHA went from fishing both gear groups together, to fishing them separately on alternating tides, and finally to the 84% for drift and 16% for set gillnet allocation adopted in 2003.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. However, the department has concerns that the set gillnet gear type may not have the ability to harvest 33 percent of the district harvest.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 91 - 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Donald Mack

WHAT WOULD THE PROPOSAL DO? This proposal would change the allocation percentages for the Naknek-Kvichak District and the Naknek River Special Harvest Area (NRSHA) based on average harvest by gear group from 1997 to present. Special safeguards would be added to allow changes in the allocation plan depending on fluctuation of set or drift gillnet effort.

WHAT ARE THE CURRENT REGULATIONS? The allocation for the Naknek-Kvichak District is 84% for drift gillnet gear and 16% for set gill net gear. The set gillnet allocation is distributed evenly between Naknek Section (8%) and Kvichak Section (8%). The allocation for the NRSHA is 84% for drift gillnet gear and 16% for set gill net gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the fishing time for the set gillnet gear group would increase and the fishing time for the drift gillnet gear group would decrease. Under the proposed plan the two gear groups would receive roughly equal fishing time on a one to one tide basis in the NRSHA. However, in the Naknek-Kvichak District it may be impossible to maintain this allocation without allowing large escapements up the rivers.

BACKGROUND: The allocation plan was developed in 1997, and has been unchanged in the Naknek/Kvichak District, but changes have occurred in the NRSHA. The NRSHA went from fishing both gear groups together, to fishing them separately on alternating

tides, and finally to the 84% for drift and 16% for set gillnet allocation adopted in 2003. Historical allocation outcomes are shown below for the years 1998 – 2006.

	Percentages				
Year	N/K Drift	Nak Set	Kvi Set	NRSHA Drift	NRSHA Set
1998	84	8	8		
1999	85	8	7		
2000	83	12	5	80	20
2001	82	16	2	74	26
2002				64	36
2003	91	9	0	65	35
2004	79	11	10	88	12
2005	80	20		81	19
2006	87	8	5	80	20
Average	84	11	5	76	24

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. However, the department has concerns that the set gillnet gear type may not have the ability to harvest a larger percentage of the district harvest.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 92 - 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Donald Mack

WHAT WOULD THE PROPOSAL DO? This proposal would require drift gillnet and set gillnet gear groups in the Naknek-Kvichak District and the Naknek River Special Harvest Area (NRSHA), to fish on alternating tides. The allocation percentages for the Naknek-Kvichak District and the NRSHA would be deleted from regulation.

WHAT ARE THE CURRENT REGULATIONS? The allocation for the Naknek-Kvichak District is 84% for drift gillnet gear and 16% for set gill net gear. The set gillnet allocation is distributed evenly between Naknek Section (8%) and Kvichak Section (8%). The allocation for the NRSHA is 84% for drift gillnet gear and 16% for set gill net gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the harvest of sockeye salmon in the Naknek/Kvichak District and the NRSHA would be divided between drift gillnet gear and set gillnet gear by fishing these gear groups on alternating tides. This type of fishing pattern would have economic and biological effects for harvest and escapement. Escapement would increase significantly when sockeye salmon move through the district and into the river when only

set gillnet gear is in the water. A substantial number of surplus fish available for harvest will escape the fishery.

BACKGROUND: The allocation plan was developed in 1997, and has been unchanged in the Naknek/Kvichak District, but changes have occurred in the NRSHA. The NRSHA went from fishing both gear groups together, to fishing them separately on alternating tides, and finally to the 84% for drift and 16% for set gillnet allocation adopted in 2003.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to the limitation of management flexibility which is necessary to achieve escapement goals.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 93 - 5AAC 06.364. Naknek/Kvichak District Commercial Set and Drift gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Kvichak Setnetters Association

WHAT WOULD THE PROPOSAL DO? This proposal would open the Kvichak Section to set gillnet gear whenever the Naknek Section is opened for a drift or set gillnet period. It would also open the Naknek/Kvichak District when the preseason projections show a surplus of sockeye salmon to the Kvichak River. However, if the Kvichak River sockeye forecast projects less than one million surplus fish, set gillnet permit holders fishing in the Kvichak Section would be restricted to no more than 25 fathoms of gillnet. Additional set gillnet periods would be allowed to achieve the eight percent allocation for Kvichak Section set gillnets.

