

On-Time Public Comment List
Alaska Peninsula / Aleutian Island / Chignik Finfish
February 23–February 29, 2016

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CONCERNED AREA M FISHERMEN
35717 Walkabout Road, Homer, Alaska 99603
(907) 235-2631

February 3, 2016

Mr. Tom Kluberton, Chairman
Alaska Board of Fisheries
P.O. 25526
Juneau, Alaska 99802-5526

Re: Alaska Peninsula Proposals

Dear Mr. Kluberton and Board Members:

Concerned Area M Fishermen (CAMF) submits these comments on proposals you will be considering at the upcoming meeting concerning fisheries of the Alaska Peninsula, also known as Area M. CAMF represents the interests of drift gillnet fishermen fishing the Alaska Peninsula. Our organization represents about 2/3 of the 150 permit holders active in the fishery and our members live throughout coastal Alaska, from Dutch Harbor to Petersburg.

Our members participate in both South and North Peninsula fisheries, including the South Unimak and Shumagin Islands June Salmon Fishery (the June fishery) and the Post-June Fishery. CAMF has been active in the Board process for over 30 years and we look forward to working with you again this year.

These comments are in three parts. First, we give an overview of the North Peninsula fishery, which includes prior board actions, WASSIP results, some history of the fishery, the management style and the importance to the economy of the region. Individual North Peninsula proposal and comments follow the overview. Then, we provide general comments describing the South Peninsula June fishery and prior Board action concerning its management plan followed by individual June fishery proposals and comments. We conclude with a statement of our position and comments on specific proposals. Thank you for your consideration.

Sincerely,

Steve Brown, President
35717 Walkabout Rd.



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The North Peninsula Fishery

The fishery in the Northern District of Area M is primarily a drift gillnet fishery, and is managed under the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. Operating out of Port Moller, our fleet fishes in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections, and targets sockeye returning to local rivers. The North Peninsula fishery is orderly and well-managed. The Board has consistently rejected proposals from Bristol Bay fishermen and groups to severely restrict our fishery, and we request that you do so again this year.

We believe it would be helpful to review and summarize several aspects of the North Peninsula fishery, including prior Board action and the biology, history, and management of the fishery.

1. Prior Board Action

We first refer you to Board Findings 96-165-FB (formerly 96-09-FB) prepared at the meeting in January 1996. The Board had considered North Peninsula issues many times before that meeting, but this was the first time the Board prepared a set of findings to explain its actions. The findings summarize the comments of staff and the public, and provide the Board's rationale for rejecting all the proposals aimed at greatly restricting the North Peninsula fishery. The findings conclude (at page 3):

Like past Boards that have rejected proposals to restructure the North Peninsula fisheries, the Board found no reason to reduce fishing districts, seasons or harvests in the Northern District. The Board recognizes that there may be some amount of interception of Bristol Bay fish in the Northern District. The Board further finds that the Northern District fishery is not an expanding fishery, and does not warrant action under the Board's mixed stock policy.

Consistent with these findings, the Board at its meeting in January 1998 again rejected proposals to restrict the North Peninsula fishery. The main action taken was to adopt the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. This plan confirmed the Board's and the Department's commitment to maintaining a management regime that has succeeded in achieving escapements, sustaining production, and allowing a steady harvest of high quality fish. In fact, the principal action the Board took in 1998 was to adopt a regulation (5 AAC 09.369(j)) permitting us earlier access to the harvestable surplus from the Ilnik River, so that the fishery better fits the timing of the run.

Northern District proposals were next considered by the Board at its meeting in January 2001. As usual, Bristol Bay stakeholders advocated drastic restructuring of our fishery, relying primarily on their concerns for the status of Kvichak sockeye. Kvichak sockeye have since been removed from stock of concern list. The Board committee that reviewed the 2001 proposals found "There are no new or expanding fisheries on these stocks," and recommended status quo for the Northern District fisheries (RC # 384,

January 29, 2001). The Board unanimously voted in favor of this recommendation and rejected all the Bristol Bay proposals for our area.

The Board in 2004 made additional revisions to the Northern District plan, including easing restrictions regarding when our fleet could fish in the Ilnik Section. These changes were intended to provide additional management flexibility for the Department to harvest local runs while assuring that escapements are met.

In 2007 the Board responded to information presented by the Department showing a foregone harvest of more than 100,000 sockeye annually in the Meshik River. Our fleet has always fished this run, but restrictions on fishing in this area resulted in escapements that consistently exceeded the Department's goal. The Board opened up a portion of the Outer Port Heiden Section to the drift fleet, allowing us to fish on the north side of Port Heiden. The Board also authorized openings in the Ilnik Section northeast of Unangashak Bluffs, to better access returns to the Ilnik River, which likewise has experienced significant excess escapements. These regulatory change succeeded in harvesting the available surplus and bringing escapements in line with the established goals. At your meeting in 2010, the Board considered proposals to roll back these provisions. The Department, while neutral on the allocation aspects of these proposals, opposed them because they could result in decreased management flexibility and lost harvest opportunity. The Department recognized that since the opening of the Outer Port Heiden Section, "excessive surplus escapements into Meshik River have not occurred." *See* 2010 Staff Comments (RC 2). It should also be noted that the fishing schedule in this area is conservative, allowing us to fish only 2 ½ days per week, not continuously as implied by some.

At the 2013 meeting, the Board did make changes to the Northern District management plan that imposed some restrictions on our fishery in the Outer Port Heiden and Ilnik Sections. As discussed in more detail below, in our comments on specific proposals, we disagree with the premises of these actions and believe they have adversely impacted our fishery.

In sum, the Board over the years has taken several steps to improve management in our area and provide the Department the necessary management flexibility to harvest local runs while assuring that escapements are met. These actions should be seen as an endorsement of, and a demonstration of confidence in, the current management regime.

2. Harvest Rates

The 9-year, 9-million dollar WASSIP study shows that Bristol Bay stocks are mixed in our North Peninsula catches to a higher extent than previous analyses suggested. However, the WASSIP results also show that our overall harvest rate on Bristol Bay stocks in the North Peninsula fishery was between 1.9% and 2.6%. This low harvest rate indicates that the impact of the North Peninsula fishery on Bristol Bay sockeye is minimal. By comparison, the error in knowing the size of the Bristol Bay return after the season is over is in the range of 3 – 4 %, roughly double the impact of the North

Peninsula fishery. Any suggestion that the North Peninsula fishery poses conservation or management concerns for Bristol Bay sockeye are not well grounded. Bristol Bay stocks, it now seems clear, have always been a component of our harvests along the North Peninsula, and are of great importance to the economy of the Alaska Peninsula region and to the survival of the Port Moller cannery. The Bristol Bay fishery is the largest sockeye fishery in the world, and it is unrealistic to expect that no Bristol Bay sockeye will be harvested in the nearby and far smaller North Peninsula fishery.

3. History of Fishing

Area M drift gillnetters have fished the Northern District since statehood. As early as 1915, harvests of sockeye on the North Peninsula exceeded 2 million fish. The 1960 Annual Management Report shows that as many as 50 vessels fished the Ilnik Section (as it was then defined). The amount of effort in the Ilnik and Three Hills Sections increased in the early 1980s, but this was primarily a function of increased returns to the North Peninsula. The same phenomenon also occurred in the Ugashik and Egegik Districts of Bristol Bay, where returns to those systems resulted in nearly identical percentage increases in effort and harvest. Since 1983 our harvest has been relatively stable and has not increased out of proportion to the size of North Peninsula escapements. As the quote from the 1996 findings shows, the Board specifically found that the North Peninsula fishery was not new and expanding and did not require action under the mixed stock policy. The North Peninsula fishery has existed for many years and has been examined intensely by past Boards, none of which found any justification for adopting the kind of restrictions advocated by interests from Bristol Bay.

4. Dispersed Management

The North Peninsula drift fishery is very orderly and well-managed. By keeping our boats dispersed along the beach instead of concentrated around stream termini, area managers are able to avoid costly and management-intensive pulse fishing. This approach allows the managers to obtain a steady stream of escapement throughout the season. Our season lasts from June to mid-September, three or four times longer than the majority of Bristol Bay fisheries. The long coastline in our area is completely exposed to westerly weather, and fishing is inevitably interrupted in-season. If the fleet fished only in small areas in front of river mouths, these interruptions would produce excess escapement. Because of the small size of our rivers we do not have the flexibility to move in-river to reduce over-escapement. Dispersing the fleet over a larger area provides a crucial buffer of time between weather interruptions and the build-up of fish in front of rivers as they prepare to move upstream.

The arguments by Bristol Bay interests for boxing in the North Peninsula fishery rest largely on the premise that terminal management, the way their fishery is managed in the Bay, should be applied elsewhere. This rationale ignores the differences between the fisheries in the two areas and the nature of our respective fleets. The majority of the vessels in our fleet are larger, deep draft vessels built to handle an open ocean fishery. Forcing our fleet to fish in boxes around river termini will create a serious safety issue for



our fishermen. Dispersing the fleet also minimizes conflicts among boats vying for sets and removes incentive for line violations. We have developed a system of self-regulation in which those who want to fish the line take turns making drifts. The result is a high quality product – exactly what the state should support in light of the modern market for salmon. Terminal management is the exception rather than the rule in Alaska, and for good reason. Orderly fisheries and quality products can best be maintained by other management methods.

For these reasons, we urge the Board again to reject all proposals that seek to restrict our Northern Peninsula fishery and impose Bay-style management in our area. North Peninsula runs are well managed, with annual escapements of about 1 million fish. We turn out a high quality product, and we don't experience many of the management and enforcement problems encountered in the Bay.



**BOARD OF FISHERIES
ALASKA PENINSULA / ALEUTIAN ISLANDS / CHIGNIK FINFISH
FEBRUARY 23–MARCH 1, 2016**

PROPOSAL 22 – 5 AAC 06.100. Description of area; 5 AAC 06.200. Fishing districts and sections; 5 AAC 09.100. Description of area; and 5 AAC 09.200. Description of districts and sections. Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

We recommend that the BOF change the descriptions of the Bristol Bay area to include the Cinder River and Inner and Outer Port Heiden sections and remove the same sections from the Alaska Peninsula area. Suggested draft regulatory language follows:

5 AAC 06.100. Description of area. The Bristol Bay Area includes all waters of Alaska in Bristol Bay east of a line from Cape Newenham at 58° 38.88' N. lat., 162° 10.51' W. long. to Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long. [CAPE MENSHIKOF AT 57° 28.34' N. LAT., 157° 55.84' W. LONG.]

5 AAC 09.100. Description of area. The Alaska Peninsula Area includes the waters of Alaska on the north side of the Alaska Peninsula, southwest of a line from Strogonof Point (56° 53.50' N. lat., 158° 50.45' W. long. [CAPE MENSHIKOF AT 57° 28.34' N. LAT., 157° 55.84' W. LONG.] to...

Additionally, we recommend deleting 5 AAC 09.200 (1) and (2) (A) and (B) from Chapter 09. Alaska Peninsula Area and adding new fishing districts (e) and (f) to the Bristol Bay area.

We recommend adding to 5 AAC 06.200 Fishing Districts and sections

(e) Cinder River District, waters of Bristol Bay between Cape Menshikof at 57° 28.34' N. lat., 157° 55.84' W. long. and 158° 20.00' W. long

(f) Port Heiden District:

(1) Outer Port Heiden Section: waters located between 158° 20.00' W. long. and the longitude of Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long., excluding the waters of the Inner Port Heiden Section;

(2) Inner Port Heiden Section: waters of Port Heiden Bay south and east of a line from Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long. to the mainland shore of the northeast entrance to the bay at 56° 56.50' N. lat., 158° 51.50' W. long.

What is the issue you would like the board to address and why? The residents of Port Heiden ask the Board of Fisheries to change the Alaska Administrative Code so that the boundaries of the Bristol Bay area include the village Port Heiden and the Cinder River and Port Heiden Districts for the following reason:

1. Port Heiden is a member community in the Bristol Bay Economic Development Corporation;

2. The community of Port Heiden is within the Bristol Bay Coastal Resource Service Area;
3. The residents of Port Heiden have strong family ties to other communities in the Bristol Bay Area;
4. Most of the commercial fishing permits that are owned by Port Heiden residents are T permits, or commercial Bristol Bay fishing permits;
5. Including Port Heiden in the Bristol Bay area would facilitate enforcement efforts in the Outer and Inner Port Heiden sections.

PROPOSED BY: Native Village of Port Heiden

(EF-C15-039)

CAMF POSTION: OPPOSE

CAMF COMMENTS: The area in question (Fig. 1) has been managed by Westward staff since statehood and has been considered the Alaska Peninsula Area since the turn of the century. The Cinder River has the 3rd largest 10-year average escapement in the Northern District. The Meshik River has the 4th. These two systems are very important for the vitality of the fishery. Moving districts from one area to another will set a precedent that could lead to territorial battles across the state.

PROPOSAL 23 – 5 AAC 06.100. Description of area; and 5 AAC 09.100. Description of area. Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

We recommend that the BOF change the descriptions of the Bristol Bay area to include the Cinder River and Inner and Outer Port Heiden sections and remove the same sections from the Alaska Peninsula area. Suggested draft regulatory language follows:

The language for this proposal is identical to proposal 22. For full text of proposal 23 see proposal book.

PROPOSED BY: Gerda Kosbruk

(EF-C15-112)

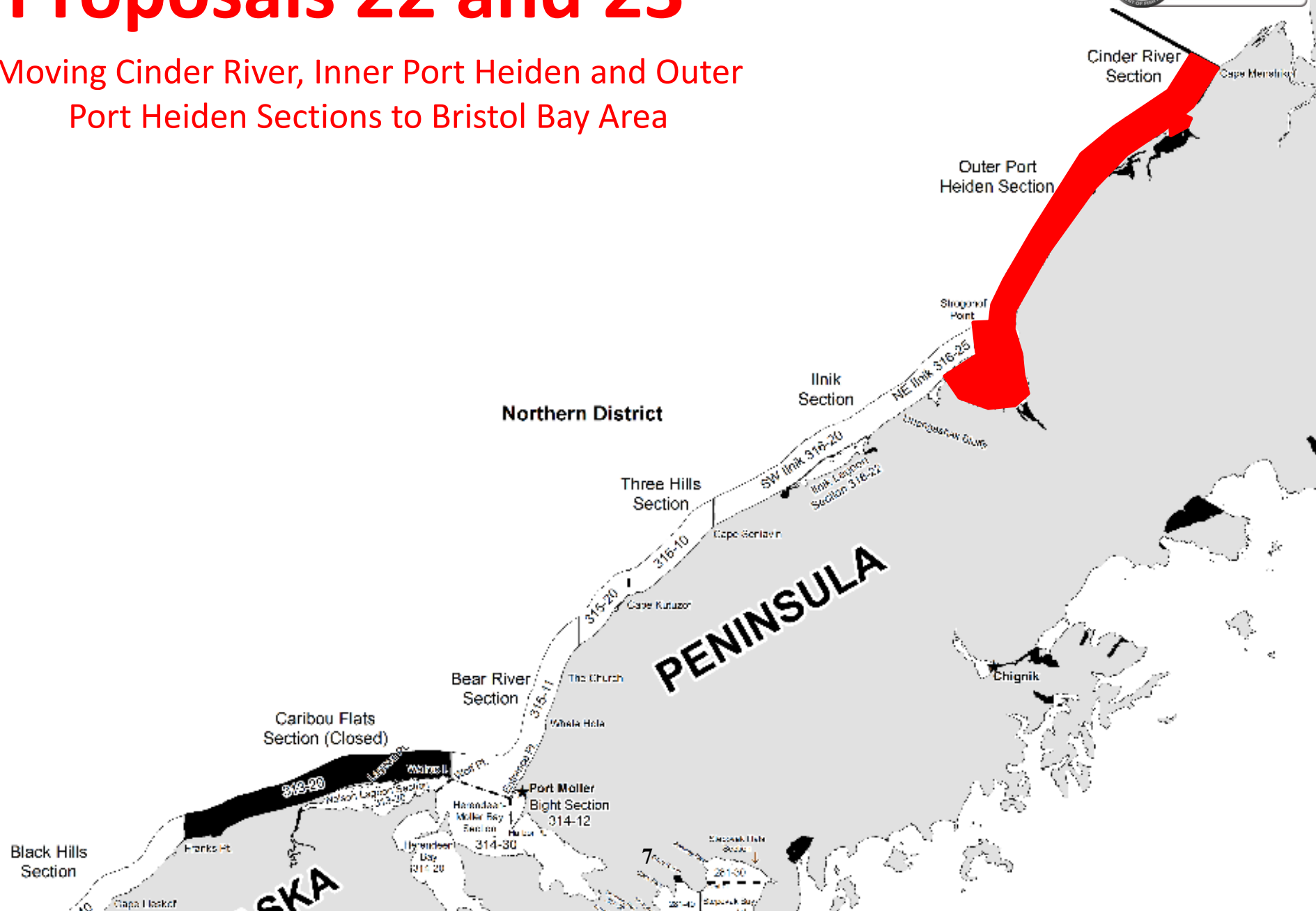
CAMF POSITION: OPPOSE

CAMF COMMENTS: See comments for proposal 22.

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Proposals 22 and 23

Moving Cinder River, Inner Port Heiden and Outer Port Heiden Sections to Bristol Bay Area





PROPOSAL 24 – 5 AAC 06.100. Description of Area and 5 AAC 09.100. Description of Area. Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

I propose that Area T, Bristol Bay, be recognized as starting at Cape Seniavin, and managed as such. The genetics of WASSIP clearly show that the vast majority of salmon caught above Cape Seniavin are bound for Bristol Bay. Port Heiden is recognized as part of Area T. I suggest that the Entry Commission inadvertently misdrew the divide between Area T and Area M. If you want to catch Bristol Bay fish, buy a Bristol Bay permit.

Alternatively, Area M fishing opportunity and area could be gradually curtailed within this zone.


What is the issue you would like the board to address and why? I am addressing the indiscriminate interception of Bristol Bay bound salmon. Area M fishing openers are specifically targeting Bristol Bay salmon stocks without adequate regard to escapement requirements. Bristol Bay stocks are managed through small terminus fisheries with strict adherence to the state's constitutional directive of sustainable fisheries. This sustainability is only guaranteed through the use of intense scientific and management procedures and tools. Decades ago the ADF&G recognized interceptive fisheries as dangerous to the health of salmon stocks and set in motion actions to curtail such fisheries. Area M intercepting Bristol Bay salmon is in violation of such mandatory efforts. Bristol Bay salmon must be managed for OEG's, not by "windows".

PROPOSED BY: Larry K. Christensen

(EF-C15-134)

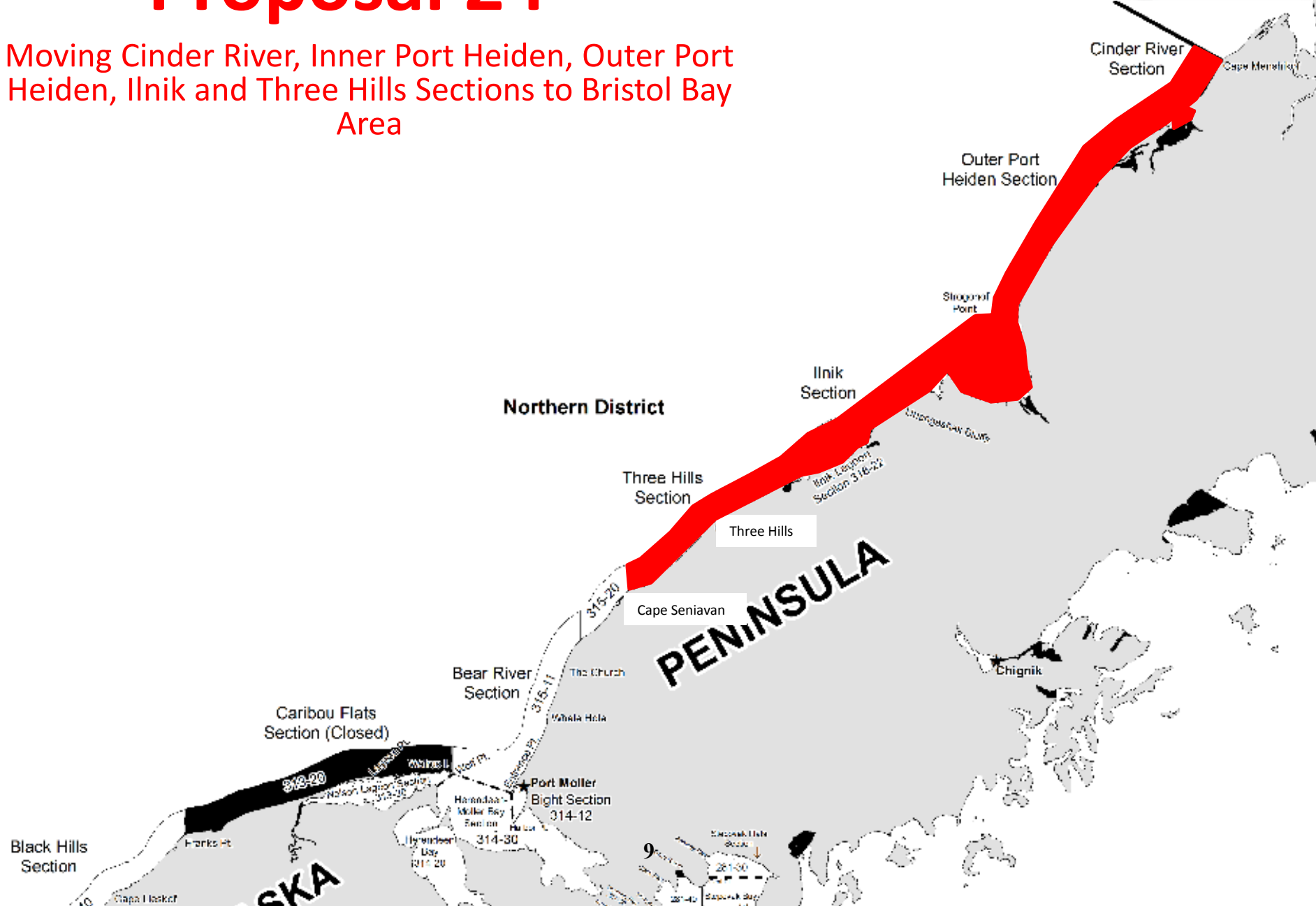
CAMF POSITION: OPPOSED

CAMF COMMENTS: Please reference comments from proposal 22. In addition, this additional area would include the Ilnik River system which has the 5th largest 10-year escapement average on the North Peninsula. (Fig. 2)


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Cinder River
Section



PROPOSAL 147 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Repeal sequential closures in the Bear River, Three Hills, and Ilnik sections, as follows:

5 AAC 09.369 is amended to delete subsection (n).

What is the issue you would like the board to address and why? The Northern District Salmon Fisheries Management Plan was amended in 2013 to include a series of rolling closures of certain sections of the North Peninsula area above Port Moller. This new regulation has created problems for the drift gillnet fleet in maintaining an orderly and effective fishery. The fishery in this area is important for processors and the local economy. The premise of the rolling closure regime was ensuring adequate returns to Nelson Lagoon, but this rationale was flawed: escapements and harvests in Nelson Lagoon are healthy and the drift gillnet fishery in the Bear River, Three Hills, and Ilnik Sections have low harvest rates on Nelson River stocks according to the recent WASSIP study.

PROPOSED BY: Concerned Area M Fishermen (EF-C15-041)

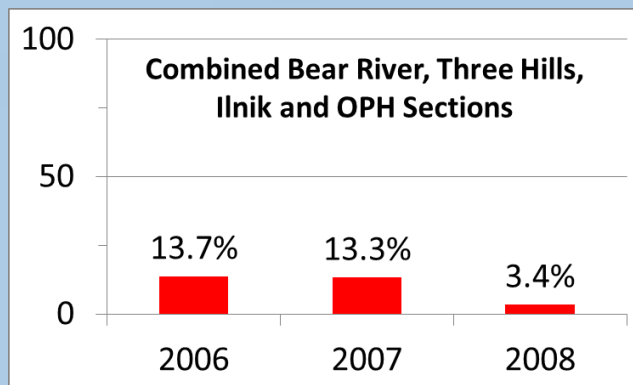
CAMF POSITION: SUPPORT

COMMENTS:

- Vast majority of the Nelson Reporting Stock Harvest is in Nelson Lagoon. (Fig. 3)
- 38 miles of beach are closed for a buffer zone around Nelson Lagoon. (Fig. 4)
- Between 86% and 97% of the Nelson Reporting Stock returned to the lagoon in either catch or escapement. (Fig. 5)
- Rolling closures were adopted at the BOF in 2013 partially because of lower production during the 2010 to 2012 years. We feel this lower production was not because of interception of Nelson stocks in the North Peninsula but by a flood that occurred. (Fig. 6)

Figure 3. Combined Harvest Rates Bear River Section to OPH (2006 to 2008)

Combined Nelson Lagoon Harvest Rates



130 to 140 Permits
from Bear River to
OPH

25 Permits Harvested a
Majority of the Nelson
Reporting Stock.

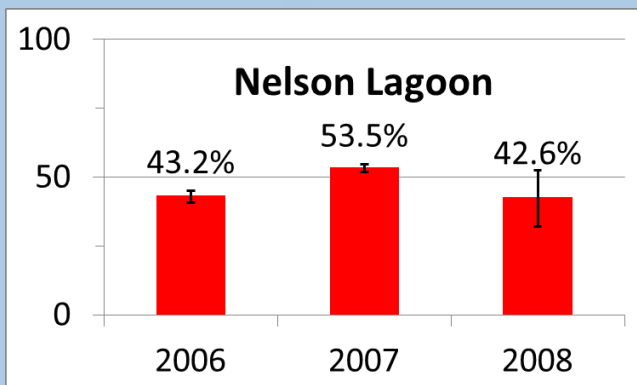


Figure 4. Caribou Flats Section Closed

Caribou Flats Section Closed

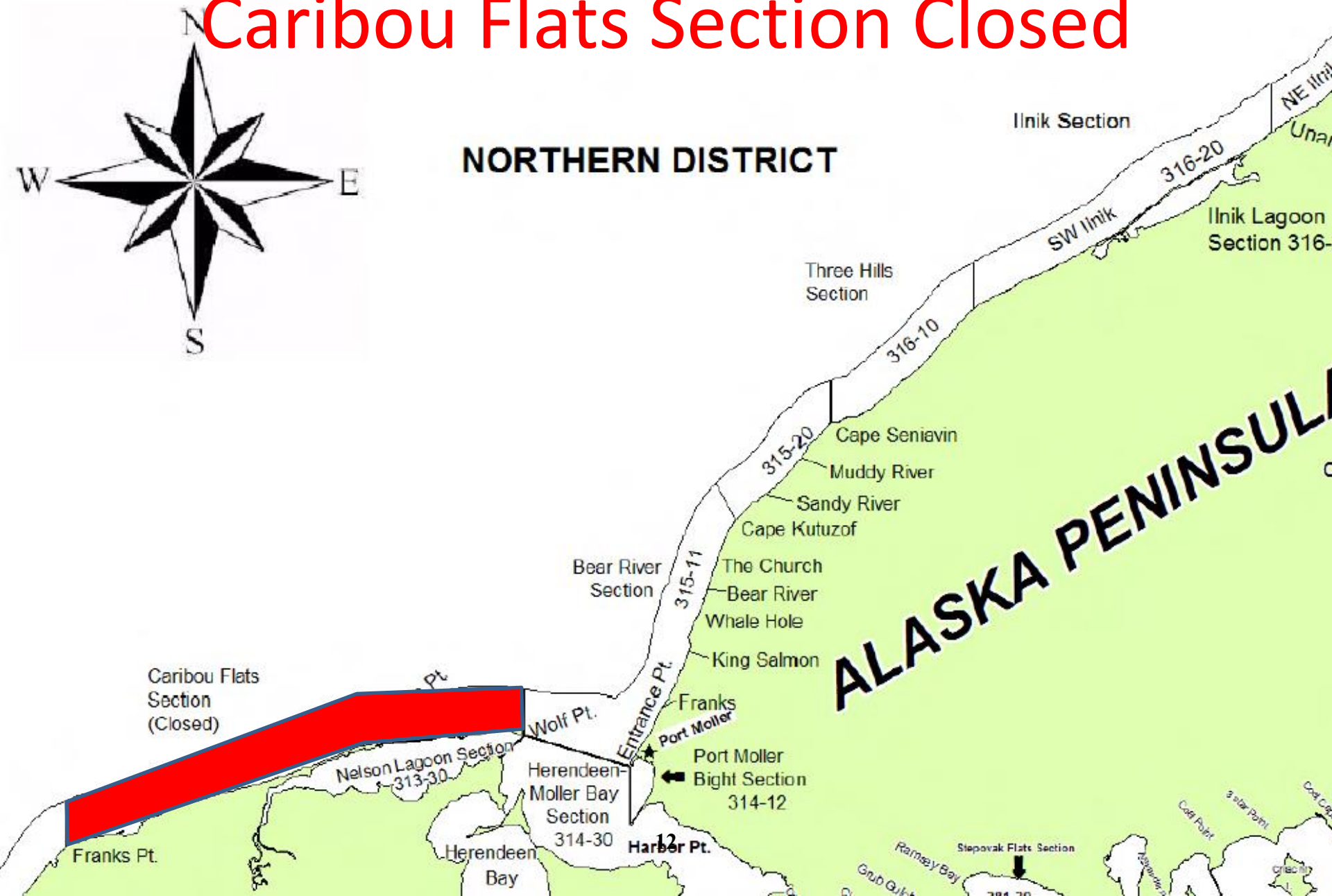
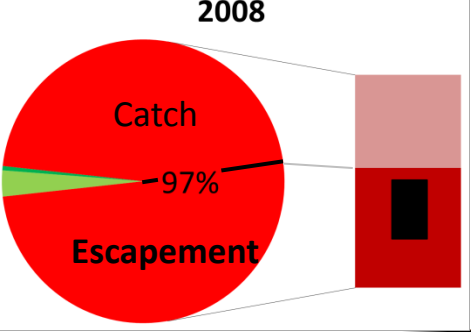
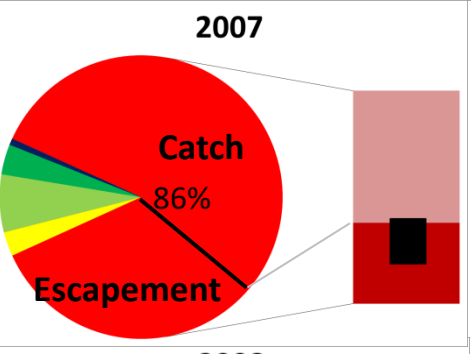
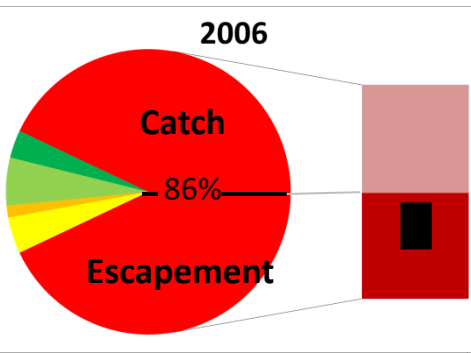



Figure 5. Sockeye returning to Nelson Lagoon.

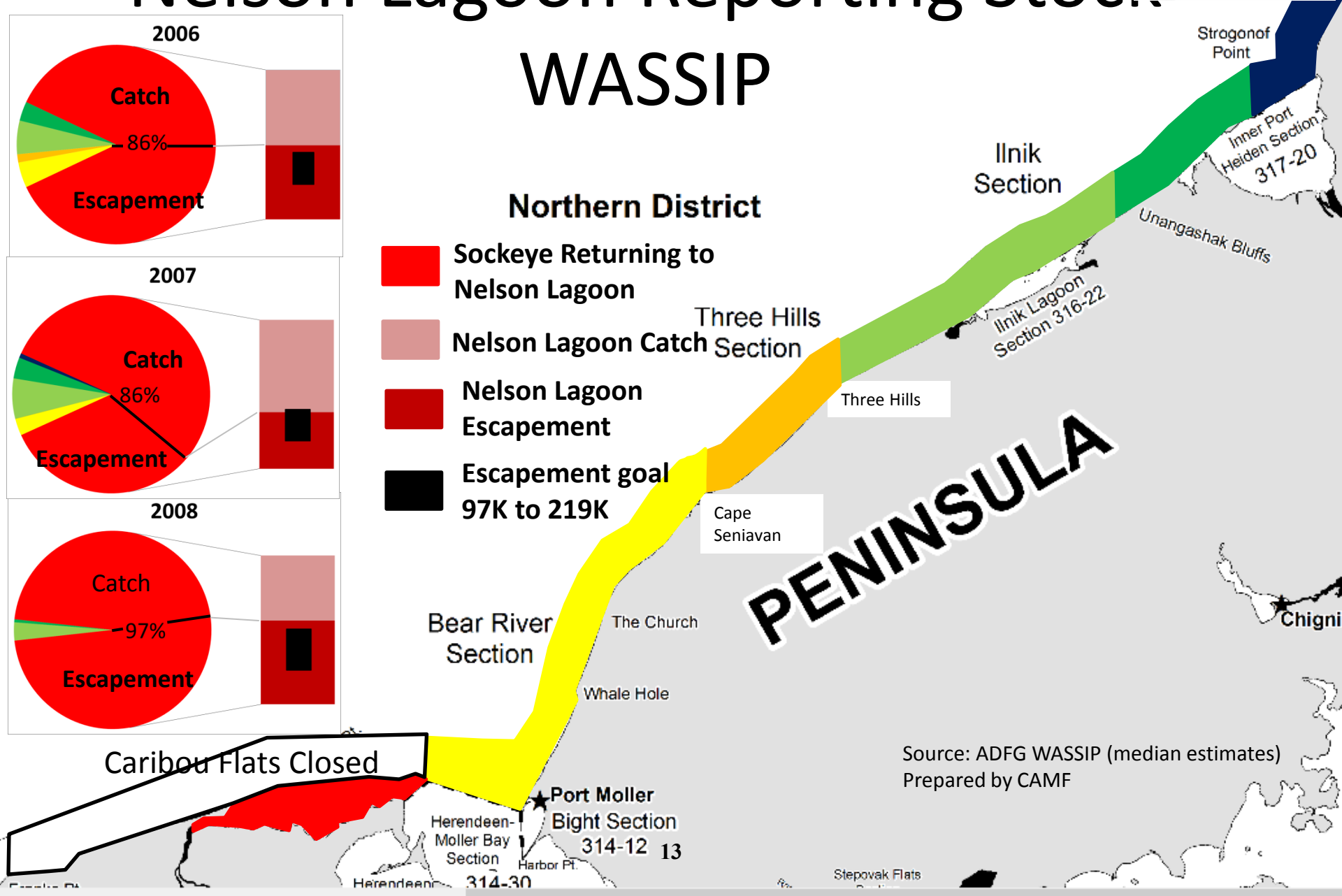
Nelson Lagoon Reporting Stock

WASSIP



Northern District

-  Sockeye Returning to Nelson Lagoon
-  Nelson Lagoon Catch Section
-  Nelson Lagoon Escapement
-  Escapement goal 97K to 219K



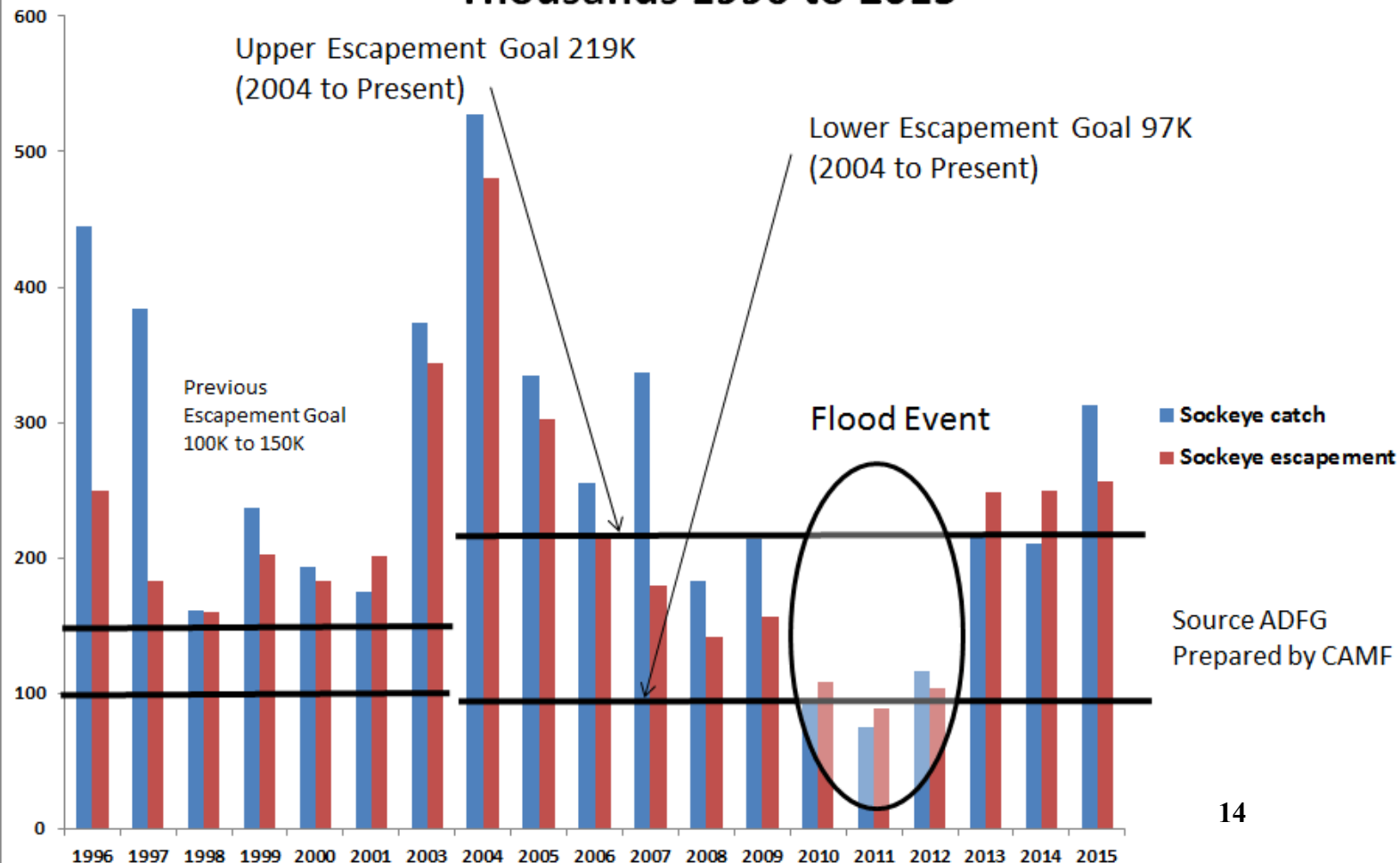
Source: ADFG WASSIP (median estimates)
Prepared by CAMF

Figure 6. Nelson River Sockeye Catch and Escapement.

Nelson Lagoon Sockeye Catch and Escapement Thousands 1996 to 2015



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PROPOSAL 148 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Allow commercial fishing for salmon with drift gillnet gear in the Ilnik Section, as follows:

5 AAC 09.369 is amended to read:

To allow drift gear in the Ilnik Lagoon section from June 1 thru September 30. Openings will be Monday morning 6:00 a.m. to Thursday midnight and closures will be Friday to Monday morning at 6:00 a.m.

What is the issue you would like the board to address and why? I would like to open up Ilnik Lagoon section on the north side of the Alaska Peninsula for driftnet fishing on the inside of the lagoon. The reason why is to have another area to fish when the wind is blowing gale force wind. This peninsula can also give the drift fleet more area to fish. It can also help control escapement.

PROPOSED BY: Brian Hartman

(HQ-F15-079)

CAMF POSITION: NUETRAL

CAMF COMMENTS: Drift gillnet fishing is already allowed in Ilnik Lagoon.

PROPOSAL 149 – 5 AAC 09.310. Fishing seasons; 5 AAC 09.320. Fishing periods; 5 AAC

09.330. Gear; 5 AAC 09.369. Northern District Salmon Fisheries Management Plan; and 5

AAC 39.120. Registration of commercial fishing vessels. Create a directed sockeye salmon fishery in the Cinder River Section, as follows:

5 AAC 09.310(a)(1)(B): from **June 20** [August 1] through September 30 throughout this section.

5 AAC 09.320(a)(3): in the Cinder River Section, salmon may be taken from 6:00 a.m. Monday to 6:00 p.m. Tuesday from June 20 to July 31, and from 6:00 a.m. Thursday until 6:00 p.m. Saturday after July 31.

5 AAC 09.330(a)(1), add a new subsection as follows: () from June 20 through July 31 salmon may be taken with drift gillnets only in the waters outside the lagoon into which the Cinder River drains.

5 AAC 09.369(m), add the following language: [.] , provided, that from June 20 to July 31 if the commissioner closes that portion of the Egegik District specified in 5 AAC 06.359(c) for conservation of Ugashik River sockeye salmon stocks, the commissioner may, by emergency



order, close the portion of the Cinder River section outside the lagoon into which the Cinder River drains.

5 AAC 39.120(d), revise the definition for Area T as follows: T Bristol Bay Area (5 AAC

06.100) and **the following portions of the Alaska Peninsula Area (5 AAC 09.200): January 1 through June 19, the portion of the Cinder River section outside the lagoon into which the Cinder River drains; January 1 through December 31, the portion of the Cinder River Section within the lagoon into which the Cinder River drains** [Cinder River] and Inner Port Heiden Section; and August 1 through December 31, that portion of the Ilnik Section within Ilnik Lagoon and all waters inside the Seal Islands [of the Alaska Peninsula Area (5 AAC 09.200(a) – (3))].

What is the issue you would like the board to address and why? This series of regulatory changes would establish a directed sockeye salmon fishery in the Cinder River Section from June

20 through September 30. Cinder River sockeye returns have been above escapement goals nearly every year for over a decade, which represents foregone harvest opportunity for the Area M drift gillnet fleet.

PROPOSED BY: Concerned Area M Fishermen

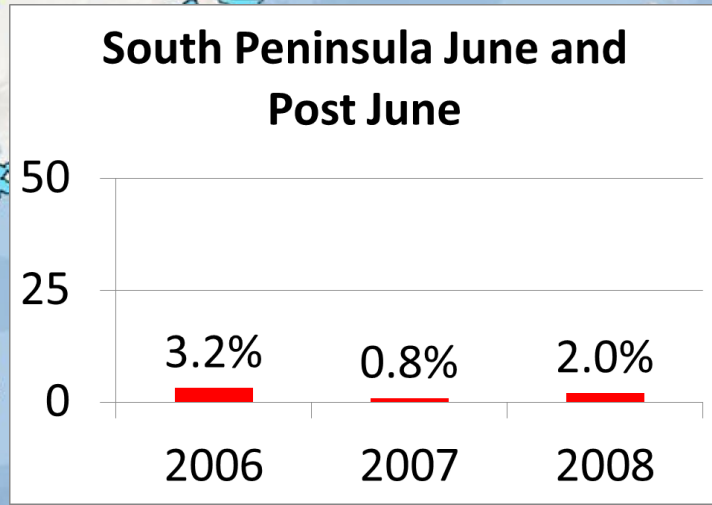
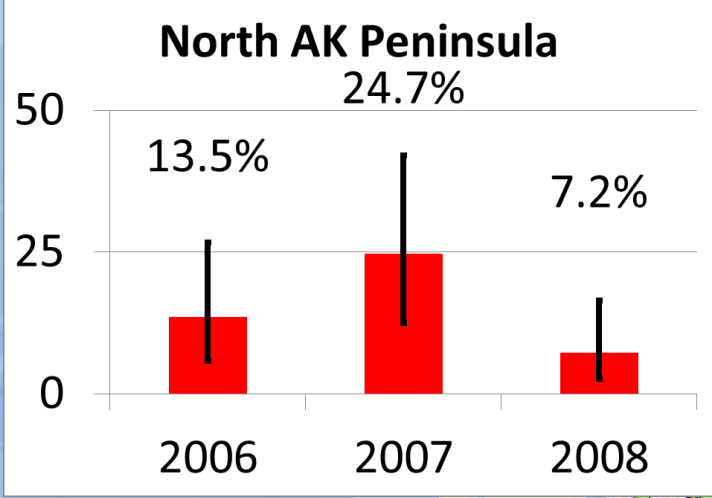
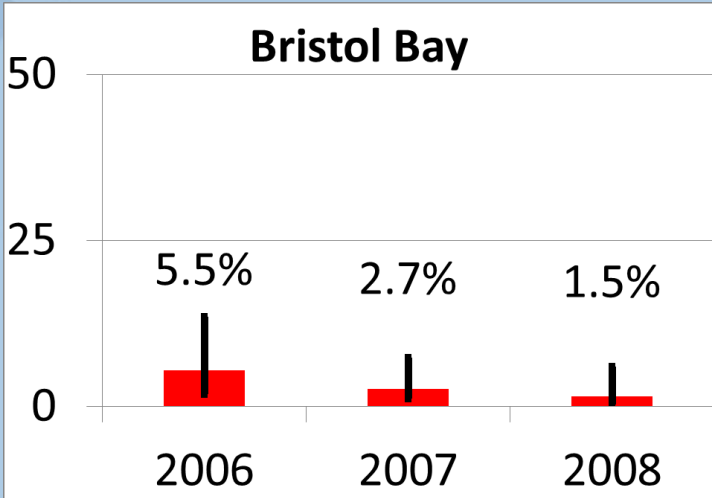
CAMF POSITION: SUPPORT

COMMENTS

- Cinder River is in the North Peninsula area. The harvest rate is relatively low compared to other systems. (Fig. 7)
- Cinder River reporting stock has one of the lowest all-fishery harvest rates of any reporting stock in WASSIP. The resource is currently underutilized. (Fig. 8 and Fig. 11)
- Cinder River has had excessive escapement since 2003. (Fig. 9 and Fig. 10)
- Cinder River has had the 3rd largest 10 year average escapement in the Alaska Peninsula Area
- The Alaska Peninsula Area should not be used as a marine protected area for Bristol Bay. (Fig. 12)

Figure 7. Harvest Rates for Cinder River Reporting Stock.

Cinder River Reporting Stock Harvest Rates



Source ADFG WASSIP
Prepared by CAMF

Figure 8. Median Harvest Rates for Bristol Bay and North Peninsula reporting stocks.



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Median Harvest Rates for WASSIP Reporting Stocks

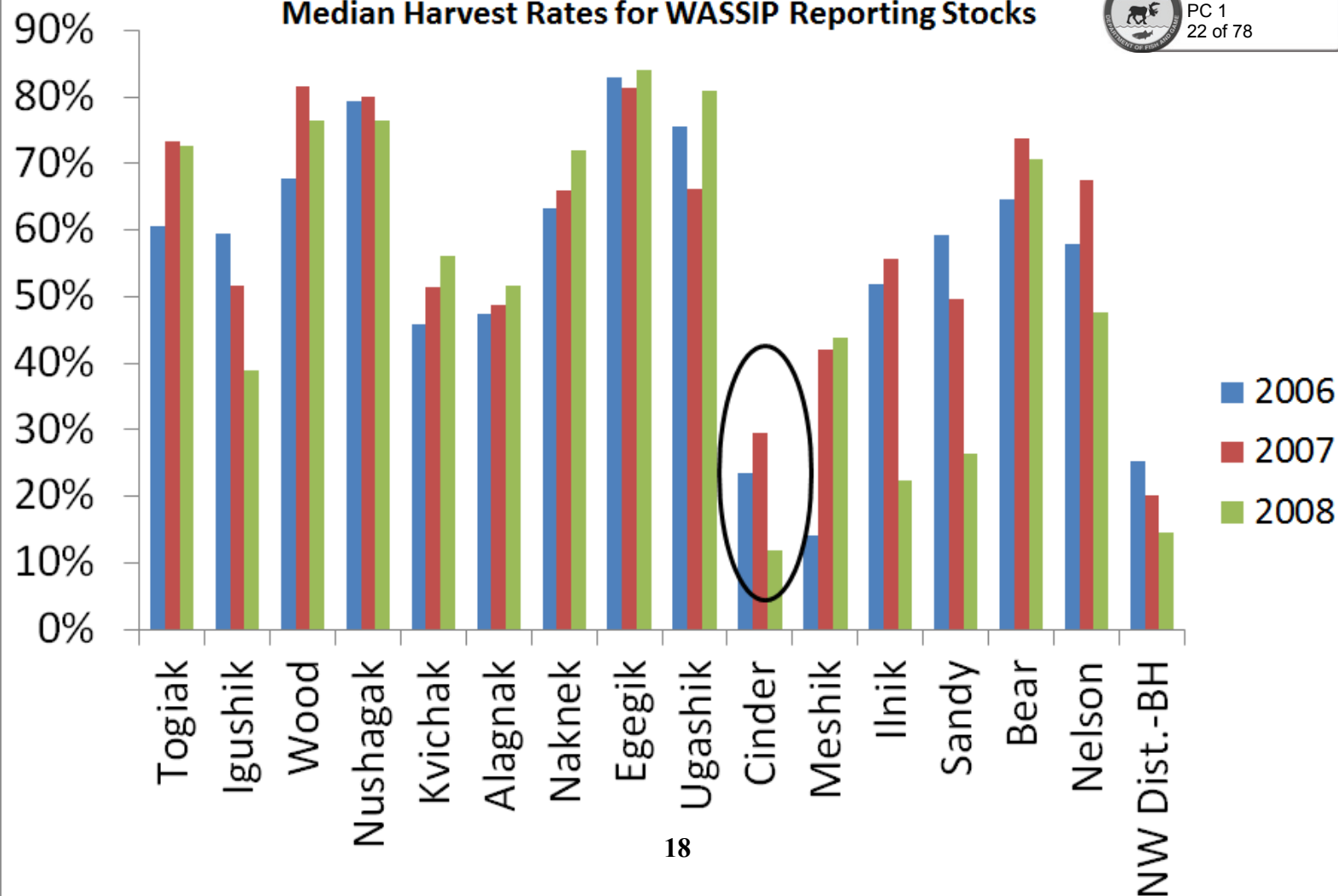


Figure 9. Cinder River Escapement and Escapement goal range using expanded aerial index of 2.47 used in WASSIP.

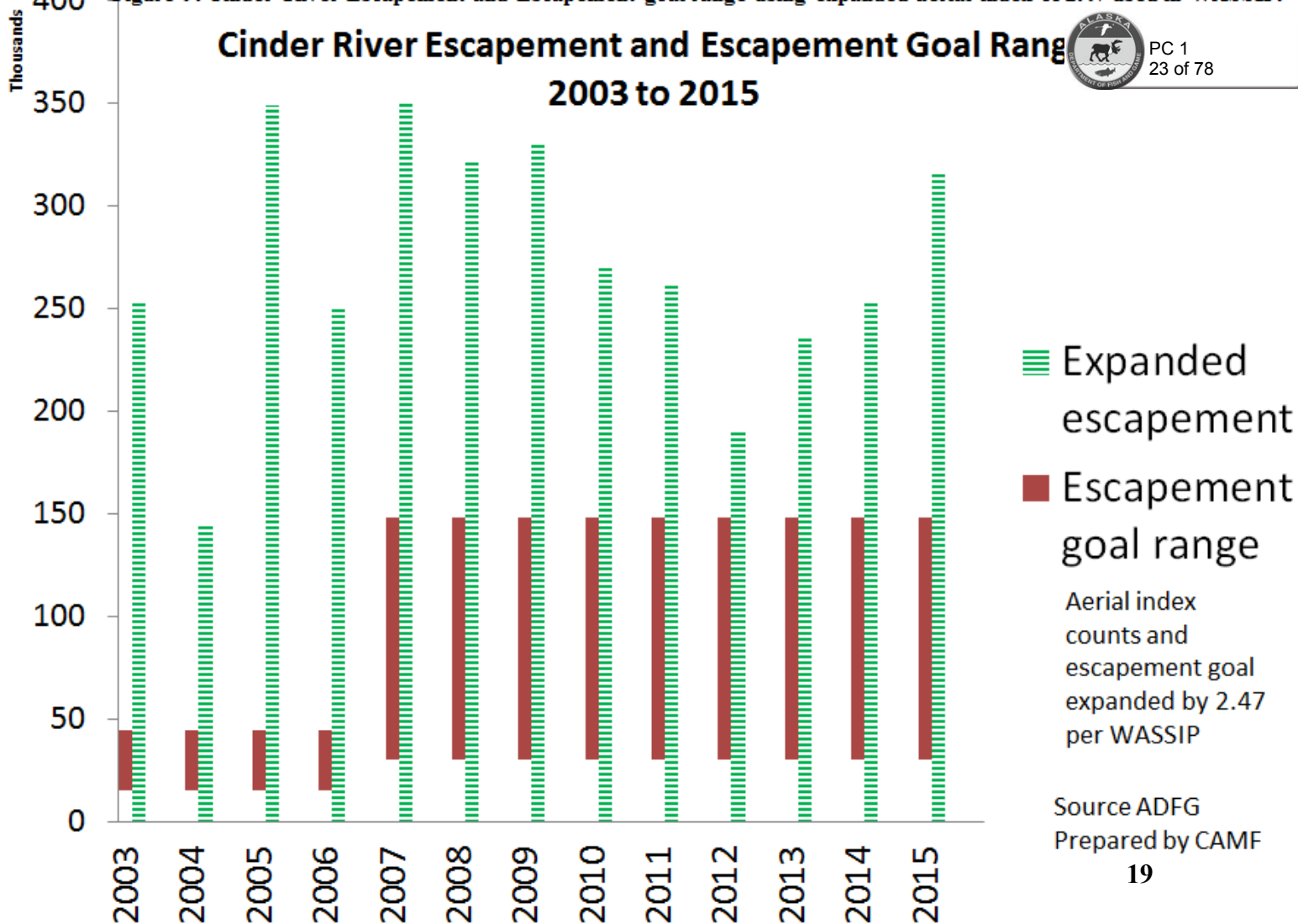


Figure 10. Cinder River Escapement and Escapement goal range not using expansion multiplier.

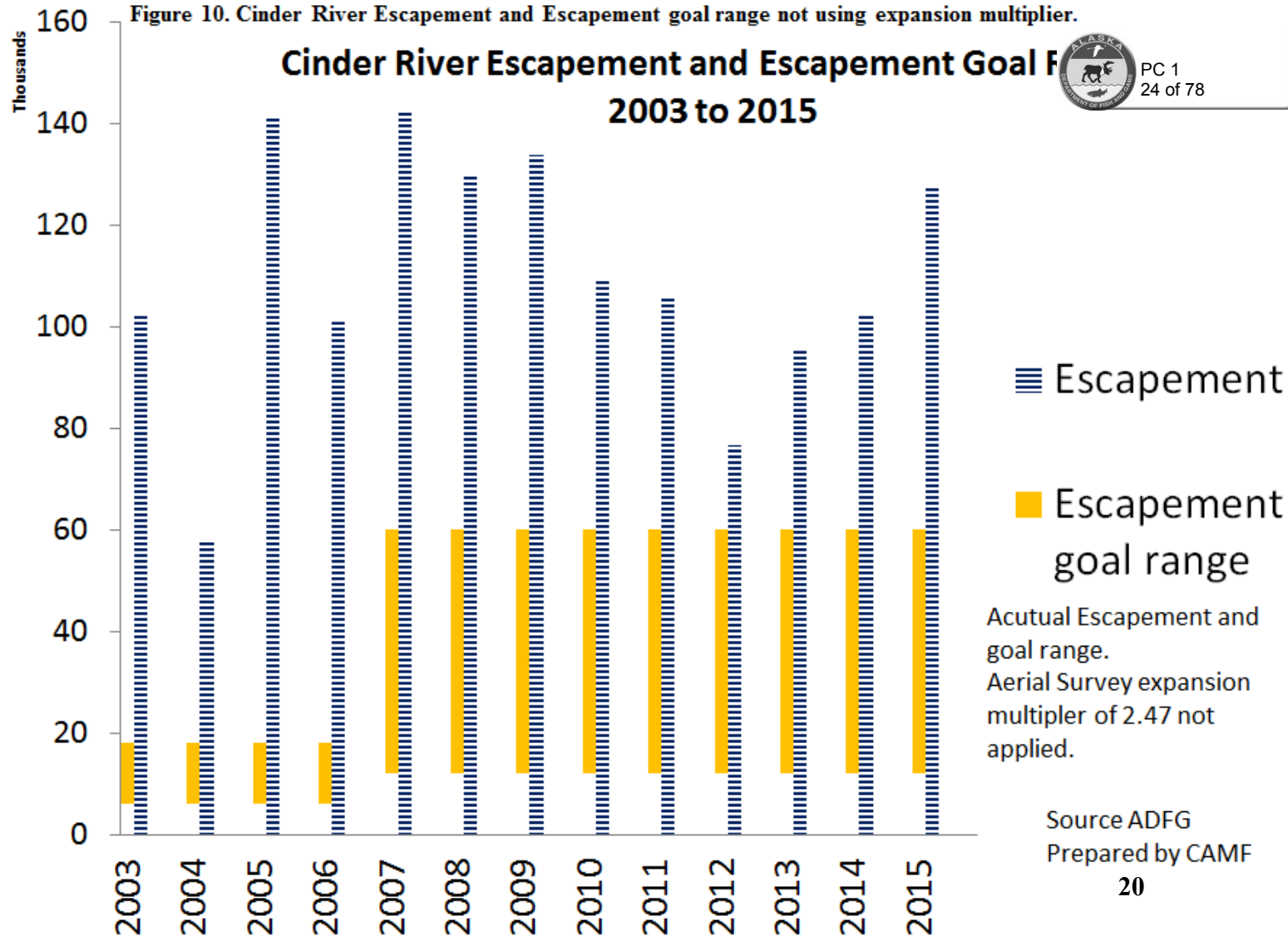


Figure 11. Cinder River Reporting Stock.

Cinder River Reporting Stock

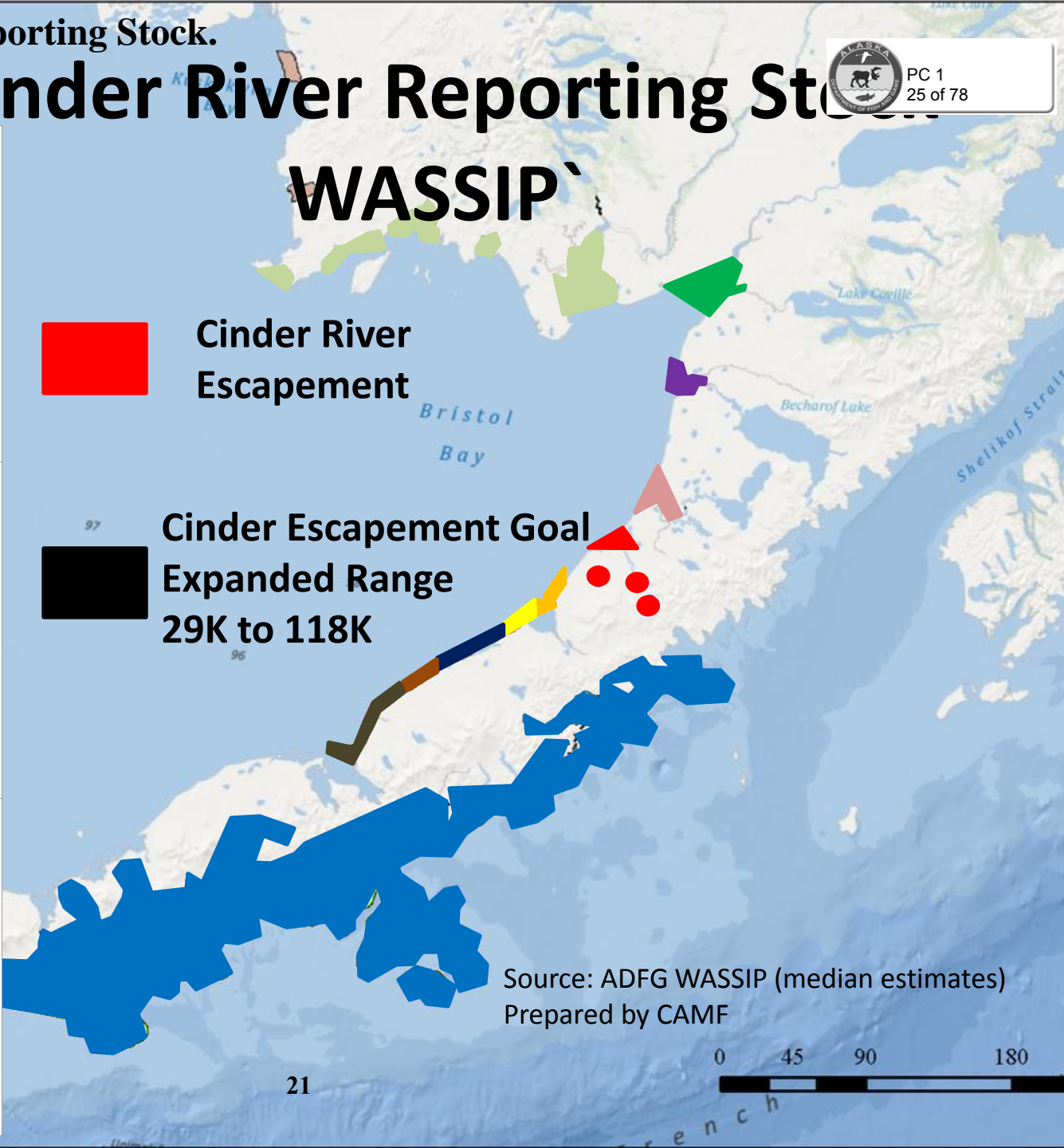
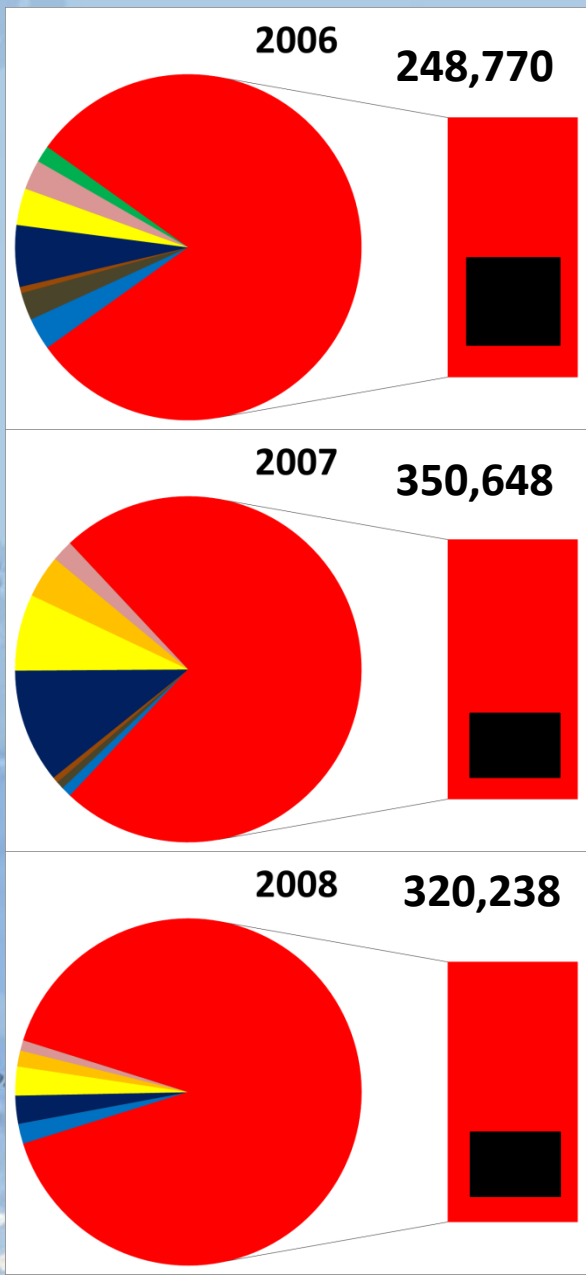


Figure 12. North Peninsula Average Escapements.

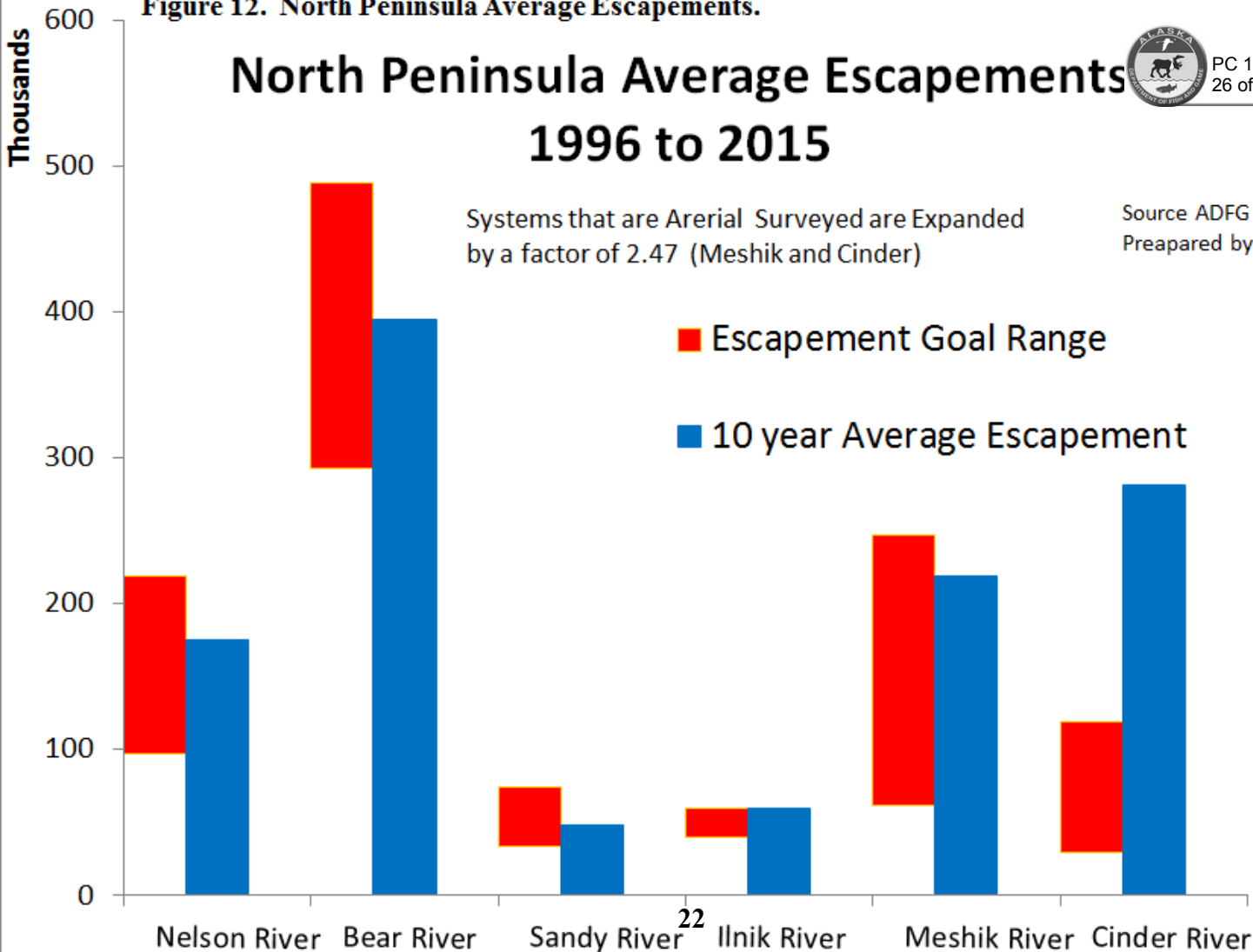


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North Peninsula Average Escapements 1996 to 2015

Systems that are Aerial Surveyed are Expanded
by a factor of 2.47 (Meshik and Cinder)

Source ADFG
Prepared by CAMF





PROPOSAL 150 – 5 AAC 09.310. Fishing seasons. Describe waters of Cinder River Lagoon open to commercial salmon fishing, as follows:

5 AAC 09.310(a)(1)(A) is amended to read:

- (a) In the Northern District, salmon may be taken as follows: (1) Cinder River Section:

(A) from May 1 through September 30 within the lagoon into which Cinder River drains (locally known as False Ugashik or Shagong) **described by a line across the lagoon entrance from 57° 21.14' N. lat., 158° 06.82' W. long. to 57° 21.46' N. lat., 158° 04.68' W. long.**

What is the issue you would like the board to address and why? Current regulations do not describe Cinder River Lagoon, which is the only area of the Cinder River Section that can be commercially fished for salmon prior to August 1. This proposal will define waters of Cinder River Lagoon that are currently open to commercial salmon fishing during scheduled weekly fishing periods.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F15-06)

CAMF POSSITION: SUPPORT

COMMENTS: Housekeeping proposal

PROPOSAL 151 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Consider the catch of non-local salmon as a factor in management of Northern District salmon fisheries, as follows:

5 AAC 09.369 is amended to read:

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information **taking into account the percentage of the catch which is not of the targeted river.** The department shall manage each section of the Northern District as specified in this management plan and 5 AAC 09.320.

What is the issue you would like the board to address and why? Effectively manage the

Northern Peninsula fishers areas by modifying 5 AAC 09.369.

PROPOSED BY: Roland Briggs

(EF-C15-046)

CAMF POSITION: OPPOSE

COMMENTS: The WASSIP study clearly showed that catch percentage and harvest rates varied greatly between years and time strata. This proposal would put an unnecessary burden on area managers to calculate a catch percentage without any way of scientifically enumerating it. (Fig. 13, 14, 15)

Figure 13. South Ilnik WASSIP stock composition and harvest rate range.



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Ranges of Stock Composition and Harvest Rate Each Temporal Stratum in South Ilnik 2006-2008 (11 observations)

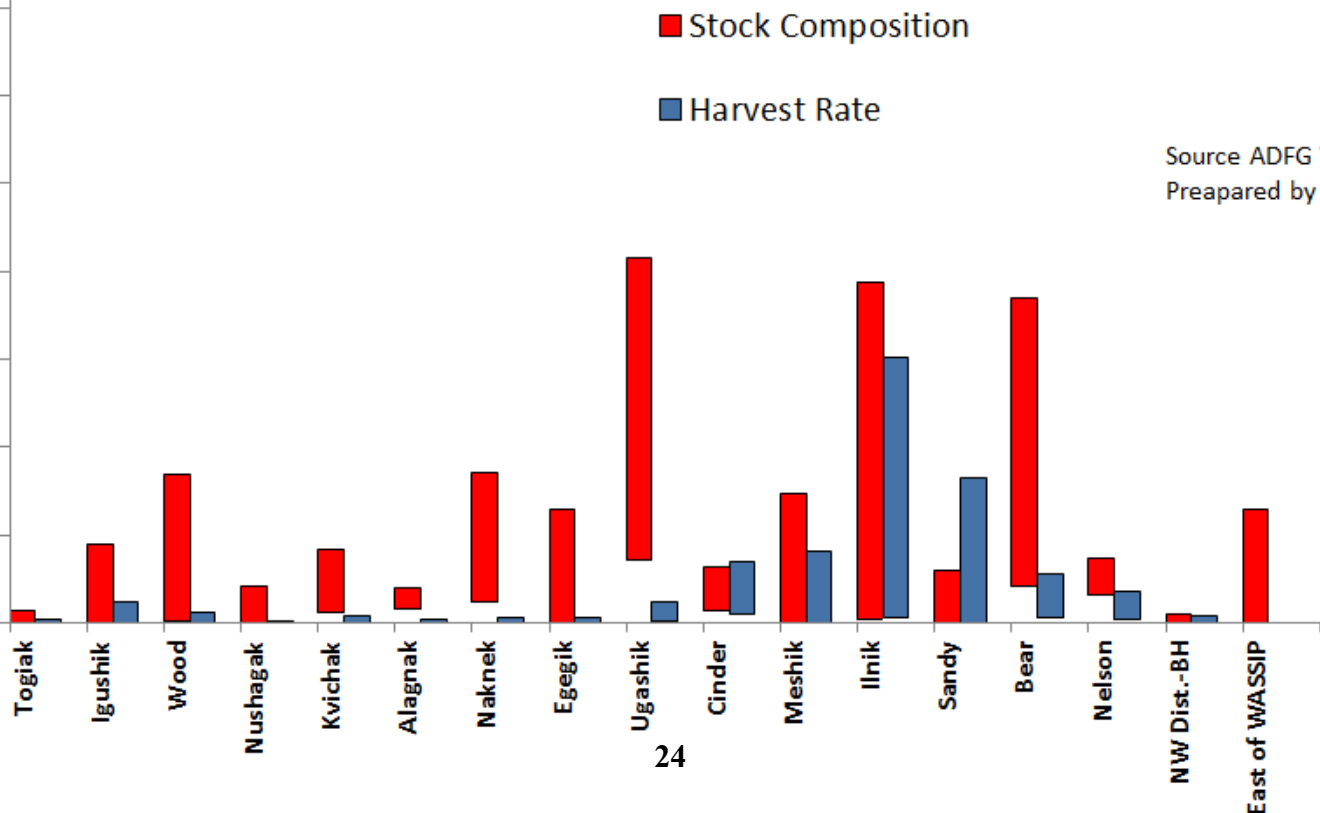


Figure 14. North Ilnik WASSIP stock composition range and harvest rate range.



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Ranges of Stock Composition and Harvest Rate Each Temporal Stratum in North Ilnik 2006-2008 (11 observations)

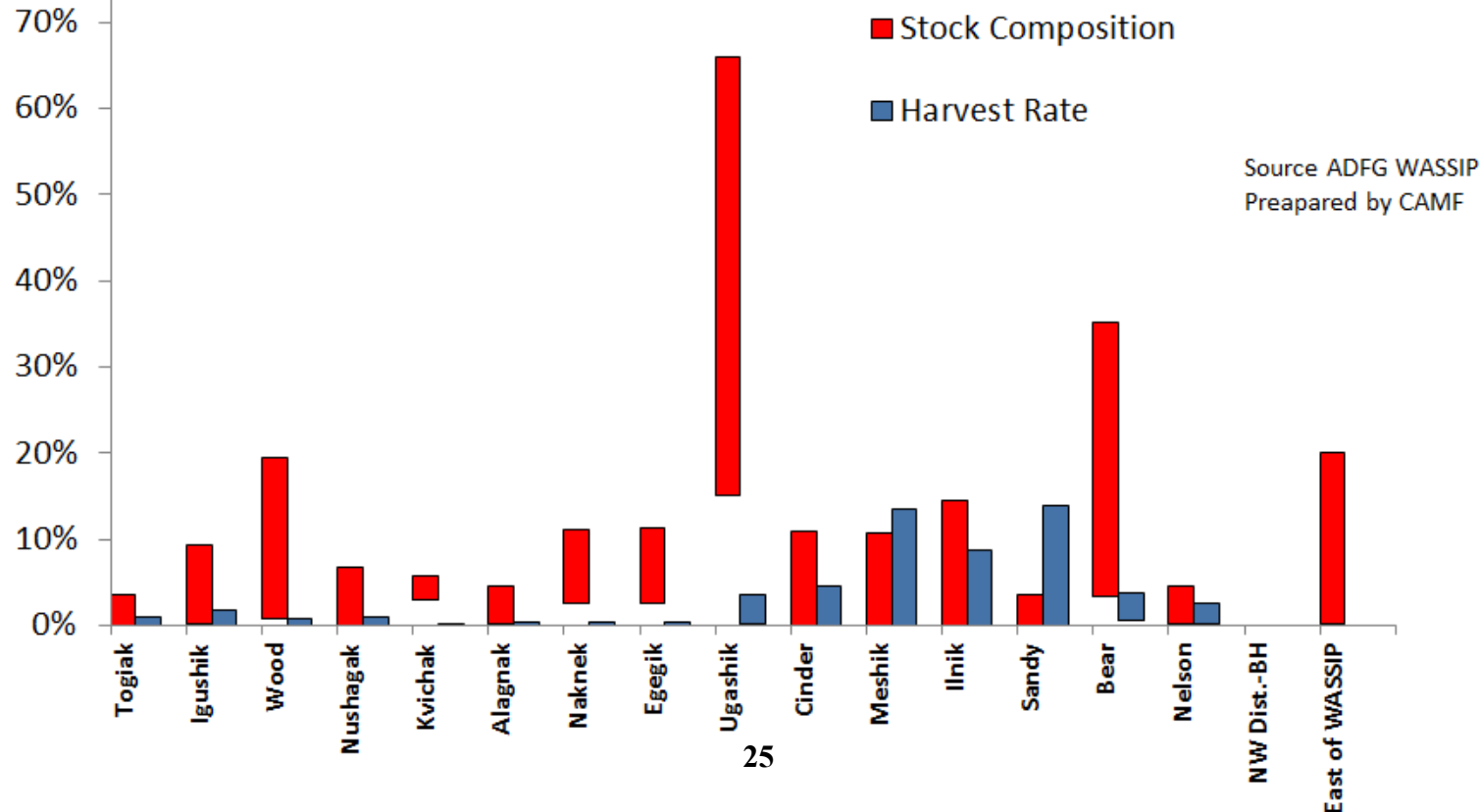
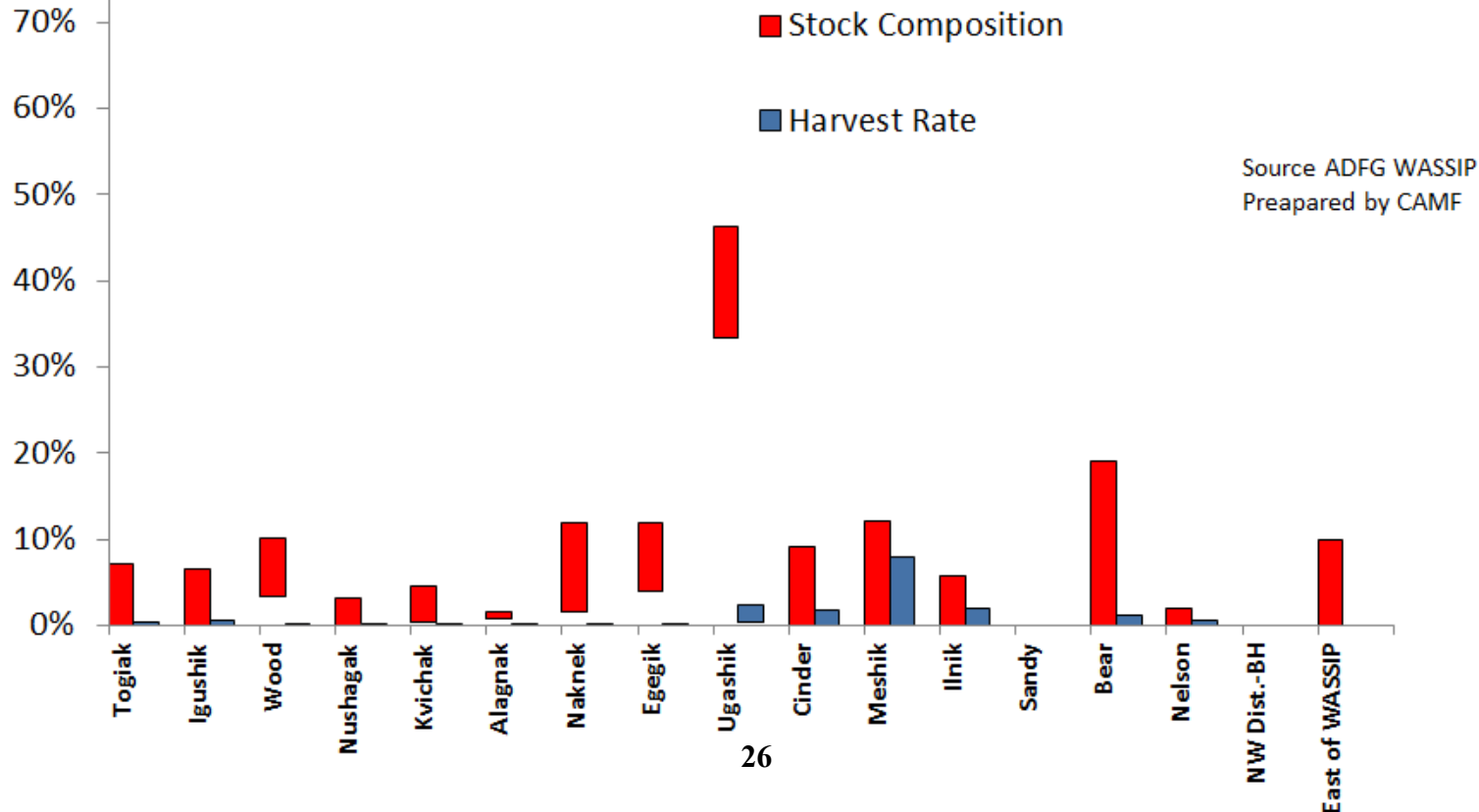


Figure 15. Outer Port Heiden WASSIP stock composition range and harvest rate.



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Ranges of Stock Composition and Harvest Rate Each Temporal Stratum in OPH 2007-2008 (6 observations)



PROPOSAL 152 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

From June 20 through July 20 manage the Northern District salmon fisheries jointly with Alaska Department of Fish and Game Alaska Peninsula and Bristol Bay staff, as follows:

5 AAC 09.369 is amended to read:

(1) notwithstanding 5 AAC 09.320(a)(4), from June 20 through July 20, must be managed in cooperation with East Side Bristol Bay staff.

Strike the Section (B).

What is the issue you would like the board to address and why? More effective manage individuals river's stocks of fish.

Modify 5AAC 09.369.

PROPOSED BY: Roland Briggs

(EF-C15-047)

CAMF POSTION: OPPOSE

COMMENTS: There's already provisions in the North Peninsula Management Plan that addresses management in Ilnik and Outer Port Heiden sections if the Egegik line is moved in to protect Ugashik stocks. Due to the similar harvest rates in the North Peninsula and Egegik on the Ugashik reporting stock no further management tools are necessary. (Fig. 16)

PROPOSAL 153 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Include information on the abundance of non-local salmon stocks as a factor in managing Northern District commercial salmon fisheries, as follows:

5 AAC 09.369 is amended to:

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information **taking into account the abundance of non-Northern Peninsula in the catch area**. The department shall manage each section of the Northern District as specified in this management plan and 5 AAC 09.320.

What is the issue you would like the board to address and why? More effective manage rivers on the North Peninsula.

From the WASSIP study it showed that a significant portion of the Northern Peninsula catch was actually destined for non-North Peninsula rivers therefore managing by escapement and catch per unit effort could allow over exploitation of a rivers run. Managing based on catch per unit effort when it is established that a large portion of the catch is not of the targeted river puts sustainability in question.

PROPOSED BY: Roland Briggs

(EF-C15-048)

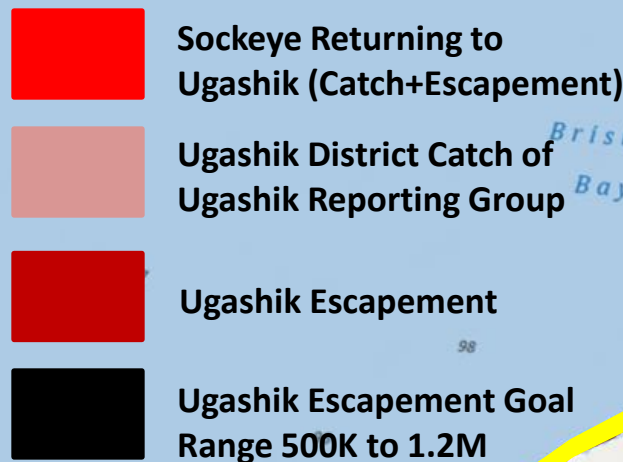
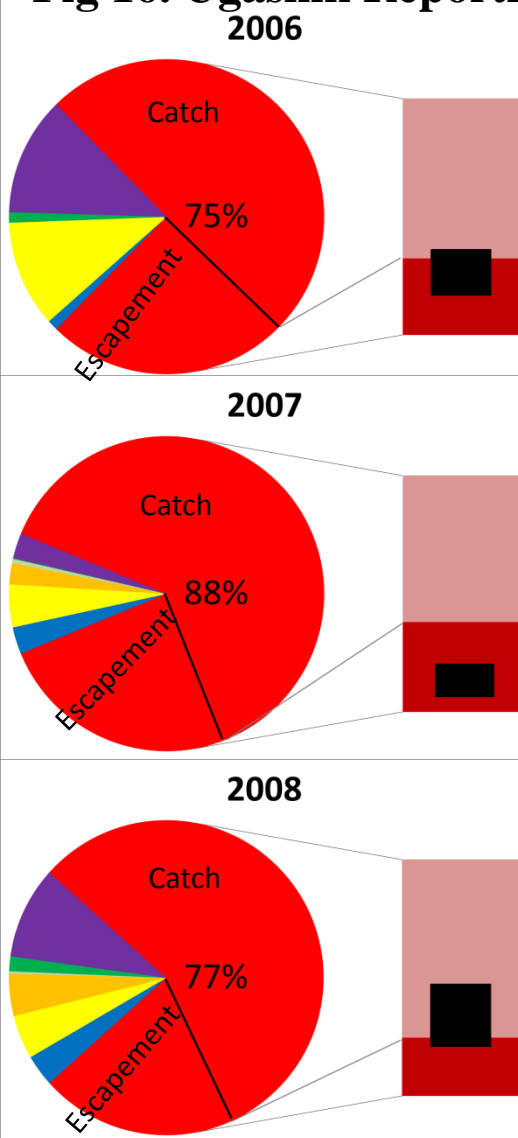
CAMF POSTION: OPPOSE

COMMENTS: Same as Proposal 152.

Fig 16. Ugashik Reporting Group.



Ugashik Reporting Stock WASSIP



Source: ADFG WASSIP (median estimates)
Prepared by CAMF

0 45 90 180

PROPOSAL 154 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Link management actions in the Northern District of the Alaska Peninsula Area commercial salmon fisheries to salmon abundance in adjacent Bristol Bay Area districts, as follows:

5 AAC 09.369 is amended to read:

(a)The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

Realizing data on some of the river systems are limited the manager shall use all available data to correct his catch per unit effort numbers to reflect actual catch of the targeted river system. Up to and including smaller sub districts around the targeted river mouths or lagoons in order to trigger a management action in the district.

If past studies have shown that 40% or more of the catch is of non-targeted stocks then the area shall be co-managed by managers of the areas that have 15% or more of their fish in the catch. Or if past studies of catch in that area have shown the potential harvest of a particular river to be more that 30% of the low end escapement goal of a non-targeted river the area shall be co-managed.

The starting % shall be initiated from the WASSIP study. As more data is collected and as longer timeline and better picture of the long-term catch patterns in an area are achieved the management will adjust accordingly.

(Both managers must agree on openings if the managers cannot agree the commissioner shall make the final decision after reviewing the potential damage to each system.)

What is the issue you would like the board to address and why? The North Peninsula Management plan needs to work in partnership with management plans in areas where there is cross harvesting of resources. There are portions of the North Pacific Management Plan that appear to be in conflict with itself. It appears the managers are directed to make management decisions to which they have insufficient data to determine, thus this could lead to overharvest of the targeted river.

PROPOSED BY: Roland Briggs (EF-C15-091)

CAMF POSITION: OPPOSE

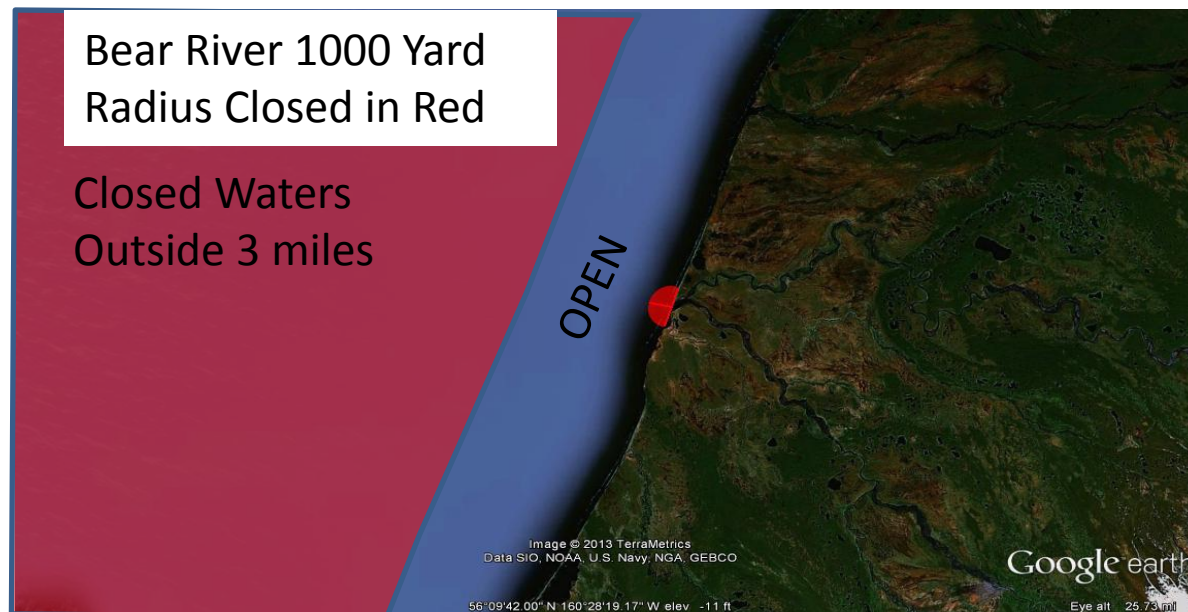
CAMF COMMENTS: Same as 151, 152, and 153. This proposal also requests smaller sub districts in the North Peninsula. Essentially wanting to change the current dispersed management method used in the North Peninsula Area to terminal management method used in the Bristol Bay Area. (Fig. 17)

Figure 17. Terminal Management compared to Dispersed Management.

Terminal Management Compared to Dispersed Management



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Images are
at the same
scale



PROPOSAL 155 – 5 AAC 09.310. Fishing seasons; 5 AAC 09.320. Fishing periods; 5 AAC

09.330 Gear; 5 AAC 09.350. Closed waters; and 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Close the Outer Port Heiden Section of the Northern District to commercial salmon fishing, as follows:

Close the Outer Port Heiden Section to commercial fishing for sockeye salmon by amending the following:

5 AAC 09.310 Fishing Seasons.

(a) In the Northern District, salmon may be taken as follows: (2) Port Heiden Sections:

...

(B) Outer Port Heiden Section: **no open season** [FROM JUNE 20 TO JULY 31];

5 AAC 09.320. Fishing Periods.

(a) In the Northern District, salmon may be taken only during weekly fishing periods from

6:00 a.m. Monday until 6:00 p.m. Thursday, unless modified by emergency order, except as follows:

(4) In the [OUTER PORT HEIDEN,] Inner Port Heiden[,] and Ilnick Sections, salmon may be taken from 6:00 a.m. Monday through 6:00 p.m. Wednesday, except...

5 AAC 09.330. Gear.

...

[(10) OUTER PORT HEIDEN SECTION: WITH DRIFT GILLNETS ONLY]

5 AAC 09.350. Closed waters.

Salmon may not be taken in the following locations.

(3) Outer Port Heiden: waters of Outer Port Heiden Section[(A) BETWEEN THE THREE-MILE SEAWARD BOUNDARY LINE, DESCRIBED IN 5 AAC 09.301, AND A LINE THAT IS ONE AND ONE-HALF MILES SHOREWARD OF THE THREE-MILE BOUNDARY LINE;]

5 AAC 09.369. Northern District Salmon Fisheries Management

Plan. (a) The purpose of this management plan is to....

[(1) THE OUTER PORT HEIDEN SECTION IS OPEN FROM JUNE 20 TO JULY 31

TO COMMERCIAL FISHING IN THOSE WATERS WEST OF A LINE FROM 57° 05.52' N. LAT., 158° 34.45' W. LONG. TO 57° 08.85' N. LAT., 158° 37.50' W. LONG. BASED ON THE ABUNDANCE OF MESHIK RIVER SOCKEYE SALMON. IF THE COMMISSIONER CLOSES THE PORTION OF THE EGEGIK DISTRICT, AS SPECIFIED IN 5 AAC 06.359 FOR THE CONSERVATION OF UGASHIK RIVER SOCKEYE SALMON STOCKS, THE COMMISSIONER MAY, BY EMERGENCY ORDER, CLOSE THE OUTER PORT HEIDEN SECTION, AND IMMEDIATELY REOPEN THE OUTER PORT HEIDEN SECTION, WITH ADDITIONAL FISHING RESTRICTIONS THAT THE COMMISSIONER DETERMINES NECESSARY.]



See Proposal Book for complete language.

PROPOSED BY: Mitch Seybert

(EF-C15-

079)

**

CAMF POSITION: OPPOSE

- In 2007, the board adopted two proposals that were aimed at reducing excess escapement into the Ilnik and Meshik Rivers. One was an ADF&G proposal to open the Ilnik Section northeast of Unangashak Bluffs as early as June 20th based on the abundance of Ilnik and Meshik River sockeye. The other was a board-generated proposal which added sub-section (I) to the **North Peninsula Management Plan (5 AAC 09.369)** that authorized opening a portion of OPH based on abundance of Meshik River sockeye. ADF&G had presented information regarding the excessive escapements in both rivers, and the board members who voted in favor of these proposals made it clear that their intent was to give ADF&G the tools necessary to harvest these fish. In 2010 the board considered several proposals that would have undone or revised the 2007 actions pertaining to Ilnik and OPH. ADF&G said it was neutral on the allocation aspects of these proposals but opposed them because of the potential for surplus escapement and lost harvest opportunity. ADF&G expressly stated in its staff comments (RC 2) that since opening the OPH Section in 2007, “excessive surplus escapements into the Meshik River have not occurred”.
- The proposer cites the Mixed Stock Policy 5 AAC 39.220 (d) but fails to notice that that subsection **ONLY APPLIES** in the absence of a management plan, but 5 AAC 09.369 (I) explicitly provides for fishing in OPH. The proposers “findings” that OPH is not in compliance totally ignores the North Peninsula Management Plan. Bristol Bay fishers not liking the North Peninsula Management Plan is not the same as it not existing. Our “finding” is that the OPH regulation is in compliance with the State’s Mixed Stock Policy.
- Elimination of OPH would provide little benefit to Ugashik or Bristol Bay fisher compared to the loss for an OPH or North Peninsula fisher. (Fig. 18 and Fig. 19)
- The largest 11 non-local harvest and 16 of the largest 20 non-local harvests during the WASSIP years occurred in the Bristol Bay area. (Fig. 20)
- The OPH fishery is limited by time (2 ½ days per week) but has increased the North Peninsula Harvest Rate on Meshik sockeye by 3-fold during WASSIP years. Proving to be a great management tool for ADF&G. (Fig. 21)
- It seems the proposer believes that just because the OPH Section is in the North Peninsula Area there’s a problem because he failed to addresses non-local harvests at the Bristol Bay meeting. (Fig. 22)
- Gain to Ugashik would be small with elimination of OPH. (Fig 23)

Figure 18. Estimated Gain to the Ugashik District harvest with closure of OPH.



Estimated Gain to Ugashik District Sockeye Harvest if OPH was eliminated (2006-2008)

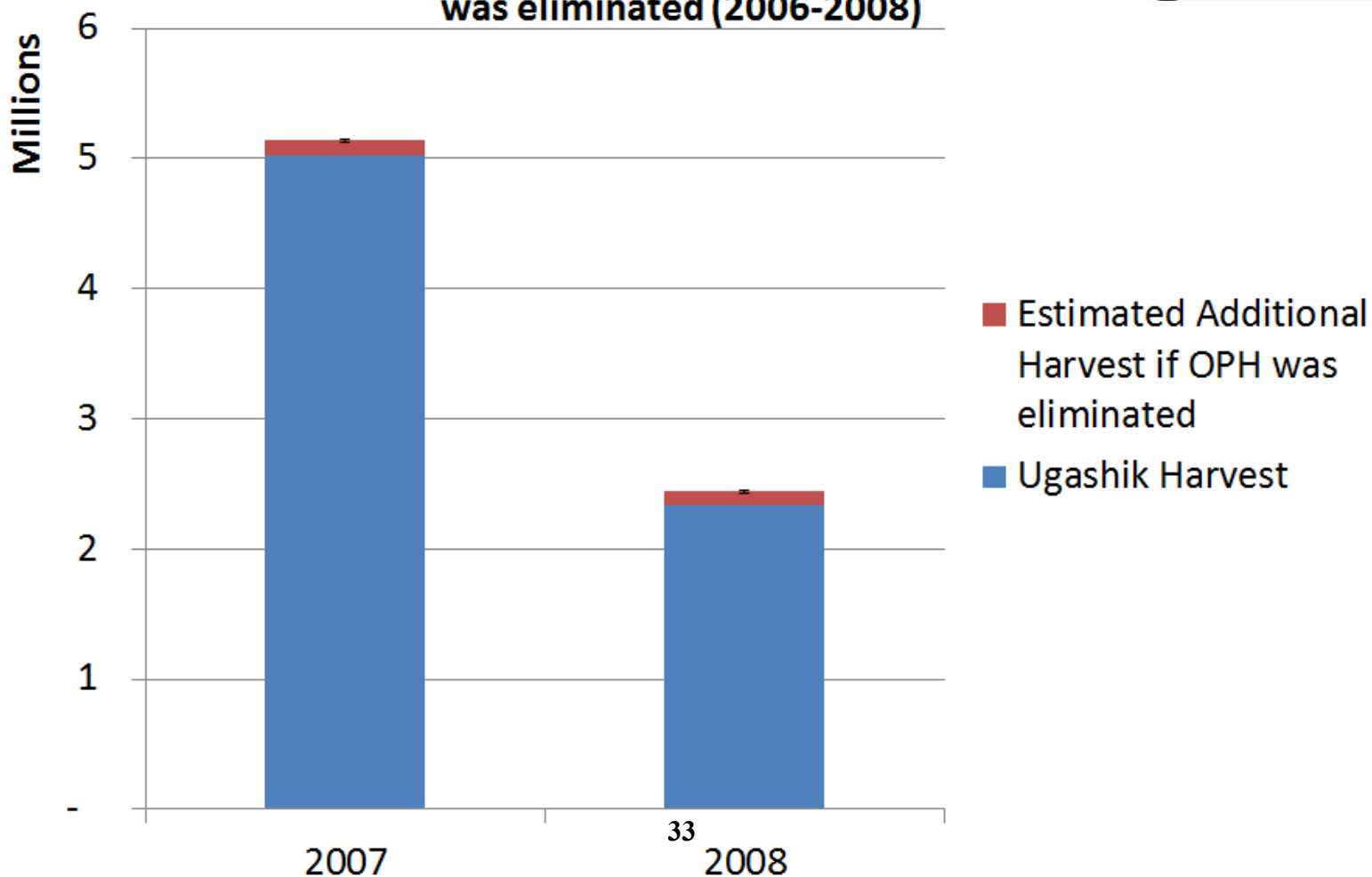


Figure 19. Estimated Gain to BB Harvest if the entire harvest of Bristol Bay stocks in NP were harvested



Estimated Gain to the Bristol Bay Harvest if the entire harvest of Bristol Bay Stocks in North Peninsula Fishery were harvested in Bristol Bay. (2006-2008)

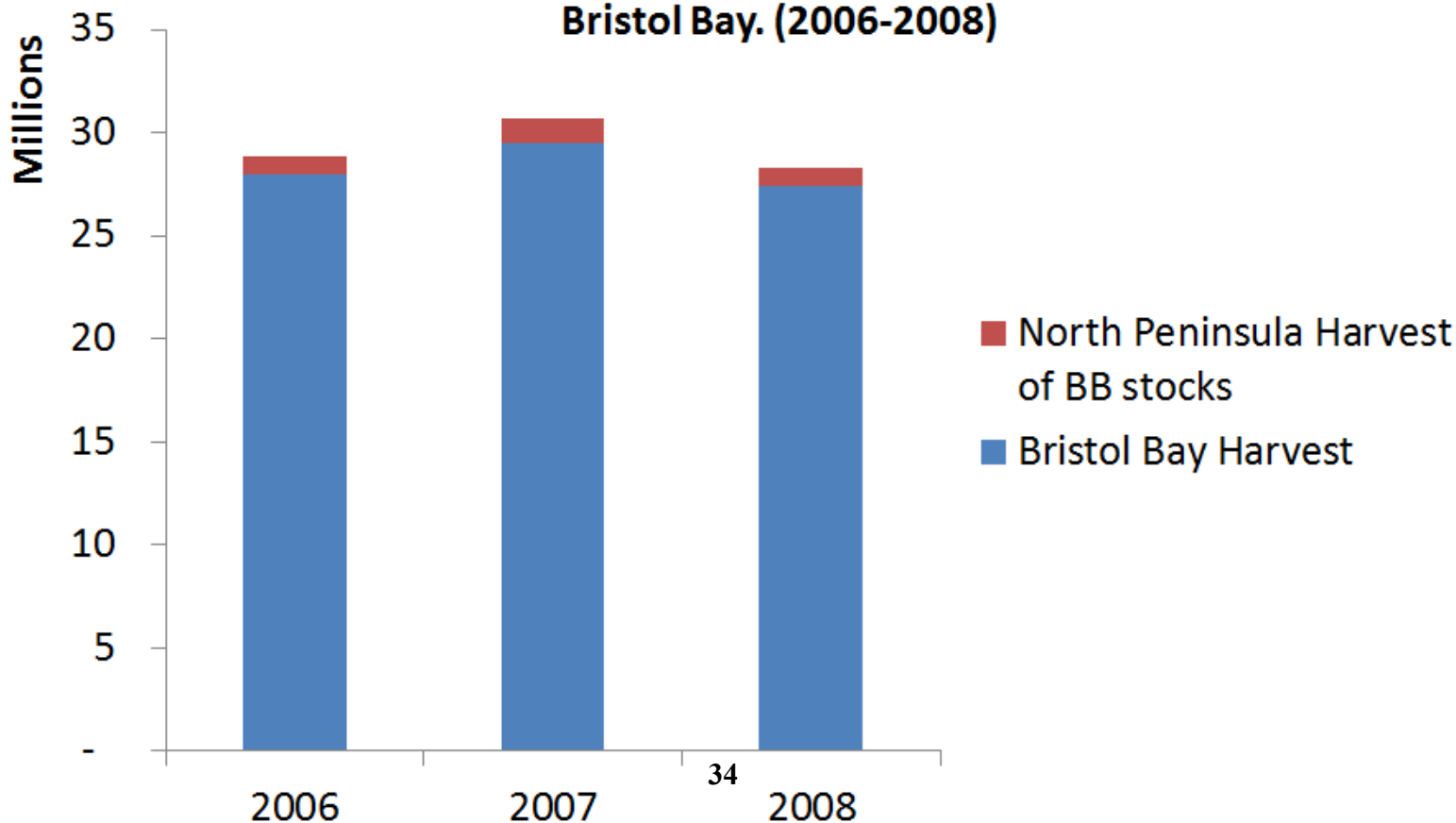


Figure 20. Top Twenty Non-Local Sockeye Harvest during WASSIP.