WHAT ARE THE CURRENT REGULATIONS? On or after June 27, when the Kvichak River escapement is one or more days behind the historical run curve, the Naknek/Kvichak District is closed and the fishery is restricted to the Naknek River Special Harvest Area (NRSHA) for both gear groups. In addition, when the preseason forecast for the Kvichak River is less than 30% above the minimum escapement goal, the district is closed and all commercial fishing is restricted to the NRSHA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED If the proposal is adopted, when the Kvichak River preseason forecast projects a harvestable surplus, the Naknek-Kvichak District would be open, and the Kvichak Section would be open to set gillnet gear whenever the Naknek Section is open to set or drift gillnet gear.

BACKGROUND: The BOF classified the Kvichak River sockeye salmon stock as a stock of yield concern in 2000 and a stock of management concern in 2003. At each of these BOF sessions, the regulatory trigger points were tightened to assist in minimizing the harvest of Kvichak River sockeye salmon stocks elsewhere. During the 2003 BOF

meeting, the board added language to the Naknek River Sockeye Salmon Special Harvest Area Management Plan stipulating that when the preseason forecast is less than 30 percent above the minimum biological escapement goal, the Naknek/Kvichak District will be closed and only the NRSHA will be open.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is **OPPOSED** to any change to the current regulation that would result in an increase in exploitation on Kvichak River sockeye salmon.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 94 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Wanda Nelson

WHAT WOULD THE PROPOSAL DO? This proposal would require the department to allocate the catch on a daily basis in the Naknek River Special Harvest Area (NRSHA), based on the number of set and drift gillnet participants.

WHAT ARE THE CURRENT REGULATIONS? The allocation goal for the NRSHA is 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, it would be necessary to determine the number of drift and set gillnet users and to determine the harvest rates of each gear group on a daily basis.

BACKGROUND: Managing the NRSHA for allocation on a daily basis would require additional staff time which is unfunded at this time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department is concerned that adoption of this proposal would create additional record keeping for the department, requiring additional, currently unfunded personnel. The department would point out that additional layers of regulation on an already complex allocation plan may be counterproductive. If this proposal is adopted, the department would require additional direction from the board in determining allocation goals based on level of effort by each gear group.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 95 - 5AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Eike Smith

WHAT WOULD THE PROPOSAL DO? This proposal would limit the drift gillnet gear group to no more than three fishing periods in the Naknek River Special Harvest Area (NRSHA) before a set gillnet period is allowed.

WHAT ARE THE CURRENT REGULATIONS? The allocation for the NRSHA is 84% for drift gillnet gear and 16% for set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the percentage of the NRSHA harvest taken by the set gillnet gear group will increase.

BACKGROUND: The board changed the allocation in the NRSHA in 2003 from alternating periods between user groups to 84 % for drift gillnet gear and 16% for set gillnet gear. Under the current plan the drift gillnet fleet fishes up to five periods before the set gillnet gear group is allowed to fish.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.

PROPOSAL 99 - 5 AAC 06.367(c). Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Nushagak Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would change the end of the accounting period for allocation percentages from July 17 to July 12.

WHAT ARE THE CURRENT REGULATIONS? The current regulations specify the accounting period for allocation percentages is from June 1 until July 17.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would cease to make management decisions based on allocation, on July 12.