Top Twenty Non-Local Sockeye Harvest Listed by Year, Rep and Fishery in Thousands

Prepared by CAMF
Source WASSIP

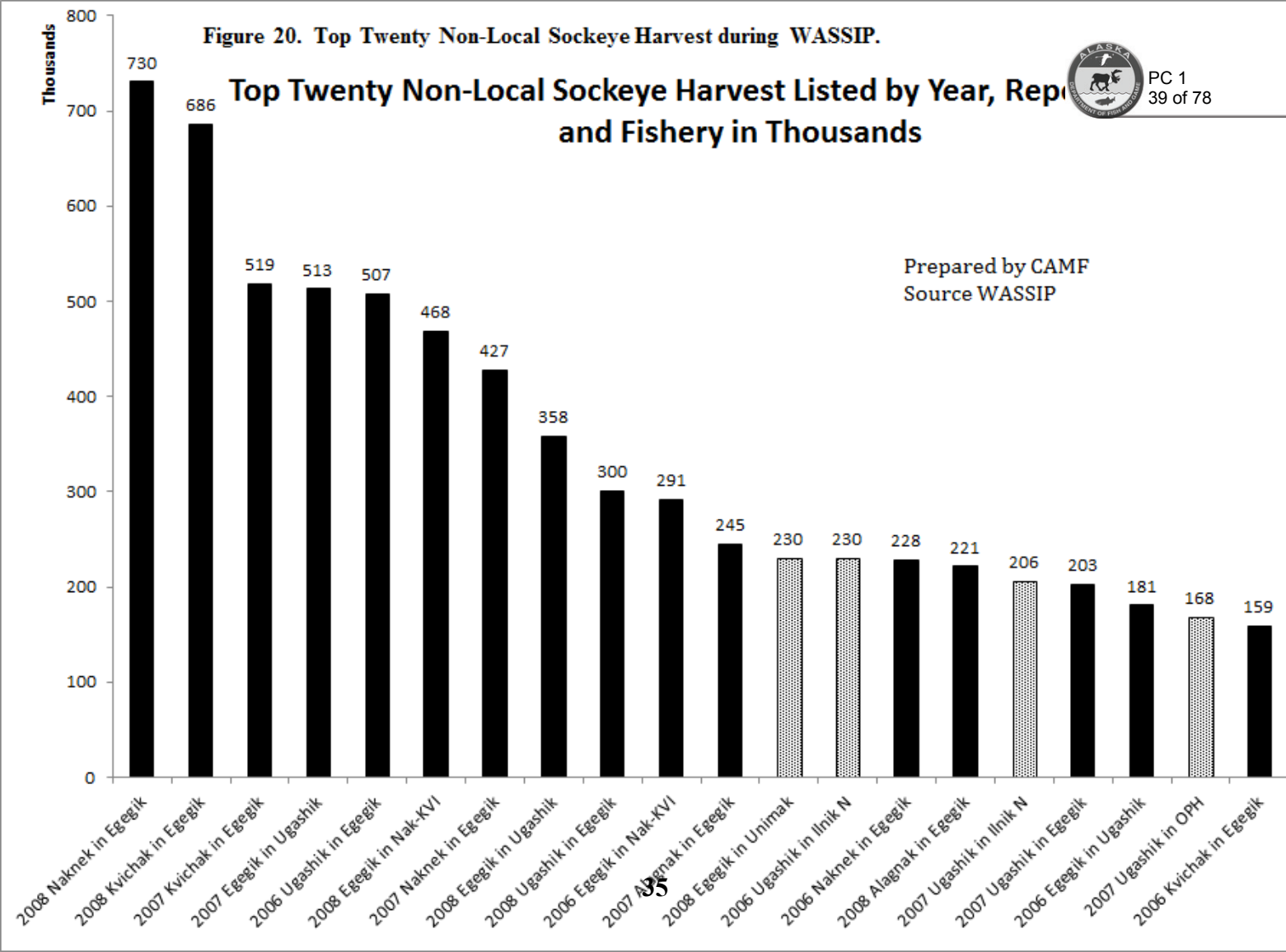


Figure 21. Three fold increase in Meshik harvest rate when OPH was opened in 2007

Meshik Reporting Stock

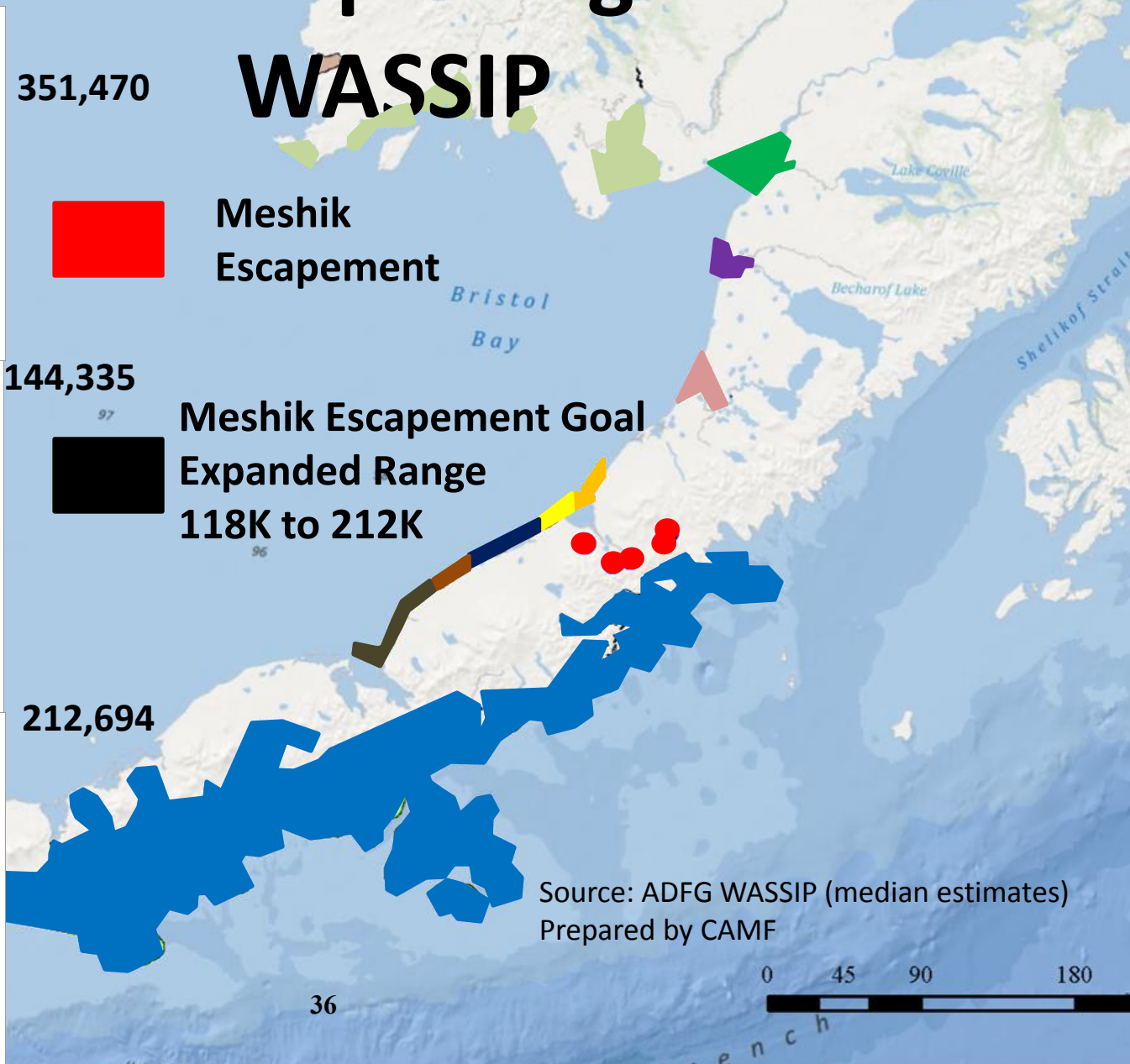
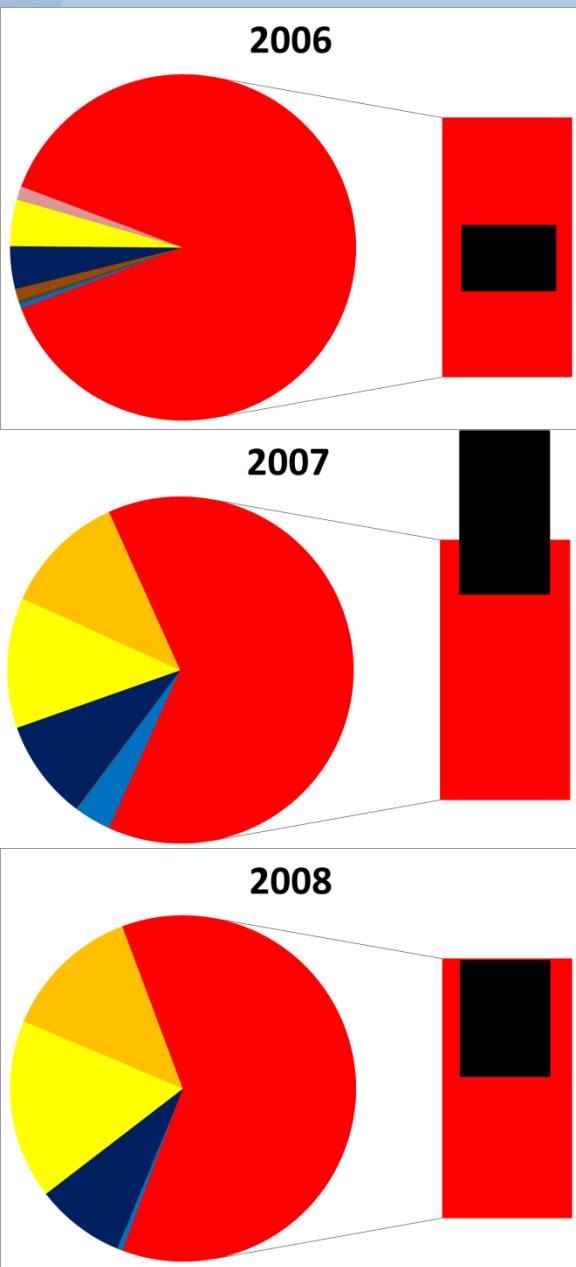
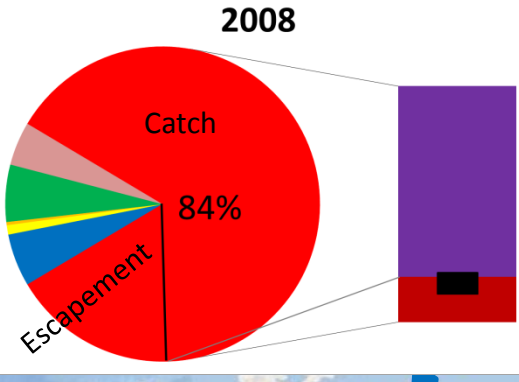
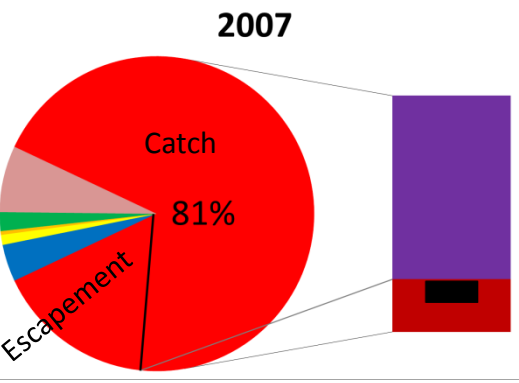
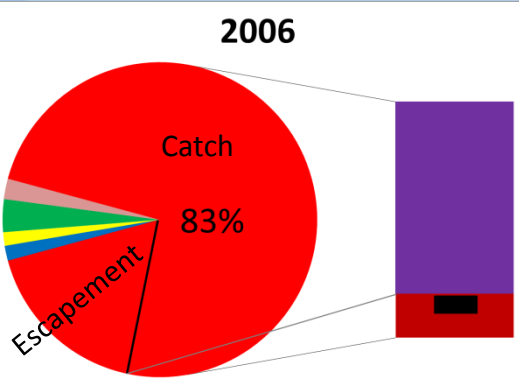
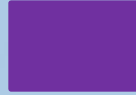


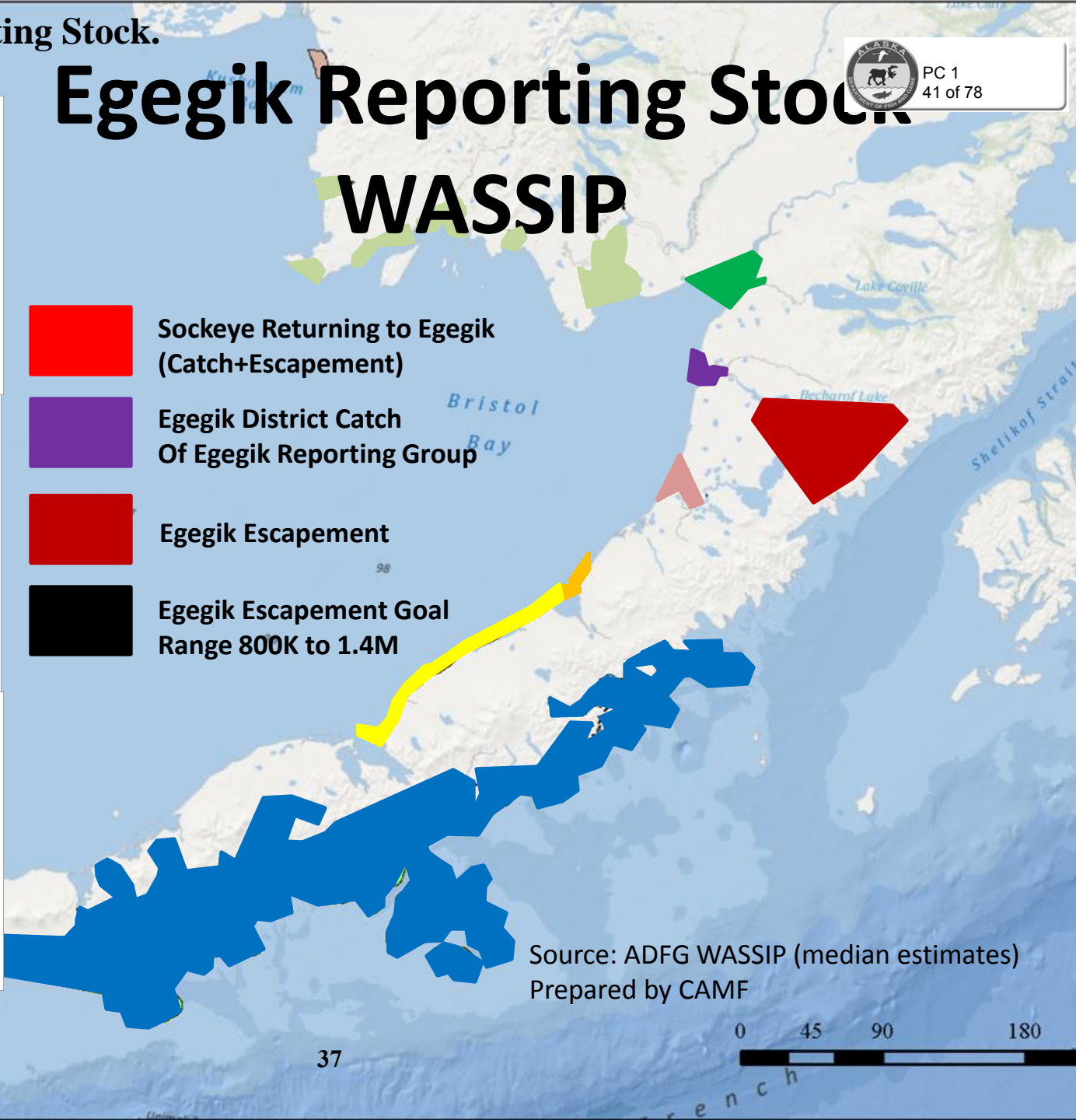
Figure 22. Egegik Reporting Stock.

Egegik Reporting Stock

WASSIP



-  Sockeye Returning to Egegik (Catch+Escapement)
-  Egegik District Catch Of Egegik Reporting Group
-  Egegik Escapement
-  Egegik Escapement Goal Range 800K to 1.4M



Source: ADFG WASSIP (median estimates)
Prepared by CAMF



Fig 23. Ugashik Run and OPH catch.

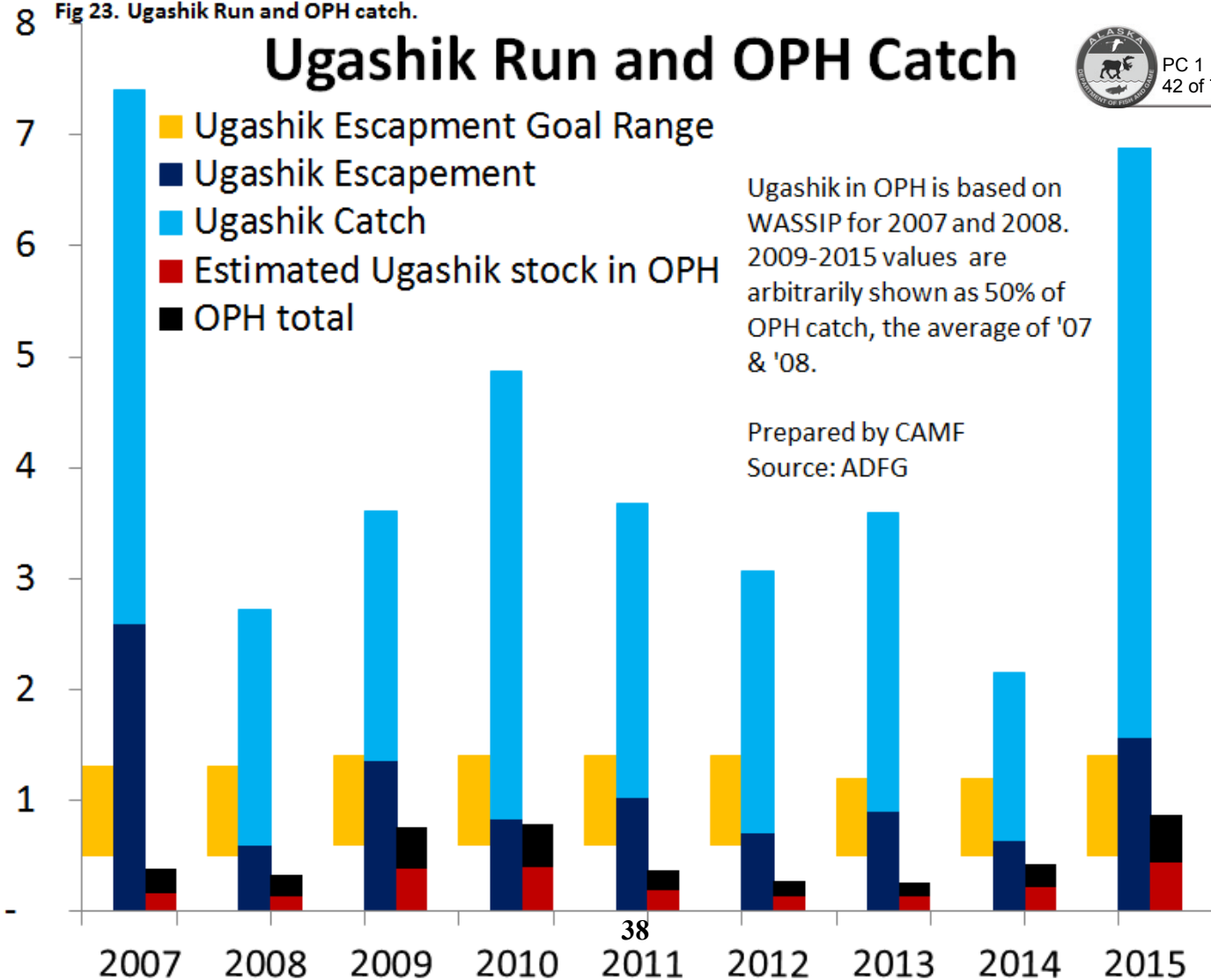
Ugashik Run and OPH Catch

- Ugashik Escapment Goal Range
- Ugashik Escapement
- Ugashik Catch
- Estimated Ugashik stock in OPH
- OPH total

Ugashik in OPH is based on WASSIP for 2007 and 2008. 2009-2015 values are arbitrarily shown as 50% of OPH catch, the average of '07 & '08.

Prepared by CAMF
Source: ADFG

Millions





PROPOSAL 156 – 5 AAC 09.310. Fishing seasons; and 5 AAC 09.350. Closed waters.
Close the Outer Port Heiden Section of the Northern District to commercial salmon fishing, as follows:

Close the Outer Port Heiden
Section.

What is the issue you would like the board to address and why? The Northern Peninsula District is a mixed stock fishery that intercepts Bristol Bay salmon. At the 2007 Alaska Peninsula Board of Fish meeting the Northern Peninsula District's opportunity to intercept Bristol Bay fish was increased by opening the Outer Port Heiden Section. State fisheries policy is to not allow the expansion of mixed stock fisheries.

The WASSIP study shows that almost all of the fish caught in the Outer Port Heiden Section are bound for Bristol Bay and as much as 80% of those are bound for the Ugashik River. Ugashik is having trouble meeting its escapement goals in a time where the total Bristol Bay run is increasing.

PROPOSED BY: Kurt Johnson

(EF-C15-111)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- Ugashik is not having trouble meeting escapement.
- The Outer Port Heiden Section is part of the *North Peninsula Management Plan*.
- While Bristol Bay Stocks accounted for 72% of the OPH catch in 2007 and 80% of the catch in 2008 the harvest rate was very low. Harvest rate on BB stocks in OPH was 0.6% in both years.(Table 58, Table 59, WASSIP SP12-24)
- Ugashik District has achieved its escapement goal every year since 1979. (Fig. 24)
- Current escapement goal is 500,000 to 1,400,000.
- The average escapement for the last 10 year period is 1,124,240.
- The average escapement for the last 20 year period is 999,648.
- The average escapement for the last 30 year period is 1,110,331.

Figure 24. Ugashik Escapement and Escapement Goal Range.

Millions

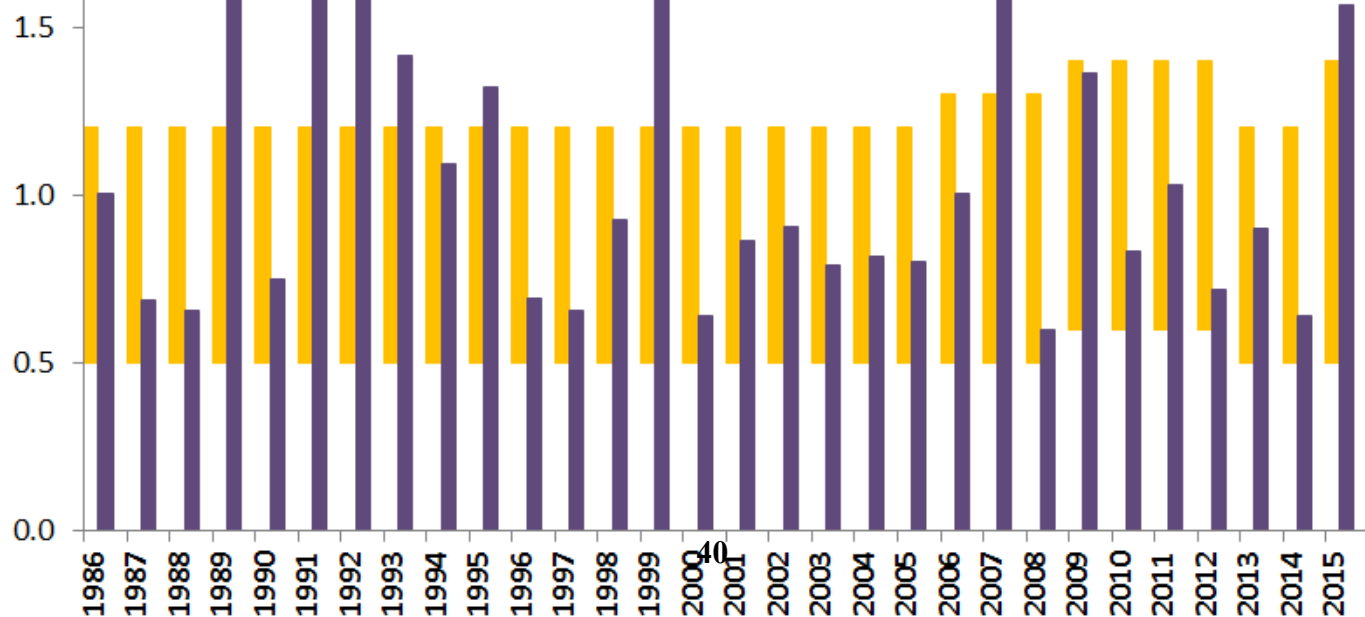
Ugashik Escapement 1986 to 2015



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- Ugashik Escapement Goal Range
- Ugashik Escapement

Source ADFG
Prepared by CAMF



PROPOSAL 157 – 5 AAC 09.320. Fishing periods. In the Inner and Outer Port Heiden sections of the Northern District restrict commercial fishing for salmon to no more than four days in any seven day period, as follows:

In the Port Heiden Section of Area M's North Peninsula commercial salmon fishery, fishing will be permitted a maximum of four days in a seven day period, to protect the escapement of the small streams in the Port Heiden Inner District, and North River Outer District and migrating stocks to Bristol Bay, and Nelson Lagoon in the month of July.

What is the issue you would like the board to address and why? Conservation, subsistence harvest concerns, (kings, chums, sockeye).

High interception of Bristol Bay's migrating stocks.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-092)

CAMF POSITION: OPPOSE

CAMF COMMENTS: The Outer Port Heiden fishery is currently managed for no more than 2 1/2 fishing days per calendar week. In addition, contrary to the proposal's statement, escapement goals are being achieved in Port Heiden. And, according to the WASSIP study, very few or no, sockeye bound for Nelson Lagoon are harvested in the Outer Port Heiden section.

There is no "North River Outer District" in the North Peninsula, as stated in the proposal.

PROPOSAL 158 – 5 AAC 09.350. Closed waters. Restrict commercial salmon fishing in the Three Hills, Ilnik, and Outer Port Heiden sections of the Northern District to no more than one and one-half miles offshore, as follows:

In the Area M's North Peninsula Commercial Salmon fishery,[Ilnik to Port Heiden] fishing will be permitted in a reduced area until total run strength to Ugashik is 2.5 million or 5 million to Egegik. Fishing will be permitted from the 18 ft high tide mark out to a GPS line 1.5 miles off shore, Starting from the Three Hills northern eastwest line go north to intersect the Port Heiden Outer Dist. southern eastwest corner line, 1.5 miles off shore.

What is the issue you would like the board to address and why? Harvesting migrating
Bristol Bay stocks in a year of less abundance when local stocks of Area M are healthy.

Harvesting Bristol Bay migrating stocks needed to sustain locally owned Bristol Bay permit numbers in the villages of Port Heiden, Ugashik, Egegik.

Harvesting migrating Bristol Bay stocks unnecessarily when it can be reduced with time and area that won't affect local harvests and escapements of Port Heiden and Ilnik.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-109)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- Reference previous comments concerning restriction of the North Peninsula fishery.
- The proposer fails to define who will define the total run strength of Egegik or Ugashik; and as well as when it will be defined. In addition it's unclear what is meant by "*eastwest line*" Most boundary lines in the North Peninsula are longitudinal. (Fig 25. Ilnik section assumed intention)
- Outer Port Heiden section is already restricted to inside 1.5 miles offshore. The proposer fails to define the GPS line.
- It is unclear what the 18 foot high tide line is. Generally an extreme high tide in Port Moller doesn't exceed 12 feet.
- Two of three years Egegik had a higher harvest rate on Ugashik stocks than the entire North Peninsula Area (WASSIP). No action was taken at the Bristol Bay meeting to curtail any district based on run strength of another.
- Moving the fleet into 1.5 miles would create a safety problem in westerly weather, already experienced in the last three seasons due the passage of rolling closures and 1.5 mile boundary in OPH at the 2013 BOF meeting.
- Area M drift fishermen do not fish like Area T fishermen. In Area M for the purpose of a more orderly fishery nets are set ½ mile apart. When restricting a fishery inside 1.5 miles at time there is little room to set, so a fisher must travel (burn fuel) just to set ones net.

Also fishing inside 1.5 miles can affect the quality of the salmon harvest.

- During ebb tide one can drift farther away from the beach, which in turn may require a fisher to pick the net without care of the fish in order to stay in legal waters. (i.e. no bleeding, reckless picking, fish not placed in RSW in a timely manner)
- With little or no room, nets must be placed in the surf, which is dangerous and sometimes produces low quality.



Proposal 158 Closes Area in Red Due to Run Strength in Ugashik and Egegik

District

Three Hills
Section

Ilnik
Section

Stroganof
Point

Inner Port
Heiden Section
317-20

Unangashak Bluffs

Ilnik Lagoon
Section 316-22

Three Hills

PROPOSAL 159 – 5 AAC 09.350. Closed waters. Open waters of the Outer Port Heiden Section of the Northern District from one and one half miles to three miles offshore to commercial salmon fishing, as follows:

5 AAC 09.350(3) is amended by deleting current subsection (A).

What is the issue you would like the board to address and why? The board in 2013 closed the portion of the Outer Port Heiden section from one and one-half miles offshore to the three- mile seaward boundary. These closed waters should be reopened in the interest of an orderly and safe fishery. The current open area, inside one and one-half miles, includes shallow waters and obstacles (e.g., snags) that are difficult and dangerous to fish in heavy weather, particularly during night hours. The three-mile line is well defined in charting programs, and is used throughout the North Peninsula District, but the one and one-half mile line is not, potentially creating enforcement/compliance problems.

PROPOSED BY: Concerned Area M Fishermen

(EF-C15-040)

CAMF POSITION: SUPPORT

CAMF COMMENTS:

- Passage of this proposal will re-instate the fishery regulations that existed from 2007-2013.
- OPH was opened in 2007 to address ADF&G concerns for excessive over-escapement into the Meshik River system. (Fig. 26)
- Managers limit the fishery to 2 ½ days per-week, this schedule has given them the tools to control Meshik escapement numbers. (Fig. 21)
- Harvest Rates on Meshik stocks has increased by 3-fold based on WASSIP. (Fig. 27)
- The action by the 2013 board to reduce the OPH Section outside boundary has resulted in a “less safe and orderly fishery”. The fleet is now fishing in shallower waters outside Port Heiden during low tides, while prevailing westerly winds disrupt normal daylight fish practices and make it especially difficult during night fishing hours.
- Recent studies have shown that stock composition doesn’t change inside or outside of 1½ miles from the beach, only the risk to the fleet increases.
- It is not possible to control Meshik River escapement by fishing inner Port Heiden.

Figure 26. Meshik Escapement and Escapement goal (not expanded by 2.47) 1996 to 2015

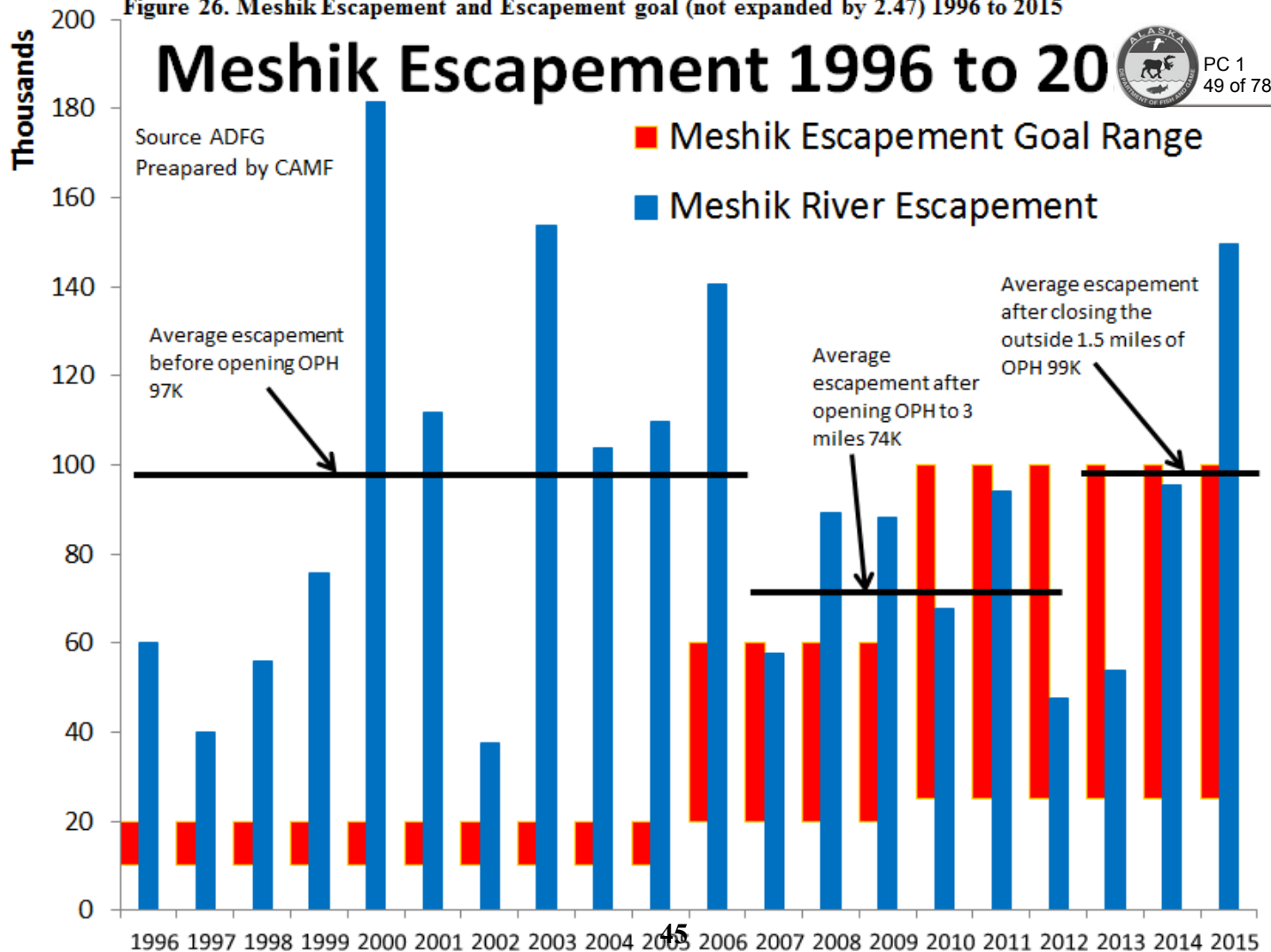
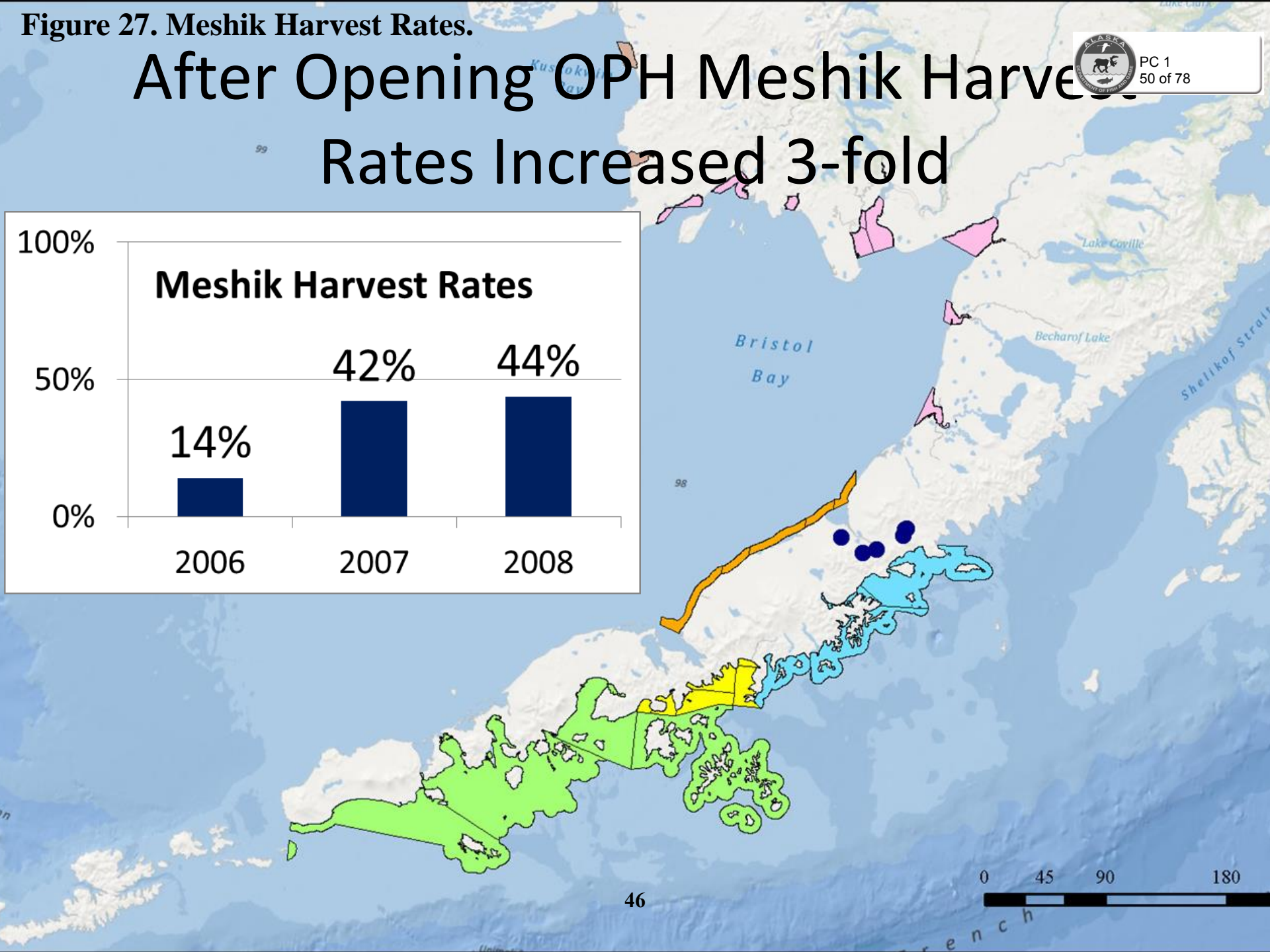
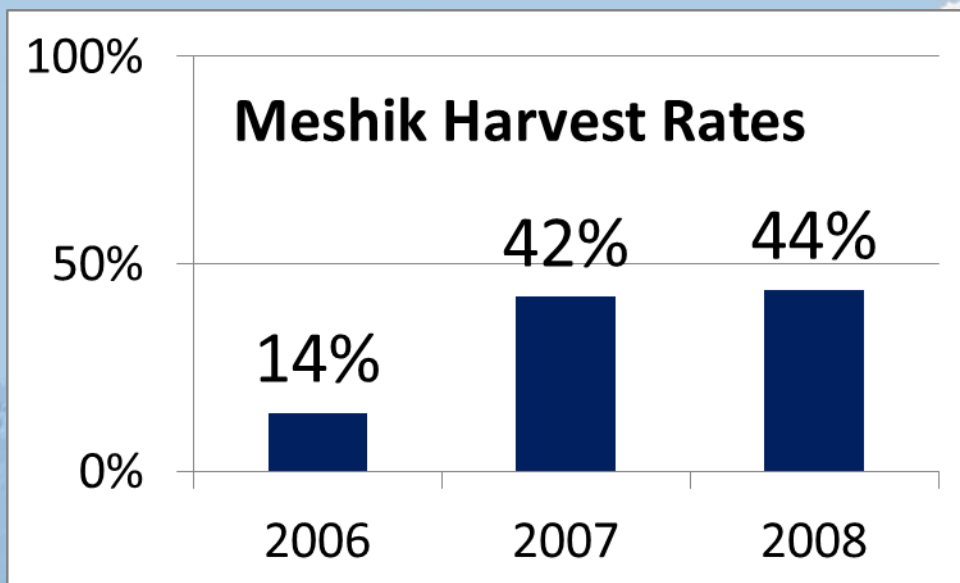


Figure 27. Meshik Harvest Rates.

After Opening OPH Meshik Harvest Rates Increased 3-fold



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PROPOSAL 160 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Close waters of the Bear River and Nelson Lagoon sections of the Northern District between zero to one and one-half miles offshore to commercial salmon fishing with drift gillnet gear until escapement objectives have been met, as follows:

From June 1 to August 15 sockeye season, drift gear will be restricted to no less than 1.5 to 3 miles away from shore until Bear River and Nelson River have achieved their adequate escapement.

What is the issue you would like the board to address and why? The *sustainability* of the Bear River and Nelson River Fishery due to the mismanagement of the North Peninsula Fishery between June 1 to August 15 sockeye salmon season.

Under the current management, the Bear River and Nelson River escapement will be depleted and will no longer have a fishery.

PROPOSED BY: Ray Johnson

(EF-C15-110)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- This proposal is an unnecessary burden on Area M management.
- Bear River has achieved its escapement goals every year since 1986 while the Nelson River has achieved its escapement every year but one since at least 1989. We are not clear what mismanagement the proposer is referring to.
- The North Peninsula systems are managed on weekly escapement goals to cover all components of the runs and fishing is closed when escapement is lagging.
- The Caribou Flats section (located offshore of Nelson Lagoon) is already closed for the entire season while the Bear River district is regularly closed when escapement goals are not being met.

PROPOSAL 161 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Close waters of the Northern District between zero and one and one-half miles offshore to commercial fishing with drift gillnet gear when Bear River and/or Nelson River coho salmon escapements do not meet objectives, as follows:

From August 15 to September 30 coho salmon season drift gear will be restricted to no less than

1.5 to 3 miles away from shore until Bear River and Nelson River have achieved their adequate escapement.



What is the issue you would like the board to address and why? The *sustainability* of the Bear River and Nelson River Fishery due to the mismanagement of the North Peninsula Fishery between August 15 to September 30 coho salmon season.

Under the current management, the Bear River and Nelson River escapement will be depleted and will no longer have a fishery.

the season. There currently are no conservation concern for any coho runs in the North Peninsula.

PROPOSED BY: Ray Johnson

(EF-C15-110)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- This proposal would place an unnecessary burden on Area M managers.
- The Bear River, 3-Hills and Ilnik Sections are currently managed on Bear River sockeye escapement goals from August 1st to approximately August 25th when the Bear River weir is pulled.
- Since 2000 Nelson Lagoon has met or exceeded its Coho escapement goal in every year but one, (2010). The Department states that there is no conservation concern for Nelson River Coho.

PROPOSAL 162 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Close waters of the Northern District between zero and one and one-half miles offshore to commercial fishing with drift gillnet gear when Bear River and/or Nelson River sockeye salmon escapements do not meet objectives, as follows:

At any time between June 1st and September 30 salmon season, should the Bear River and/or Nelson River fall short of adequate escapement, the drift fleet will revert back to the 1.5 to 3 mile "away from shore" regulation.

What is the issue you would like the board to address and why? The *sustainability* of the Bear River and Nelson River Fishery due to the mismanagement of the North Peninsula Fishery between June 1 to September 30 salmon season.

Under the current management, the Bear River and/or Nelson River escapement will be depleted and will no longer have a fishery.

PROPOSED BY: Ray Johnson

(EF-C15-114)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- Comments from proposal 160 also apply to this proposal.
- As stated in the North Peninsula AMR: “While the earliest opening dates are established by regulation and modified by emergency orders, actual fishing time in North Alaska Peninsula fisheries is based on in-season evaluations of local stock abundance and escapement objectives.”
- There are currently no Conservation or Management concerns on the North Peninsula.

PROPOSAL 163 – 5 AAC 09.331. Gillnet specifications and operations. Between the longitude of Three Hills and the northern boundary of the Outer Port Heiden Section restrict drift and set gillnets to 29 and one-half meshes depth, as follows:

In the North Peninsula of Area M’s commercial salmon fishery, from the Northern Three Hills Section east/west boundary line to the northern shore boundary line of Outer Port Heiden Section maximum mesh depth permitted will be 29 ½ mesh.

What is the issue you would like the board to address and why? Harvesting weak stocks

(king, sockeye, chum) while targeting larger systems in the Port Heiden

section. Subsistence concerns.

Intercepting high percentages of Bristol Bay migrating stocks in the Illnik and Port Heiden sections of Area M.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-098)

CAMF POSITION: OPPOSE

CAMF COMMENTS:

- Exorbitant amount of cost involved for fleet to comply with this regulation. Most Area M fishers own 3 nets to fish the long duration of the North Peninsula fishery.
- No biological reason to implement this regulation, please refer to previous comments concerning low Harvest Rates on migrating stocks.
- Gear cut would make fleet catching power less efficient and lead to more fish time to control escapements.
- Safety factor for large gillnet vessels in shallow waters and during westerly winds.
- No conservation or management concern exist for sockeye, king or chum on NP.
- 29 ½ mesh nets may work for Bristol Bay fishers but not for Area M.
- Current regulation allows for maximum 70 mesh nets.



PROPOSAL 164 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Manage commercial salmon fishing in the Black Hills Section and in Moffet Lagoon in the Izembek-Moffet Bay Section based on Moffet Lagoon escapement, as follows:

The Black Hills section starting north from Moffet Point should only be opened and closed with the Moffet Lagoon section to allow local escapement in Moffet Lagoon. If any emergency orders for opening the Black Hills section are made both Black Hills and Moffet Lagoon sections should be opened for fishing. Area biologists managing both areas need to communicate and align fishery openers. In the past Moffet Lagoon section closed and Black Hill section remained open by emergency order.

What is the issue you would like the board to address and why? The depletion of Moffet Lagoon section escapement and fishery sustainability.

PROPOSED BY: Herman Samuelson
CAMF POSSITION: OPPOSE

(HQ-F15-078)

CAMF COMMENTS:

- We feel Black Hills and Izembek-Moffet sections are currently management correctly.
- Department currently has authority to open and close different sections of this coast line based on local chum and sockeye escapements to each system.
- Department exercised that authority in 2013 to address Izembek-Moffet chums.
- There is no conservation or management concern for chum or sockeye in these systems.

PROPOSAL 165 – 5 AAC 09.331. Gillnet specifications and operations. In the Nelson Lagoon Section allow the compliment of drift gillnet gear to be split into two 100 fathom nets that may be fished simultaneously, as follows:

In Nelson Lagoon, drift gear can be split into two 100 fathom nets, and fished separately yet simultaneously.

What is the issue you would like the board to address and why? In Nelson Lagoon the drift gear is no more than 200 fathoms. In some places the channel in the lagoon is not wide enough to hold a 200 fathom net.

PROPOSED BY: Ray Johnson

(EF-C15-117)

CAMF POSTION: NUETRAL

CAMF COMMENTS: It is our understanding that it's already legal to split drift nets into two 100 fathom sections.

PROPOSAL 166 – 5 AAC 09.350. Closed waters; and 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Eliminate closed waters in Caribou Flats and allow drift gillnet fishing in Caribou Flats by emergency order if Nelson Lagoon escapement goals are achieved, as follows:

5 AAC 09.350 and 5 AAC 09.369 are amended to read:

5 AAC 09.350 -- delete subsection (13)

5 AAC 09.369 Northern District Salmon Fisheries Management Plan. Revise subsection (d) to read as follows: In the Caribou Flats Section, from June 16 through August 15, the commissioner may, by emergency order, allow commercial fishing for sockeye salmon if escapement goals in Nelson Lagoon have been achieved.

What is the issue you would like the board to address and why? The Caribou Flats Section has been closed to drift gillnetting for many years, to ensure returns to Nelson Lagoon. The fishery inside the lagoon has concentrated on larger fish using larger mesh gear. This has, over time, skewed the escapement to smaller fish. Allowing drift gillnet effort in the Caribou Flats Section, once Nelson Lagoon escapements have been achieved, would likely result in the harvest of these smaller fish and help in rebalancing the size distribution of the escapement.

PROPOSED BY: Joe Hinton

(HQ-F15-063)

CAMF POSITION: SUPPORT

CAMF COMMENTS: We support only if the Nelson River has exceeded its season top end escapement goal.

PROPOSAL 167 – 5 AAC 09.320. Fishing periods. Open the Uria Bay Section of the Northwestern District to regular fishing periods, as follows:

5 AAC 09.320(b)(3) is amended to read:

(3) Uria Bay Section from 6:00 a.m. Monday until 6:00 p.m. Thursday

What is the issue you would like the board to address and why? Uria Bay Section opens only by emergency order. This section in the past was open to commercial fishing, June 1st well into July on a weekly fishing period Monday thru Thursday.

PROPOSED BY: False Pass Fish and Game Advisory Committee

(HQ-F15-085)

CAMF POSITION: SUPPORT

CAMF COMMENTS: We support the local residents' position.

PROPOSAL 168 – 5 AAC 09.350. Closed waters. Reduce closed waters in Christianson Lagoon, as follows:

5 AAC 09.350(18)(A) is amended to read:

(A) Christianson Lagoon: waters of the lagoon **from a point located 250 yards upstream from the lagoon outlet channel terminus at the ocean shoreline [AND THOSE WATERS WITHIN 500 YARDS OF THE LAGOON'S EXIT CHANNEL TERMINUS AT THE OCEAN SHORELINE]** What is the issue you would like the board to address and why? Closed waters of

Christianson Lagoon in the Uria Bay Section. This is a lagoon entrance and not a river mouth.

PROPOSED BY: Travis Hoblet

(HQ-F15-084)

CAMF POSITION: SUPPORT

CAMF COMMENTS: We support the local residents' position.

PROPOSAL 169 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.206. Use of global positioning system (GPS). Implement global positioning satellite coordinates for all district and section boundaries in the Northern District of the Alaska Peninsula Area, as follows:

That Alaska Department of Fish and Game and/or Fish and Wildlife Protection establish a series of points that can be implemented by regulatory definition so all fishermen can be fish legally within boundaries that can be defined and navigated with modern GPS equipment.

What is the issue you would like the board to address and why? The most offshore boundaries of the Sections of the North Peninsula fishing areas. At present there are no GPS specifications so that Area M fishermen can be confident that they are fishing legally within their Sections.

PROPOSED BY: Dan Barr

(EF-C15-100)

CAMF COMMENTS: OPPOSE

CAMF COMMENTS: The Northern District already uses GPS boundaries between districts except for the seaward boundary. The seaward boundary is available on modern GPS based navigation chart systems and is used currently in the fishery. There is no need for additional regulation.

PROPOSAL 170 – 5 AAC 09.350. Closed waters. Redefine the boundaries of the Outer Port Heiden Section using GPS coordinates, as follows:

5 AAC 09.350. Closed waters. Salmon may not be taken in the following locations:

...

(3) Outer Port Heiden: waters of the outer Port Heiden Section

(A) **Seaward of a line of a line defined by the following GPS coordinates: N57 19.300 X W158 20.000, N57 16.400 X W158 26.500, N57 11.700 X W158 30.500, N57 03.200 X W158 40.500, N56 58.700 X W158 44.500, N56 56.500 X W158 47.200, N56 55.800 X W158 50.450** [BETWEEN THE THREE-MILE SEAWARD BOUNDARY LINE DESCRIBED IN 5 AAC 09.301, AND A LINE THAT IS ONE AND ONE-HALF MILES SHOREWARD OF THE THREE-MILE SEAWARD BOUNDARY-LINE];

Note: The line defined by the proposed coordinates roughly follows the 1 ½ mile limit on the most current NOAA chart. This was done in an attempt to maintain the current perceived legal fishing area. The number of points could easily be reduced by straightening the line which would slightly change the current fishing area.

What is the issue you would like the board to address and why? Current regulatory language in 5 AAC 09.350(3) is very difficult to effectively enforce under the best of circumstances and especially difficult with aircraft patrols. The difficulty in enforcing the current regulation is differences in how the 3 mile line is drawn on NOAA charts and how that compares with 5 AAC

39.975(13) “waters of Alaska”. This is a remote fishing district and aircraft are the most used

method to patrol the area. Enforcement personnel must be able to determine if a violation is occurring and be able to take action to notify the operator. If a Trooper pilot must make passes over a vessel to determine the latitude and longitude it is fishing, and then later plot the location on a chart to determine if a violation exists, it is unlikely the trooper can address the violation in a timely manner.

Defining the Outer Point Heiden closed waters boundary with GPS coordinates would allow enforcement and fishermen to accurately determine if nets are fishing in legal waters. GPS coordinates are used to define all manner of fish and game boundaries throughout the state. GPS has been vetted extensively in the Alaska Court system and has been found to be extremely

accurate. Even a very basic (cheap) GPS can accurately show a line between points and display a cross track distance from the line. GPS is practical, easy to use and defensible.

It is in the State's best interest to clearly defined, enforceable commercial fishing boundaries in order to protect the resource and to ensure appropriate allocation and management of resources. Using GPS coordinates to define the Outer Port Heiden closed waters line is a far better means of attaining these goals than the current method.

PROPOSED BY: Alaska Department of Public Safety, Alaska Wildlife Troopers (EF-C15-103)

CAMF POSITION: OPPOSED

CAMF COMMENTS: We are seeking reinstatement of the 3 nautical mile state line. Recent research seems to indicate that stocks are mixed equally between outside 1.5 miles and inside 1.5 miles. If the 3 mile state line is not reinstated we would SUPPORT with substitute language. Replacing two of the points listed in the proposal.

- **N57 11.700 X W158 30.500 with N57 11.76 X 158 30.66**
- **N57 03.200 X W158 40.500 with N57.03.25 X 158 40.68**

See (Chart 1).

- Red Line is Northern Boundary of the OPH fishery at this time.
- Blue Line is defined by the points in the proposal.
- Green Line is defined by new points in our comments.
- Purple Line is the route into Port Heiden which is accessible at or near high water.

PROPOSAL 171 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.206. Use of global positioning system (GPS). Implement global positioning satellite coordinates for all district and section boundaries in the Northern District of the Alaska Peninsula Area, as follows:

In the North Peninsula Area M's commercial salmon fishery, all boundary lines will be defined by true enforceable GPS lines.

What is the issue you would like the board to address and why? Lack of enforceable boundary lines on the North Peninsula. Area M existing boundary lines are not worth the time for enforcement, because location of legal waters is not defined clearly.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-094)

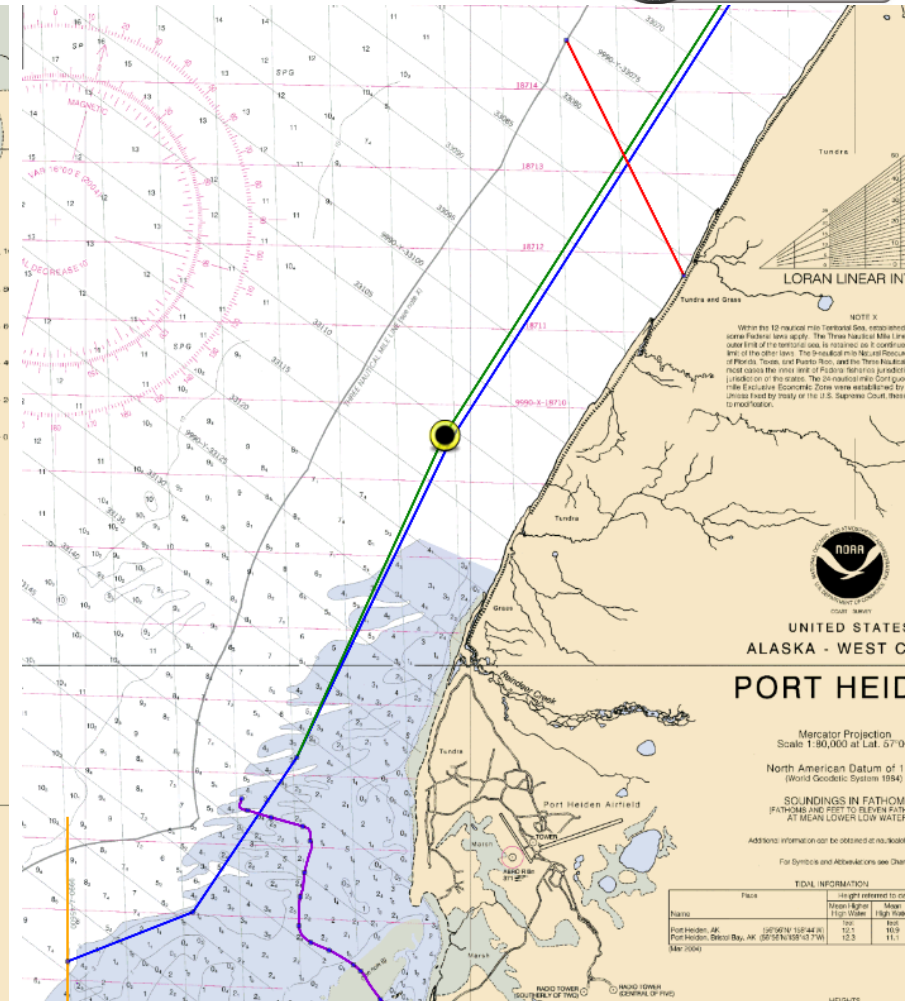
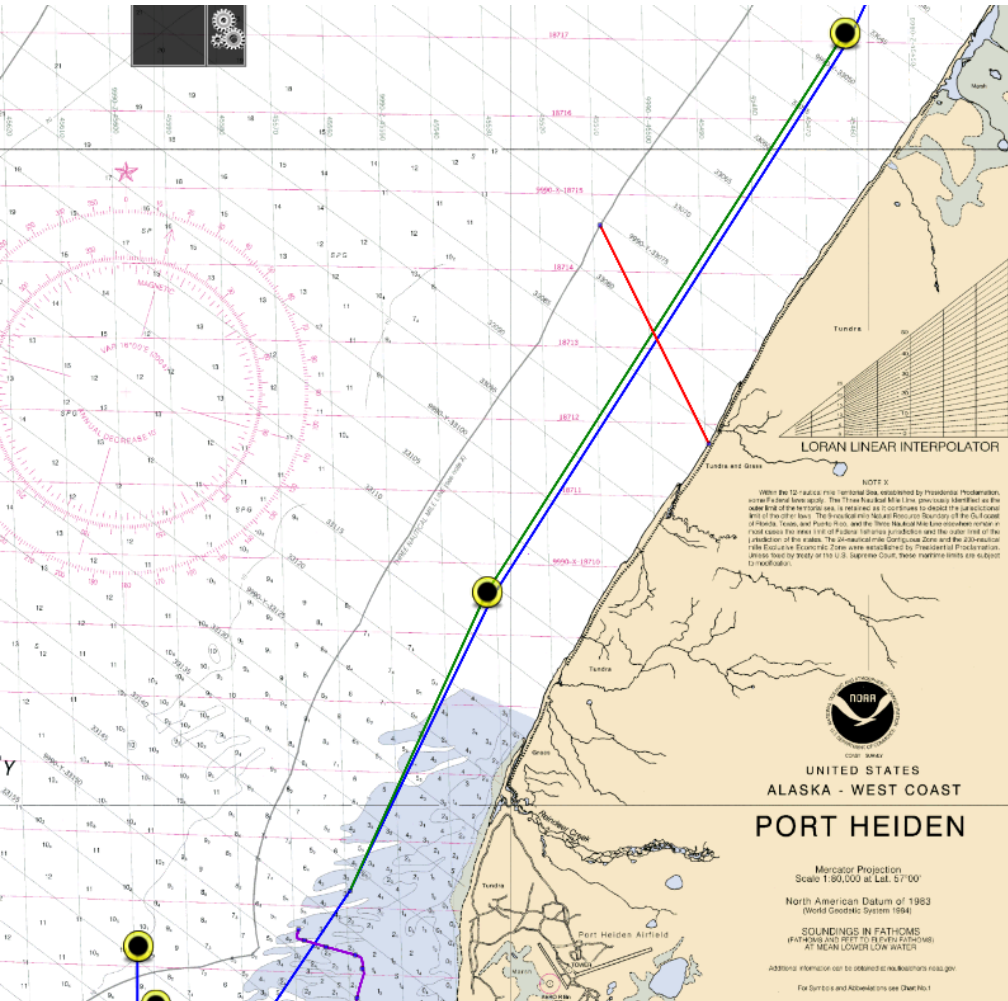
CAMF POSITION: OPPOSE

CAMF COMMENTS: Reference comments on Proposal 169.

Chart 1. Proposal 170 Define 1.5 mile line with GPS points.



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- Red Line is Northern Boundary of the OPH fishery at this time.
- Blue Line is defined by the points in the proposal.
- Green Line is defined by new points in our comments.
- Purple Line is the route into Port Heiden which is accessible at or near high water.

The South Unimak and Shumagin Island June Fishery.

Bristol Bay-bound sockeye have been harvested at South Unimak and in the Shumagin Islands during the month of June for nearly a century. There's a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery is very valuable to its participants, to the Alaska Peninsula economy, and to the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past Boards have understood the value of the June fishery and have been committed to assuring us a viable sockeye harvest.

In 2004, the Board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that drastically cut our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The Board in 2004 recognized multiple problems with the prior plans – not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits – and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage Board members to review the findings prepared by the Board in 2004 (2004-229-FB).

In adopting these changes to the June fishery management plan, the key question the Board asked was whether the fishery would still perform within historical levels of harvest. The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The harvest of sockeye in the June fishery has ranged from roughly 1.7 million in 2008 to 660,000 in 2014, while the harvest of chum salmon has averaged around 400,000 fish for entire period 2004-15. These harvest levels are in the lower middle range of our historical catches for both species, and are **smaller** than the error in estimates of the size of the Bristol Bay sockeye and AYK chum runs after the season is over. Harvests of this magnitude are biologically insignificant.

Nor did the 2004 plan result in any significant increase in the amount of effort. The number of permits fished remained relatively constant from prior years, and is considerably lower than the number of permits that fished during the 1980s and 1990s.

The only time the chum harvest in the June fishery exceeded 500,000 under the current management plan was in 2009, when approximately 700,000 chum were caught. Area M fishermen well understand the need to control their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet participates in "chum harvest pools" where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. But it must

also be recognized that occasionally there will be a year like 2009 when the presence of chum in area waters is so continuous that they are hard to avoid, and that at some point, vessels need to fish if they are to maintain a reasonable sockeye harvest. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as by-catch to our harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery.

Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on a number of studies of the June fishery – including tagging; genetic stock identification (GSI), including the recent Western Alaska Salmon Stock Identification Program (WASSIP); and mark-recapture – certain conclusions have become clear:

- Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock;

- the chum salmon harvested in our fishery originate from a wide geographic area – Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, Southcentral Alaska – and only about a third are AYK summer chum;

- Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are not even present in the June fishery; and

- only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing. This is particularly true for Norton Sound chum salmon, whose run timing is similar to Yukon chum runs.

In short, the June fishery has little or no biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting a viable fishery to be prosecuted there.

We also note that western Alaska chum salmon runs have generally improved since the 1990s and are abundant, with only a couple of stocks identified as yield concerns. Just this year, the chum runs in Norton Sound Subdistrict 1 (Nome), long the spear point of efforts to impose restrictions on the June fishery, has been removed from the stock of concern list. The improved performance of AYK chum runs, notwithstanding the 2004 June fishery management plan, confirms what some Boards have recognized in past findings, that the June fishery has little measurable impact on chum salmon returns in western Alaska. Even if no chum salmon were caught in the fishery – which could only be accomplished by a complete closure – they would do very little to alleviate the few yield concerns in the AYK. In fact, it is more than likely that “savings” of this magnitude would not even be measurable in the rivers of origin, a point recognized by past boards. *See, e.g.,* Findings FB-1-92 at 3 (impact of the June fishery on AYK chums “so minimal, if detectable at all, as to be insignificant”); 94-150-FB (formerly 94-04-FB)



at 6 (savings “would be totally undetectable in areas as large as Northern Norton Sound or the Yukon River”); and 96-164-FB (formerly 96-08-FB) at 5 (“further reductions in the June Area M fishery would not alleviate the remaining conservation concerns” for AYK rivers).

In sum, the current June fishery management plan is working well, data from WASSIP confirm the basis for prior Board actions and findings, and we urge the Board to resist any calls for a return to the unworkable and unreasonable management plans and policies of the past. In particular, we OPPOSE proposals 181 and 184, which call for the repeal of the current June fishery management plan.

PROPOSAL 181 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Repeal the South Unimak and Shumagin Islands June Salmon Management Plan, as follows:

5 AAC 09.365. South Unimak and Shumagin June Salmon Management Plan is amended to read:

Repeal
ed

What is the issue you would like the board to address and why? Close commercial salmon intercept fishery, for conservation of Yukon Kuskokwim salmon.

AS 16.05.251 Regulations of the Board of Fisheries
(a)(2).

PROPOSED BY: Jesse Foster

CAMF POSITION: OPPOSE

CAMF COMMENTS: The 9-year 9 million dollar WASSIP study showed that the June fishery harvest levels are insignificant compared to the size of each run. (Fig. 28 to 33)

Figure 28. 2006 WASSIP Sockeye Run Size compared to the June Fishery.



2006 Sockeye Run Size compared to the June Fishery Harvest with 90% Confidence Intervals

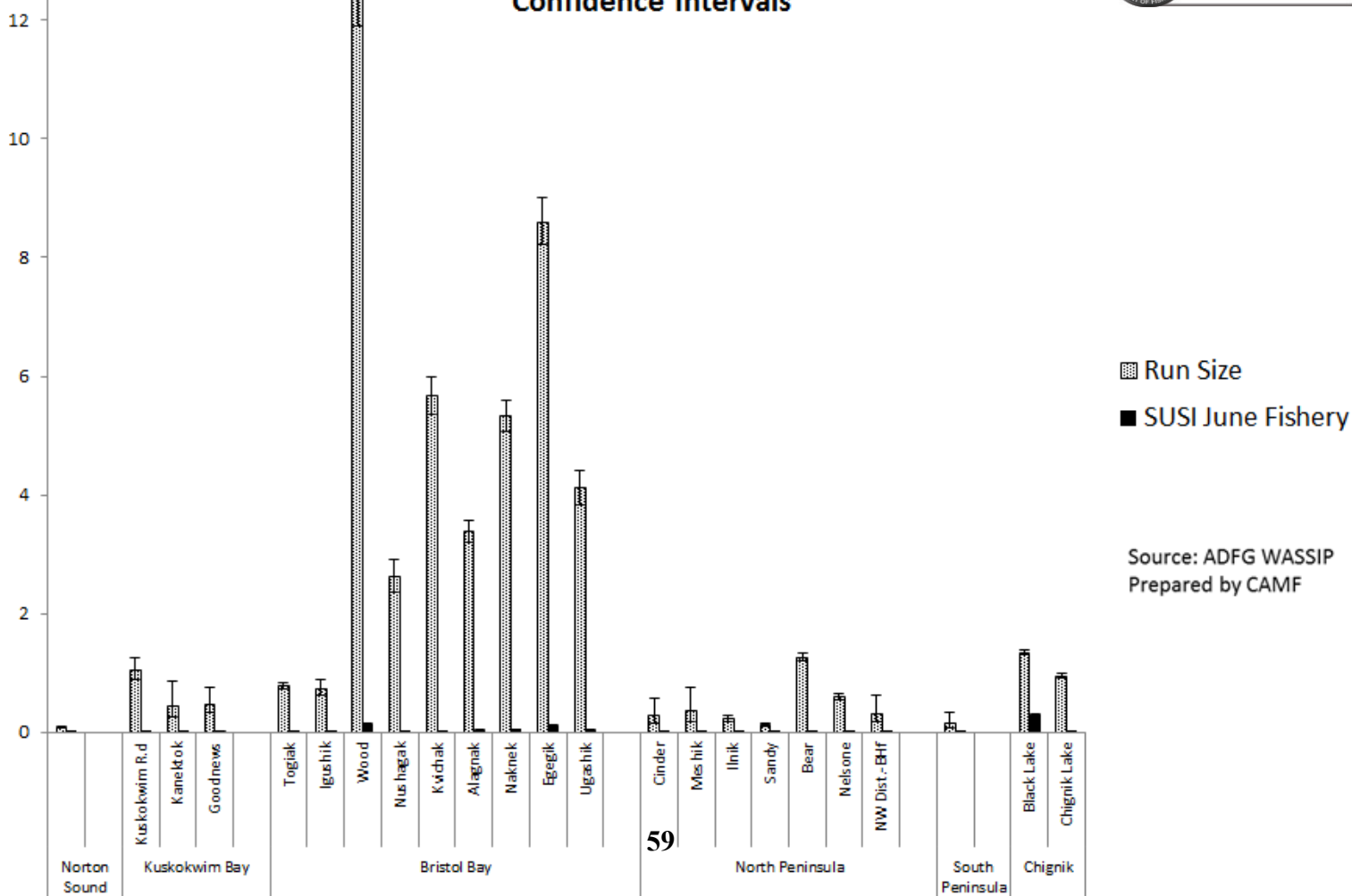


Figure 29. 2007 WASSIP Sockeye Run Size compared to the June Fishery.

2007 Sockeye Run Sizes compared to the June Fishery harvest with Confidence Intervals



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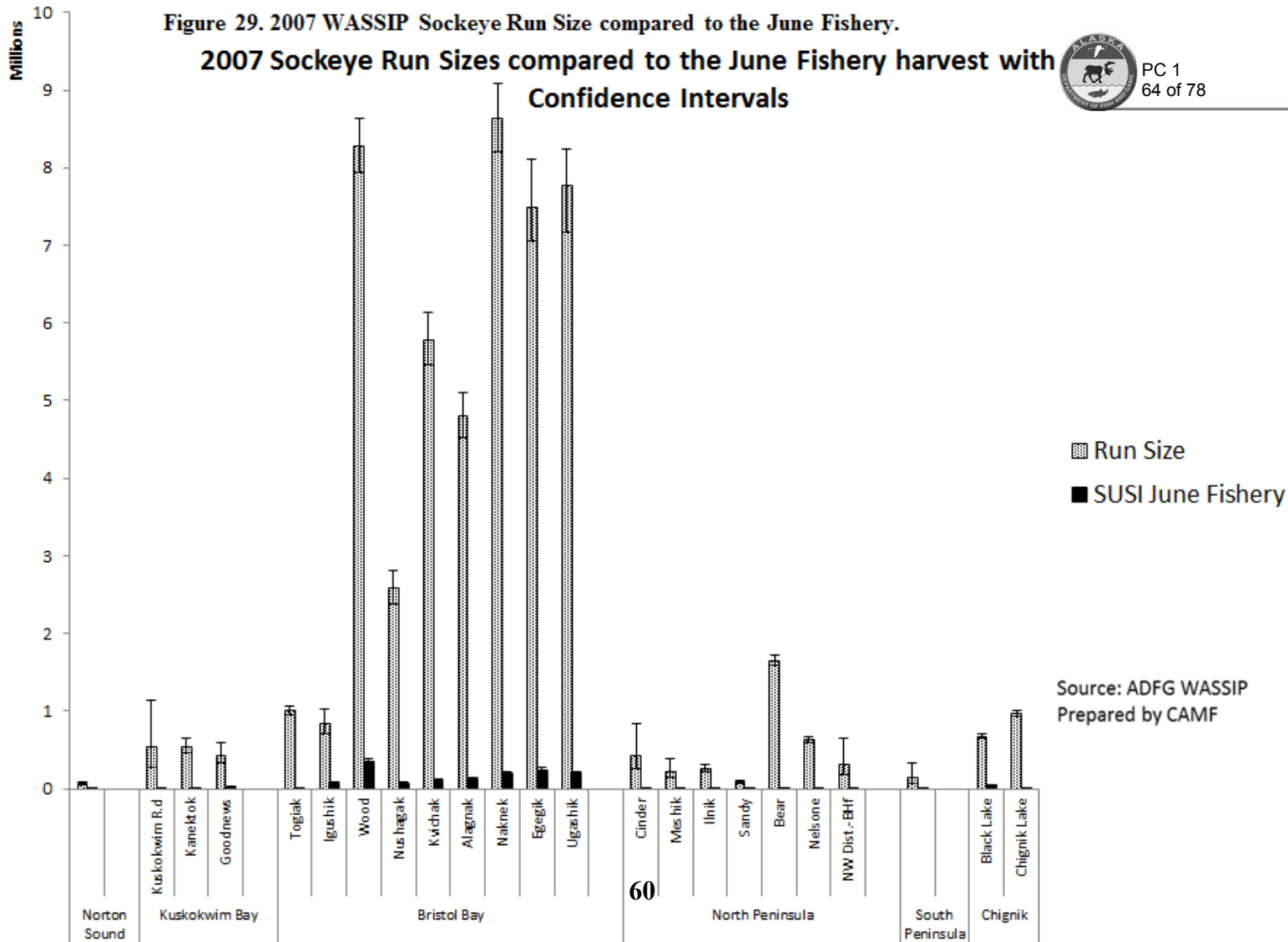


Figure 30. 2008 WASSIP Sockeye Run Size compared to the June Fishery.

2008 Sockeye Run Size compared to the June Fishery harvest Confidence Intervals



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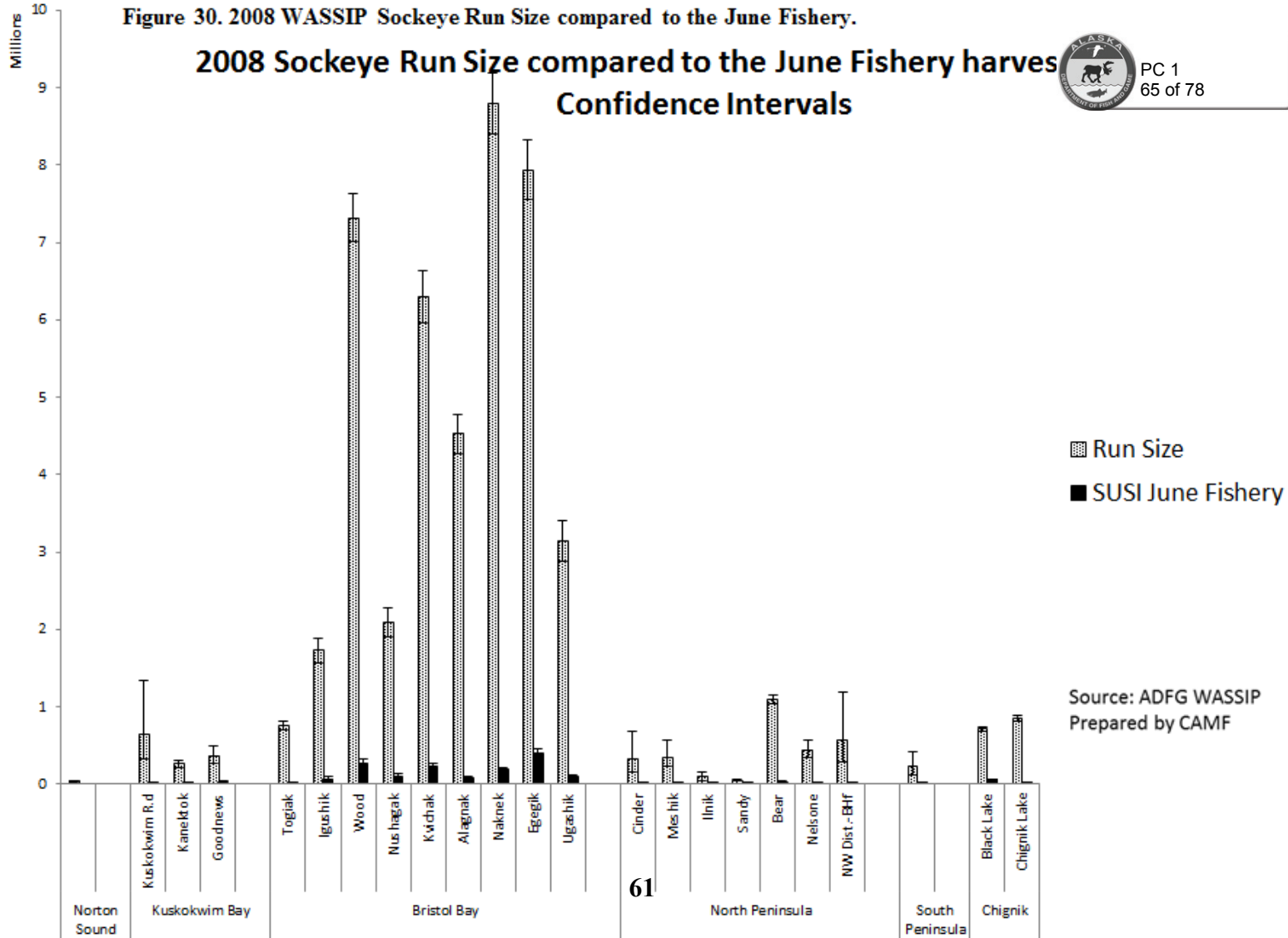


Figure 31. 2007 WASSIP Chum Run Size compared to the June Fishery.

2007 Chum Run Sizes compared to the SUSI June Fishery harvests 90% Confidence Intervals



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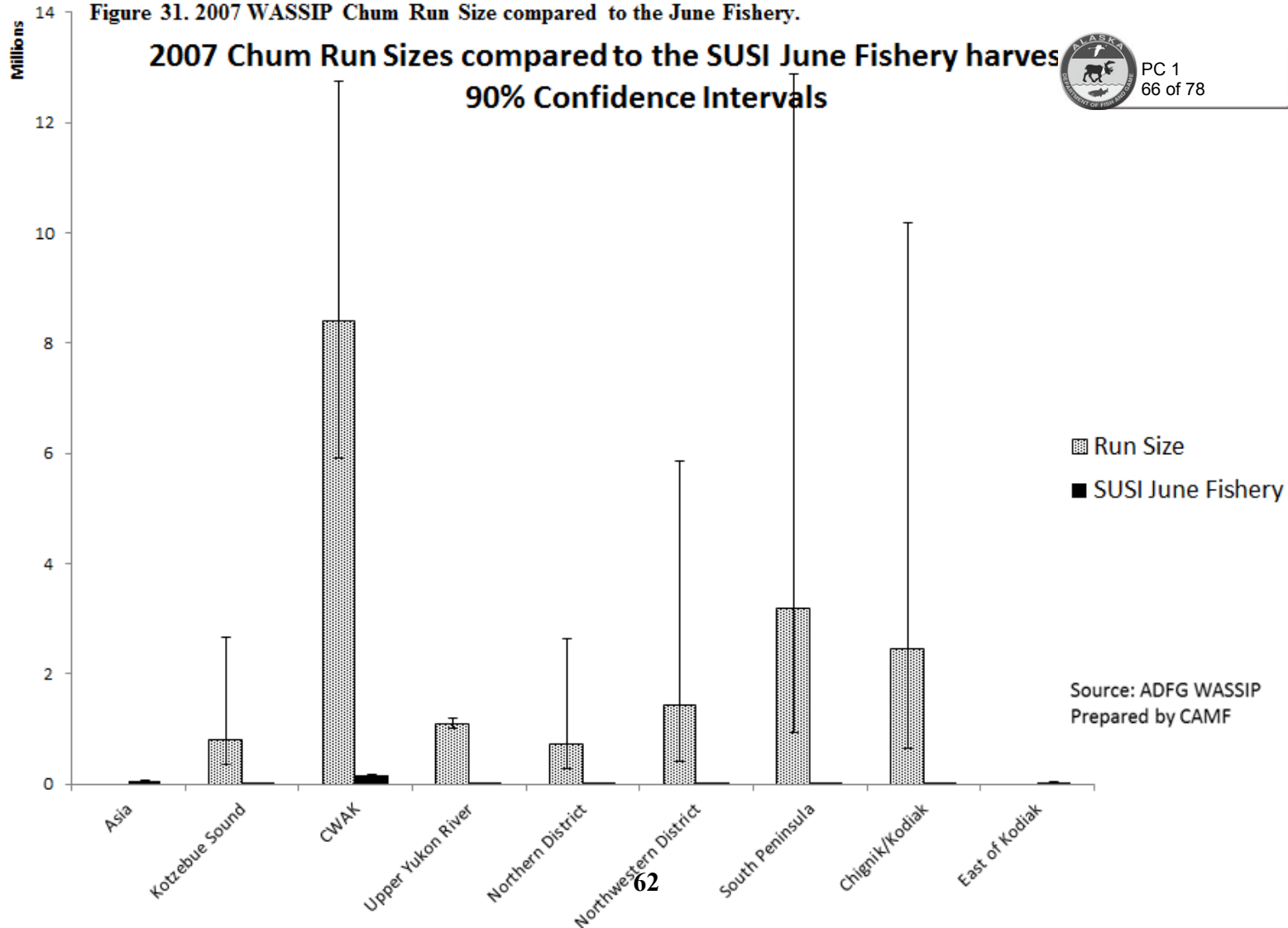


Figure 32. 2008 WASSIP Chum Run Size compared to the June Fishery.

2008 Chum Run Sizes compared to SUSI June Fishery Harvest with Confidence Intervals



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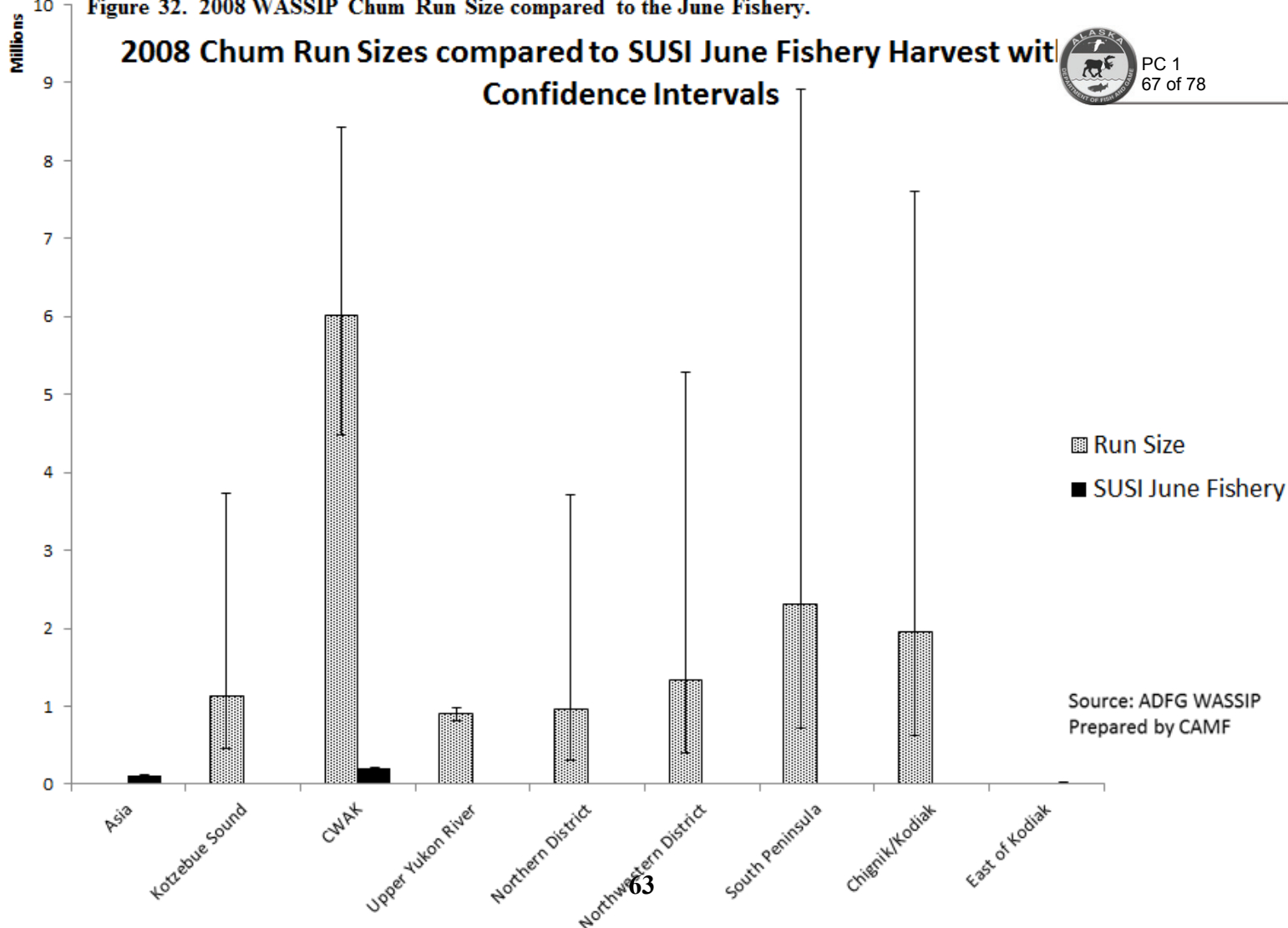
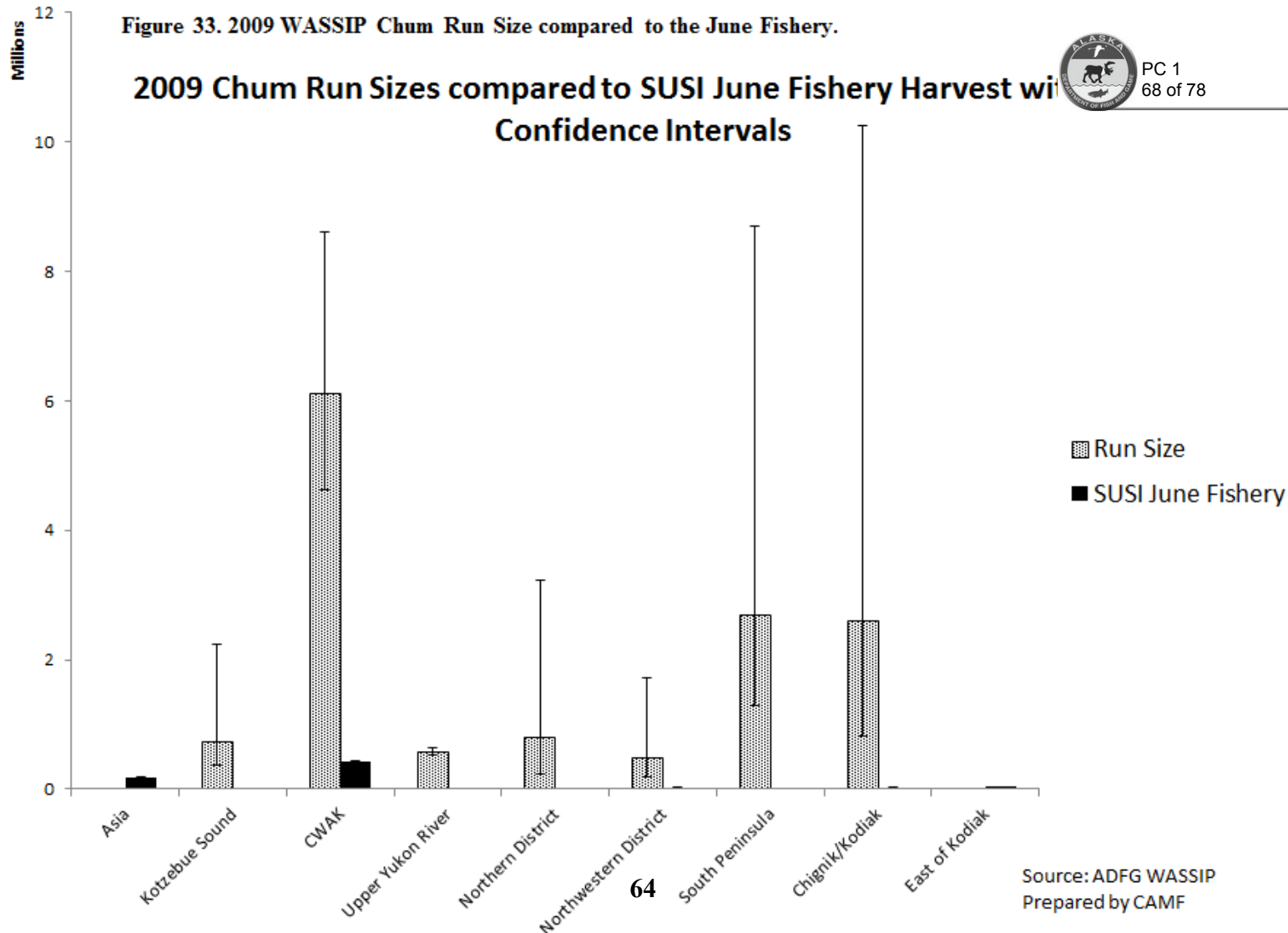


Figure 33. 2009 WASSIP Chum Run Size compared to the June Fishery.



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2009 Chum Run Sizes compared to SUSI June Fishery Harvest with Confidence Intervals



PROPOSAL 182 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Modify the South Unimak and Shumagin Islands June Salmon Management Plan to shift the opening date for the drift gillnet fishery to coincide with the set gillnet fishery opening date, as follows:

5 AAC 09.365(d) In the South Unimak and Shumagin Islands fisheries, the commissioner may establish, by emergency order, commercial fishing periods as follows:

- (1) for set gillnet **and drift gillnet** gear, ...
- (2) for seine [AND DRIFT GILLNET] gear, ...

What is the issue you would like the board to address and why? The South Unimak and Shumagin Islands June Salmon Management Plan establishes one fishing schedule for set gillnets and another for drift gillnets and purse seines. Set gillnets begin their fishing schedule on June 7 and drift gillnets and seines begin on June 10. The plan should be amended so that drift gillnets are on the same schedule as set gillnets. This will help reduce competition between drift gillnets and purse seines.

PROPOSED BY: Concerned Area M Fishermen

CAMF POSSITION: SUPPORT

CAMF COMMENTS:

- We believe there was no justification to support the 2013 board vote to change the drift gillnet and seine SUSI June Fishery opener from June 7th to June 10th.
- This date change was implemented to protect chum salmon bound for the AYK region. WASSIP has shown that the Harvest Rate on these chum stocks is negligible at best. Please refer to graphs from proposal 181 & 184 for June chum catches.
- Harvest Rates for sockeye and chum on Western Alaska Stocks are in the low single digit for the SUSI June fishery.
- This proposal would move the drift gillnet opener to June 7th and the same start date as the set gillnet fleet and not affect the purse seine start date.
- CAMF also supports the concept of earlier staggered opener schedule to reduce gear conflicts between the drift and seine fleets.
- The SUSI June fishery would open for drift and setnet fleets on June 7th at 6:00 am and run 88 hours open, 32 closed for 4 periods with the 5th opener running for 64 hours and closing on June 29th 10:00 pm.

PROPOSAL 183 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Modify the South Unimak and Shumagin Islands June Salmon Management Plan to stagger opening days for the drift and purse seine fisheries, as follows:

5 AAC 09.365 is amended to read:

(d)

(2)

(A) Beginning June 9 drift gillnet gear commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. Three days later, commercial fishing will then close for 32 hours and reopen 6:00 a.m. two days later. The final June fishing period for drift gillnetting in June will be June 27 at 10:00 p.m.

(B) Beginning June 10th opening for the seine fleet will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. Three days later, commercial fishing for the seine fleet will close for 32 hours and reopen at 6:00 a.m. Two days later. The final fishing period will end at 10:00 p.m. on June 28th for the seine fleet.

What is the issue you would like the board to address and why? During the June South Unimak and Shumigan Islands Fishery, stagger the openings for the seine and drift gillnet fleets. Staggering the opening date by one day, for the seine and drift fleets would give at least one day per week without gear conflicts between the drift and seine fleets. The scheduled amount of days would remain the same; the opening day would just change.

PROPOSED BY: Sand Point Fish and Game Advisory Committee (EF-C15-087)

CAMF POSITION: SUPPORT with clearer language but would prefer proposal 182.

CAMF COMMENTS: The language of this proposal is confusing. We think the intent of the proposal is to start the June SUSI drift gillnet fishery one day before it starts now and follow the same 88 hours on and 32 hours off and end the fishery at 10pm on the June 27th instead of June 28th. The seine fishery would remain the same. CAMF will work with the proposer during committee to confirm the intent of this proposal.

PROPOSAL 184 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt the management plan in place during 2003-2004, as follows:

Revert to the regulation found in Register 166 of the Alaska Fish and Game Laws and Regulations 2003-2004 for 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan.

What is the issue you would like the board to address and why? Fishing on stocks of concern when the harvest of discrete stocks are unknown.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (HQ-F15-080)

CAMF POSITION: OPPOSE

CAMF COMMENTS: The proposal is not clear but assuming the proposal requests to go to the management present in the 2001, 2002, 2003 seasons. This management led to the highest CPUE for chums in the last 20 years. (Fig. 34-36)

Figure 34. CPUE for SUSI June Fishery.

Source A
Prepare



PC 1
71 of 78

Catch Per Boat Day in June fishery

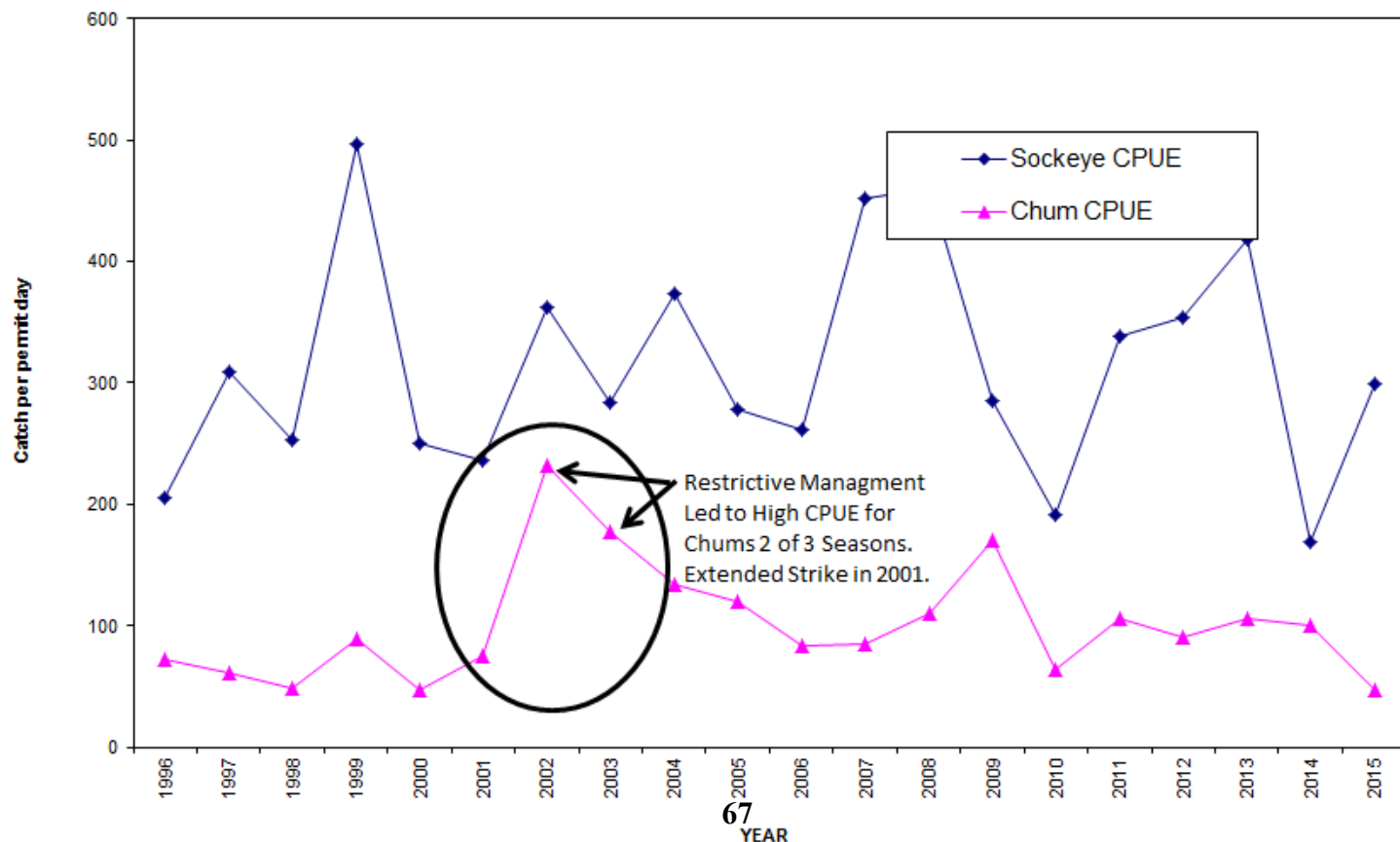


Figure 35. June SUSI Sockeye and Chum Catches 1975 to 2015.