BACKGROUND: The board adopted allocation plans for most Bristol Bay districts in 1997. The plan for the Nushagak District requires the department to manage for

allocation secondarily to escapement from June 1 to July 17. In some recent years with earlier run timing or smaller runs, fishing has been largely complete by July 10 to July 15. When this happens, the perception is that many participants quit fishing and the gear type that is ahead on harvest percentage is held back from fishing while there is diminishing effort by the gear type that is behind on harvest percentage.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that approval of this proposal would result in an additional cost for a private person to participate in this fishery.

PROPOSAL 103 - 5 AAC 06.365. Egegik District Commercial Set and Drift Gillnet Allocation Plan.

PROPOSED BY: Cody and Kim Rice

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of 200 fathoms of drift gillnet gear to enable the drift gillnet fleet to catch up on their allocation should they fall behind by 2%. Additionally, both gear groups would fish concurrently if the drift fleet is less than 200 vessels, and the allocation plan would be terminated should the drift fleet be unable to catch up after three tides.

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages in regulation are 86% percent for drift gillnet and 14% for set gillnet. The accounting period for purposes of determining the allocation is June 1- July 17. The only time the allocation plan can be suspended under current regulations is when the need to manage escapement compels managers to fish as much gear as possible.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the proposal is adopted, the drift gillnet fleet in Egegik District would be allowed to fish 200 fathoms of gillnet if they were 2% or more below their allocation. If after three fishing periods with no improvement in the allocation imbalance, the allocation plan would no longer apply. The proposal also addresses the possibility of an insufficient fleet to maintain the allocation percentages late in the season. If there are less than 200 drift gillnet vessels, drift gillnet and set gillnet gear groups would fish concurrently during the three periods when 200 fathoms of drift gear is in use.

BACKGROUND: Typically, the department attempts to achieve the allocation goals by allowing more fishing time to the gear group that is behind. Unless the catch allocation is fairly balanced before the mid-point of the run, the volume of fish already harvested is so large relative to the late season harvests, that several tides may be needed to correct any imbalance. The later in the run the attempt is made, the harder it is to significantly change the allocation percentages. In the past few years, the final percentages have

slightly favored the set gillnet group. The department does not manage for allocation on a daily basis but rather to achieve the allocation goals for the entire season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. However, the department would point out that additional layers of regulation on an already complex allocation plan might be counterproductive.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 104 - 5 AAC 06.365. Egegik District Commercial Set and Drift Gillnet Allocation Plan.

PROPOSED BY: Kim Rice

WHAT WOULD THE PROPOSAL DO? This proposal would change the Egegik District allocation accounting period to June 1 until the escapement goal is met.

WHAT ARE THE CURRENT REGULATIONS? The allocation percentages in regulation are 86% percent for drift gillnet and 14% for set gillnet. The time period for purposes of determining the allocation is June 1 - July 17.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The allocation accounting period, in most cases would be shortened. The allocation plan would no longer apply once the escapement goal is attained.

BACKGROUND: Typically, the department attempts to achieve the allocation goals by allowing more fishing time to the gear group that is behind. Unless the catch allocation is fairly balanced before the mid-point of the run, the volume of fish already harvested is so large relative to the late season harvests that several tides may be needed to correct any imbalance. The later in the run the attempt is made the harder it is to significantly change the allocation percentages. In the past few years, the final percentages have slightly favored the set gillnet group. The department does not manage for allocation on a daily basis but rather to achieve the allocation goals for the entire season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: The department does not believe that the approval of this proposal would result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 260 - 5 AAC 28.645. Aleutian Islands District Pollock Management Plan. Amend the Aleutian Islands District state-waters walleye pollock fishery management plan to coordinate the start date and guideline harvest level with the federally-exempted walleye pollock fishery in the Aleutian Islands.

PROPOSED BY: Alaska Board of Fisheries.

WHAT WOULD THIS PROPOSAL DO? Currently, the state-waters walleye pollock fishery management plan, as passed by the BOF in October 2006, specifies an opening date of January 20 and a guideline harvest level of 3,000 metric tons, less any harvest to be taken by federally permitted vessels within sea lion critical habitat between 174 degrees W and 178 degrees W.