June SUSI Sockeye and Chum catches 1975 to 2015

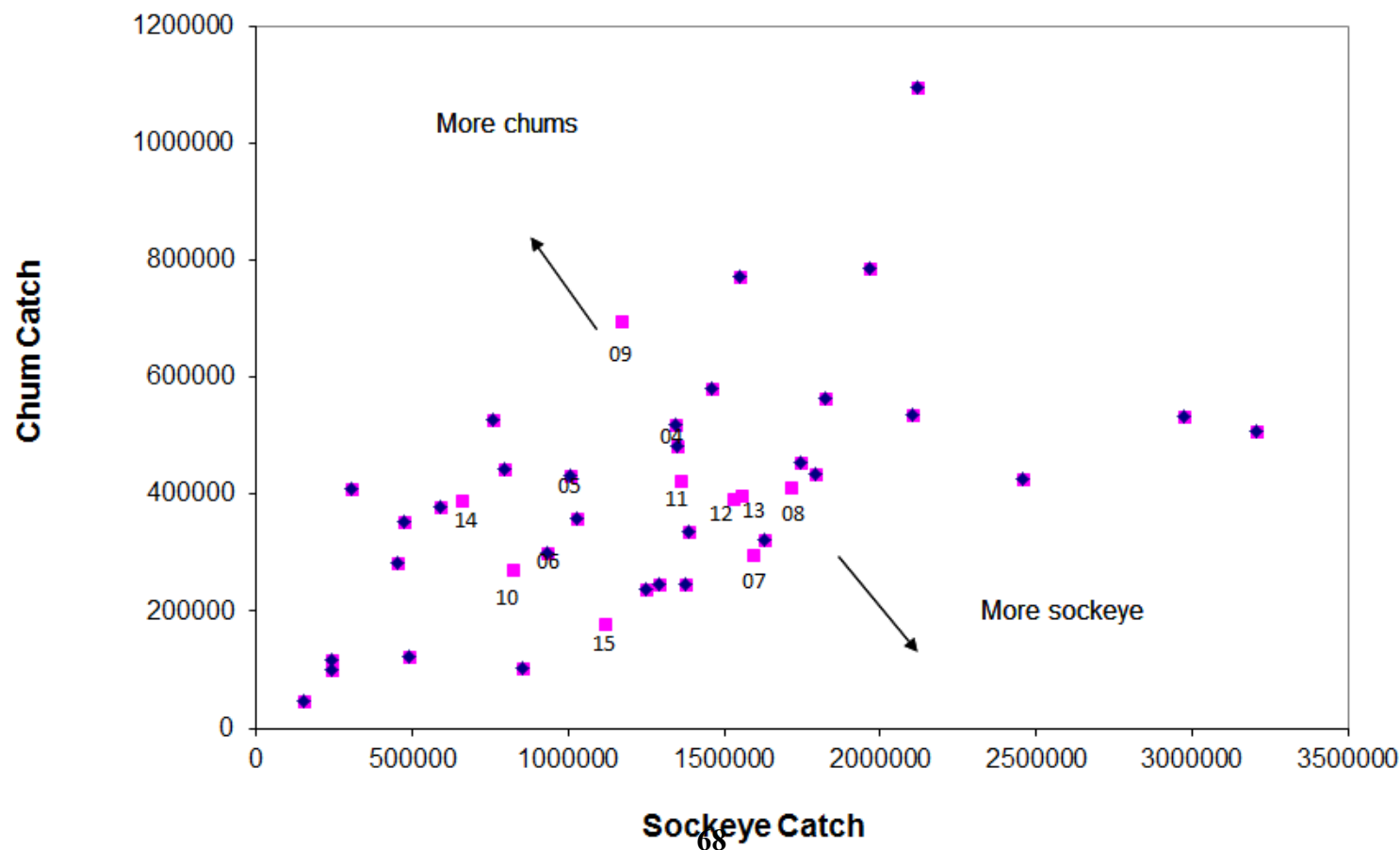


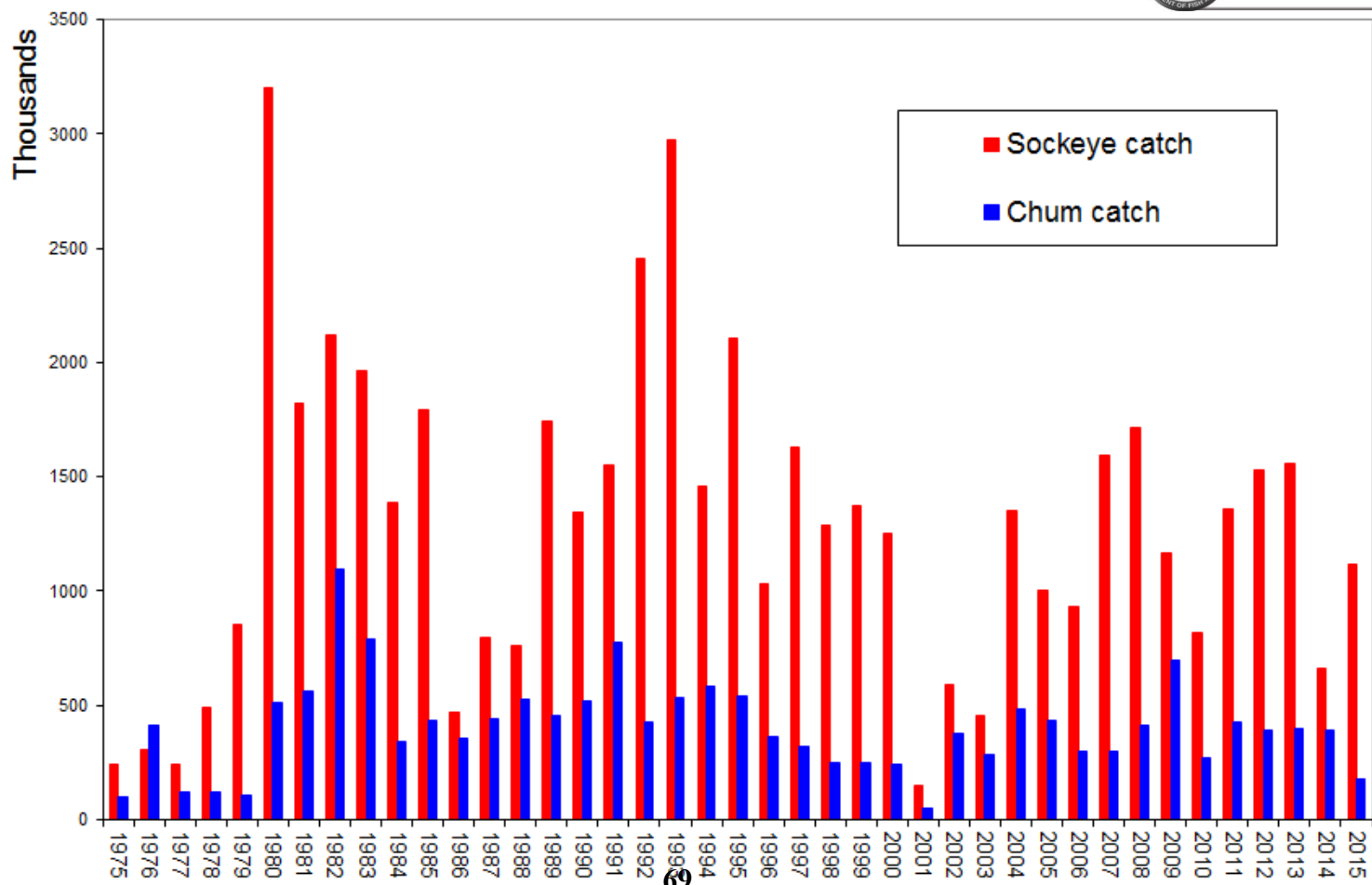
Figure 36. June SUSI Harvest.

June SUSI Harvest

Source ADFG
Prepared by CA



PC 1
73 of 78



PROPOSAL 185 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.XXX Dolgoi Island Section Salmon Fisheries Management Plan. Establish a Dolgoi Island Section and Dolgoi Island Section Management Plan, as follows:

Refer to the proposal book for detailed language in the proposal.

PROPOSED BY: John Jones- Agent for United Chignik Salmon Fishermen (HQ-F15-001)

CAMF POSITION: OPPOSED

CAMF COMMENTS: There is no need for a Dolgoi Management Plan. The harvest rates in the Dolgoi Island Area of Chignik bound sockeye are generally low. A brief summary below from Tables 27, 28, and 29 for June and Tables 40,41, and 42 for Post-June in the WASSIP report SP12-24.

- Dolgoi June median values are as follows.
 1. 2006 7.4%
 2. 2007 1.1%
 3. 2008 0.8%
- Dolgoi Post June median values are as follows.
 1. 2006 7.1%
 2. 2007 5.3%
 3. 2008 1.7%

PROPOSAL 186 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.XXX Dolgoi Island Section June Salmon Fisheries Management Plan. Establish a Dolgoi Island Section and Dolgoi Island Section June Management Plan, as follows:

Refer to the proposal book for detailed language in the proposal.

PROPOSED BY: Chignik Fish and Game Advisory Committee (HQ-F15-033)

CAMF POSITION: OPPOSE

CAMF COMMENTS: Same comments as Proposal 185

PROPOSAL 187 – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Modify the Post-June Salmon Management Plan for South Alaska Peninsula to provide the department authority to make openings for specific gear groups, as follows:

The Department of Fish and Game will have the authority to make openings for specific gear groups during the post June Management in Area M.

What is the issue you would like the board to address and why? Missed fishing opportunities for the set gillnet fleet while local managers wait for full escapement levels in Area M to arrive.

PROPOSED BY: John A. Foster

CAMF POSITION: NEUTURAL

PROPOSAL 188 – 5 AAC 12.320. Weekly fishing periods. Establish open commercial salmon fishing periods in the Unalaska District that coincide with the last two open fishing periods in July in the Shumagin Islands Section, as follows:

5 AAC 12.320 is amended to read:

The Unalaska District will be opened for two 22-hour fishing periods. The first period begins on July 26th at 6:00 a.m. and remains open until July 27 at 6:00 p.m. The second period begins on July 30 at 6:00 a.m. and remains open until July 31 at 6:00 p.m.

For entire proposal language see proposal book

PROPOSED BY: Mike Kurtz and John Mitchell

(HQ-F15-088)

CAMF POSITION: NEUTURAL

PROPOSAL 189 – 5 AAC 09.332. Seine specifications and operations. Allow for dual permit vessels and increased gear limits for dual permit vessels in the Alaska Peninsula Area commercial salmon purse seine fishery, as follows:

The maximum seine length is 250 fathoms, or 300 fathoms with a "lock 2" permit. Prior to the fishing season an individual with two permits locked together must register with ADF&G their intent to fish that season with a "lock 2" permit.

For entire proposal language see proposal book

PROPOSED BY: Ray Koso and Don McCallum

(EF-C15-093)

CAMF POSITION: OPPOSE

CAMF COMMENTS: We are against permit stacking.

PROPOSAL 190 – 5 AAC 09.332. Seine specifications and operations. Change purse seine depth measurement standard from number of meshes deep to an equivalent depth measurement in feet and inches, as follows:

Prefer the department regulation to describe the seine depth in equivalent terms using feet and inches.

For entire proposal language see proposal book

CAMF POSITION: NEUTRAL

PROPOSAL 191 – 5 AAC 09.331. Gillnet specifications and operations. Repeal minimum mesh size standards for drift gillnet gear, as follows:

5 AAC 09.331 (a)(2) is amended to read:
(2) a drift gillnet has no minimum mesh size

What is the issue you would like the board to address and why? Driftnet mesh size. There is no minimum mesh size in any of the Area M Fisheries except in the post-June South Peninsula fishery in the Unimak District and a western portion of the SW District. This area is fished by the entire fleet in June, without mesh size limits, which means that the drift gillnetters who fish in June have to purchase an additional net for Post-June. This imposes a substantial financial burden on drift netters, particularly local drifters that prefer fishing the South Peninsula over the North Peninsula in July. We also feel that it is a housekeeping proposal that would allow a more orderly driftnet fishery.

PROPOSED BY: King Cove Fish and Game Advisory Committee (HQ-F15-096)

CAMF POSITION: SUPPORT

CAMF COMMENTS: The Alaska Board of Fisheries eliminated the minimum mesh size restriction in the South Peninsula June fishery over 20 years ago. Salmon fishermen have substantial additional cost (\$2500 approx. in web alone) to have an additional net to fish in the post-June fishery, instead of just being able to fish the net they used in June. The ADF&G has generally opposed minimum mesh size regulations elsewhere around the State.

PROPOSAL 192 – 5 AAC 09.330. Gear. Allow commercial fishing for salmon with set gillnets in the area between Popof Head and Dark Cliffs any time the area is closed to commercial salmon fishing with purse seine gear, as follows:

For entire proposal language see proposal book

PROPOSED BY: Jim Smith (EF-C15-097)

CAMF POSITION: NEUTRAL



PROPOSAL 193 – **5 AAC 09.301. Seaward boundary of districts.** Change the Southwestern and Unimak District seaward boundary, as follows:

5 AAC 09.301 is amended to read:

5 AAC 09.301. Seaward boundary of districts. For the purpose of managing the historical salmon net fishery in the vicinity of False Pass and Unimak Bight, the outer boundary of the Southwestern and Unimak Districts is a line drawn **along 54° 22.5'N. lat. from 163° 01.2'W. long. near the western end of Sanak Island to 164° 27.1' W. long., south of** Cape Lutke on Unimak Island [THREE MILES SEAWARD FROM A LINE COMMENCING AT 54° 26.70'

N. LAT., 162° 53.00' W. LONG.] The seaward boundary of all other districts is a line three miles seaward of the baseline, as described in 5 AAC 39.975(13).

What is the issue you would like the board to address and why? The 2012 amendment to the Federal Salmon Fishery Management Plan (FMP) redefined the plan's boundaries to exclude from its West Area three historical net fisheries managed by the State of Alaska, including the Alaska Peninsula fishery (50 C.F.R. 679.2, Definition of Salmon Management Area, Subsection (2)(iii)). The current seaward boundary of the state's Southwestern and Unimak Districts does not match up with the shoreward boundary of the federal FMP, leaving a gap of unregulated waters between the state and federal management areas. The state boundary should be revised so it is coterminous with the federal line, to avoid confusion and potential enforcement problems from having two different management boundaries.

PROPOSED BY: Concerned Area M Fishermen

(EF-C15-043)

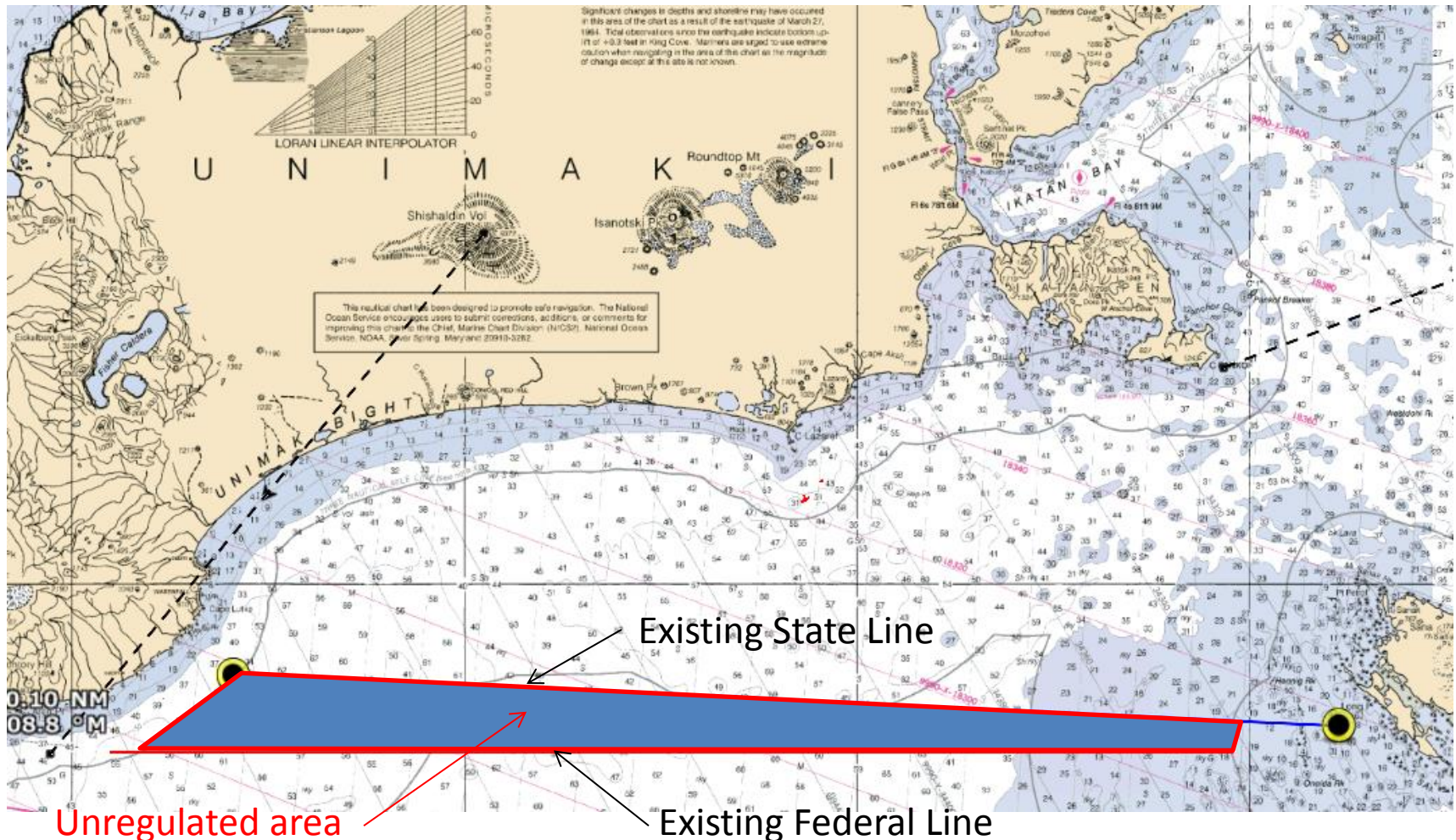
CAMF POSITON: SUPPORT

CAMF COMMENTS: The west end of the boundary line as described in the present state regulation is not a defined latitude and longitude and is thus open to interpretation. In fact, the actual present boundary in state regulation is given in the form "three miles seaward of a line..." and is not shown on navigation charts. The proposed language departs from this 'baseline' nomenclature in that it would adopt the actual Federal FMP language and coordinates for the state managed fishery. The equivalent 'baseline' latitude would be 57°22.5'N.

In effect the new Federal FMP cedes slightly over 100 square miles to state management, if the state were to adopt this proposal. (Fig. 37)

The effect on the South Unimak fishery would be very slight. Present fishing effort near the proposed additional area is limited to the extreme west end south of Cape Lutke. No change in stock composition or magnitude of harvests is likely to take place with the proposed boundary change.

Proposal 193 – Match State Boundary to Federal Boundary





Submitted By
Thomas Bursch
Submitted On
2/7/2016 10:04:15 PM
Affiliation

I'm writing in favor of proposals 155 and 156. I am concerned at the high percentage of Ugashik (Bristol Bay) fish harvested in the Outer Port Heiden District(as high as 80% in some samples). At times when fishing time in Ugashik is limited to 6 hour periods to accommodate for escapement the Area M fishermen are getting 60 hour periods in Oter Port Heiden. Please allow these fish through to their system of origin where they can be intensively managed to assure vitality of the stocks. Area M Gillnet fleet has ample fishing area and fishing time without continuing fishing outer Port Heiden . Thank You

Date: 7 February 2016

To: Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094
Email: dfg.bof.comments@alaska.gov

From: L. Tiel Smith, Benjamin Smith, Alec Smith, Erin Smith
Silke Smith, Lyle Smith, Niel Smith, Kaleb Smith

We are responding to RC 054 regarding the coastal erosion proposal to the Naknek-Kvichak north-eastern boundary line. We are the owners of the neighboring net locations.

Preface

As the adjacent net locations, we have been closely involved and following this process. We have submitted letters, attended meetings, and supplied testimony; however, we have unfairly been left out of the recent discussions even though we have involved ourselves from the beginning with the Alaska Department of Fish and Game. We were not given notice—either by letter, email, or phone—of the January 4th or January 16th meetings and so did not even have the chance to be present or comment during the discussions. We strongly feel this has allowed for a one-sided conversation. We ask that you pay special attention to our following letter as this will now be our first opportunity to enter the recent discussion.

Proposal Criteria

1. **Erosion Related:** While Tract A and C were defined as of DNR SFDI-1333, they were not claimed and leased as plated until a couple years ago. There is no historical evidence that suggests the users tried to legally establish net location usage. While there has been erosion on the beach, the present-day owners of Tract A and C should not be able to claim historical usage rights as they have no prior shore-fish lease evidence to lean back on—the legally required process of every fisherman.
2. **Historical Site Usage:** We are the owners of Tract B and D. We have been leasing these sites consistently since the adoption of the DNR SFDI-1333 plat and have made every effort to comply with the intent of the shore-fish lease program.
3. **Affected Stakeholder Approval:** We and others have already stated in previous letters and testimony that we do approve of Tracts A – D as shown on DNR SFDI-1333 but nothing additional.

4. Salmon Escapement Impact: The inclusion of any additional sites would impact the escapement and management of the river.
5. Number of Legal Sites: DNR SFDI-1333 only identifies tracts A – D and no others south of the boundary line—there is no half-site north of Tract A.
6. Adverse Effects on Historical Fishing Area: The inclusion of any additional sites would adversely impact the economic profitability of adjacent and downstream sites.
7. Historical Fairness: A site was claimed without a survey and lease—just by one owner putting down a screw anchor and fishing. This is not a legal or fair process, especially as the site is in a questionable location. If the site is to even be considered, it should go through a legal process where it is available to the public.
8. Adverse Effects on Another Leaseholder: The inclusion of any additional sites would adversely impact the economic profitability of adjacent sites *and* the placement of future shore-fish lease and plating.
9. Allocation Impact: If an erosion exception proposal is entertained then the allocation should not adversely impact the current management allocation balance in that area.

Background

The Armstrongs and Smiths have been neighboring fishing families since the mid-1950's. Dick Armstrong obtained his net location on the east side of the Kvichak River from the watchman of the Graveyard Point Cannery; it was the first net location south of the north-eastern boundary line. Lyle Smith took ownership of the second net location down from the boundary line. The two men fished independently but from time-to-time partnered. They had grown up together since childhood and were close friends. Off season, they spent time together, and their families continued to be intertwined, with the children growing up side-by-side.

As time progressed, more net locations were added south of the boundary line. Referencing DNR SFDI-1333, Tract A was unleased, Tract B is Smiths, Tract C was unleased, and Tract D is Smiths. However, in the signature block Tract A was signed by Richard Armstrong, Tract B by Lyle Smith, Tract C by Curt Armstrong, and Tract D by L. Tiel Smith.

Recommendation

We would support a north-eastern boundary line change that accommodates the Armstrong's Tract A net location only for current and future erosion issues.

Evidence

- Attachment: DNR Shore Fishery Diagram SFP-1333 (SFDI-1333)
- Survey Plat Link: <http://dnr.alaska.gov/gis/raster/dnr/surveys/20000731/00020487.pdf>



Response to Suggested RC 054
Smith





TRIDENT SEAFOODS CORPORATION


 PC 4
1 of 1

5303 Shilshole Ave. NW, Seattle, WA 98107-4000 USA • (206) 783-3818 • Fax 782-7195

Domestic Sales: (206) 783-3474 • Fax: (206) 782-7246

Canned Sales: (206) 781-7606 • (206) 781-7604

Export Sales: (206) 783-3718 • (206) 782-7195

Alaska Department of Fish and Game
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Proposal 173

Purpose: Reduce the current closed waters areas in Kujulik, Portage, and Ivanof Bays to their historic areas.

Trident supports this proposal. With low Sockeye salmon forecasts over current and previous years, focus has moved towards targeting more Pinks and Chums. We feel if the current closed waters are moved back to the historic areas we would still maintain fish quality while potentially increasing revenue for the Chignik area.

Proposal 175

Purpose: Improve Chignik Pink and Chum Salmon Management by establishing standard three-day a week fishing openings in terminal bays for July and August.

Trident supports this proposal. Fishing 3 days a week could increase efficiencies in harvest. With Tender coverage already in the area we can monitor quality of fish closely. This proposal also has the potential to increase revenue for the Chignik Area.

Sincerely,

Dean Fasnacht
Western Alaska Operations

Alaska



Washington

Akutan • Anchorage • Chignik • Clarks Point • Cordova • Dillingham • Dutch Harbor
Ketchikan • Kodiak • Naknek • Petersburg • Sand Point • South Naknek • St. Paul
Motley, MN • Newport, OR



Anacortes • Bellingham • Everett
Tacoma • Seattle



Joe Kalmakoff
Space 266
~~24980~~
2420 Brayton Dr.
Anchorage, Alaska 99507

February 3, 2016,

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

Dear Fisheries Board:

I am Joe Kalmakoff, a Chignik commercial salmon permit holder and a lifelong Alaska resident.

Your help is needed. F&G is not providing us adequate opportunity to harvest our local pinks and chums. They seem only interested in managing our two sockeye runs. In early years we were able to fish our pink and chums in every district in the bays, and there were better runs then than we have now. Everyone knows that pinks and chums need to be harvested when they are in good condition. There is no canning done in Chignik. F&G does not understand this, and thinks that they need to see high fish numbers spawning before they will even consider, if at all, any bay openings. By then it is way too late to catch fish in the condition that the processor wants to buy. Not only do we lose out on harvesting but too many fish end up spawning. It is a shameful waste. We want and need to fish all our salmon runs not just our red salmon.

I understand that F&G believes that if Chignik bays are open 3 days a week for fishing pinks and chums that no or not enough fish will end up as escapement. That is not so because fishing would not be allowed 4 days a week, and there would be the old closed areas off the stream mouths which would provide good escapement as the old closed areas worked in the past and escapement was not a problem. F&G needs to understand that none of us can afford to fish in bays when there are not many fish coming in. If there is not a strong number of fish then there will be little fishing effort, if any. We do not creek-rob so that should not be a concern. Please understand that we cannot rely on just our red catches alone. The Chignik communities are dying, and we have no land-based processor. A processor will only build in Chignik if there is enough salmon available in our fishery to make a profit. We need regular weekly fishing periods in our outside bays to catch our local pinks and chums. I ask you to pass Proposals 173 and 175.

As for proposals in Area M, limits need to be set on Dolgoi. They are catching lots of Chignik red salmon when they have no local reds in that area. It is not fair that Chignik reds have to support fisheries in Kodiak and in several areas on the south side of the Peninsula. Too much interception is occurring, and it is not right or fair to Chignik. The Dolgoi fishery needs to be reduced to where there is a limit and control on the interception of Chignik reds. They are already catching Chignik fish in the Shumagins and in Stepovak. That is more than enough. Please look after Chignik interest—we want to be treated fairly and we have already given too much. Pass either Proposal 185 or 186—it would be the right thing to do.

Sincerely,

2 - 4 - 16



International Seafoods of Alaska, Inc.

Kodiak • Seattle

February 1, 2016

Chairman Tom Kluberton
Alaska Board of Fish & Game

Dear Chairman Kluberton,

International Seafoods of Alaska is in support of Proposal 173 for the following reasons:

1. Fishermen need access to harvestable amounts of fish in Ivanof Bay, Portage Bay and Kujulik Bay. Fishing in these areas will help provide better quality fish to send to markets.
2. It would improve economic conditions in Chignik and lessen the likelihood of over escapements.
3. Status Quo is not working. Timely pink and chum salmon management is not occurring. In the past there were good chum and pink salmon runs when the closed water area in the bays were reduced along with standard weekly fishing hours. Now we are experiencing excessive escapements and the absence of will to provide sensible and timely harvest opportunity on the local Chignik pink and chum salmon runs.
4. Chignik is in serious economic downturn and is in need of a good harvest opportunities on more than it's two Sockeye salmon runs. It has been estimated that Chignik loses approximately two million dollars (conservatively) annually due to lost opportunity to catch pink and chum salmon.

International Seafoods of Alaska is in support of Proposal 175 for the following reasons:

1. Chignik pink and chum salmon stocks are under harvested and more fishing opportunity is needed and this will only occur with standard fishing days inside the capes where the fleet can harvest those fish without impacting the sockeye salmon headed to the Chignik river system.
2. The proposal as written, has safeguards to ensure stock conservation. The department can suspend or reduce weekly fishing periods in the event of run failure or escapement shortfalls.
3. Processors want high quality fish not water marked pink salmon in particular. The fish entering the bays need to be harvested while they are bright. Starting a fishery after escapements have been met is basically too late.
4. The board of fish may want to add a sunset provision to ensure a re-evaluation occurs at the next board cycle.

Thank You,

Mitch Kilborn
International Seafoods of Alaska
Kodiak, Alaska 99615

☒ 517 Shelikof Street
P.O. Box 2997
Kodiak, AK 99615-2997, USA
TEL: 907 / 486-4768
FAX: 907 / 486-4885



☐ 192 Nickerson Street, Suite 302
Seattle, WA 98199-1285, USA
TEL: 206 / 284-4830
FAX: 206 / 286-5920



Submitted By
Michael Shangin
Submitted On
2/4/2016 12:12:41 PM
Affiliation

Phone
9078534124
Email
michael_shangin@hotmail.com
Address
1001 Trapper Hill Rd
Port Heiden, Alaska 99549

To whom it may concern or interest;

Hello all my name is Michael Shangin I am a 33 year old lifelong commercial fisherman, born and raised in the great state of Alaska. I grew up a seiner in Chignik, Alaska and further moved on to Bristol Bay when the Alaska Board of Fish in 2001 granted a Co-Op fishery in Chignik. The Co-Op caused a lot of heart ache and pain for us young fishermen. I was 18 years of age at the time, but I am living proof that a Co-Op fishery does NOT always solve problems. I also seined Herring in Togiak until 2007 when our market cut the big seiners off because we costed too much for operations. I've also longlined for halibut in area 3B, and also pot fish for cod and crab in the Chignik area. At age 18 I graduated from AVTEC in Seward, Alaska with a entry level diesel/heavy equipment certificate and now have over 30,000 hours in the trade. What I'm really here to ask for is some help or any direction with turning the Port Heiden district into Area T management and move Area M back down the line. Area M has a fishing district that extends from False Pass to the Second Cape North of Port Heiden which is a ridiculous amount of fishing area. Where I fish in Bristol Bay is the Ugashik district is only a 5-8 mile district and the University of Washington study shows that they're intercepting fish that are bound for the Ugashik district. I personally tried set net fishing here in the Inner Port Heiden district in 2012 and caught 134 fish total and it was a bust. I've seen where the locals in Port Heiden were not able to catch fish for subsistence in the Inner Port Heiden and it upsets me, because ADF&G still allows this to happen. I have personally seen some of the Area M drift fleet cut our local creeks and rivers off where I gather my subsistence fish and it's upsetting. I've seen this as many locals in Port Heiden have. Area M also delivers fish in Lake & Pen Borough waters, they say they deliver their fish south of Stroganoff Point, No they don't, I've seen Area M tenders outside of Port Heiden and far as the First Cape north of Port Heiden and the Lake and Borough and city of Port Heiden get no fish tax. I've also seen Area M fishermen destroy local housing in the old Meshik village and shoot at locals on the beach and no law enforcement is taking any action. Area M has a fishery here in Port Heiden with an emergency order when there are NO numbers for escapement and allowable catch, where is the justice in this? It's allowed on a twice a year fly by from ADF&G. When I asked why the ADF&G why they don't check the local rivers in Port Heiden more often, the response I got was that there is no AV Gas available in Port Heiden, which is not true the city of Port Heiden sells it, Ugashik sells it and Chignik sells it right on the other side of Port Heiden. Any sense of direction for help and even a helping voice would be greatly appreciated as you know the Area M board of fish round is upcoming at the end of February and any help would greatly be appreciated by many. Thank you for taking the time to read my letter.

Sincerely,
Michael Shangin~
A concerned \$.50 Bristol Bay Fishermen



City of Chignik

PO Box 110
Chignik, AK 99564

Phone (907) 749-2280
Fax (907) 749-2300

February 3, 2016

Board of Fisheries
Alaska Department of Fish and Game
P O Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Re: BOF Proposals 173 and 175

To Whom It May Concern:

As the only municipality lying in the Chignik Fisheries Management Area, the City of Chignik has a substantial interest in the managed sockeye salmon run. Our budget relies heavily on the one percent processing and one percent landing tax collected from the Chignik fishery. The above referenced proposals call for a similar management by Fish and Game of Chignik's pink and chum salmon runs. The City of Chignik whole heartedly supports these proposals, as they would strengthen the local economy by supplying fisherman with additional product to sell and by providing the City with more income from landing and processing taxes.

Financial loss of this underutilized resource is estimated in the millions. The processing and landing tax the city collects helps fund the City's port facilities, which are utilized by the Chignik fleet. Though fully operational, the small boat harbor is already in need of expansion. The regional public dock is slated to begin construction this year. This is a critical time for the City, its residents and fishermen. In order to support the growing infrastructure of the community there will need to be an increase in revenue. Proposals 173 and 175 have the potential to secure revenue directly for the city in the form of taxes but also indirectly through an increase in fleet size and operation. The passage of the proposals could also mean that other processors would be interested in buying Chignik salmon.

In addition to having a positive financial impact for the City, the proposals are also meant to increase the overall fish quality that results from a managed fishery. Having better quality fish means that more buyers will be interested in Chignik salmon. From the perspective of the City,



the fishermen and the processors, these proposals present a win-win-win situation. On behalf of the Chignik City Council and residents, we trust that you will strongly consider these proposals and their positive outcomes to all entities involved.

Best Regards,

A handwritten signature in blue ink that reads "Richard J. Sharpe".

Richard J. Sharpe

Mayor



Submitted By
Erick Sabo
Submitted On
2/3/2016 11:37:20 AM
Affiliation
Bristol Bay Permit Holder

Phone
3608211159
Email
erick_sabo@hotmail.com
Address
17920 W. Narramore Rd
Goodyear, Arizona 85338

OK... I want to write to show my support for all the proposals that are taking into account the WASSIP data, which overwhelming shows that the outer sections of the Port Heiden district and related fisheries on the Peninsula are intercepting significant numbers of Bristol Bay salmon. In particular I want to support the proposals that call for turning over mgmt of certain areas to the "T" area, i.e., to be including in management of Bristol Bay. Specifically, I believe this support is for proposals, 22, 23, and 24. Alternatively, if jurisdiction of those areas is not passed onto Bristol Bay resource mgmt, I support those proposals by the late Roland Briggs, and similar proposals that ask for Peninsula mgmt to be done in concert or collaboration with the Bristol Bay eastside bmanagers, proposals 151, 152, 153, 154, 155, 156, 157, and 158.

I specifically oppose proposal 159, which would completely ignore WASSIP data and promote greater interception of salmon migrating to the Bristol Bay rivers.

I support proposals 169, 170, and 171, which further promote effective management and the goal of reducing intercept fisheries.

The issue is simple.... the Peninsula fisheries should be delineated and managed to catch fish bound for spawning in rivers along the Peninsula. Bristol Bay salmon should be manage similarly.



Comments for Proposal #2

The following comments were submitted as on-time comments and record copies to the 2015 Alaska Peninsula, Chignik, Aleutian Islands-Bering Sea Pacific Cod Meeting. Some of the minutes have been truncated to reflect just comments for Proposal #2

Kodiak Fish and Game Advisory Committee Meeting Minutes

Aaron Anderson On-Time Public Comment

Chignik Fish and Game Advisory Committee Record Copy

Kodiak Advisory Committee



PC 10
2 of 10

November 18, 2015

ADF&G-Kodiak

I. Call to Order: 2:14p by Paul Chervenak, Chairman

II. Roll Call:

Members Present: Paul Chervenak, Peter Hannah, Oliver Holm, Ron Kavanaugh, Rolan Ruoss, Kip Thomet, Mellissa Berns (Conrad Peterson), Tuck Bonney

Members Absent: Julie Kavanaugh, Lou Dochterman, Andrew Finke, Nathan Rose (A), Ronnie Lind, Dale Reft(A), Curt Waters

Number Needed For Quorum on AC: 7

List of User Groups Present: Processor, Big Game Guide/Outfitter, South End Set net, Small Boat Crab/Herring/Salmon, Transporter/Sport Fish Charter, West Side Salmon Gillnet, Old Harbor Community

III. Approval of Agenda: Motion (Thomet) 2nd (Holm) Passes 8-0

IV. Approval of Previous Meeting Minutes: From meeting date: February 23, 2015

Motion (Thomet) 2nd (Holm) Passes 8-0



V. Fish and Game Staff Present:

Taryn Oconnor-Brito

Wayne Donaldson, Nathaniel Nichols

VI. Guests Present:

VII. Old Business: Discussion of vacant seats and seats expiring so as to send out notification to interested parties before our January election meeting

VIII. New Business:

Discussion of proposals-Chignik Pacific Cod, S AK Peninsula Pacific Cod and Bering Sea-Aleutian Is Pacific Cod

Selection of Committee member to represent KAC at BOG (Motion passes 8-0 to send Julie Kavanaugh)

Set next meeting date for January 26th at 1:00p

Motion for Paul Chervenak to approve minutes (due to submission deadline) passes 8-0

This space may be used to record minutes



BOF	2	<p>Allow bycatch retention of Pacific cod in the Chignik Area salmon seine fishery. (This proposal will be heard at the Pacific cod meeting and heard and deliberated on at the Alaska Peninsula / Chignik / Aleutian Islands Finfish meeting.)</p>	<p>This would be a good use of the resource as there is deadloss seine caught cod while salmon fishing ...though there isn't much caught historically</p> <p>However:</p> <p>Concerned with where the allocation would come from</p> <p>Would probably be poor quality and small fish, hard if even possible to sell...no market value</p> <p>Would be an expense and tracking problem to keep track of catch</p>
-----	---	--	---



Oppose	0	8	Click here to enter text
BOF	3	Appor tion the Chigni k Area state- water s Pacific cod allocat ion for pot vessel s by vessel length	<p>Allocation issue-This would be a change in historical catch as traditionally the large boats are catching close to 95%</p> <p>There are only 2-3 small boats traditionally fishing and have only once caught over 9%, so there asking for quite a large increase</p> <p>Small boats might not catch this allotment, leaving fish on the table</p>
Oppose	0	8	Click here to enter text



Aaron Anderson

Box 43

Chignik Lagoon, AK 99565

November 9, 2015

Alaska Board of Fisheries

P.O. Box 115526

Juneau, Alaska 99811-5526

Dear Board Members,

I am a life long resident of Chignik Lagoon. I provide for my family by commercial fishing for Salmon and Pacific Cod in the Chignik area.

I support proposals 1 and 2. I feel that they would increase economic opportunity for local boats who are invested only in the salmon fishery. These proposals would not take away from the boats who have invested in the P. Cod fishery as the Jig quota has remained unharvested, pre roll over date, for years.

I am strongly opposed to proposal 3. There are many local residents who have invested in the P. Cod fishery for years. It would be unfair to take away quota from those who have invested in the fishery and give it to those who have not. As I'm sure you have heard many times, Chignik is a small boat fishery. Chignik Lagoon is very shallow and the local boats are built shallow to fish it. One common misconception is that the length of a boat reflects its size. While length is considered criteria, one must also consider draft. Shallow draft boats cannot handle the weather that deep drafted boats can. Stability of a boat is directly related to the relationship of the amount of boat out of the water versus the amount of boat in the water. If this proposal were to pass, the local, shallow draft boats of Chignik would lose out to the non-local, deep drafted boats.

I am opposed to proposal 4. This proposal will slow the fishery down too much. As the proposer states in the proposal, weather plays a huge factor for the local shallow draft boats of Chignik. As everyone will agree, weather can be very unpredictable especially during the winter and early spring. Storms during this time of year occur frequently. There are times when the only time you can get to your gear is at night, in between storms. If the times that we can fish is restricted to a few hours during the day, fishers would take more risks in order not to miss a fishing period.

I support Proposal 5. As the proposal states "the fall rollover fish has gone unharvested with limited participation." By removing the gear restrictions, we would increase the economic viability of the fishery.



I don't have a problem with Proposal 6. There is plenty of opportunity for local fishers to harvest the roll over fishery before the October 30th date in the proposal.

I support Proposal 7.

I strongly oppose Proposal 8. Cod are more spread out during the federal fishery. Any more restrictions on the amount of gear a fisher could use will severely impact the economic viability of the fishery.

I strongly support Proposal 9. Chignik is unique when it comes to the Stellar Sea lion restrictions. We have very little area inside three miles that can be fished during the parallel season. Most residents of Chignik did not qualify for a P. Cod endorsement on their LLP, therefore they are restricted to state waters. By opening the closed waters around haul outs to pots and jig within state waters, the State will increase opportunity to local fishers without jeopardizing Stellar Sea lions.

Thank You,

Aaron Anderson

F/V Arianna Sage

MINUTES
Chignik Fish and Game Advisory Committee
Teleconference Meeting
Wednesday, September 23, 2015



PC 10
8 of 10

RC 000

- I. Call to Order: Chairman Jacob Shangin called the meeting to order at 1:45 pm, September 23, 2015

II. Roll Call:

Full Member List by member groups:

Chignik Lake: Mitchell Lind; Ronald Lind; Vacant

Chignik Lagoon: Don Bumpus; Alfredo Aboueid; Gary Anderson

Perryville: Patrick Kosbruk; Marvin Yagie; Vacant

Ivanof Bay: Jacob Shangin; Stephan Shangin; Noah Shangin;

Chignik Bay: Ben Allen; Vacant; Vacant

Alternates at large: Rodney Anderson; Vacant

Members Present: Mitchell Lind; Don Bumpus; Alfredo Aboueid, Gary Anderson; Jacob Shangin; Ben Allen; and, Rodney Anderson.

Members Absent: Ronald Lind; Patrick Kosbruk; Marvin Yagie; Stephan Shangin; Noah Shangin

Number Needed for Quorum on AC: 7

List of User Groups Present: Chignik Lake; Chignik Lagoon; Chignik Bay; Ivanof Bay

List of User Groups Absent: Perryville

- III. Approval of Agenda: Motion to defer finfish to future meeting Rodney & Alfredo approved by unanimous consent. Amended Agenda approved by unanimous consent.

IV. Introductions:

- a. Fish and Game Staff Present: Taryn Oconnor-Brito, Board Support; Nathaniel Nichols, Westward Region Groundfish; Mark Stichert; Westward Region Groundfish

- b. Guests Present: Chuck McCallum, Lake and Peninsula Borough; Tony G, Chignik Lagoon; Al Anderson, Chignik Lagoon; Ramé Abou-eid, Chignik Lagoon; George Anderson, Chignik Lagoon; Dean Anderson, Chignik Lagoon; Aaron Anderson, Chignik Lagoon; Dave Crowley, ADF&G King Salmon; Chris Peterson, ADF&G King Salmon; Lisa Scarbrough, ADF&G Subsistence; Courtney Cartny, BBNA; Liza Mack, Aleutians East Borough; and, Bruce Barrett, United Chignik Salmon Fishermen.

V. New Business: Comments on cod proposals



**ALASKA PENINSULA / CHIGNIK / ALEUTIAN ISLANDS-
BERING SEA PACIFIC COD
NOVEMBER 30–DECEMBER 1, 2015
Alaska Board of Fisheries**

Mandatory- Please Summarize Your Proposal Comments in this Form

BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	1		Add purse seine gear as an additional gear type to share the 10 percent mechanical jigging machine and hand troll (jig) gear allocation in the Chignik Area state-waters Pacific cod fishery.
<input checked="" type="checkbox"/> Support as Amended	7	0	Nathaniel Nichols notes that the Department has little data so that it is difficult to comment on what bycatch might be and how allocations might be affected. With that in mind he noted that the sunset provision was helpful. Motion to adopt by Alfredo and Seconded by Don Bumpus. Rodney expresses concern that after such a lean salmon season that some won't be able to afford safety decals. Al Anderson says that in order to fish next year that you have to have the decal, that we have not had it in Chignik before because we are too far away and that we need to call the Coast Guard about it. Alfredo expresses concern about observer costs and Mark Stichert (who had just dialed into the meeting) comments that the State does not have an observer program, that observers will not be mandatory, and the language was included to allow the department an opportunity to learn. Alfredo challenges the requirement for five years' experience as not being good for the community and if you were new to the fishery it wasn't fair. Mark Stichert comments that he wasn't sure how ADF&G would monitor experience. Alfredo makes motion to amend by dropping #7 to require 5 years' experience. Motion to amend passes by unanimous consent. Don Bumpus calls for the question. Motion to support Proposal #1 passes as amended with none opposed.
BOF	2		Allow bycatch retention of Pacific cod in the Chignik Area salmon seine fishery. (This proposal will be heard at the Pacific cod meeting and heard and deliberated on at the Alaska Peninsula / Chignik / Aleutian Islands Finfish meeting.)



<input checked="" type="checkbox"/> Support	7	0	<p>Mark Stichert comments that there might be some catch acc issues. The fish ticket data base for salmon is separate from groundfish and management will need information in season to react. The data base folks are being asked about how this issue can be addressed. Motion to adopt by Rodney and seconded by Alfredo. Rodney asks what permit cards are needed to qualify and Mark Stichert lays out some options. Don asks if salmon season could be closed if cod bycatch is too high and Mark says no, and they would manage to the cod GHL and if cod bycatch was high they would close cod and stop the retention of cod but not close salmon. Tony asks if you have to have a pot or jig license to deliver cod on salmon fish ticket and how it effects the exclusivity of the fishery. Mark says that you don't have to be in the cod fishery so the super exclusive would not apply because you are not in the fishery. Rodney states that there is a problem with cod going and he would like to see this solution even if it has to come off the jig quota. Mark Stichert notes that seine mortality for cod is high but technically the dead cod is supposed to be reported on the fish ticket and accounted for. Mark Stichert asks what level, in the fishermen's experience, should the bycatch level be set at? Tony notes that right now the Chignik jig fishery is not a viable fishery but if, in the future, the jig fishery becomes viable we may have to deal with that. Tony asks if anyone has approached the canneries and if the companies will buy? Al Anderson says that he wrote the proposal and hates to see the waste and that last year everyone was swamped. George asks if the department would be more favorable if there was a sunset clause. Mark said that he wasn't sure he had a good answer. Mark noted that this is less complicated and that waste might be of interest to the BOF. Catch acct is the crux of the issue. Sunset probably won't make a difference on how the department comments. George asks if there will be additional costs for the department. Mark says there will be some additional costs to mesh the two systems, groundfish and salmon, together. The cost could be a problem in this fiscal environment. Rodney calls for question. Motion passes with all in favor.</p>
BOF	3		Apportion the Chignik Area state-waters Pacific cod allocation for pot vessels by vessel length.
<input checked="" type="checkbox"/> Oppose	0	7	<p>Rodney moves to adopt Alfredo seconds. Don Bumpus states that he has a problem with this one. Forty seven foot to fifty seven foot boats have the same problem and would lose about 100,000 lbs. Tony, the proposer, says that he put the proposal in just make sure the AC had the option of changing it to best fix the problem because the small boats can't compete. Nathaniel notes that 96% of the harvest is made by boats 47 feet or longer and the average number of boats less than 47 feet is two. Rodney notes that not all 58 foot boats are deep and wide: "I get my ass kicked along with the 50 footers." Alfredo says that making this change for two boats doesn't make sense. Rodney calls for the question – Alfredo seconds: Motion fails with all against.</p>
BOF	4		Establish daily pot gear fishing periods for the Chignik Area state-waters Pacific cod fishery.



ALASKA BOARD OF FISHERIES
Alaska Peninsula / Aleutian Island / Chignik Finfish –

February 23–29, 2016

Alaska Board of Fisheries Proposals
Synopsis and Recommendations

On time Public Comments

BY

The Bristol Bay Economic Development Corporation
Regional Fisheries Committee

February 8, 2016





**Board Meeting: Alaska Peninsula / Aleutian Island / Chignik Finfish –
February 23–29, 2016**

Name: Gene J Sandone:

Affiliation: BRISTOL BAY ECONOMIC DEVELOPMENT CORPORATION
(BBEDC)

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**Do you consent to your contact information being included on printed copies
of your comment? Yes**



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Alaska Peninsula Area/Bristol Bay Area Boundary

PROPOSAL 22 and 23 –5 AAC 06.100. Description of area; 5 AAC 06.200. Fishing districts and sections; 5 AAC 09.100. Description of area; and 5 AAC 09.200. Description of districts and sections.

PROPOSAL 22 PROPOSED BY: Native Village of Port Heiden

PROPOSAL 23 PROPOSED BY: Gerda Kosbruk

BBEDC POSITION: SUPPORT

ADF&G POSITION: OPPOSE

WHAT WOULD THIS PROPOSAL DO?

Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District (Figure 1) of the Alaska Peninsula Area to the Bristol Bay Area. Proposal 22 and 23 are identical. These two proposals seek to expand the Bristol Bay Area south and west to the longitude of Stroganoff Point (Figure 2). If accepted, the, and Cinder River Sections, Outer Port Heiden, and Inner Port Heiden (Figure 2) that are currently within the Northern District would be transferred into the Bristol Bay Area.

CURRENT REGULATIONS

5 AAC 06.100. Description of area

<http://www.legis.state.ak.us/basis/aac.asp#5.06.100>

The Bristol Bay Area includes all waters of Alaska in Bristol Bay east of a line from Cape Newenham at 58_ 38.88' N. lat., 162_ 10.51' W. long. to Cape Menshikof at 57_ 28.34' N. lat., 157_ 55.84' W. long.

5AAC 06.200. Fishing districts and sections

<http://www.legis.state.ak.us/basis/aac.asp#5.06.200>

Bristol Bay

5 AAC 09.100. Description of area

<http://www.legis.state.ak.us/basis/aac.asp#5.09.100>

The Alaska Peninsula Area includes the waters of Alaska on the north side of the Alaska Peninsula, southwest of a line from Cape Menshikof (57_ 28.34' N. lat., 157_ 55.84' W. long.) to Cape Newenham (58_ 39.00' N. lat., 162_ W. long.) and east of the longitude of Cape Sarichef Light (164_ 55.70' W. long.) and on the south side of the Alaska Peninsula, from a line extending from Scotch Cap through the easternmost tip of Ugamak Island to a line extending 135_ southeast from Kupreanof Point (55_ 33.98' N. lat., 159_ 35.88' W. long.).

5 AAC 09.200. Description of districts and sections

<http://www.legis.state.ak.us/basis/aac.asp#5.09.200>

Alaska Peninsula

PROPONENT STATEMENT:

The Village of Port Heiden is located within the Northern District of the Alaska Peninsula Management Area (Figure 1)

Proponent cites numerous reasons for wanting these Sections to be included in the Bristol Bay Area:

1. Port Heiden is a member community in the Bristol Bay Economic Development Corporation;
2. The community of Port Heiden is within the Bristol Bay Coastal Resource Service Area;
3. The residents of Port Heiden have strong family ties to other communities in the Bristol Bay Area;
4. Most of the commercial fishing permits that are owned by Port Heiden residents are Area T permits, or commercial Bristol Bay fishing permits;
5. Including Port Heiden in the Bristol Bay area would facilitate enforcement efforts in the Outer and Inner Port Heiden sections.
6. The vast majority of the salmon captured in the Outer Port Heiden Section originate in Bristol Bay;
7. The Inner Port Heiden Section has not had a fishery for a number of years and when the fishery was prosecuted the harvest was exceedingly small, less than 2,000 fish were harvested since 1997 and less than 10,000 fish since 1989. The largest harvest occurred in 1979 of approximately 37K fish; with the second largest harvest occurring the next year, in 1980 of approximately 25K.

COMMENTS:

Proposal 22 and 23 are identical. These two proposals seek to expand the Bristol Bay Area south and west to the longitude of Stroganoff Point (Figure 2). If accepted, the, and Cinder River Sections, Outer Port Heiden, and Inner Port Heiden (Figure 2) that are currently within the Northern District would be transferred into the Bristol Bay Area.

Results from the WASSIP study regarding the analysis of the Outer Port Heiden Section indicated that the vast majority (n=2; range 72.7% - 81.6%) of the harvest consisted of salmon that originated from Bristol Bay (Table 1, Figure 3). Based on the WASSIP study, the Ugashik River stock made up a majority of the harvest, 59.6% in 2007 and 52.1% in 2008 (Table 2, Figure 3). The Egegik River stock contributed the second highest percentage, 10.3% in 2007, while the Meshik River stock (13.9%) and the Naknek River stock (13.6%) contributed nearly identical percentage in 2008 (Table 2, Table 3, Figure 3). Note however, stocks from the North Peninsula only contributed 23.7% in 2007 and 17.9% in 2008 (Table 1, Figure 3), with the Meshik River stock contributing only 6.7% in 2007 and 13.9% in 2008 to the Outer Port Heiden harvest (Table 3, Figure 3). Further, the harvest rate on the Meshik River stock by the Outer Port Heiden fishery was relatively low, 11.5% in 2007 and 13.3% in 2008 (Table 3). The Outer Port Heiden fishery is no doubt a Bristol Bay-intercept fishery that has little impact on the Meshik River escapement.

During 2014 and 2015 a Genetic Stock Identification (GSI) study was conducted in the Ilnik and Outer Port Heiden Sections (Boatright et al. 2016).

Boatright, C., W. Larson, L. Seeb, R. Hilborn. 2016. Estimating the stock composition in the sockeye salmon fishery in the Outer Port Heiden and Ilnik Sections of Alaska's North Peninsula Fishery, 2014-15. Alaska Salmon Project, School of Aquatic and Fishery Sciences, University of Washington.

The information from sampling the Outer Port Heiden section that was open to commercial fishing indicated that samples collected throughout the season were dominated by Bristol Bay-origin salmon. In 2014, 92% of the samples collected were of Bristol Bay-origin salmon; in 2015, 83% were attributed to Bristol Bay. Overall stock proportions were similar for all regional and individual stocks when period samples were weighted by associated harvest (Figure 4). In 2014, using the weighted samples, Bristol Bay-origin salmon comprised 89% of the samples; in 2015, 88% were attributed to Bristol Bay-origin salmon (Figure 4). In 2014, the Bristol Bay-origin salmon component of the Outer Port Heiden combined open section samples were dominated by: Kvichak River, 42%, Egegik River, 26%, and Ugashik River, 19%, respectively (Figure 4). In 2015, although the order was reversed, the same three Bristol Bay stocks accounted for: Kvichak River, 14%, Egegik River, 28% and Ugashik River, 34%, of the combined samples (Figure 4). Although Northern Peninsula-origin stocks accounted for 5% in 2014 and 15% in 2015 of the total combined sample, Meshik River-origin salmon contributed 0% to both years combined samples. However, Meshik River-origin salmon were detected, and accounted for 1%, in two of the four sampling periods in 2015, but accounted for 0% in all other five sampling periods within the open area for both years (Figure 4).

The stated intent of the establishment of the Outer Port Heiden salmon fishery is based on the abundance of Meshik River salmon ([5 AAC 09.369](#) 1). Because ADF&G has raised the Meshik River Sustainable Escapement Goal (SEG) twice since 2006, the huge sockeye salmon surplus that the BOF identified in 2007 has now for all practical purposes evaporated (Figure 5).

Since the WASSIP study concluded, the number of salmon harvested in the Outer Port Heiden Section has drastically increased in 2008 and 2009 and then decreased since then to levels similar to 2007 and 2008 (Figure 6). Preliminary harvest information from 2015 indicates that a record harvest of 867,350 sockeye salmon was taken from the Outer Port Heiden Section (Figure 6), which more than doubled the 2007-2014 average commercial harvest of 357,675 sockeye salmon. However, what is more troubling is the marked increase in the contribution of the Outer Port Heiden sockeye salmon harvest to the total Northern Peninsula District harvest (Figure 7). In 2007 and 2008, the Outer Port Heiden Section contributed only 12% and 16%, respectively to the total Northern District sockeye salmon harvest. Since then, however, the Outer Port Heiden contribution to the North Peninsula total harvest has ranged from 22% in 2014 to 42% in 2011 (Figure 7). The mean contribution since 2007 has been 34%, nearly 2.5 times the contribution to the North Peninsula harvest during the WASSIP years (2007, 2008). Preliminary 2015 data indicates that this proportion is very near the 2007-2014 median and median value of 34% (Figure 7). The BOF regulation passed in 2013, which closed the outer half of the Outer Port Heiden Section, apparently did not affect the harvesting potential of the fleet fishing in this Section.

Finally, we believe it is unconscionable not to allow residents of Port Heiden access to this commercial fishery, or to receives any benefits from this fishery, which occurs at their doorstep. The residents of Port Heiden are mainly Area T permit holders who cannot fish in this commercial fishery which is restricted only to Area M permit holders.

BBEDC POSITION: SUPPORT

Table 1. WASSIP summary analysis for the Port Heiden Section sockeye salmon harvest, 2007 and 2008. (The Port Heiden Section was closed in 2006 and no harvest was taken.)

Regional	Median Catch		Harvest Rate (%)		Regional Stock Harvest Rate (%)	
	2007	2008	2007	2008	2007	2008
Norton Sound	0	0	0.0	0.0	0.0	0.0
Kuskokwim Bay	1,130	1,294	0.3	0.4	0.1	0.1
Bristol Bay	282,061	262,543	72.7	81.6	0.6	0.6
North Peninsula	91,991	57,591	23.7	17.9	2.5	1.9
South Peninsula	0	0	0.0	0.0	0.0	0.0
Chignik	225	0	0.1	0.0	0.0	0.0
East of WASSIP	12,380	303	3.2	0.1	?	?
Total	387,787	321,731	100.00	100.00		
Total Interceptions	295,796	264,140	76.3	82.1		

Table 2. Contribution by number and percent and percent of stock harvested in the Outer Port Heiden Section of Bristol Bay-origin Salmon, by stock, 2007 and 2009.
(Information from WASSIP study).

Stock	2007			2008		
	Number Harvested	% of stock	Harvest Comp. (%)	Number Harvested	% of stock	Harvest Comp (%)
Togiak	4,111	0.4	1.5	3,317	0.4	1.3
Igushik	1,843	0.2	0.7	16,423	0.9	6.3
Wood	32,976	0.4	11.7	27,954	0.4	10.6
Nushagak	1,528	0.1	0.5	6,672	0.3	2.5
Kvichak	12,832	0.2	4.5	4,632	0.1	1.8
Alagnak	5,024	0.1	1.8	5,910	0.1	2.3
Naknek	27,581	0.3	9.8	35,759	0.4	13.6
Egegik	29,155	0.4	10.3	25,579	0.3	9.7
Ugashik	168,051	2.1	59.6	136,774	4.3	52.1
Total BB	283,101	0.6	73.0	263,020	0.6	81.8

Table 3. Contribution by number and percent and percent of stock harvested in the Outer Port Heiden Section of North Peninsula-origin Salmon, by stock, 2007 and 2009.
(Information from WASSIP study).

Stock	2007			2008		
	Number Harvested	% of stock	Harvest Comp (%)	Number Harvested	% of stock	Harvest Comp (%)
Cinder	18,909	4.2	4.9	5,251	1.5	1.6
Meshik	26,140	11.5	6.7	44,872	13.3	13.9
Ilnik	8,512	3.2	2.2	0	0.0	0.0
Sandy	0	0.0	0.0	0	0.0	0.0
Bear	33,714	2.0	8.7	7,128	0.7	2.2
Nelson	4,560	0.7	1.2	0	0.0	0.0
NW Dist. BH	0	0	0.0	0	0.0	0.0
Total NP	91,835	2.5	23.7	57,251	1.5	17.8

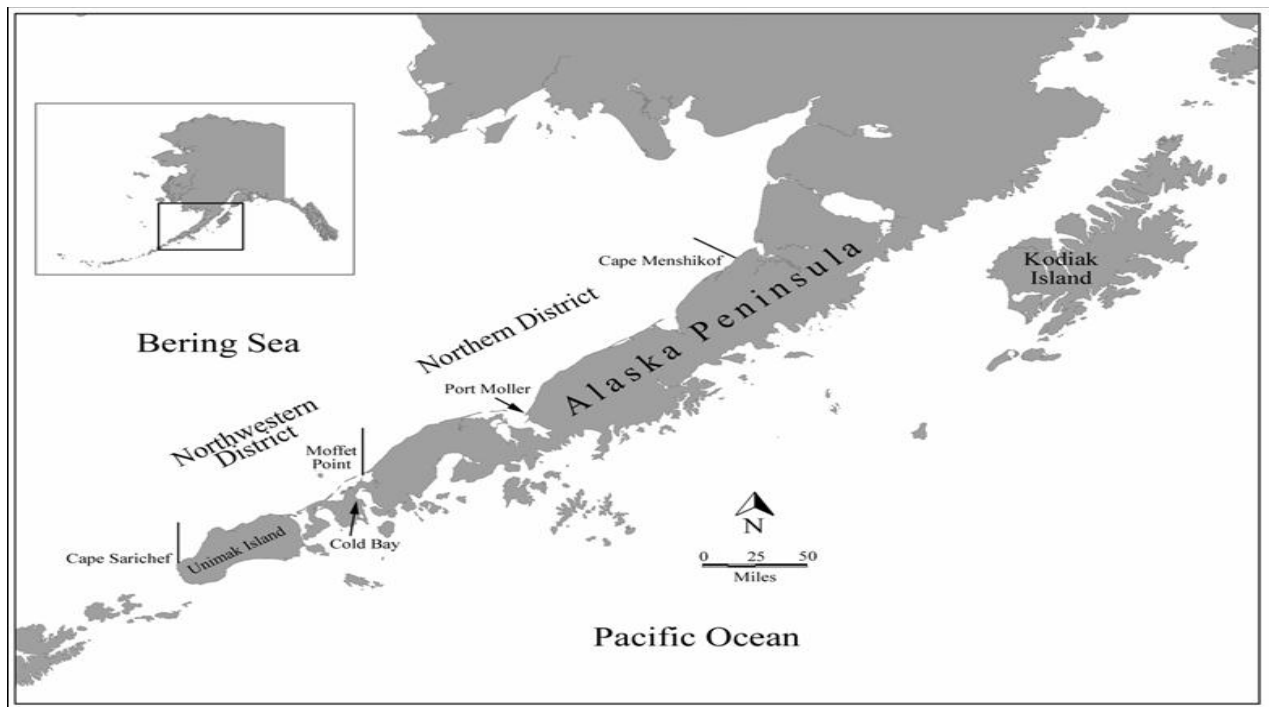


Figure 1. Map of the Alaskan Peninsula showing North Alaska Peninsula Fishing Districts

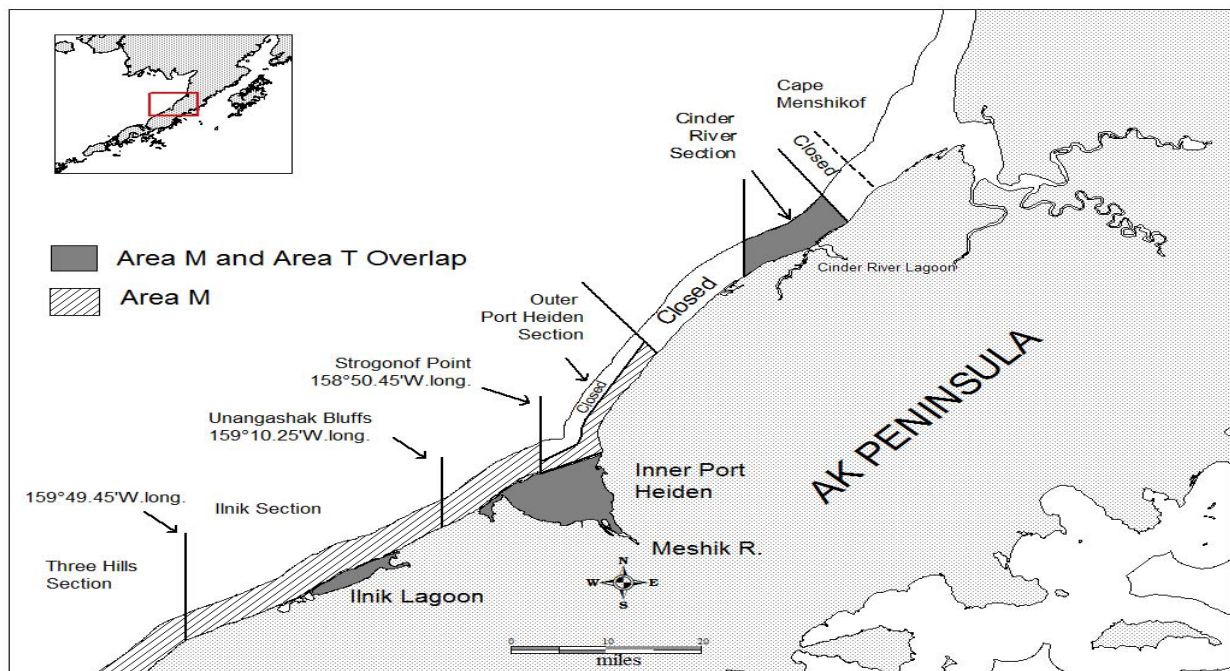


Figure 2. Map of the Northwestern portion of the Northern District of the Alaskan Peninsula Area, from the Three Hill Section to the Cinder River Section, showing Area M and Area T overlap and open and closed to commercial fishing sections.

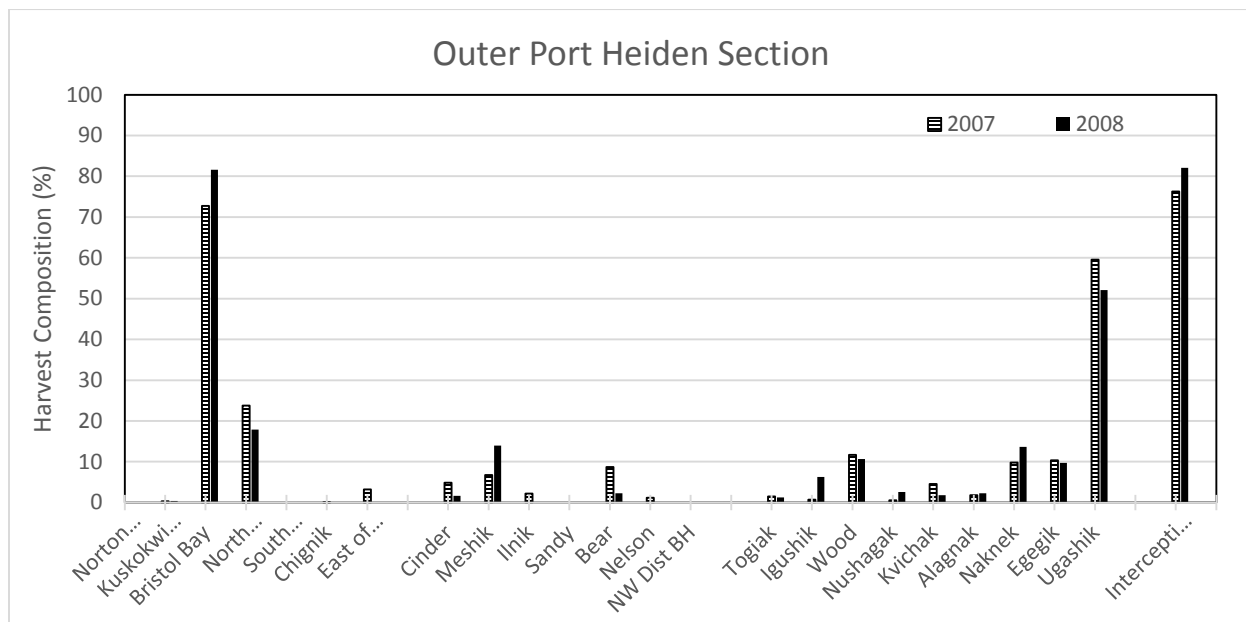


Figure 3. Harvest composition of the Outer Port Heiden Section, by regional and specific reporting groups. Data are from the WASSIP study, 2006-2007. Interceptions are considered all harvested fish that do not originate in Northern District spawning areas.

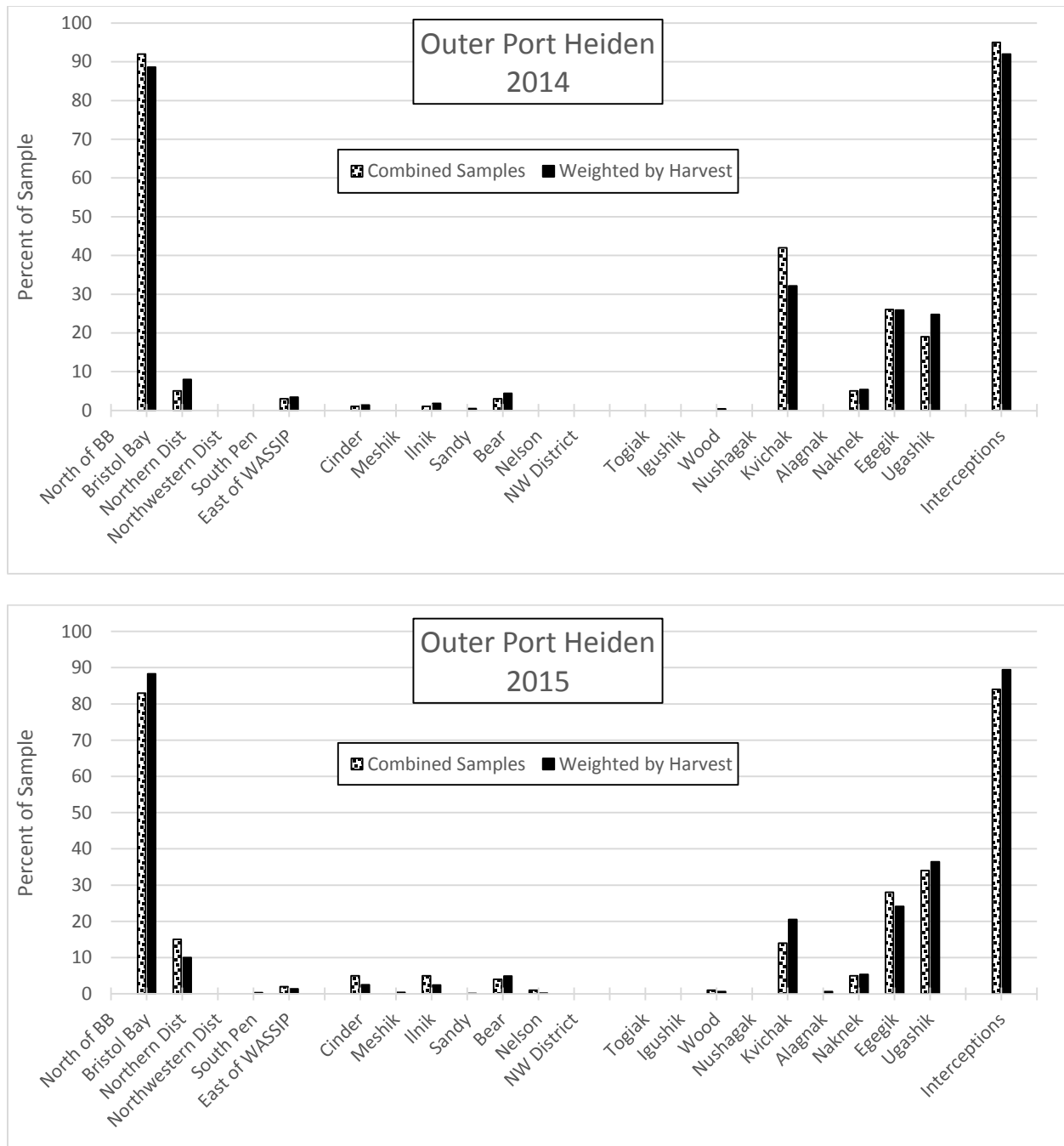


Figure 4. Comparative overall stock composition by regional and fine-scale reporting groups, using unweighted and weighted samples, open portion of the Outer Port Heiden Section, 2014 (above) 2015 (below).

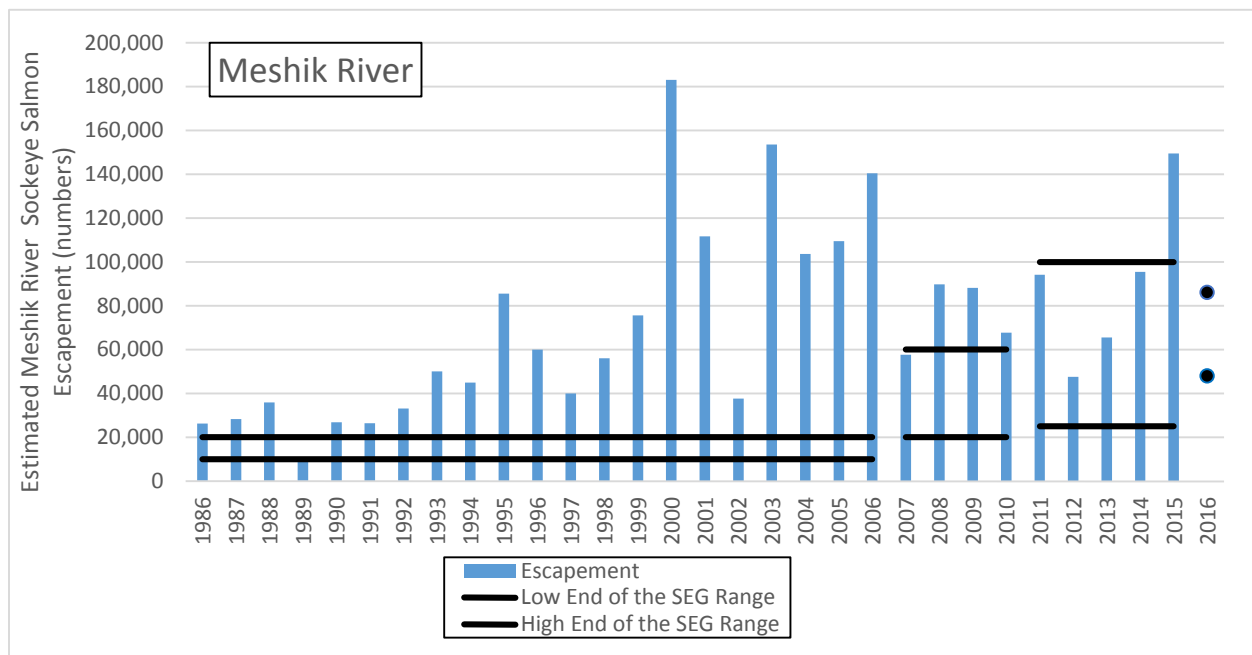


Figure 5. Estimated Meshik River sockeye salmon escapement and associated Sustainable Salmon Escapement (SEG) ranges, 1986-2015. The dots in 2016 represent the new ADF&G recommended SEG for this stock.

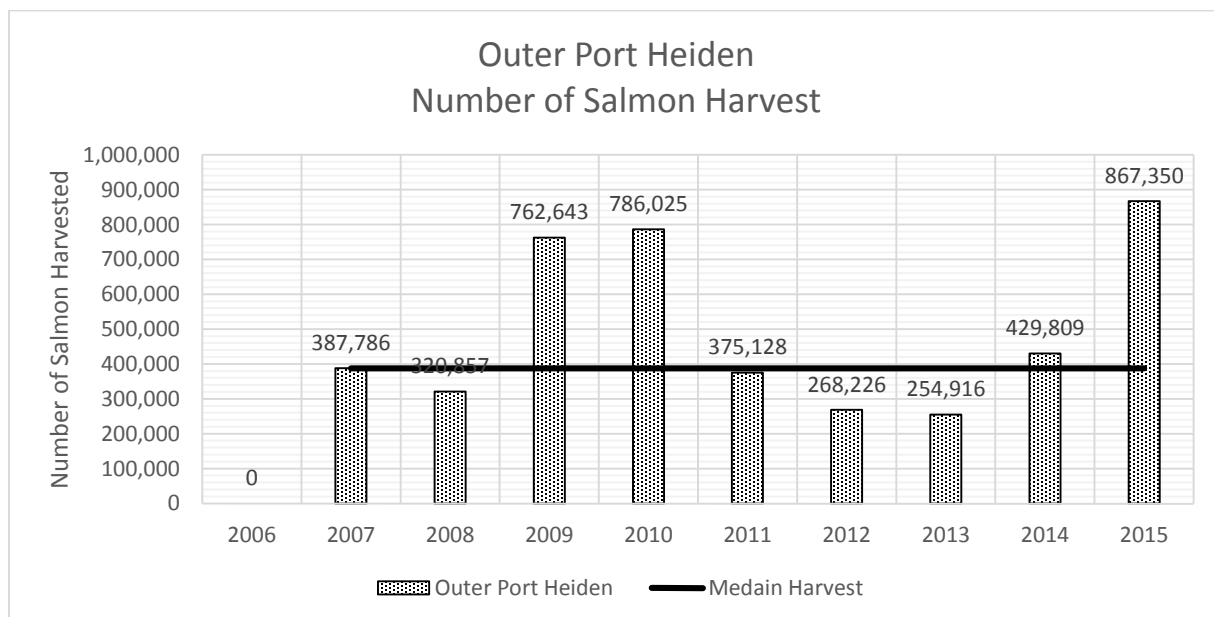


Figure 6. Number of sockeye salmon harvested in the Outer Port Heiden Section from 2006 – 2015.

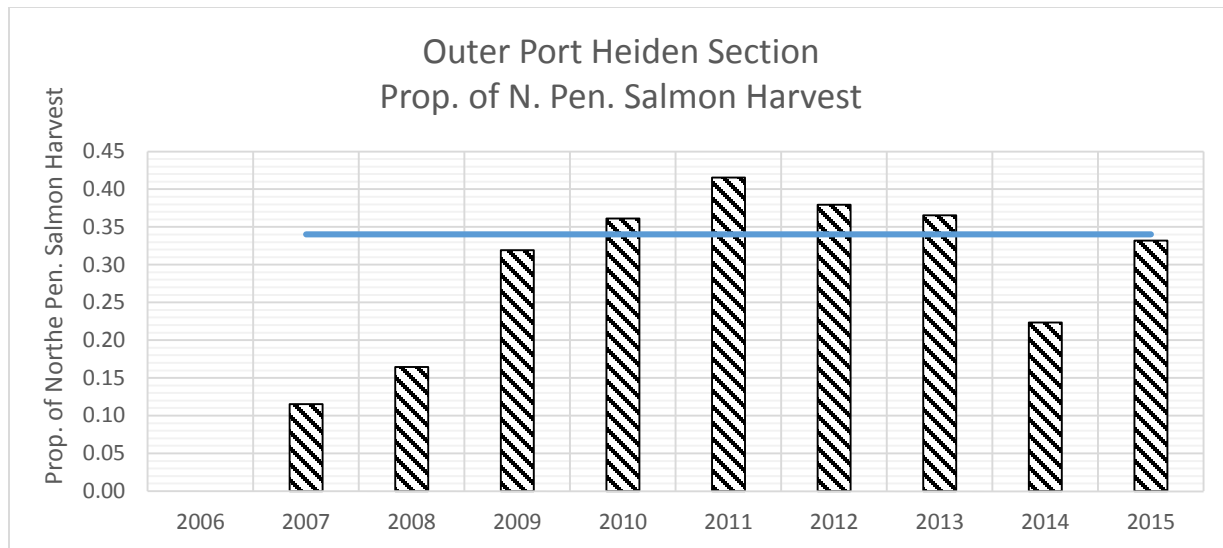


Figure 7. Proportion of total number of sockeye salmon harvested in the Northern Peninsula Area by fishers in the Outer Port Heiden Section, 2006-2015.

PROPOSAL 24 – 5 AAC 06.100. Description of Area and 5 AAC 09.100.

Description of Area.

PROPOSED BY: Larry K. Christensen

BBEDC POSITION: SUPPORT AS AMENDED (exclude Three Hills Section).

ADF&G POSITION: OPPOSE

CURRENT REGULATIONS

5 AAC 06.100. Description of area

<http://www.legis.state.ak.us/basis/aac.asp#5.06.100>

The Bristol Bay Area includes all waters of Alaska in Bristol Bay east of a line from Cape Newenham at 58° 38.88' N. lat., 162° 10.51' W. long. to Cape Menchikof at 57° 28.34' N. lat., 157° 55.84' W. long.

5 AAC 09.100. Description of area

<http://www.legis.state.ak.us/basis/aac.asp#5.09.100>

The Alaska Peninsula Area includes the waters of Alaska on the north side of the Alaska Peninsula, southwest of a line from Cape Menchikof (57° 28.34' N. lat., 157° 55.84' W. long.) to Cape Newenham (58° 39.00' N. lat., 162° W. long.) and east of the longitude of Cape Sarichef Light (164° 55.70' W. long.) and on the south side of the Alaska Peninsula, from a line extending from Scotch Cap through the easternmost tip of Ugamak Island to a line extending 135° southeast from Kupreanof Point (55° 33.98' N. lat., 159° 35.88' W. long.).

WHAT WOULD THIS PROPOSAL DO?

Proposal 24 seeks to further expand the Bristol Bay area to the southwest along the Northern Alaska Peninsula to the longitude of Cape Seniavin, the SW boundary of the Three Hills Section (Figure 8). This expansion would include the Sections mentioned above but would also include the SW Ilnak, NW Ilnik, and Three Hills Section (Figure 8). Note that in this proposal the proposer made a slight error and used latitude of Cape Seniavin instead of longitude. The proponent states: *Port Heiden is recognized as part of Area T. I suggest that the Entry Commission inadvertently misdrew the divide between Area T and Area M. If you want to catch Bristol Bay fish, buy a Bristol Bay permit.*

Alternatively, Area M fishing opportunity and area could be gradually curtailed within this zone.

COMMENT:

The proposer states that, *The genetics of WASSIP clearly show that the vast majority of salmon caught above Cape Seniavin are bound for Bristol Bay.* While the majority of salmon caught in the 2006-2008 fisheries starting in the NW Ilnak Section (n=3; range=54.6% to 74.2%; mean=65.6%; Figure 9) and farther northeast in the Outer Port Heiden Section (n=2 (2007 and 2008 fisheries); range=72.7% to 81.6%; mean=77.2%; Figure 9) originate in Bristol Bay, most of the harvest in the SW Ilnak (n=3; range=47.2% to 50.0%; mean= 48.0%; Figure 9) and Three Hills Sections (n=3; range=0.0% to 27.2%; mean= 12.0%; Figure 9) does not originate in Bristol Bay. However, note that because the harvest in the SW Ilnak section was much larger than in sections farther to the NE, the number of Bristol Bay-origin salmon harvested in the SW Ilnak Section either exceeds or rivals the number caught in the NE Ilnak and Outer Port Heiden Sections (Figure 9). While it makes sense to include the NW Ilnak and SW Ilnak Section in the request to include certain Northern District Sections in the Bristol Bay Area, the data from WASSIP does not support including the Three Hills in this request. In the Three Hills section, Bristol Bay-origin salmon do not comprise the majority of fish harvested in the Three Hills section and the harvest of Bristol Bay-origin fish is relatively small (Figure 9), based on the WASSIP study.

Regulations (5 AAC 09.369 (j)(1)(A)(i) and (ii) state that

[5 AAC 09.369. Northern District Salmon Fisheries Management Plan](#) (a) *The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.* (b) **The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information.** The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

(j) *In the Ilnik Section, (1) notwithstanding [5 AAC 09.320\(a\)\(4\)](#), from June 20 through July 20, (A) commercial salmon fishing will be permitted in the Ilnik Section (i) southwest of the Unangashak Bluffs based on the abundance of Ilnik River sockeye salmon; and (ii) northeast of the Unangashak Bluffs based on the abundance of Meshik River and Ilnik River sockeye salmon, combined;*

However, the WASSIP study found that the Meshik and Ilnik River reporting groups contributed very little to the harvest within the Ilnik SW and Ilnik NW harvests (Figures 9). Mean contribution of the Meshik River and Ilnik River reporting groups to the Ilnik SW harvest was 4.1% (n=3; range: 2.0% to 8.3%; Figure 10) and 6.8% (n=3; range: 2.7% to 9.0%; Figure 10), respectively. Mean contribution of the Meshik River and Ilnik River reporting groups to the Ilnik NW Section harvest was 5.9% (n=3; range=3.2% to 10.8%; Figure 10) and 3.5% (n=3; range = 0.5% to 6.1%; Figure 10), respectively. This is a very small contribution of fish from these two reporting groups to base the management of this fishery.

The proponent also suggests that an alternative measure would be to gradually curtail the harvest within the zone.

BBEDC POSITION: Support as amended. Delete the Three Hills Section from this proposal.

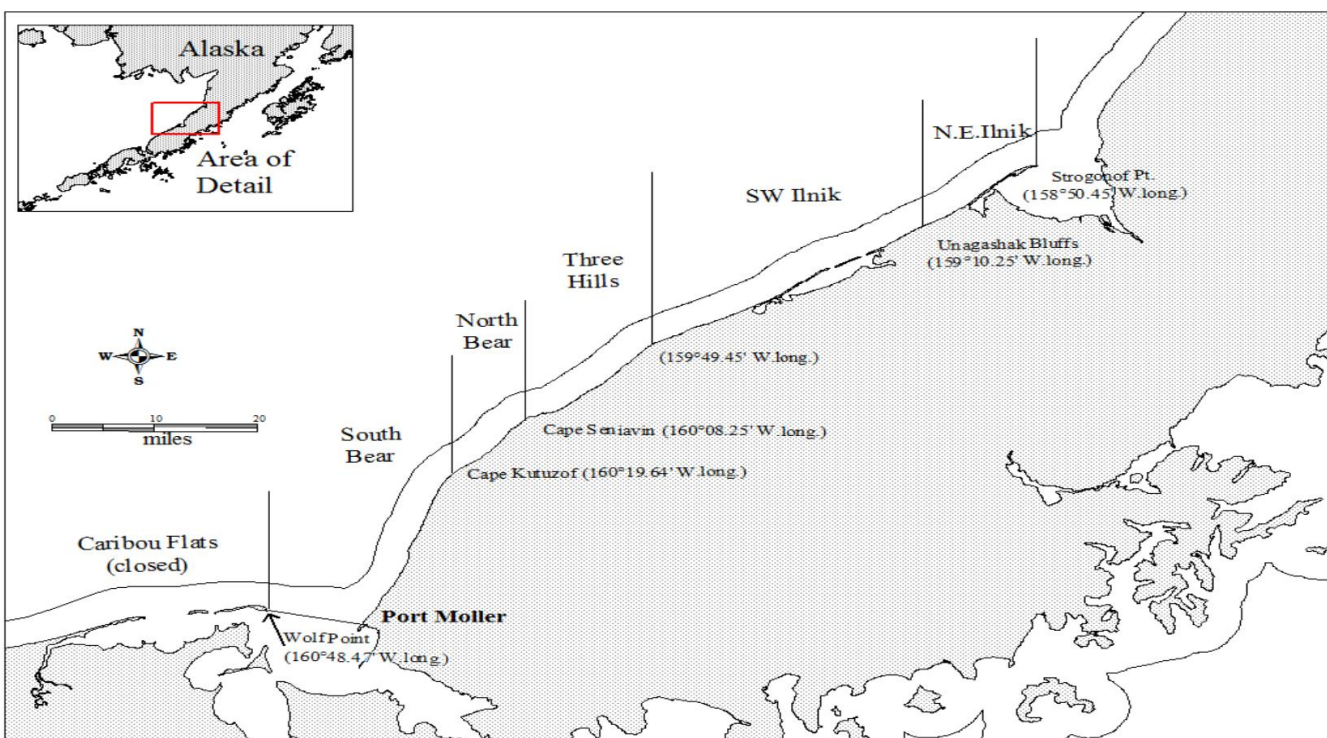


Figure 8. Map of part of the southwestern portion of the Northern District of the Alaska Peninsula Management Area.

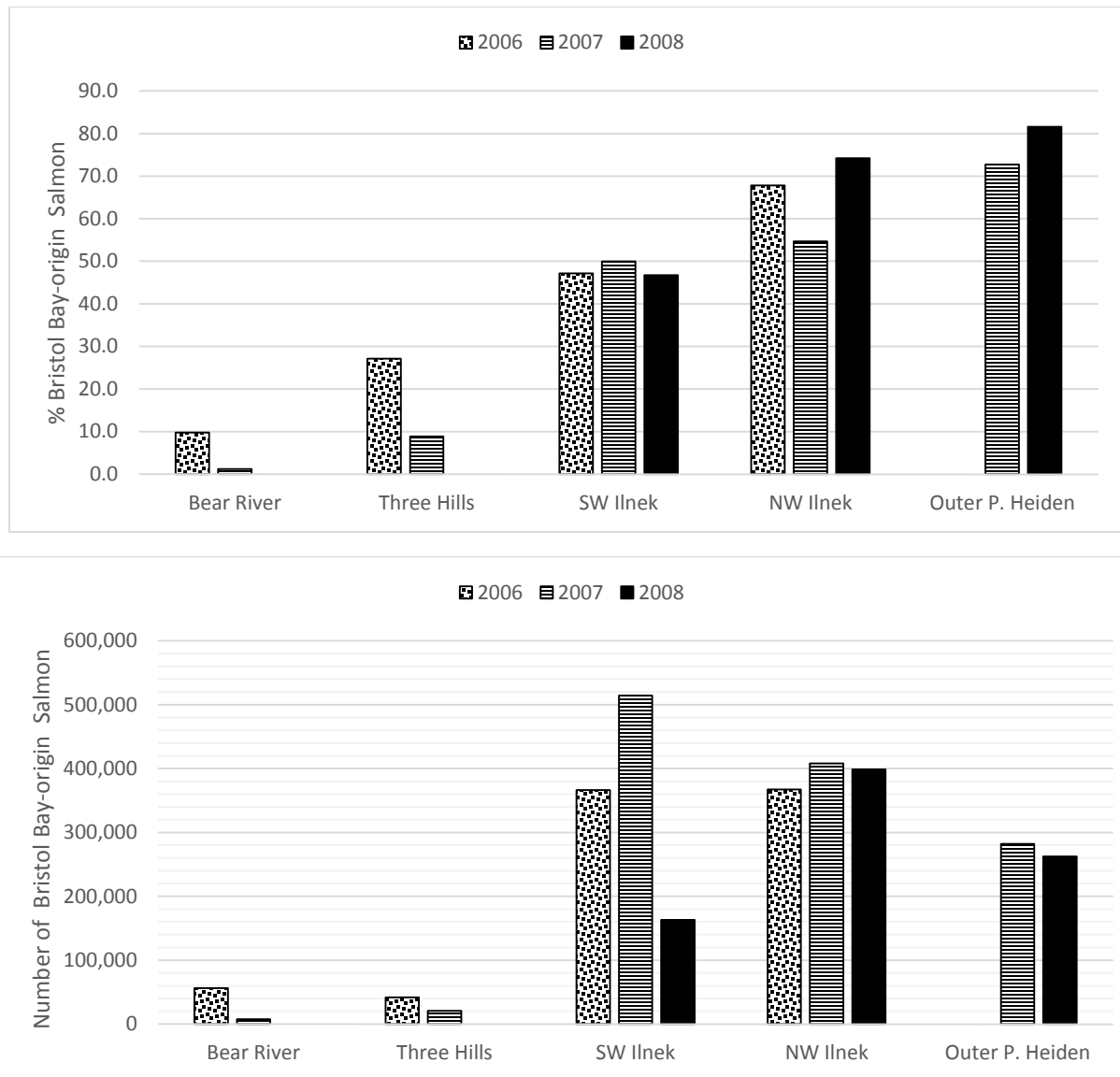


Figure 9. Percent (above) and number (below) of Bristol Bay-origin sockeye salmon that contribute to the salmon harvest in the Bear River, Three Hills, SW Ilnek, NW Ilnek, and Outer Port Heiden Sections of the North Peninsula Area, 2006-2008. (Data from WASSIP Study)

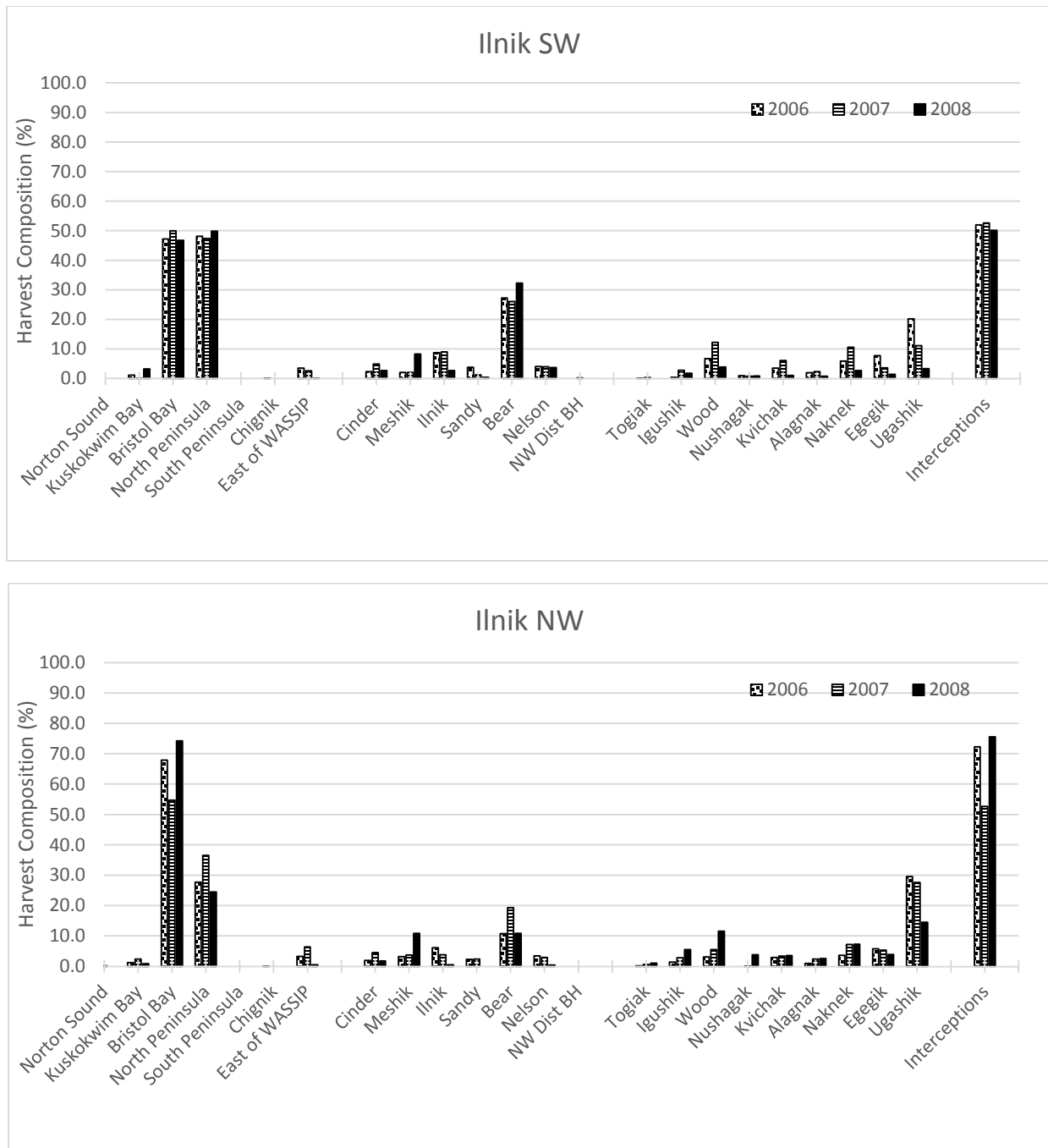


Figure 10. Harvest composition of the Ilnik SW (above) and Ilnik NW (below) Sections, by regional and specific reporting groups. Data are from the WASSIP study, 2006-2007. Interceptions are considered all harvested salmon that do not originate in Northern District spawning areas.

North Alaska Peninsula Salmon Northern District (25 proposals)

PROPOSAL 147 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Repeal sequential closures in the Bear River, Three Hills, and Ilnik sections,

PROPOSED BY: Concerned Area M Fishermen

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPOSAL DO?

If adopted as written, the proposal would reverse the sequential closures in the Bear River, Three Hills and Ilnik Sections to protect Bear River, Sandy River and Nelson River sockeye salmon stocks. These rolling closures were initiated in 2013.

Proposer states:

- rolling closures of certain sections of the North Peninsula area above Port Moller.
- This new regulation has created problems for the drift gillnet fleet in maintaining an orderly and effective fishery.
- The fishery in this area is important for processors and the local economy.
- The premise of the rolling closure regime was ensuring adequate returns to Nelson Lagoon,
- but this rationale was flawed: escapements and harvests in Nelson Lagoon are healthy and
- the drift gillnet fishery in the Bear River, Three Hills, and Ilnik Sections have low harvest rates on Nelson River stocks according to the recent WASSIP study.

CURRENT REGULATIONS

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(n) From June 20 through July 31, the department shall manage the Bear River, Three Hills, and Ilnik Sections to conserve Bear River and Nelson River sockeye salmon stocks by allowing the passage of sockeye salmon from the northeast to the southwest of the Northern District as described in this subsection. Notwithstanding the provisions of 5 AAC 09.320, from June 20 through July 31, the commissioner shall, by emergency order, establish fishing periods for the Bear River and Three Hills Sections, and that portion of the Ilnik Section between the longitude of Strogonof Point at 159° 50.45' W. long. and the longitude of Unangashak Bluffs at 159° 10.25' W. long. and that portion of the Ilnik Section between the longitude of Unangashak Bluffs and the longitude of Three Hills at 159° 49.45' W. long.,

during which the waters that are between the three-mile seaward boundary line, described in 5 AAC 09.301, and a line that is one and one-half miles shoreward of the three-mile seaward boundary are closed for one 24-hour period during a seven-day period. The waters located to the southwest of the open waters where a 24-hour closure has occurred will have sequential closures that allow fishing only in the waters out to the one and one-half mile line described in this subsection for the first 24 hours of an open fishing period.

COMMENTS: It appears that the regulations put into place by the BOF in 2013 are working (Figure 11). Escapements have rebounded to either above or near the upper end of the SEG. However, we question that the stock has rebounded to the point where the regulations are no longer needed. Eliminating these regulations may cause escapements to again decrease because of the overharvest of these local stocks. It seems to BBEDC that eliminating these regulations would be a knee-jerk reaction to what could possibly a temporary scenario or the fact that these regulations are working and that they need to stay in place.

The increase in escapement to these rivers may be caused by the decrease in fishing effort and associated harvest in these sections partly because of the increased effort in the Outer Port Heiden Section (Figure 12). Do these rolling closure regulations cause the decreased effort in these sections and the increased effort and harvest in the Outer Port Heiden Section or vice versa? Additionally, the increased escapement may be the result of increased productivity of the stock. Regardless of the cause, BBEDC recommends that these regulations remain in place for at least another board cycle, especially if the Outer Port Heiden Section is closed.

BBEDC POSITION: OPPOSE:

BBEDC believes that the period that the regulations were in place, since 2013, is too short for a conclusion that they are not needed. In fact, they appear to do what they were intended to do. Escapements in the Nelson, Bear, and Sandy river have all increased since the rolling closures were initiated.

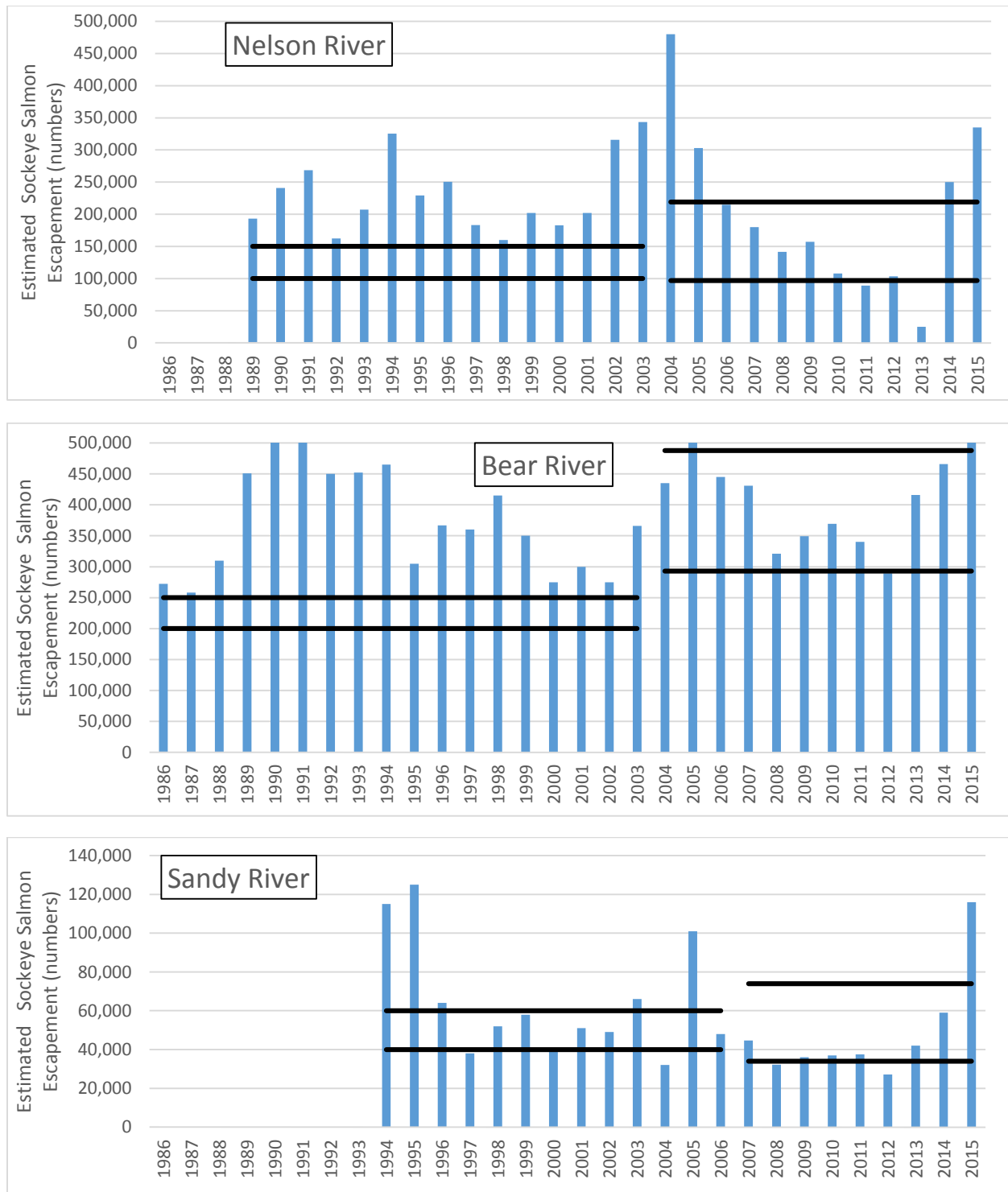


Figure 11. Estimated sockeye salmon escapement to the Nelson River, Bear River and Sandy River (from top to bottom) and associated sustainable escapement goals (SEG), 1986-2015.