The January 20 opening date may occur prior to federal authorization to fish walleye pollock in this critical habitat. If this were to occur, staff would not know the allowable harvest level and would not be able to set the state-waters GHL so that the combined harvest would not exceed 3,000 metric tons.

The proposal contains three options to revise the state-waters walleye pollock management plan. The three options are intended to coordinate the state-waters fishery with the EFP fishery so that the total GHL of 3,000 metric tons would not be exceeded in the combined state-waters and federally authorized (e.g., exempted fishery permit; EFP) fisheries.

WHAT ARE THE CURRENT REGULATIONS? The Aleutian Islands state-waters walleye pollock fishery management plan was adopted at the October 14-15 State Waters Trawl regulatory BOF meeting. The management plan is currently under review. The management plan is expected to become effective prior to the beginning of the state-waters walleye pollock fishery in 2007.

The Aleutian Islands state-waters walleye pollock management plan specifies a guideline harvest level of 3,000 metric tons of walleye pollock from 174º W. long., to 178º W. long. The state-waters walleye pollock fishery GHL shall be reduced by the quantity of walleye pollock harvested by federally permitted vessels in critical habitat for Steller sea lions from 174º W. long., to 178º W. long.

According to 5 AAC 28.089. Guiding Principles For Groundfish Fishery Regulations - to the extent practicable, the BOF will coordinate regulations with the North Pacific Fishery Management Council and other federal agencies.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Under option one, the state-waters walleye pollock fishery would open on a fixed date. This date would be chosen with the assumption that allowable harvest in the federally authorized fishery would be known and could be deducted from the 3,000 metric ton state-waters GHL. This could result in the state-waters fishery occurring well after the federally authorized fishery.

Under option two, staff would announce the opening of the state-waters fishery by emergency order once the federally authorized fishery harvest level was announced. This option would allow staff to set the GHL so that the combined state and federally authorized fisheries would not exceed 3,000 metric tons. The drawback to this option is that it would not provide advance notice to potential state-waters fishery participants of the actual opening date.

Under option three, the state-waters fishery opening would be linked to the closure in another fishery. This option would be beneficial to potential fishery participants that wish to participate in multiple fisheries, however it may not allow staff to manage for a total harvest of 3,000 metric tons because the closure timing for another groundfish fishery will likely change annually.

BACKGROUND: In the central Aleutian Islands directed fishing for walleye pollock has been closed since 1998, to protect Steller sea lion prey sources. The U.S. Congress required that future directed fishing allowances of walleye pollock in the Aleutian Islands be allocated to the Aleut Corporation (in Section 803 of the Consolidated Appropriations Act of 2004 – HR 2673, now Public Law 108-199).

In 2006, Aleut Enterprise Corporation and the National Marine Fisheries Service collaborated to investigate the feasibility of using commercial fishing vessels for acoustic surveys of walleye pollock. The experiment tested the effectiveness of performing biomass hydroacoustic surveys for walleye pollock in and around Steller sea lion haulouts from commercial vessels and to corroborate those hydoracoustic results with actual fish capture. The experimental fishing activity allowed for activities in state waters to be coordinated with experimental activities in adjacent federal waters according to conditions as specified under a federal exempted fishing permit. During the experimental fishing in 2006, which could extend from March 1 until April 30, no more than 1,000 metric tons of walleye pollock could be taken and sold. In total, 965 metric tons were taken during experimental fishing that extended from March 14 until April 4.

DEPARTMENT COMMENTS: The department **SUPPORTS** option two of proposal 260. This option would best allow the fishery to operate so that the total allowable harvest from both the federally authorized fishery and the state-waters walleye pollock fishery do not exceed 3,000 metric tons.

COST ANALYSIS: The department does not believe that approval of this proposal would result in a direct cost for a private person to participate in this fishery.