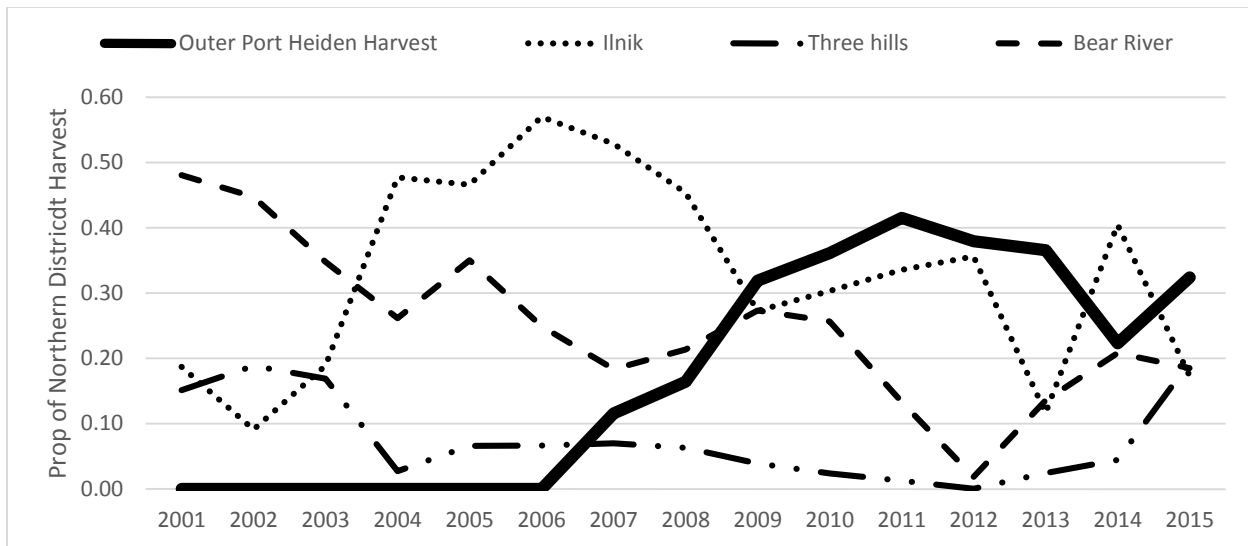


Figure 12. Estimated proportional contribution to the total Northern District sockeye salmon harvest by fishing section, 2001-2015.

PROPOSAL 148 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Allow commercial fishing for salmon with drift gillnet gear in the Ilnik Section,

PROPOSED BY: Brian Hartman

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPOSAL DO? This proposal would allow drift gear in the Ilnik Lagoon section (Figure 13) from June 1 thru September 30. Openings will be Monday morning 6:00 a.m. to Thursday midnight and closures will be Friday to Monday morning at 6:00 a.m.

Proposer states:

- The reason why is to have another area to fish when the wind is blowing gale force wind.
- This peninsula can also give the drift fleet more area to fish.
- It can also help control escapement.

CURRENT REGULATIONS

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

(j) In the Ilnik Section,

(1) notwithstanding [5 AAC 09.320\(a\)\(4\)](#), from June 20 through July 20,

(A) commercial salmon fishing will be permitted in the Ilnik Section

(i) southwest of the Unangashak Bluffs based on the abundance of Ilnik River sockeye salmon; and

(ii) northeast of the Unangashak Bluffs based on the abundance of Meshik River and Ilnik River sockeye salmon, combined;

(B) if the commissioner closes that portion of the Egegik District specified in [5 AAC 06.359\(c\)](#) for conservation of Ugashik River sockeye salmon stocks, the commissioner may, by emergency order, close the Ilnik Section and immediately reopen the Ilnik Section, with additional fishing restrictions that the commissioner determines necessary;

(2) from July 21 through August 15, fishing periods may be modified in the Ilnik Section based on the abundance of Bear River sockeye salmon stocks;

(3) after August 15, fishing periods may be modified in the Ilnik Section based on the abundance of

(A) coho salmon stocks in the Unangashak and Ilnik Rivers, and the Ocean River when the Ocean River flows directly into the Bering Sea; and

(B) the Bear River late-run sockeye salmon stock.

BBEDC notes that the Ilnik Lagoon is an overlap area with Bristol Bay. Permit holders from both Area M and Area T can fish this Lagoon if it is open.

COMMENTS: If opened it should be managed based on Ilnik River escapement. Recent escapement to the Ilnik River has been within the SEG range, except for 2015 (Figure 14).

BBEDC POSITION: NEUTRAL

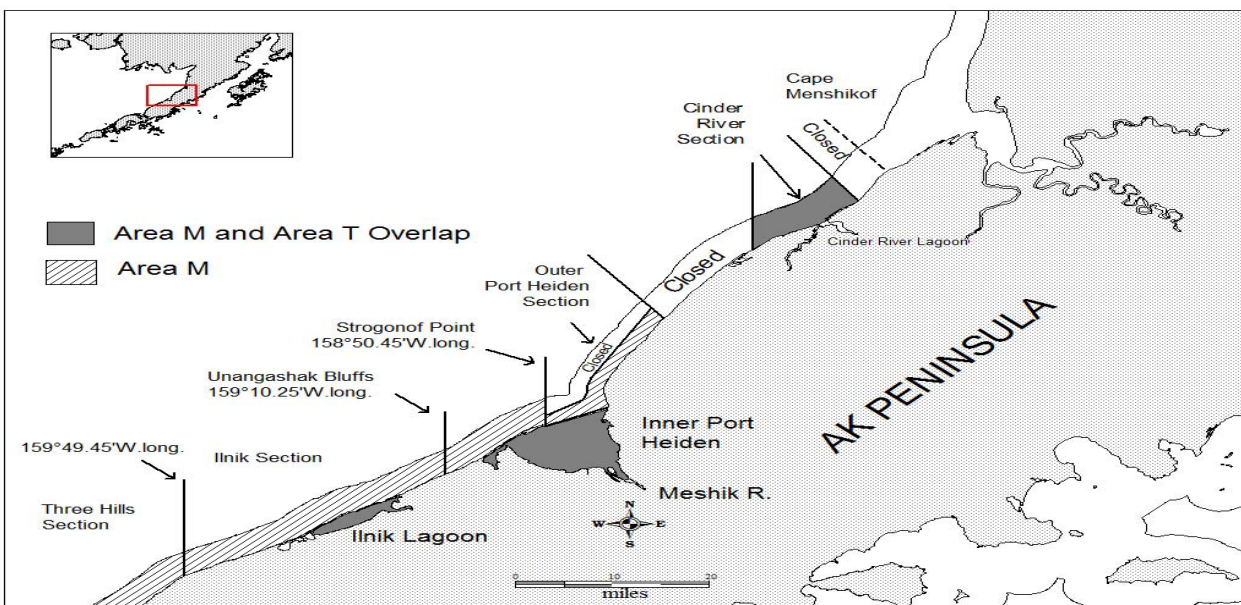


Figure 13. Map of the Northwestern portion of the Northern District of the Alaskan Peninsula Area, from the Three Hill Section to the Cinder River Section, showing Area M and Area T overlap and open and closed to commercial fishing sections. Note that Ilnik Lagoon is an Area M and Area T overlap area.

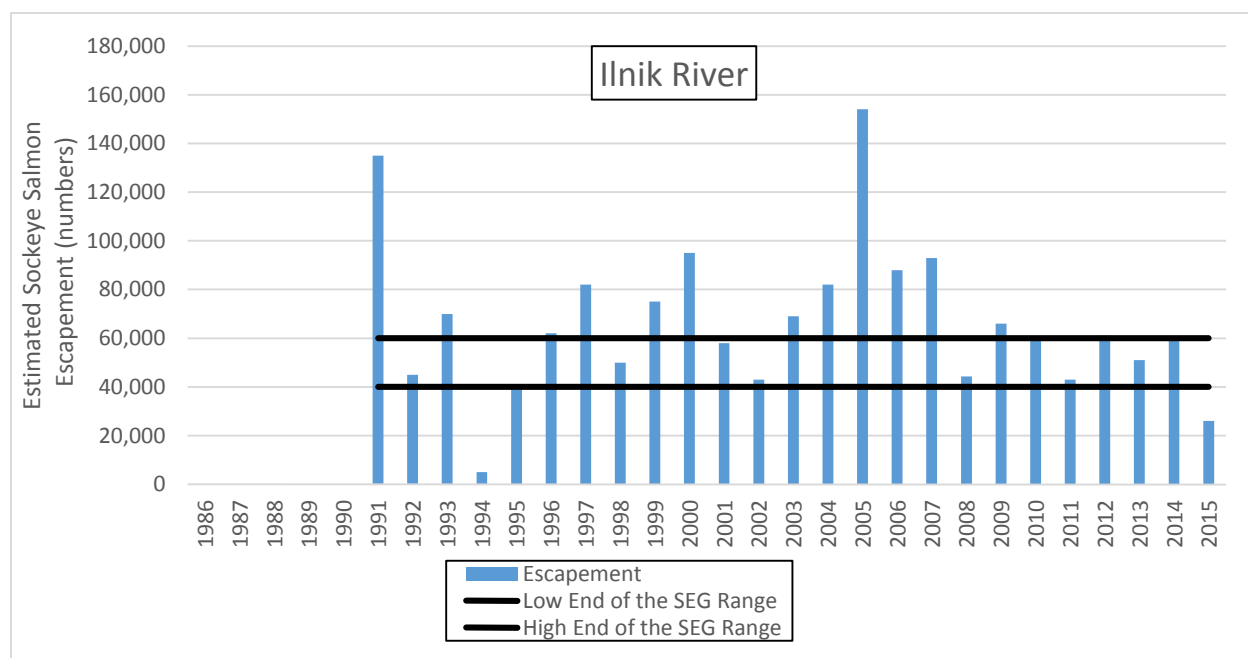


Figure 14. Estimated sockeye salmon escapement and applicable sustainable salmon escapement goals (SEG) for the Ilnik River.

PROPOSAL 149 – 5 AAC 09.310. Fishing seasons; 5 AAC 09.320. Fishing periods; 5 AAC 09.330. Gear; 5 AAC 09.369. Northern District Salmon Fisheries Management Plan; and 5 AAC 39.120. Registration of commercial fishing vessels. Create a directed sockeye salmon fishery in the Cinder River

PROPOSED BY: Concerned Area M Fishermen

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPOSAL DO?

This proposal seeks to create a new sockeye salmon commercial fishery in the Cinder River Section, starting on June 20 and extending through July 31, exclusive of the lagoon in which the Cinder River drains (Figure 15). It also seeks that drift gillnets would be the only legal gear in this fishery. Further, this proposal would exclude Area T fishermen from participating in this fishery. Only Area M fishermen could participate in this newly created fishery.

CURRENT REGULATIONS:

5 AAC 09.310. Fishing periods

<http://www.legis.state.ak.us/basis/aac.asp#5.09.310>

a) In the Northern District, salmon may be taken as follows:

(1) Cinder River Section:

(A) from May 1 through September 30 within the lagoon into which the Cinder River drains (locally known as False Ugashik or Shagong);

(B) from August 1 through September 30 throughout this section;

5 AAC 09.320. Fishing periods

<http://www.legis.state.ak.us/basis/aac.asp#5.09.320>

(3) in the Cinder River Section, salmon may be taken only from 6:00 a.m. Thursday until 6:00 p.m. Saturday;

5 AAC 09.330. Gear

<http://www.legis.state.ak.us/basis/aac.asp#5.09.330>

(a) In the Northern District salmon may be taken in the

(1) Cinder River Section: with drift gillnets or set gillnets only;

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(m) In the Cinder River Section, fishing periods may be modified based on the abundance of king salmon stocks during May and June, sockeye salmon stocks during July, and coho salmon stocks after July.

5 AAC 39.120. Registration of commercial fishing vessels

<http://www.legis.state.ak.us/basis/aac.asp#5.39.120>

(d) Salmon net gear registration areas are as follows:

Bristol Bay Area ([5 AAC 06.100](#)) and January 1 through December 31, the Cinder River and Inner Port Heiden Sections of the Alaska Peninsula Area and August 1 through December 31, that portion of the Ilnik

Section within Ilnik Lagoon and all waters inside the Seal Islands of the Alaska Peninsula Area (5 AAC 09.200 (a) (1) - (3))

COMMENTS:

Current regulations allow for a commercial salmon fishery from August 1 through September 30 in the Cinder River Section. The Cinder River Section is an overlap area where both fishermen from Area T and M can fish.

Changing the start date from August 1 to June 20 will create a commercial sockeye salmon fishery within this section that would no doubt intercept large numbers of Bristol Bay-origin sockeye salmon. There is an obvious trend in Northern District fisheries with Bristol Bay origin fish comprising more of the harvest than local stocks the closer the fishery is to Bristol Bay (Figure 16). The Cinder River sockeye salmon fishery would most likely harvest a higher proportion of Bristol Bay-origin fish than any other Northern District Section fishery. We suspect that the proportion of Bristol Bay-origin salmon in this fishery may be very close to 100%. This extremely high interception of Bristol Bay-origin stocks is unacceptable. Further, this proposal also seeks to eliminate Area T fishermen from all commercial salmon fisheries in the Section except for fisheries within the lagoon. This also is unacceptable. Finally, the Bristol Bay-origin salmon stock is fully allocated and no further fisheries should be created that intercept Bristol Bay-origin salmon.

Escapement to the Cinder River has been above the high end of the SEG for a number of years (Figure 17). However, the newly ADF&G-recommended SEG for the Cinder River, 36,000 to 94,000 substantially reduces the past harvestable surplus of this stock (Figure 17) along with the need to create a fishery specifically on this stock. Additionally, we also believe that creating another sockeye salmon fishery which the harvest will be nearly all Bristol Bay-origin salmon is not the answer to control this escapement. We believe that this escapement can be at least partially controlled by allowing generous fishing time within the lagoon in which the Cinder River flows. We don't believe that opening a fishery in the section will do much to control Cinder River escapement, as the Outer Port Heiden does very little if anything to control Meshik River escapement.

BBEDC POSTION: OPPOSE

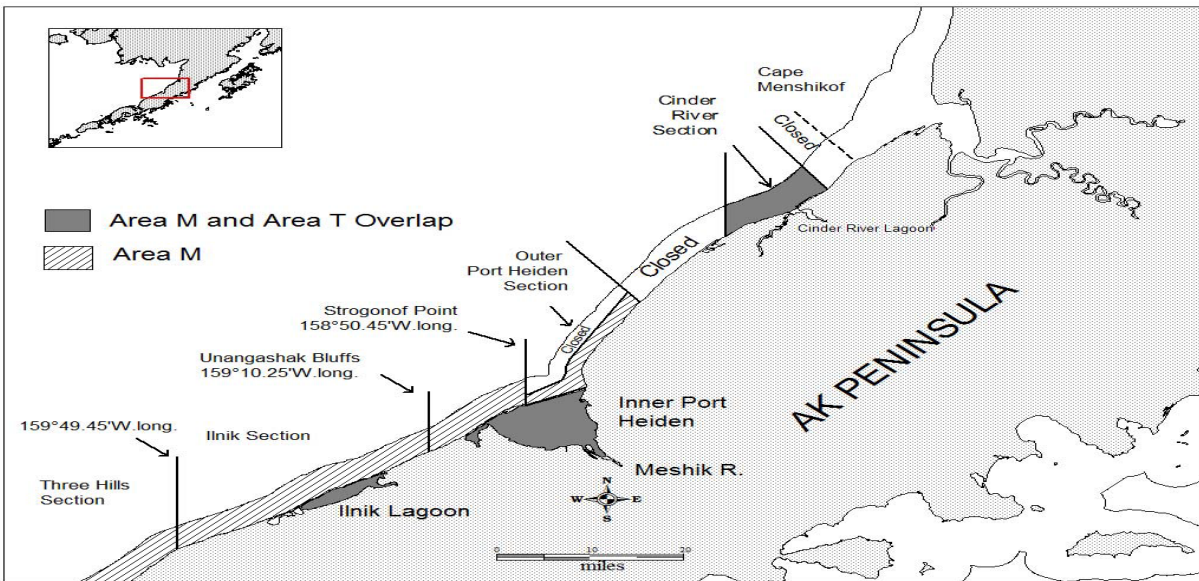


Figure 15. Map of the Northwestern portion of the Northern District of the Alaskan Peninsula Area, from the Three Hill Section to the Cinder River Section, showing Area M and Area T overlap and open and closed to commercial fishing sections. Note that the entire Cinder River Section is currently an Area M and Area T overlap area.

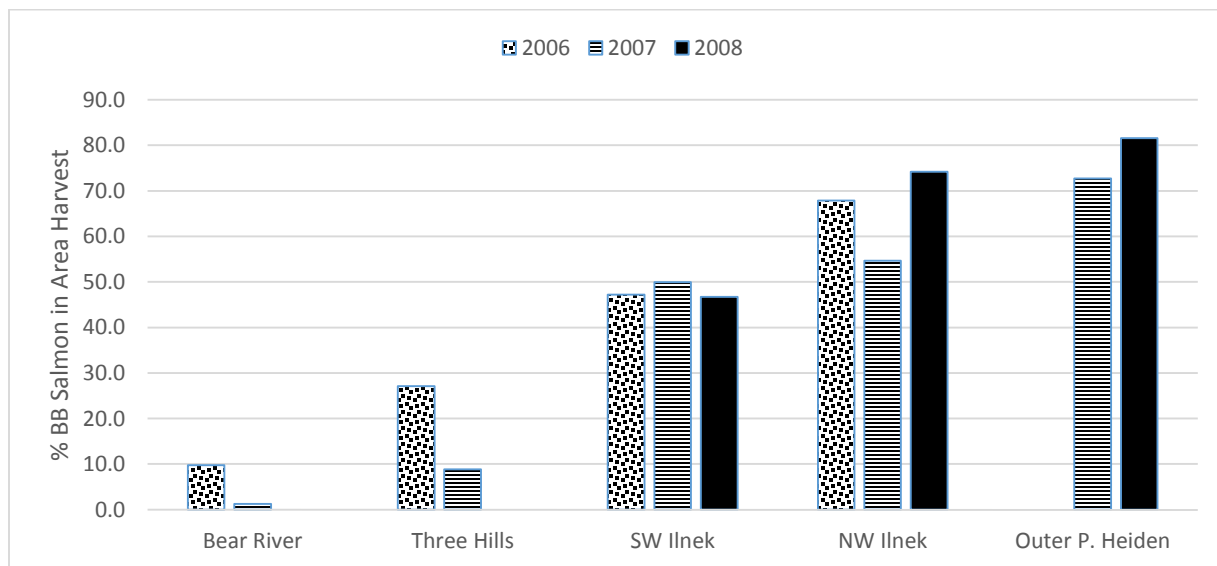


Figure 16. Proportion of Bristol Bay-origin sockeye salmon in the sockeye salmon fisheries from the most southwestern Section, Bear River Section, to the most Northeastern Section, Outer Port Heiden Section. Note the increasing trend from southwest to northeast. Outer Port Heiden fishery commenced in 2007.

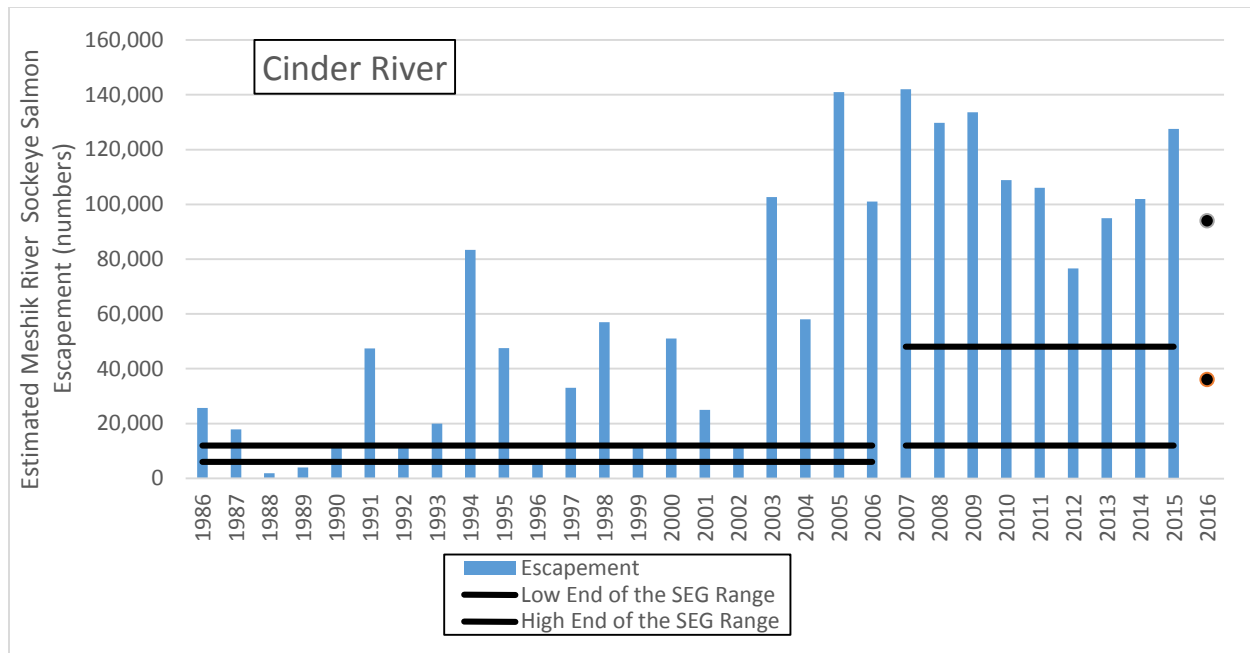


Figure 17. Estimated sockeye salmon escapement and associated sustainable salmon escapement goals (SEG) for the Cinder River, 1986-2015. The dots in 2016 represent the new ADF&G recommended SEG for this stock.

PROPOSAL 150 – 5 AAC 09.310. Fishing seasons. Describe waters of Cinder River Lagoon open to commercial salmon fishing:

PROPOSED BY: Alaska Department of Fish and Game

BBEDC POSITION: SUPPORT

ADF&G POSITION: SUPPORT

WHAT WOULD THIS PROPOSAL DO?

This proposal will define waters of Cinder River Lagoon that are currently open to commercial salmon fishing during scheduled weekly fishing periods.

CURRENT REGULATIONS:

5 AAC 09.310. Fishing seasons

<http://www.legis.state.ak.us/basis/aac.asp#5.09.310>

Current regulations do not describe Cinder River Lagoon, which is the only area of the Cinder River Section that can be commercially fished for salmon prior to August 1.

COMMENTS:



This is a house keeping proposal that would define the boundary line between the Cinder River Lagoon and the remaining portion of the Cinder River Section. This is important because commercial fishing is allowed prior to August 1 in the Cinder River Lagoon, but not in the remainder of the Section.

BBEDC POSITION: SUPPORT

PROPOSAL 151 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Consider the catch of non-local salmon as a factor in management of Northern District salmon fisheries

PROPOSED BY: Roland Briggs

BBEDC POSTION: NEUTRAL

ADF&G POSITION:

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

WHAT WOULD THIS PROPOSAL DO?

If adopted, as written, this proposal would direct ADF&G to manage the Northern District salmon fisheries on the basis of escapement information and catch per unit effort, and also take into account the percentage of the catch which is not of the targeted river.

COMMENTS: The intent of the proposal is to add another factor for ADF&G to consider when prosecuting Northern District salmon fisheries. This proposal would direct ADF&G to consideration the percentage of the catch which is not of the targeted river. There are several problems associated with this proposal.

Without a dedicated inseason GSI analysis of the catch, the percentage of the catch which is not of the targeted river would be unknown.

An in season GSI analysis of all the harvests in all the Northern District commercial fisheries would be prohibitively expensive

Although the proposal would direct ADF&G to consider the percentage of the catch which is not of the targeted river, specific information regarding the action ADF&G should take at certain percentages is lacking.

BBEDC POSITION: NEUTRAL

Realize that the timely inseason GSI analysis needed to manage in season would be very costly. Additionally, specific management actions at specific percentages need to be worked out and would be cumbersome.

PROPOSAL 152 – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. From June 20 through July 20 manage the Northern District salmon fisheries jointly with Alaska Department of Fish and Game Alaska Peninsula and Bristol Bay staff

PROPOSED BY: Roland Briggs

BBEDC POSITION: OPPOSE

ADF&G POSITION

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

WHAT WOULD THIS PROPOSAL DO?

This proposal would direct ADF&G Alaska Peninsula and Bristol Bay Management Area staff to jointly manage the Northern District salmon fisheries that occur from June 20 through July 20 through.

COMMENT: The Alaska BOF allocates resources; ADF&G manages the fisheries to achieve those allocations. The Alaska BOF creates regulations in a public process; ADF&G manages fisheries based on these regulations. A change in staff or joint management by different Area staff will not substantially alter the management of these fisheries. In order to effectively change the management of the Northern District fisheries, allocations and regulations must be changed within the BOF process.

BBEDC POSITION: OPPOSE

PROPOSAL 153 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Include information on the abundance of non-local salmon stocks as a factor in managing Northern District commercial salmon fisheries.

PROPOSED BY: Roland Briggs

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

What would this proposal do?

This proposal is similar to Proposal 151 but uses slightly different terminology. Instead of using the phrase, “*taking into account the percentage of catch which is not of the targeted river*”, this proponent of this proposal uses the phrase, “*taking into account the abundance of non-Northern Peninsula in the catch area.*”

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

COMMENTS: All comments regarding Proposal 151 also apply to this proposal. However, the proponent makes a very good points in his statement:

“From the WASSIP study it showed that a significant portion of the Northern Peninsula catch was actually destined for non-North Peninsula rivers therefore managing by escapement and catch per unit effort could allow over exploitation of a rivers run. Managing based on catch per unit effort when it is established that a large portion of the catch is not of the targeted river puts sustainability in question.”

We agree with this statement for Northern District sockeye salmon fisheries from the SW Ilnik Section up through the Outer Port Heiden fishery. These fisheries should not be managed on the bases of escapement to the targeted river and catch-per-unit effort because the majority or, in some fisheries, the vast majority of the catch, is from rivers that do not drain the Northern Peninsula. These are intercept fisheries that have little effect on the escapement to local rivers or rivers that drain into these sections. Note also that nearly all escapements are expressed in aerial survey counts which are vastly different from the number of actual fish. Catch, however, is the actual number of fish caught. When estimating total run to these rivers which expressed escapement in aerial survey counts of salmon, used a general expansion factor of 2.47 was used

to expand aerial survey counts into actual number of fish (see *Eggers, D. M., A. R. Munro, and E .C. Volk. 2012. Special Publication 12-15 of the WASSIP reports for more detail*). This means that every fish counted in the peak aerial survey count translates in to 2.47 actual fish that spawned. Conversely, every fish harvested from a local river only accounts for only 0.40 aerial survey counted fish. Using this expansion factor inseason complicates management.

Figure 18 depicts the interception rate for the Northern District sockeye salmon fisheries from 2006 – 2008 based on the WASSIP study by fishing Section. Interception is defined as salmon caught in these fisheries that were not of North Peninsula-origin. Northern District section harvests that are comprised of at least 40% intercepted salmon should be managed differently than fisheries that are primarily taking local stocks. These fisheries should not be managed based solely on escapement of local streams and catch per unit effort. For fishing Sections northeast of the Three Hills Section, another more appropriate management scenario, which includes the interception of non-local-bound sockeye salmon, should be constructed or the fishery should be eliminated or harvests reduced.

BBEDC POSITOIN: NEUTURAL

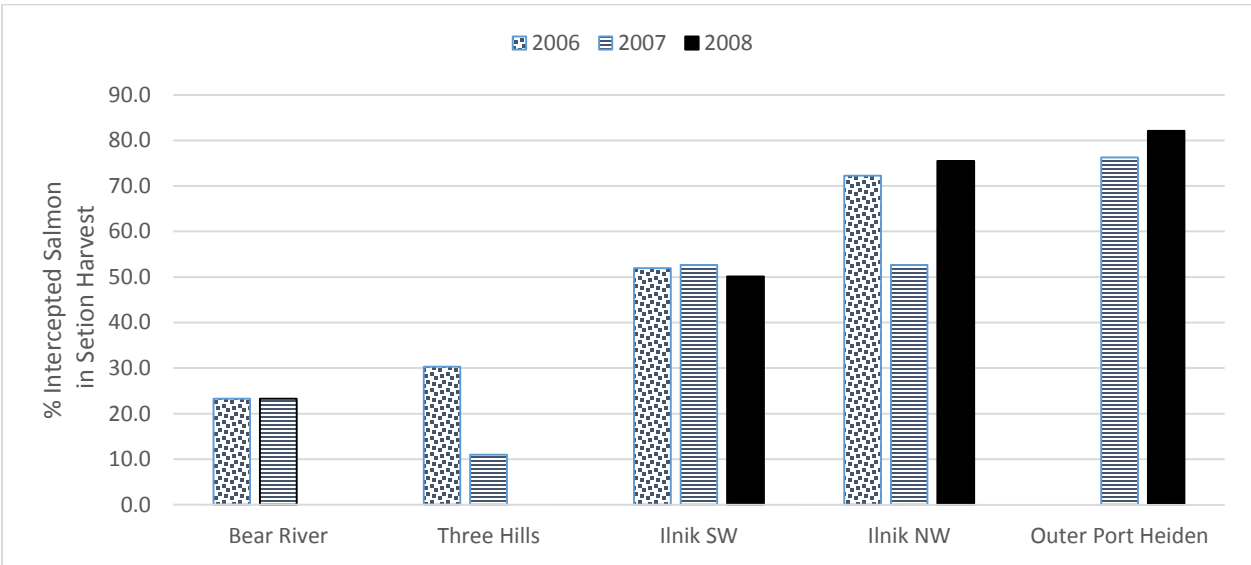


Figure 18. Estimated percent interception of salmon that originated in streams other than streams that drain the Northern Peninsula District, 2006-2008. Note that the Outer Port Heiden Fishery was closed to commercial fishing in 2006.

PROPOSAL 154 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Link management actions in the Northern District of the Alaska Peninsula Area commercial salmon fisheries to salmon abundance in adjacent Bristol Bay Area districts,

PROPOSED BY: Roland Briggs

BBEDC POSITION: OPPOSE

ADF&G POSITION:

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

WHAT WOULD THIS PROPOSAL DO? This proposal would direct ADF&G to use all available data to correct catch per unit effort numbers to reflect actual catch of the targeted river system to trigger a management action in the district.

Additionally, this would direct ADF&G to establish co-management for Northern District Sections with other ADF&G area or district managers under the following conditions:

If past studies have shown that 40% or more of the section harvest was of non-targeted stocks,

The ADF&G manager from the area that had 15% or more of the intercepted fish in the catch would co-manage that section with the Northern District ADF&G manager.

Or if past studies of catch in that area have shown the potential harvest of a particular river to be more than 30% of the low end escapement goal of a non-targeted river the area shall be co-managed.

The proposal would depend on WASSIP to start, but would rely on additional data as it is collected. If the managers disagree the commissioner would make the final decision.

COMMENT:

All comments previously stated for Proposal 151- 153 apply to this proposal.

This proposal would direct ADF&G to co-manage certain sections of the Northern District with ADF&G managers from areas that have a relatively high interception rate in the Northern District Sections fisheries. Based on WASSIP data, the SW Ilnik, NW Ilnik, and Outer Port

Heiden Sections would be co-managed by the Northern District manager and the Bristol Bay, Ugashik River District manager. There is a possibility that the Three Hills Section may also be co-managed under this proposal (Figure 18).

Bristol Bay managers have responsibilities within their district or districts for their fisheries. This proposal would have these managers split their duties between Bristol Bay and the Northern District sections. We believe that these Bristol Bay managers are fully tasked and cannot take on more management responsibility. This proposal would probably necessitate hiring an additional manager from Bristol Bay to be assigned as co-manager of the Northern District Sections that have the targeted interception rates. This proposal would be a management nightmare. As stated in previous proposals the managers would have to follow the management plan and we believe that the co-management of these select Northern District Sections would have little effect over management by the Northern District manager alone. Instead of concentration of reducing interception of non-target stocks through co- or joint-management, the primary effort should be aimed at changing the management plan and altering the fishery harvest through regulation.

BBEDC POSITION: OPPOSE.

PROPOSAL 155 – 5 AAC 09.310. Fishing seasons; 5 AAC 09.320. Fishing periods; 5 AAC 09.330 Gear; 5 AAC 09.350. Closed waters; and 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Close the Outer Port Heiden Section of the Northern District to commercial salmon fishing

PROPOSED BY: Mitch Seybert

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPOSAL DO?

This proposal would close the Outer Port Heiden Section to commercial fishing; it would revert back to the regulations prior to 2007.

CURRENT REGULATIONS:

5 AAC 09.310. Fishing seasons:

<http://www.legis.state.ak.us/basis/aac.asp#5.09.310>

(2) Port Heiden Sections:

(A) Inner Port Heiden Section: from May 1 through September 30;

(B) Outer Port Heiden Section: from June 20 through July 31

5 AAC 09.320. Fishing periods

<http://www.legis.state.ak.us/basis/aac.asp#5.09.320>

(4) in the Outer Port Heiden, Inner Port Heiden, and Ilnik Sections, salmon may be taken only from 6:00 a.m. Monday until 6:00 p.m. Wednesday...

5 AAC 09.330. Gear

<http://www.legis.state.ak.us/basis/aac.asp#5.09.330>

(10) Outer Port Heiden Section: with drift gillnets only.

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

(3) Outer Port Heiden: waters of the Outer Port Heiden Section

(A) between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line;

(B) east of a line from 57_ 05.52' N. lat., 158_ 34.45' W. long. to 57_ 08.85' N. lat., 158_ 37.50' W. long.;

COMMENTS: We reference all comments made regarding the Outer Port Heiden commercial fishery in Proposals 22 and 23. The proponent of Proposal 155 does an excellent job of outlining his reasons for closing the Outer Port Heiden Section to commercial fishing. There is no need to reiterate those reasons here. However, BBEDC would like to highlight that the main reason that the BOF allowed the opening of the Outer Port Heiden Section in 2007, control of Meshik River sockeye salmon escapement, has now evaporated primarily because of increases in the SEG since 2006. Prior to 2007, the Sustainable Escapement Goal (SEG) range for the Meshik River was from 10,000 to 20,000 sockeye salmon. However, escapements to the Meshik River regularly exceeded 80,000 sockeye salmon. At that time, it appeared that there was a very large surplus of sockeye salmon that could be harvested. However, in 2007, ADF&G increased the Meshik River sockeye salmon SEG to 20,000 to 60,000 sockeye salmon, reducing the number of salmon that were in excess of the SEG. Further, in 2010, ADF&G again changed this goal to 25,000 to 100,000, effectively substantially reducing or eliminating the excess salmon above the SEG that was perceived at the 2007 BOF Area M meeting (Figure 19). Again, ADF&G is recommending another change to the Meshik River SEG for sockeye salmon, starting in 2016 (Figure 19). Although this new goal reduces the high end of the SEG by only 14,000 salmon to 86,000 sockeye salmon, ADF&G recommends that the low end of the SEG be raised to 48,000 sockeye salmon, which nearly doubles the current SEG of 25,000 sockeye salmon (Figure 19). Even with the reduction in the high end of the SEG, there is a limited surplus of Meshik River sockeye salmon available for harvest.

It is apparent the Outer Port Heiden Section fishery does not harvest substantial quantities, of Meshik River-origin fish nor does it target Meshik River-origin salmon. Note the harvest rate on Meshik River sockeye salmon was 11.5% in 2007 and 13.3% in 2008 in the WASSIP years. However, In the Boatright et al (2016) study, during 2014 and 2015, Meshik River-origin salmon contributed 0% to both years combined samples. Although Meshik River-origin salmon were

detected, they accounted for 1% in the first two sampling periods of 2015, but accounted for 0% in the five other sampling periods within the open area for both years (Figure 20). Because of these reasons, we conclude that the Outer Port Heiden fishery is not meeting the objectives originally established for this fishery. Therefore, we believe that this fishery should be closed.

During the 2007 BOF Area M finfish meeting, the BOF deliberated on Proposal 210. According to Staff Comments, the intent of proposal 210 was unclear but ADF&G believed that “... *this proposal would reduce most of the fishing area on the North and South Alaska Peninsula to within one mile of land from May 1 through June 30.*” ADF&G goes on to say, “*The Outer Port Heiden Section has been closed to commercial fishing since 1990. The proposal is unclear and may be requesting that sections closed to commercial salmon fishing such as Outer Port Heiden and Caribou Flats sections be open to commercial salmon fishing from May through June 30 within one mile of the beach.*”

Proposal 210 cites only one regulation: 5AAC 09.200 Description of districts and sections.

The proponent also states that his proposal would “***Bring boundary into one mile from May 1 – June 30 for sockeye salmon***”.

The issue stated was: “***Ability to go out three miles in Port Heiden, Three Hills and Ilnik fishing sections for sockeye salmon.***”

He answered the following questions in the proposal:

What will happen if nothing is done? ***Continued interception of fish***”

Who is likely to benefit? ***Terminal fisheries.***

Who is likely to suffer? ***No one as fishermen as fishermen can adequately harvest terminal fisheries.***

Other solutions considered? ***Past solutions, under current board, have reverted 3 years.***

In 2007, Proposal 210 was submitted by Roland Briggs. Mr. Briggs was a well-known Bristol Bay fisherman who worked diligently to reduce the interception of Bristol Bay fish in the Area M fisheries. It appears to me that the proponent intended to bring in the boundary line for all Northern District Fishing Sections from 3 miles to 1 mile. It also appears to me that he erred in including Port Heiden in his issue statement since that Section was already closed to commercial fishing. I think that any reasonable person would come to the same conclusion about the intent of the proposal. ADF&G did not.

In the February 2007 ADF&G Staff comments regarding this proposal, under BACKGROUND, ADF&G state, *Past tagging, migration, and genetic studies indicate that Bristol Bay sockeye salmon are well offshore of North Peninsula fisheries.*

Based on the WASSIP GSI study, we now know that the statement provided to the BOF in 2007 by ADF&G regarding the availability of Bristol Bay-origin to the Northern Peninsula fisheries is false. Bristol Bay sockeye salmon may be offshore in the vicinity of Port Moller (Figure 21 and 22) but their contribution to fishery harvests increases dramatically as fishery sections are located closer to Bristol Bay (Figure 22 and 23). Figure 24 depicts the current fishing area and closed area within the Outer Port Heiden Section.

BBEDC also points out that when the Outer Port Heiden Section was opened to commercial fishing in 2007, the composition of the catch was basically unknown. However, ADF&G staff comments, indicate that ADF&G believed that “...*Bristol Bay sockeye salmon are well offshore of North Peninsula fisheries.*” This belief led the BOF to assume that the Outer Port Heiden commercial fishery would be primarily fishing on local North Peninsula stocks. Since that is obvious false for the Outer Port Heiden commercial fishery, we ask the BOF to reconsider their decision made in 2007. We also ask to BOF to reevaluate the fishery in terms of this new information and in light of 5 AAC 39.220, Policy for the management of mixed stock salmon fisheries (<http://www.legis.state.ak.us/basis/aac.asp#5.39.212>, specifically under (d):

(d) Most wild Alaska salmon stocks are fully allocated to fisheries capable of harvesting available surpluses. Consequently, the board will restrict new or expanding mixed stock fisheries unless otherwise provided for by management plans or by application of the board's allocation criteria. Natural fluctuations in the abundance of stocks harvested in a fishery will not be the single factor that identifies a fishery as expanding or new.

The Bristol Bay sockeye salmon stock was fully allocated in 2006. The new Outer Port Heiden commercial fishery catches more fish that originate in Bristol Bay than any other Northern Peninsula commercial fishery (Figure 23). The Outer Port Heiden Section now accounts for as much as 41.5% of the total Northern District Harvest. The increasing proportion of the Outer Port Heiden commercial harvest to the total Northern District harvest, combined with the highest interception rate of Bristol Bay-origin salmon among Northern District Fishing Sections, will no doubt result in more and a higher proportion of Bristol Bay-origin salmon being harvested in the Northern District fisheries.

BBEDC POSTION: SUPPORT

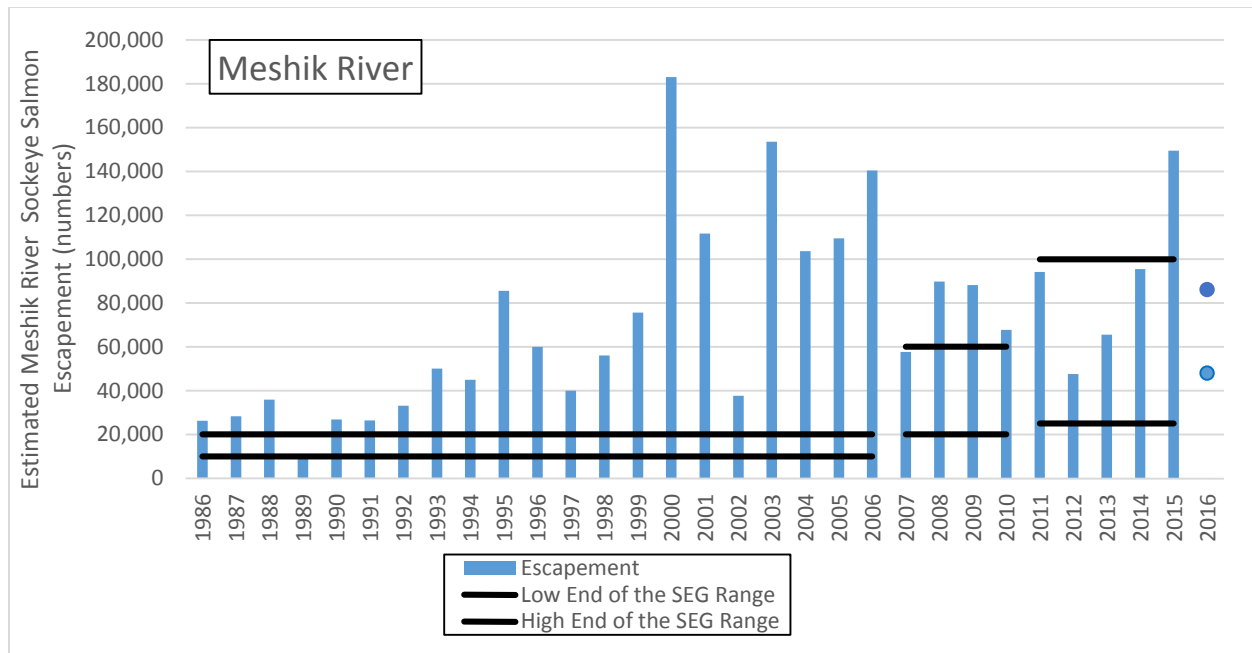


Figure 19. Estimated Meshik River sockeye salmon escapement and associated Sustainable Salmon Escapement (SEG) ranges, 1986-2015. The dots in 2016 represent the new ADF&G recommended SEG for this stock.

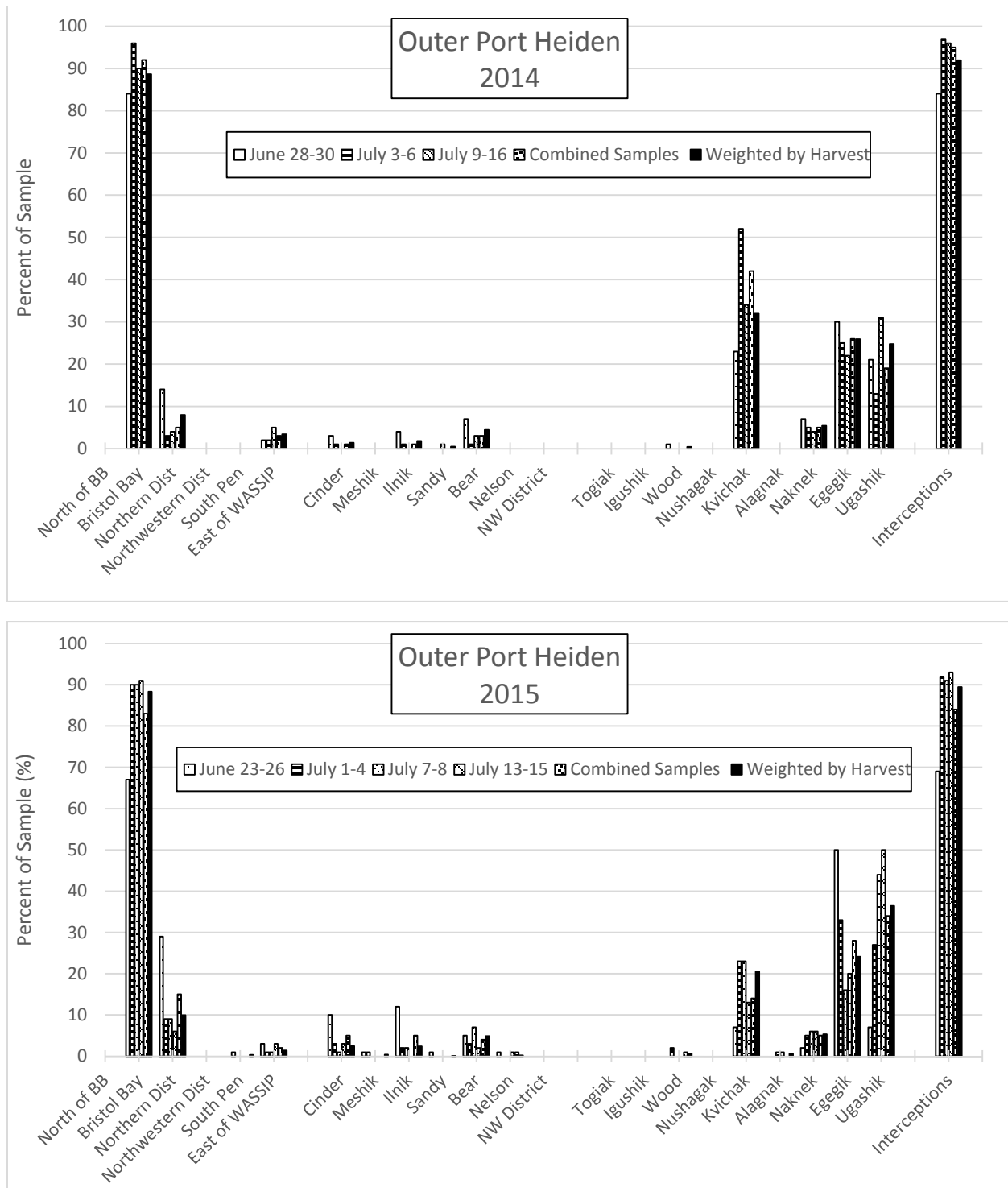


Figure 20. Comparative overall stock composition by regional and fine-scale reporting groups, showing unweighted and weighted samples for the season proportion, open portion of the Outer Port Heiden Section, 2014 (above) 2015 (below).

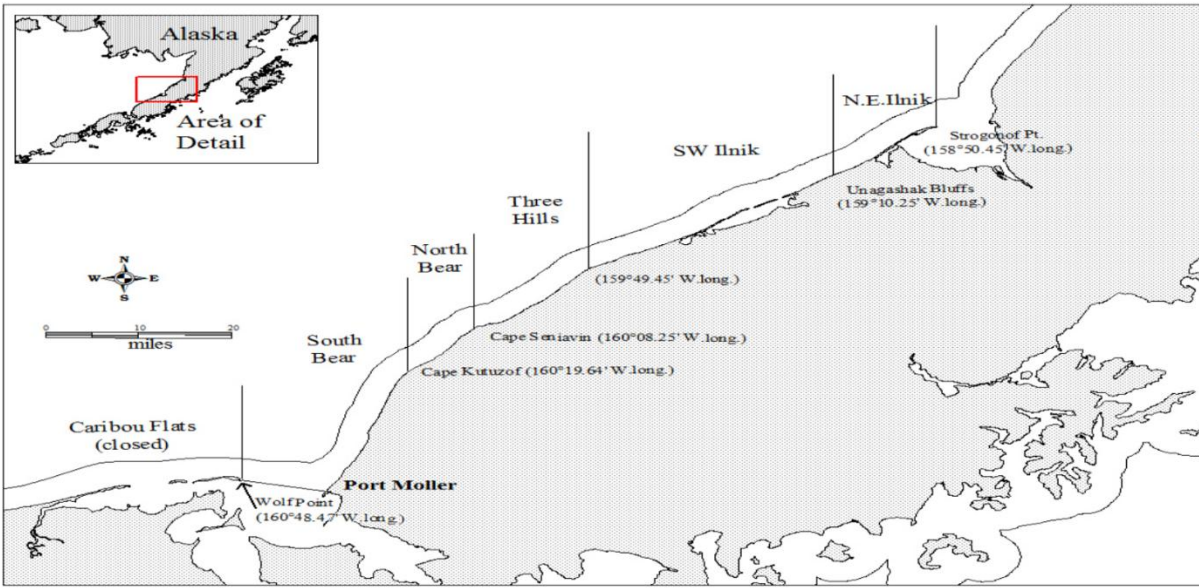


Figure 21. Map of part of the southwestern portion of the Northern District of the Alaska Peninsula Management Area.

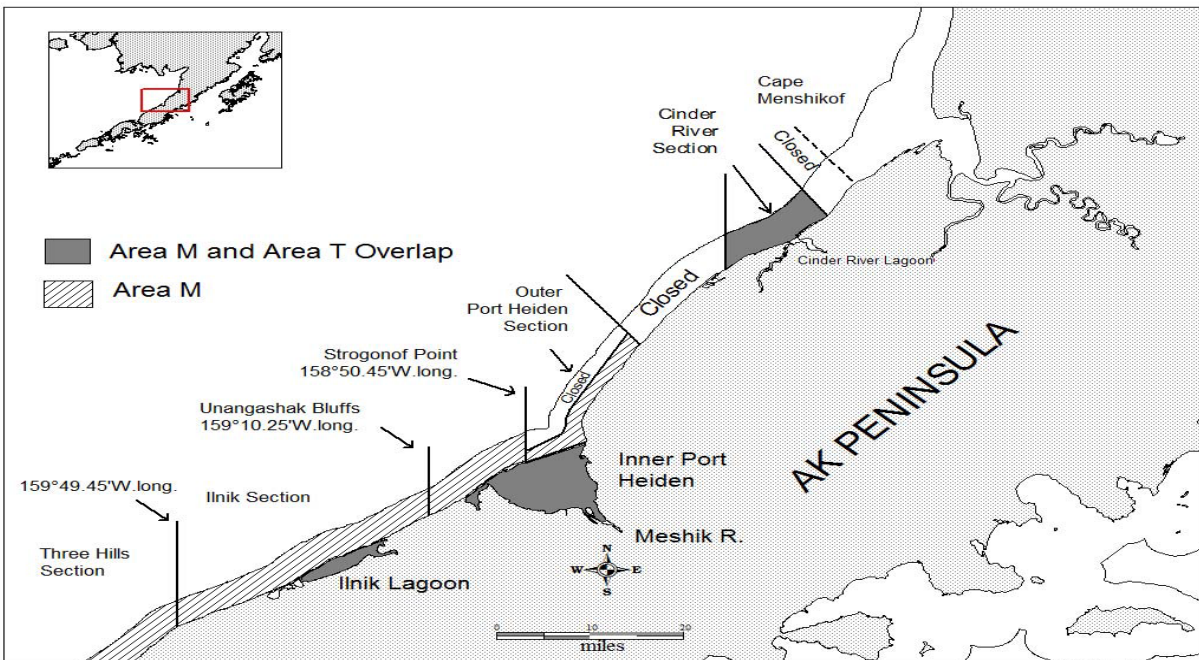


Figure 22. Map of the Northwestern portion of the Northern District of the Alaskan Peninsula Area, from the Three Hill Section to the Cinder River Section

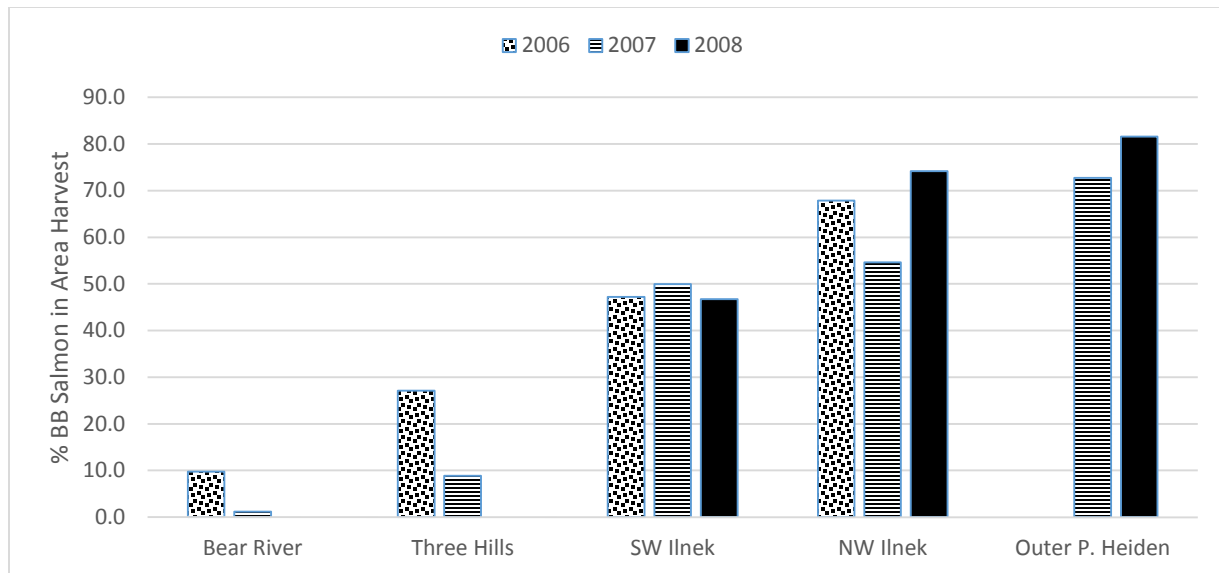


Figure 23. Proportion of Bristol Bay-origin sockeye salmon in the sockeye salmon fisheries from the most southwestern Section, Bear River Section, to the most Northeastern Section, Outer Port Heiden Section. Note the increasing trend from southwest to northeast. Outer Port Heiden fishery commenced in 2007.

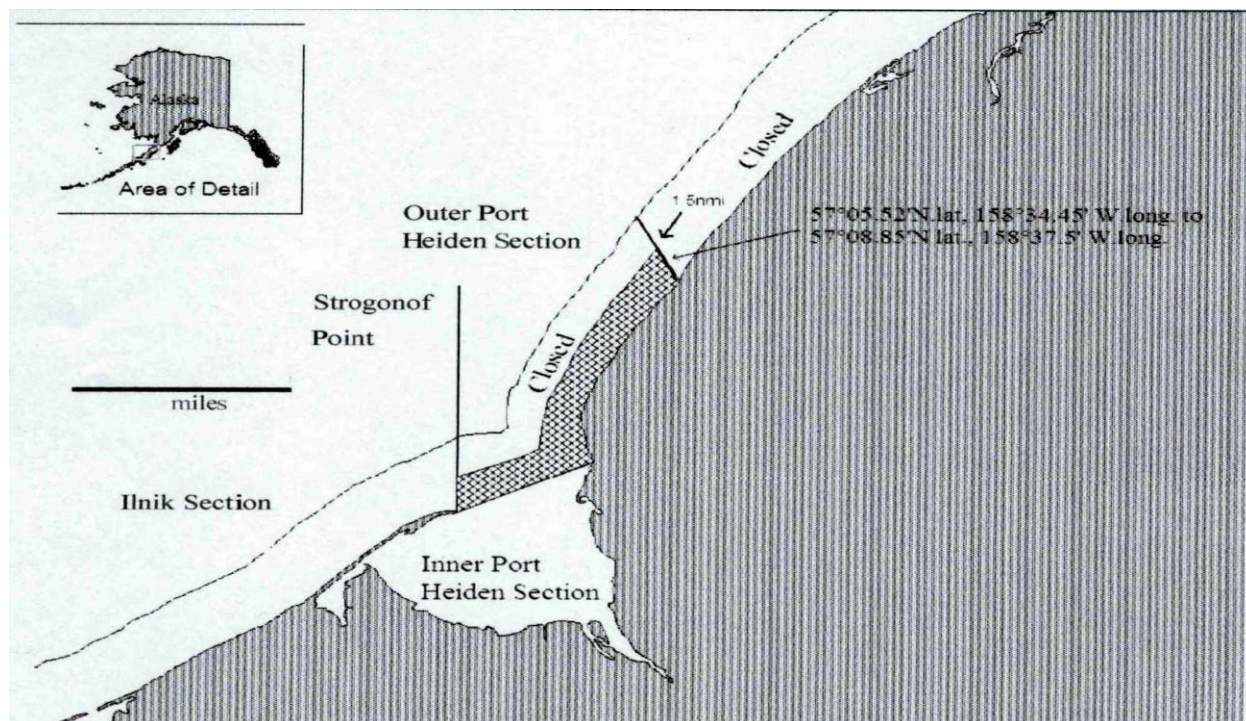


Figure 24. Map of the Port Heiden Section showing open and closed commercial fishing areas within the Outer Port Heiden Section.



PROPOSAL 156 – 5 AAC 09.310. Fishing seasons; and 5 AAC 09.350. Closed waters. Close the Outer Port Heiden Section of the Northern District to commercial salmon fishing,

PROPOSED BY: Kurt Johnson

BBEDC POSITION: NO ACTION (SUPPORT PROPOSAL 155)

ADF&G POSITIOIN:

WHAT WOULD THIS PROPOSAL DO?

This proposal would close the Outer Port Heiden Section to commercial fishing; it would revert back to the regulations prior to 2007.

CURRENT REGULATIONS:

5 AAC 09.310. Fishing seasons

<http://www.legis.state.ak.us/basis/aac.asp#5.09.310>

(2) Port Heiden Sections:

(A) Inner Port Heiden Section: from May 1 through September 30;

(B) Outer Port Heiden Section: from June 20 through July 31

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

(3) Outer Port Heiden: waters of the Outer Port Heiden Section

(A) between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line;

(B) east of a line from 57_ 05.52' N. lat., 158_ 34.45' W. long. to 57_ 08.85' N. lat., 158_ 37.50' W. long.;

COMMENT:

Reference comments made for Proposal 155

BBEDC POSITION: NO ACTION (Support Proposal 155)

PROPOSAL 157 – 5 AAC 09.320. Fishing periods.

In the Inner and Outer Port Heiden sections of the Northern District restrict commercial fishing for salmon to no more than four days in any seven-day period, as follows:

PROPOSED BY: Lower Bristol Bay Advisory Committee

BBEDC POSTION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?



This proposal seeks to restrict fishing time, but the current regulations provide only for 2.5 days in a seven-day period. This would effectively add fishing time to the weekly schedule.

CURRENT REGULATIONS:

5 AAC 09.320. Fishing periods

<http://www.legis.state.ak.us/basis/aac.asp#5.09.320>

(4) in the Outer Port Heiden, Inner Port Heiden, and Ilnik Sections, salmon may be taken only from 6:00 a.m. Monday until 6:00 p.m. Wednesday,

COMMENTS:

We do not support increasing fishing time in Area M because any increase of fishing time would increase interception of Bristol Bay sockeye salmon stocks.

BBEDC POSITION: OPPOSE

PROPOSAL 158 — 5 AAC 09.350. Closed waters. Restrict commercial salmon fishing in the Three Hills, Ilnik, and Outer Port Heiden sections of the Northern District to no more than one and one-half miles offshore, as follows:

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee

BBEDC POSITION: SUPPORT AS AMENDED (exclude the Three Hills Section)

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

This proposal would close the waters between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line for the Three Hills and Ilnik Sections of the Northern District. This proposal also requests this closure be applied to the Outer Port Heiden Section but those waters are already closed by regulation 5 AAC 09.350 (3)(A).

CURRENT REGULATIONS:

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

(3) Outer Port Heiden: waters of the Outer Port Heiden Section

(A) between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line;

(B) east of a line from 57_ 05.52' N. lat., 158_ 34.45' W. long. to 57_ 08.85' N. lat., 158_ 37.50' W. long.;

COMMENTS:

Closing the outer portion of these sections, especially the Ilnik Section, will probably decrease the interception of Bristol Bay-origin sockeye salmon.

It appears that the mature Bristol Bay-origin salmon, as migrate northeasterly along the North Alaska Peninsula towards their natal areas, may be migrating closer to shore as they approach Bristol Bay. Evidence supporting this theory is based on the varying but increasing proportion of

Bristol Bay-origin salmon in commercial fisheries in the Northern District Sections from southwest to northeast. Relatively low proportional contributions of Bristol Bay-origin salmon were observed in the most southwestern section, the Bear River Section, as measured in the WASSIP Study, and greatest in the most northeastern section, the Port Heiden Section (Figure 25). Additional evidence to support this theory is the lack of large harvests and fishing effort in the Northwestern District. In 2015, the total sockeye salmon harvest in the Northwestern District was only 31,705 salmon and most of those salmon, 21,678 salmon, were harvested within the Moffett Bay area. The small harvest and very low participation, 8 permit holders, in the commercial sockeye salmon fishery of the Northwestern District is most like due to the lack of fish from major producing streams in this area but also because of the lack of Bristol Bay-origin salmon out to the 3-mile boundary line. Accordingly, we believe that the vast majority of the Bristol Bay sockeye salmon run is probably unavailable to commercial fishers in the Northwestern District because they are farther offshore, as also evidenced by the Port Moller test fishery. However, the proportion of Bristol Bay-origin salmon in these areas may vary from year to year based on a number of unknown factors.

We recommend that closed waters be established in both Ilnek Sections, just as the area opened to commercial fisheries is limited in the Outer Port Heiden Section. Closed waters in the Ilnek Sections should read: **between the three-mile seaward boundary line, described in 5 AAC 09.301, and a line that is one and one-half miles shoreward of the three-mile seaward boundary line.;**

BBEDC POSITION: SUPPORT AS AMENDED

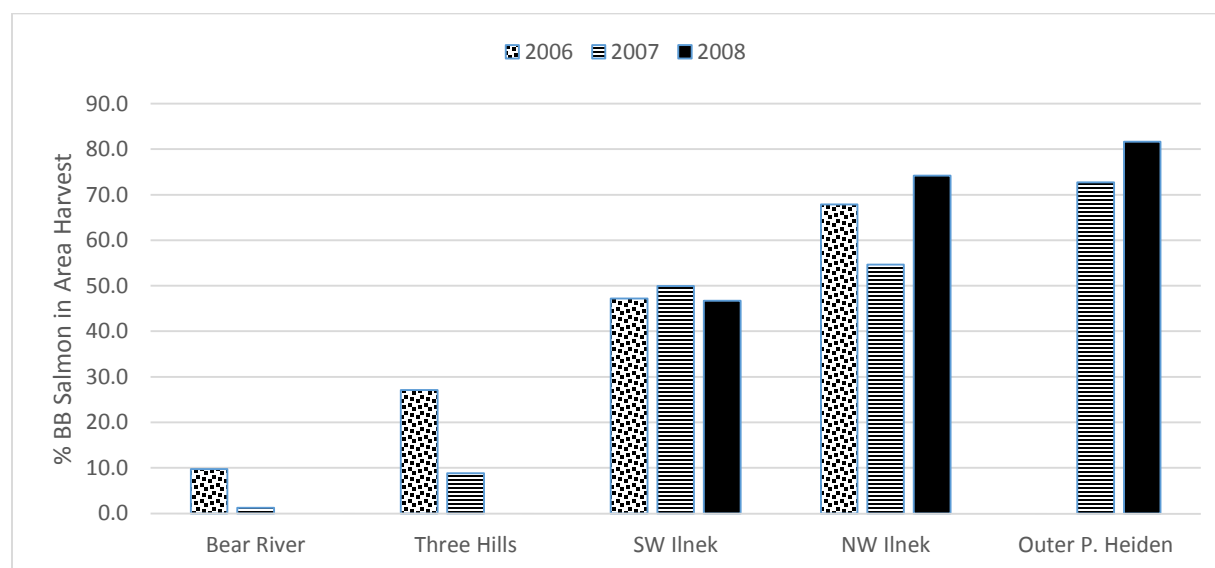


Figure 25. Proportion of Bristol Bay-origin sockeye salmon in the sockeye salmon fisheries from the most southwestern Section, Bear River Section, to the most Northeastern Section, Outer Port Heiden Section. Note the increasing trend from southwest to northeast. Outer Port Heiden fishery commenced in 2007.

PROPOSAL 159 – 5 AAC 09.350. Closed waters. Open waters of the Outer Port Heiden Section of the Northern District from one and one half miles to three miles offshore to commercial salmon fishing, as follows:

PROPOSED BY: Concerned Area M Fishermen

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

This proposal would open the waters between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line for the Outer Port Heiden Section.

CURRENT REGULATIONS:

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

(3) Outer Port Heiden: waters of the Outer Port Heiden Section

(A) between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line;

(B) east of a line from 57_ 05.52' N. lat., 158_ 34.45' W. long. to 57_ 08.85' N. lat., 158_ 37.50' W. long.;

COMMENTS:

The reason provided by the proponent for opening the 1.5 miles seaward of the current closure line to the 3-mile limit is:

These closed waters should be reopened in the interest of an orderly and safe fishery. The current open area, inside one and one-half miles, includes shallow waters and obstacles (e.g., snags) that are difficult and dangerous to fish in heavy weather, particularly during night hours. The three-mile line is well defined in charting programs,

There are several good reasons not to allow more area to be fished in the Outer Port Heiden Section. They are: 1. The extremely high contribution of Bristol Bay-origin salmon to the Outer Port Heiden commercial harvest; 2, the increasing sockeye salmon harvest from the Outer Port Heiden Section, and 3. The high contribution of the Outer Port Heiden Section harvest to the total Northern District harvest.

It appears that the mature Bristol Bay-origin salmon, as migrate northeasterly along the North Alaska Peninsula towards their natal areas, may be migrating closer to shore as they approach Bristol Bay. Evidence supporting this theory is based on the varying but increasing proportion of Bristol Bay-origin salmon in commercial fisheries in the Northern District Sections from southwest to northeast observed in the WASSIP data. Relatively low proportional contributions of Bristol Bay-origin salmon were observed in the most southwestern section, the Bear River Section, as measured in the WASSIP Study, and greatest in the most northeastern section, the Port Heiden Section (Figure 26). Additional evidence to support this theory is the lack of large

harvests and fishing effort in the Northwestern District. In 2015, the total sockeye salmon harvest in the Northwestern District was only 31,705 salmon and most of those salmon, 21,678 salmon, were harvested within the Moffett Bay area. The small harvest and very low participation, 8 permit holders, in the commercial sockeye salmon fishery of the Northwestern District is most like due to the lack of fish from major producing streams in this area but also because of the lack of Bristol Bay-origin salmon out to the 3-mile boundary line. Accordingly, we believe that the vast majority of the Bristol Bay sockeye salmon run is probably unavailable to commercial fishers in the Northwestern District because they are farther offshore, as also evidenced by the Port Moller test fishery.

Prior to the BOF allowing commercial fishing in the Outer Port Heiden Section, starting in 2007, the contribution, by section, to the total Northern District sockeye salmon harvest was dominated by the Ilnek Section (Figure 27). Since commercial fishing in the Outer Port Heiden Section was allowed, the harvest from the Ilnek Section has dramatically declined from 57.0% of the total Northern District harvest in 2006 to 11.7% in 2013. Conversely, the Outer Port Heiden contribution to the total Northern District Harvest increased from 0% in 2006 to 41.5% in 2009. Accordingly, the Outer Port Heiden harvest now is the largest section harvest in the Northern District (Figure 28). A record harvest occurred in the Outer Port Heiden Section in 2015 of 867,350 sockeye salmon (Figure 26), which more than doubled the 2007-2014 average harvest of 357,675 sockeye salmon. This harvest was the largest of any sectional harvest of any Northern District Section since 2008. Note that in 2013, the BOF closed that portion of the Outer Port Heiden Section from the 3-mile offshore boundary to line 1.5 miles shoreward of the 3-mile boundary line. This was done to reduce the interception of Bristol Bay sockeye-salmon. Effectively cutting the allowed fishing portion in half appears to have had little effect on the harvest from this Section and the proportion to the total Northern District harvest. In 2013 and 2015, the harvest and associated proportional contribution to the Northern District harvest was highest in the Northern District (Figure 27 and 28). While the Boatright et al 2016 study indicated there was no difference in the samples collected from the open and closed area, the high interception of Bristol Bay-origin salmon stock, as documented by WASSIP and Boatright et al. (2016), supports the closure of this fishing section and certainly not an expansion of the fishing area.

Increasing the area open to commercial fishing in the Outer Port Heiden Section will probably increase the efficiency of the fleet, increase the size of the fleet fishing the Outer Port Heiden Section, increase the harvest from this section, increase the contribution of the Outer Port Heiden harvest to the total Northern District sockeye salmon harvest and ultimately increase the harvest of Bristol Bay-origin and proportional contribution of Bristol Bay-origin fish in the total Northern District harvest. The Bristol Bay-origin salmon stock is fully allocated and any increase in the size of fishing areas and associated fishery harvest is against the mixed stock policy of the BOF and should not be allowed.

BBEDC POSITION: OPPOSE

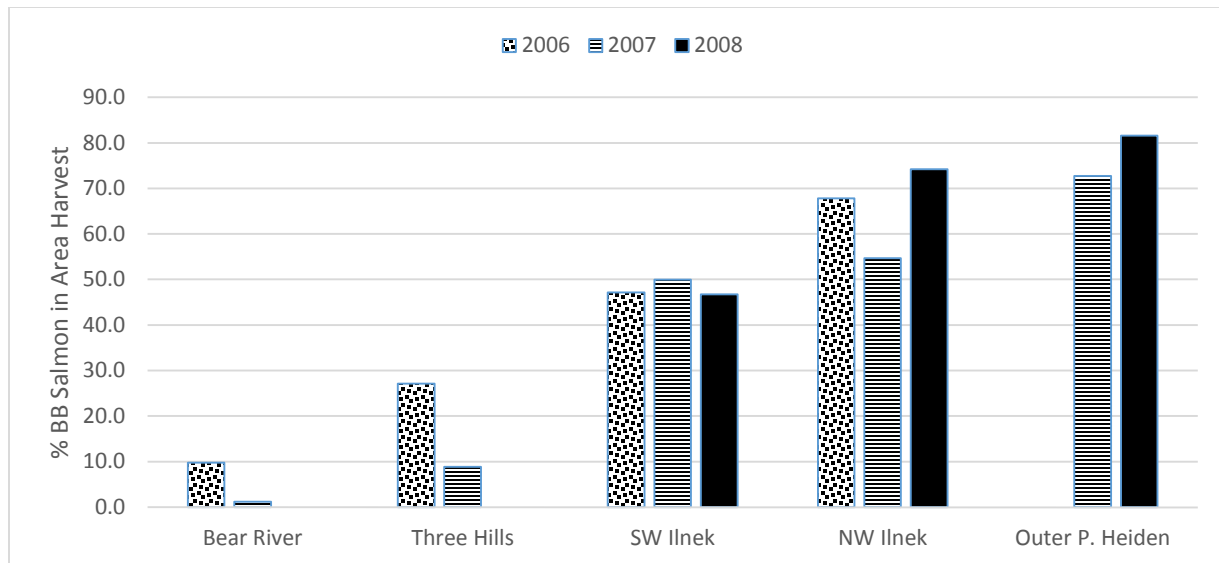


Figure 26. Proportion of Bristol Bay-origin sockeye salmon in the sockeye salmon fisheries from the most southwestern Section, Bear River Section, to the most Northeastern Section, Outer Port Heiden Section. Note the increasing trend from southwest to northeast. Outer Port Heiden fishery commenced in 2007.

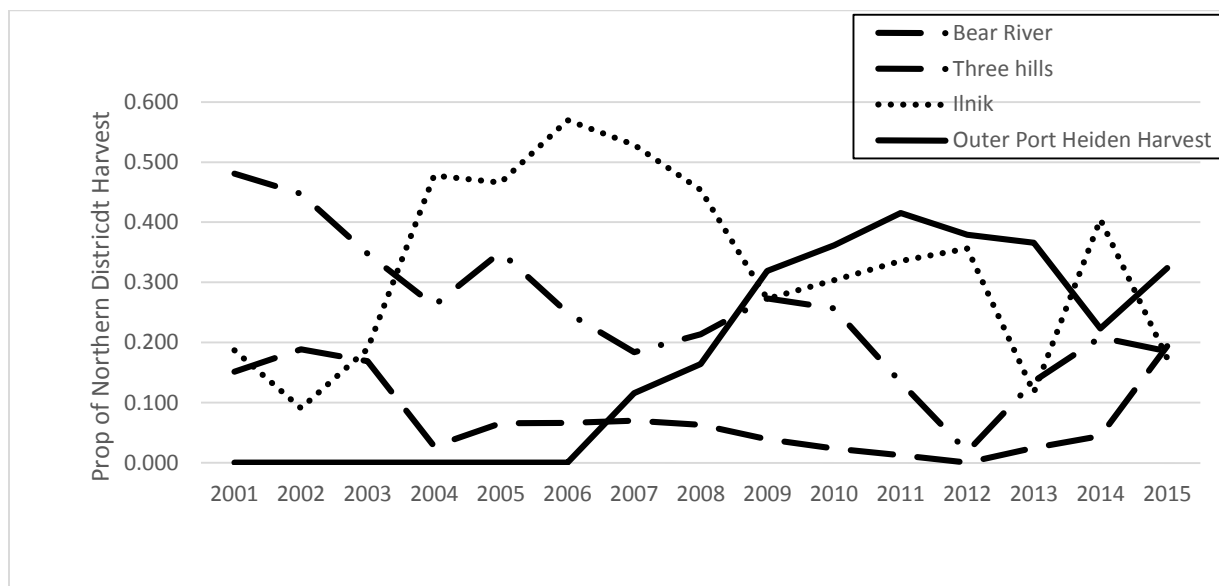


Figure 27. Comparative estimated proportion contribution of the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections to the Northern District sockeye salmon harvest, 2001-2015.

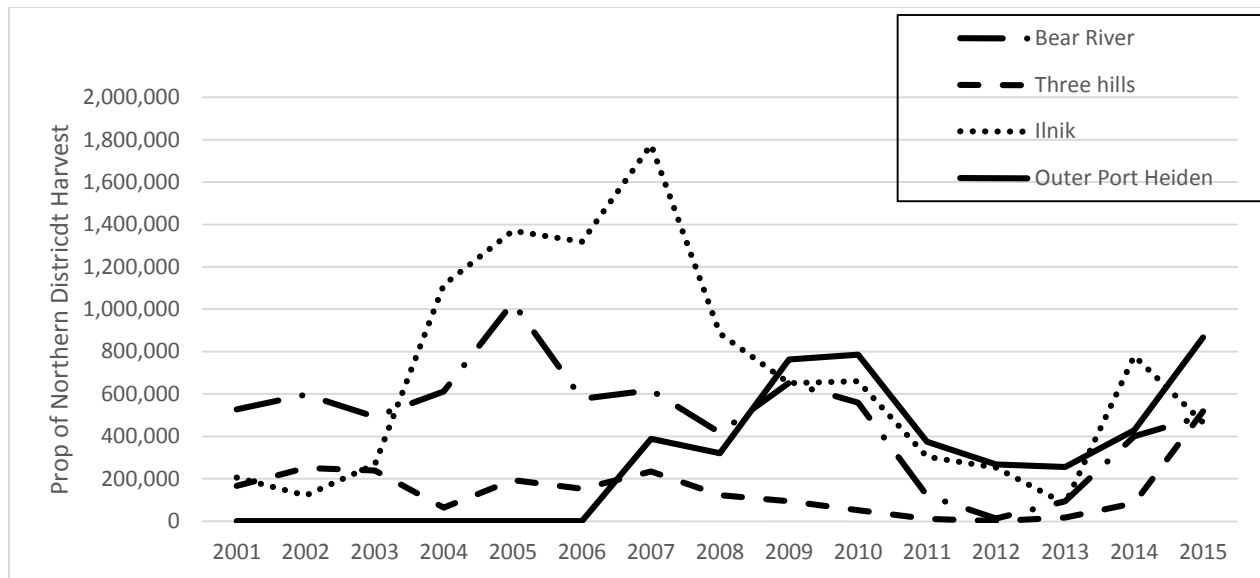


Figure 28. Comparative commercial sockeye salmon harvest from the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections of the Northern District, 2001-2015.

PROPOSAL 160 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Close waters of the Bear River and Nelson Lagoon sections of the Northern District between zero to one and one-half miles offshore to commercial salmon fishing with drift gillnet gear until escapement objectives have been met,

PROPOSED BY: Ray Johnson

BBEDC POSITION: NEUTRAL:

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

This proposal would close waters of the Bear River Section of the Northern District between zero to one and one-half miles offshore and the Nelson Lagoon to commercial salmon fishing with drift gillnet gear until escapement objectives have been met. This proposal is not specific to time of the closure nor the salmon species. We can only assume that the proposer means all species and all fishing seasons.

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

Specific regulations apply to each section and some portions of sections for each fishing season and species.

COMMENTS:

The proponent is extremely nebulous as what the proposal seeks. It appears that the proponent is asking that the inshore portion of the Bear River Section and Nelson Lagoon Sections be closed until escapements are achieved. Bear River Section harvests have been shown to contain very small proportions of Bristol Bay-origin salmon. Therefore, BBEDC will remain NEUTRAL on this proposal and defer to the affected people in this area.

BBEDC POSITION: NEUTRAL

PROPOSAL 161 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Close waters of the Northern District between zero and one and one-half miles offshore to commercial fishing with drift gillnet gear when Bear River and/or Nelson River coho salmon escapements do not meet objectives,

PROPOSED BY: Ray Johnson

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

This proposal would restrict the area available to commercially fish for salmon from August 15 to September 30 in the entire Northern District. Specifically, this proposal would allow fishing only in the area between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line. The waters from the shore to the 1.5 mi boundary line would be closed to commercial fishing in all Northern Districts. Note that this proposal only relates to the following sections: Bear River, Three Hills, and Ilnek Sections. All other sections are closed. This proposal has no effect on the Inner Port Heiden and other bay and lagoon fisheries.

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.



(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

Specific regulations apply to each section and some portions of sections for each fishing season and species.

COMMENTS:

This proposal should be discussed by all affected fishers within the Northern District in conjunction with ADF&G. An amendment to this proposal would be to change the time period from August 15 to September 30 to date from June 1 to September 30. This would most likely decrease the interception of all species of salmon migrating to other than Northern Peninsula natal streams.

BBEDC POSITION: NEUTRAL

PROPOSAL 162 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Close waters of the Northern District between zero and one and one-half miles offshore to commercial fishing with drift gillnet gear when Bear River and/or Nelson River sockeye salmon escapements do not meet objectives

PROPOSED BY: Ray Johnson

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal will close waters of the Northern District between zero and one and one-half miles offshore to commercial fishing with drift gillnet gear when Bear River and/or Nelson River sockeye salmon escapements do not meet objectives

CURRENT REGULATIONS:

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

Specific regulations apply to each section and some portions of sections for each fishing season and species.

COMMENTS:

While the main purpose of this proposal is to protect Bear River and/or Nelson River sockeye escapements, the unintended consequences of this proposal, if adopted as written, would be to move the entire fleet into the waters between the 3-mile boundary limit and the 1.5 miles from shore. Moving the fleet offshore would most likely increase the interception of stocks that migrating to AYK and Bristol Bay natal streams. In other words, this would most likely increase the interception of Bristol Bay- and AYK-origin salmon and/or increase the proportion of Bristol Bay- and AYK-origin salmon in the harvest.

BBEDC POSITION: OPPOSE

PROPOSAL 163 – 5 AAC 09.331. Gillnet specifications and operations.

Between the longitude of Three Hills and the northern boundary of the Outer Port Heiden Section restrict drift and set gillnets to 29 and one-half meshes depth,

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal will limit the depth of drift and set gillnets to 29 and one-half meshes between the northern longitude boundary line of the Three Hills and the northern boundary of the Outer Port Heiden Section. The current allowed depth is 70 meshes in depth.

CURRENT REGULATIONS:**5 AAC 09.331. Gillnet specifications and operations**

<http://www.legis.state.ak.us/basis/aac.asp#5.09.331>

(a) The size and operation of drift gillnets is as follows:

(4) in the Northern District, a drift gillnet may not exceed 70 meshes in depth, except that in the Nelson Lagoon Section a drift gillnet may not exceed 29 meshes in depth before August 16 and 38 meshes in depth from August 16 through September 30; a drift gillnet may have only one leadline, which may not exceed 60 fathoms per 50 fathoms of corkline, and no portion of the leadline may exceed 1.5 pounds per fathom.

COMMENTS:

If adopted as written, this proposal would restrict drift and set gillnets used in commercial fisheries between the longitude of the northern Three Hills section boundary and the Northern Boundary of the Outer Port Heiden Section, specifically to reduce the harvest of weak stocks (king, sockeye, and chum salmon) while targeting fish from larger systems in the Port Heiden section. The proposer also states that one of the issues that they seek the BOF to address is subsistence concerns and the high interception of migrating Bristol Bay-origin salmon stocks in the Ilnik and Port Heiden sections of Area M.



BBEDC POSITION: SUPPORT

PROPOSAL 164 – 5 AAC 09.369. Northern District Salmon Fisheries

Management Plan. Manage commercial salmon fishing in the Black Hills Section and in Moffet Lagoon in the Izembek-Moffet Bay Section based on Moffet Lagoon escapement:

PROPOSED BY: Herman Samuelson

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would direct ADF&G to coordinate openings and closures in the Black Hills section, starting north from Moffet Point and the Moffet Lagoon section, to allow local escapement in Moffet Lagoon. Specifically, if any emergency orders are announced for opening the Black Hills section, both Black Hills and Moffet Lagoon sections shall be also opened for fishing.

Proponent states that the problem is that area biologists managing both areas need to communicate and align fishery openers. In the past Moffet Lagoon section was closed while Black Hill Section remained open by emergency order.

CURRENT REGULATIONS:

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area. (b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information. The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

(c) In the Black Hills Section,

(1) before July 1, fishing periods may be modified based on the abundance of king and sockeye salmon stocks;

(2) from July 1 through August 15, fishing periods may be modified based on the abundance of sockeye and chum salmon stocks; and

(3) after August 15, fishing periods may be modified based on the abundance of coho salmon stocks.

COMMENTS:

Problem statement by proponent: Area biologists managing both areas need to communicate and align fishery openers. In the past Moffet Lagoon section was closed and Black Hill section remained open by emergency order. The proponent is concerned about the depletion of Moffet Lagoon section escapement and fishery sustainability. This proposal does not concern Bristol Bay salmon stocks.

BBEDC POSITION: NEUTRAL

PROPOSAL 165 – 5 AAC 09.331. Gillnet specifications and operations. In the Nelson Lagoon Section allow the compliment of drift gillnet gear to be split into two 100 fathom nets that may be fished simultaneously

PROPOSED BY: Ray Johnson

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

Nothing. This proposal requests something that is already legal to do.

CURRENT REGULATIONS:

5 AAC 09.331. Gillnet specifications and operations

<http://www.legis.state.ak.us/basis/aac.asp#5.09.331>

(a) The size and operation of drift gillnets is as follows:

(1) the aggregate length of drift gillnets on a salmon fishing boat or in use by such boat shall be no more than 200 fathoms in length;

COMMENTS:

Current regulations already allow for what the proponent is requesting

BBEDC POSITION: NEUTRAL

PROPOSAL 166 – 5 AAC 09.350. Closed waters; and 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Eliminate closed waters in Caribou Flats and allow drift gillnet fishing in Caribou Flats by emergency order if Nelson Lagoon escapement goals are achieved

PROPOSED BY: Joe Hinton

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would eliminate the closed waters in Caribou Flats Section (Figure 29) and allow drift gillnet fishing in the Caribou Flats Section by emergency order, from June 16 through August 15 if Nelson Lagoon escapement goals are achieved.

CURRENT REGULATIONS:

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

Salmon may not be taken in the following locations:

- (13) Caribou Flats: waters of the Caribou Flats Section;

5 AAC 09.369. Northern District Salmon Fisheries Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.369>

(a) The purpose of this management plan is to provide guidelines to the department for the management of salmon stocks in the Northern District of the Alaska Peninsula Management Area.

(b) The department shall manage the Northern District salmon fisheries on the basis of salmon abundance as determined by escapement information and catch-per-unit-effort information.

The department shall manage each section of the Northern District as specified in this management plan and [5 AAC 09.320](#).

(d) The Caribou Flats Section is closed to commercial salmon fishing.

COMMENTS: The proponent states that the Caribou Flats Section has been closed to drift gillnetting for many years to ensure returns to Nelson Lagoon. Proponent goes on to state that the fishery inside the lagoon has concentrated on larger fish using larger mesh gear. This has, over time, skewed the escapement to smaller fish. Allowing drift gillnet effort in the Caribou Flats Section, once Nelson Lagoon escapements have been achieved, would likely result in the harvest of these smaller fish and help in rebalancing the size distribution of the escapement.

The reason(s) why the Caribou Section was included in the Closed waters regulation must be fully disclosed and examined. BBEDC opposes any regulation change that would increase the interception of Bristol Bay-origin salmon within Area M. However, based on current information, it appears that the interception rate of Bristol Bay-origin salmon may be insignificant in this section since we believe that the vast majority of Bristol Bay-origin salmon are beyond the 3-mile limit at this location. Therefore, BBEDC considers this a proposal that affects Area M fishers and will not significantly affect Area T fishers or the run size into Bristol Bay. For those reasons, BBEDC is Neutral on this proposal until that time the reason(s) why the section was originally closed. However, if the BOF opens this section to commercial fishing, a GSI study should be initiated by ADF&G to determine the origin composition of the catch.

BBEDC POSITION: NEUTRAL

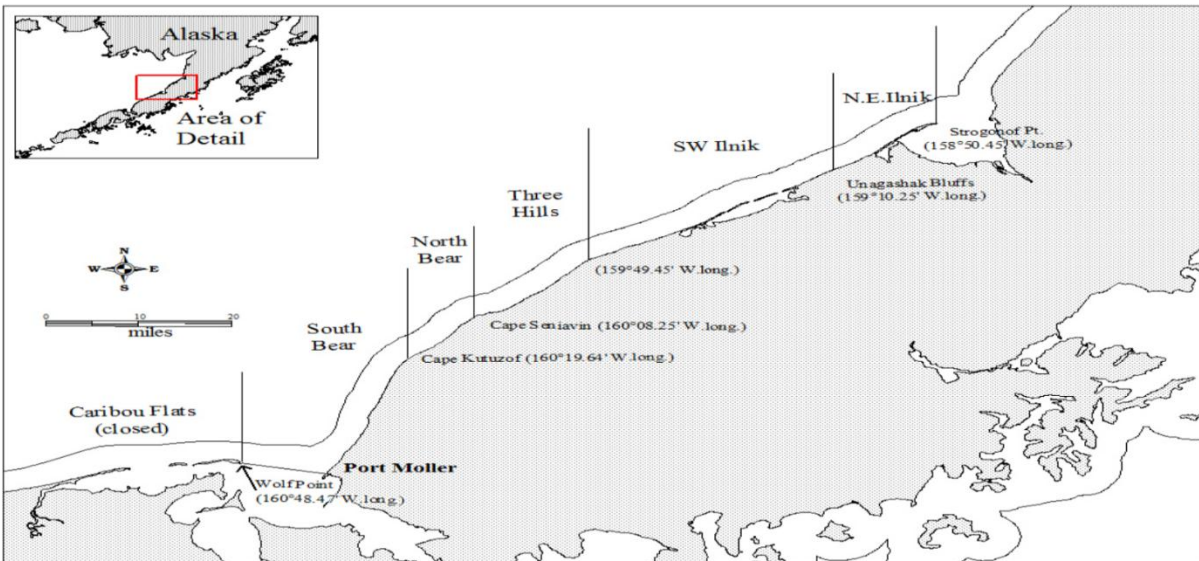


Figure 29. Map of part of the southwestern portion of the Northern District of the Alaska Peninsula Management Area showing the Caribou Flats Section.

PROPOSAL 167– 5 AAC 09.320. Fishing periods. Open the Uria Bay Section of the Northwestern District to regular fishing periods

PROPOSED BY: False Pass Fish and Game Advisory Committee

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would replace emergency order management in Uria Bay Section of the Northwestern District (Figure 30) with weekly fishing periods established by regulation.

CURRENT REGULATIONS:

5 AAC 09.320. Fishing periods

<http://www.legis.state.ak.us/basis/aac.asp#5.09.320>

- (b) In the Northwestern District, salmon may be taken during the open season from September 1 through September 30 only during fishing periods established by emergency order. Unless otherwise specified by emergency order, before September 1, salmon may be taken in the Northwestern District only during the open season in the
 - (3) Uria Bay Section, only during fishing periods established by emergency order;

COMMENTS: No comments.

BBEDC POSITION: NEUTRAL

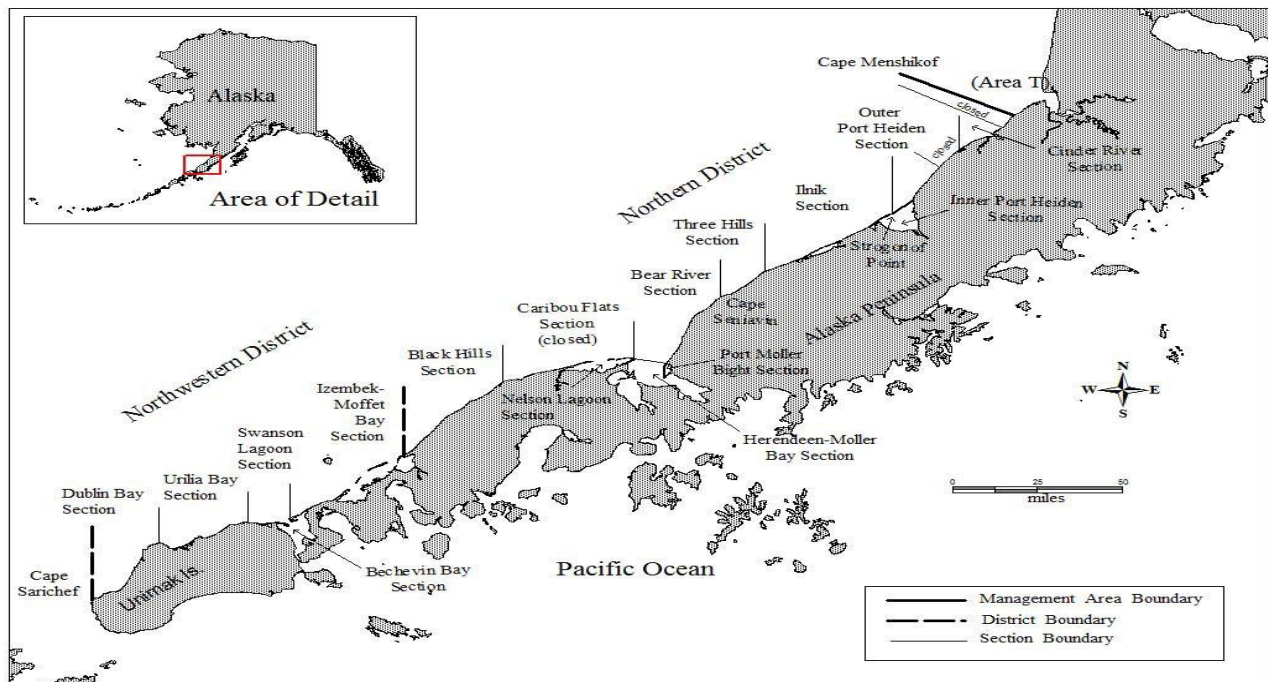


Figure 30. Map of the Northern and Northwestern District showing Fishing Sections.

PROPOSAL 168– 5 AAC 09.350. Closed waters. Reduce closed waters in Christianson Lagoon in Uria Bay Section,

PROPOSED BY: Travis Hoblet

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would reduce the closed waters of Christianson Lagoon (Figure 30) area by half. from a point located 250 yards upstream from the lagoon outlet channel terminus at the ocean shoreline.

CURRENT REGULATIONS:

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

Salmon may not be taken in the following locations:

(18) Uria Bay:

(A) Christianson Lagoon: waters of the lagoon and those waters within 500 yards of the lagoon's exit channel terminus at the ocean shoreline;

COMMENTS: No comments.

BBEDC POSITION: NEUTRAL



PROPOSAL 169 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.206. Use of global positioning system (GPS). Implement global positioning satellite coordinates for all district and section boundaries in the Northern District of the Alaska Peninsula Area

PROPOSED BY: Dan Barr

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would establish a series of points that can be implemented by regulatory definition so all fishermen can be fish legally within boundaries that can be defined and navigated with modern GPS equipment.

CURRENT REGULATIONS:

5 AAC 09.200. Description of districts and sections

<http://www.legis.state.ak.us/basis/aac.asp#5.09.200>

5 AAC 09.206. Use of global positioning system (GPS)

<http://www.legis.state.ak.us/basis/aac.asp#5.09.206>

In the Alaska Peninsula Area, boundaries, lines, and coordinates are identified with the global positioning system (GPS). If the global positioning system is not operating, the boundaries, lines, and coordinates are as identified by ADF&G regulatory markers.

COMMENTS: The proponent of this proposal states, “*At present there are no GPS specifications so that Area M fishermen can be confident that they are fishing legally within their Sections.*” This is an important task that needs to be completed as soon as possible. With new regulations creating fishing boundaries at 1.5 miles shoreward of the 3-mile limit this is vitally important for fisherman as well as enforcement to know the areas that are open and closed. It is in the State’s best interest to clearly defined, enforceable commercial fishing boundaries in order to protect the resource and to ensure appropriate allocation and management of resources.

BBEDC POSITION: SUPPORT

PROPOSAL 170 – 5 AAC 09.350. Closed waters. Redefine the boundaries of the Outer Port Heiden Section using GPS coordinates

PROPOSED BY: Alaska Department of Public Safety, Alaska Wildlife Troopers

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would replace language in the Closed waters regulation (3) (see current regulations below) with a series of GPS coordinates defining the line. Public Safety also suggest that a straight line could be used to define closed waters from open waters of the Outer Port Heiden Section.

CURRENT REGULATIONS:

5 AAC 09.350. Closed waters

<http://www.legis.state.ak.us/basis/aac.asp#5.09.350>

(3) Outer Port Heiden: waters of the Outer Port Heiden Section (A) between the three-mile seaward boundary line, described in [5 AAC 09.301](#), and a line that is one and one-half miles shoreward of the three-mile seaward boundary line;

COMMENTS: Proponent states:

Current regulatory language in 5 AAC 09.350(3) is very difficult to effectively enforce under the best of circumstances and especially difficult with aircraft patrols. The difficulty in enforcing the current regulation is differences in how the 3-mile line is drawn on NOAA charts and how that compares with 5 AAC 39.975(13) "waters of Alaska". Enforcement personnel must be able to determine if a violation is occurring and be able to take action to notify the operator. If a Trooper pilot must make passes over a vessel to determine the latitude and longitude it is fishing, and then later plot the location on a chart to determine if a violation exists, it is unlikely the trooper can address the violation in a timely manner.

Defining the Outer Point Heiden closed waters boundary with GPS coordinates would allow enforcement and fishermen to accurately determine if nets are fishing in legal waters. GPS coordinates are used to define all manner of fish and game boundaries throughout the state. GPS has been vetted extensively in the Alaska Court system and has been found to be extremely accurate. Even a very basic (cheap) GPS can accurately show a line between points and display a cross track distance from the line. GPS is practical, easy to use and defensible.

It is in the State's best interest to clearly defined, enforceable commercial fishing boundaries in order to protect the resource and to ensure appropriate allocation and management of resources. Using GPS coordinates to define the Outer Port Heiden closed waters line is a far better means of attaining these goals than the current method.

BBEDC agrees with the proponent's comments and support the use of GPS in defining boundaries. We also support establishing the line with as little points as possible so that questions regarding the boundary line could be nearly eliminated. BBEDC believes that the argument of "no net loss or gain" of fishing area should be secondary to the ability and ease of Public Safety to enforce the boundary line.

BBEDC POSITION: SUPPORT



PROPOSAL 171 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.206. Use of global positioning system (GPS). Implement global positioning satellite coordinates for all district and section boundaries in the Northern District of the Alaska Peninsula Area

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would direct ADF&G to implement global positioning satellite coordinates for all district and section boundaries in the Northern District of the Alaska Peninsula Area. In the North Peninsula Area M's commercial salmon fishery, all boundary lines will be defined by true enforceable GPS lines.

CURRENT REGULATIONS:

5 AAC 09.200. Description of districts and sections

<http://www.legis.state.ak.us/basis/aac.asp#5.09.200>

5 AAC 09.206. Use of global positioning system (GPS)

<http://www.legis.state.ak.us/basis/aac.asp#5.09.206>

In the Alaska Peninsula Area, boundaries, lines, and coordinates are identified with the global positioning system (GPS). If the global positioning system is not operating, the boundaries, lines, and coordinates are as identified by ADF&G regulatory markers.

COMMENTS:

BBEDC references all comments provided for Proposals 169 and 170.

BBEDC POSITION: SUPPORT

South Alaska Peninsula Salmon June Management Plan (6 proposals)

PROPOSAL 181 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Repeal the South Unimak and Shumagin Islands June Salmon Management Plan:

PROPOSED BY: Jesse Foster

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted as written, this proposal would repeal the South Unimak and Shumagin Islands June Salmon Management Plan but it suggest nothing to replace it. It appears that intent of the proposal is to not allow fishing in June in these areas.

CURRENT REGULATIONS:

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.365>

(a) The South Unimak and Shumagin Islands June fisheries harvest both sockeye salmon and chum salmon in a mixed stock fishery during the month of June. The sockeye salmon are predominantly Bristol Bay and Alaska Peninsula origin. The chum salmon are bound for a number of areas, including Japan, Russia, the Arctic-Yukon-Kuskokwim, Bristol Bay, the Alaska Peninsula, and southcentral Alaska. These salmon stocks have historically been harvested along the south Alaska Peninsula during the month of June. This management plan is intended to be consistent with the Policy for the Management of Sustainable Salmon Fisheries ([5 AAC 39.222](#)) and the Policy for the Management of Mixed Stock Salmon Fisheries ([5 AAC 39.220](#)).

(b) The South Unimak fishery takes place in the Unimak District, the Southwestern District, the East Pavlof Bay and the West Pavlof Bay Sections of the South Central District, and the Bechevin Bay Section of the Northwestern District.

(c) The Shumagin Islands fishery takes place in the Shumagin Islands Section.

(d) In the South Unimak and Shumagin Islands fisheries, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(see regulation for continuation)

COMMENTS:

BBEDC: Although BBEDC seeks to reduce the interception of Bristol-Bay origin salmon, this proposal is too drastic a change that would eliminate a long standing fishery. We believe that changes to this fishery are more appropriate than eliminating the fishery.

BBEDC POSITION: NEUTRAL

PROPOSAL 182 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Modify the South Unimak and Shumagin Islands June Salmon Management Plan to shift the opening date for the drift gillnet fishery to coincide with the set gillnet fishery opening date, as follows:

PROPOSED BY: Concerned Area M Fishermen

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would set the same schedule for set and drift gillnet fishery in the South Unimak and Shumagin Islands June Salmon fishery. Currently, set gillnets begin their fishing schedule on June 7 and drift gillnets and seines begin on June 10 (Figure 31). Specifically, it would alter the plan to allow drift gillnet fishing in the South Unimak and Shumagin Island fisheries, under (d) below on June 7 instead of June 10. Note that it would add 64 hours of fishing time to the drift fleet and would significantly reduce the competition between the off shore gear types fisheries, drift gillnet and purse seine fisheries. It would also eliminate any windows of no fishing by purse seine or drift gillnets in the Section (Figure 32).

CURRENT REGULATIONS:

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan
<http://www.legis.state.ak.us/basis/aac.asp#5.09.365>

(d) In the South Unimak and Shumagin Islands fisheries, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(A) beginning June 7, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 29;

(2) for seine and drift gillnet gear,

(A) beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will than close for 32 hours and reopen at 6:00 a.m. two days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 28.

See Figure 29 for a figure that portrays the regulatory schedule for all gear types.

COMMENTS:

There are three major effects of this proposal:

1 It would add 64 hours of fishing time to the drift gillnet fishery;

2. It would substantially decrease the competition for fishing area between the purse seine and drift gillnet fleets; and
3. It would eliminate all no-fishing windows offshore.

The obvious effects of this regulation is to increase fishing time for the drift gillnet fleet, in conjunction with the set net fleet, by adding 64 hours of fishing time to the drift fleet. Although the drift gillnet fleet will not be affected by the set net fishery, the set net fleet will be no doubt affected by the competing drift gillnet fishery fishing during the same time. Note that the set net fleet catches a much higher percentage of local salmon than the drift gillnet or the seine fleet. Another primary effect of this proposal would be to decrease the competition between the purse seine fleet and the drift gillnet fleet. This proposed change will no doubt increase the efficiency of the both the drift fleet and the purse seine fleet, resulting in much higher salmon harvests. Harvests will be higher and the harvest of salmon migrating to AYK and Bristol Bay will be much higher than if the regulation remains the same or if fishing time were reduced (Proposal 184). During the WASSIP years, Bristol Bay-origin sockeye salmon comprised 52.5%, 88.3%, and 79.6% in 2006, 2007 and 2008, respectively of this fishery harvest.

Another negative factor associated with this proposal is that it will eliminate the windows when there is no drift or purse seine fishing in the area (Figure 32). This is unacceptable because there needs to be windows of time when there is no fishing in the waters offshore to allow fish to pass through this area and return to their natal streams in the AYK Region and also the Bristol Bay Area.

BBEDC POSITION: OPPOSE

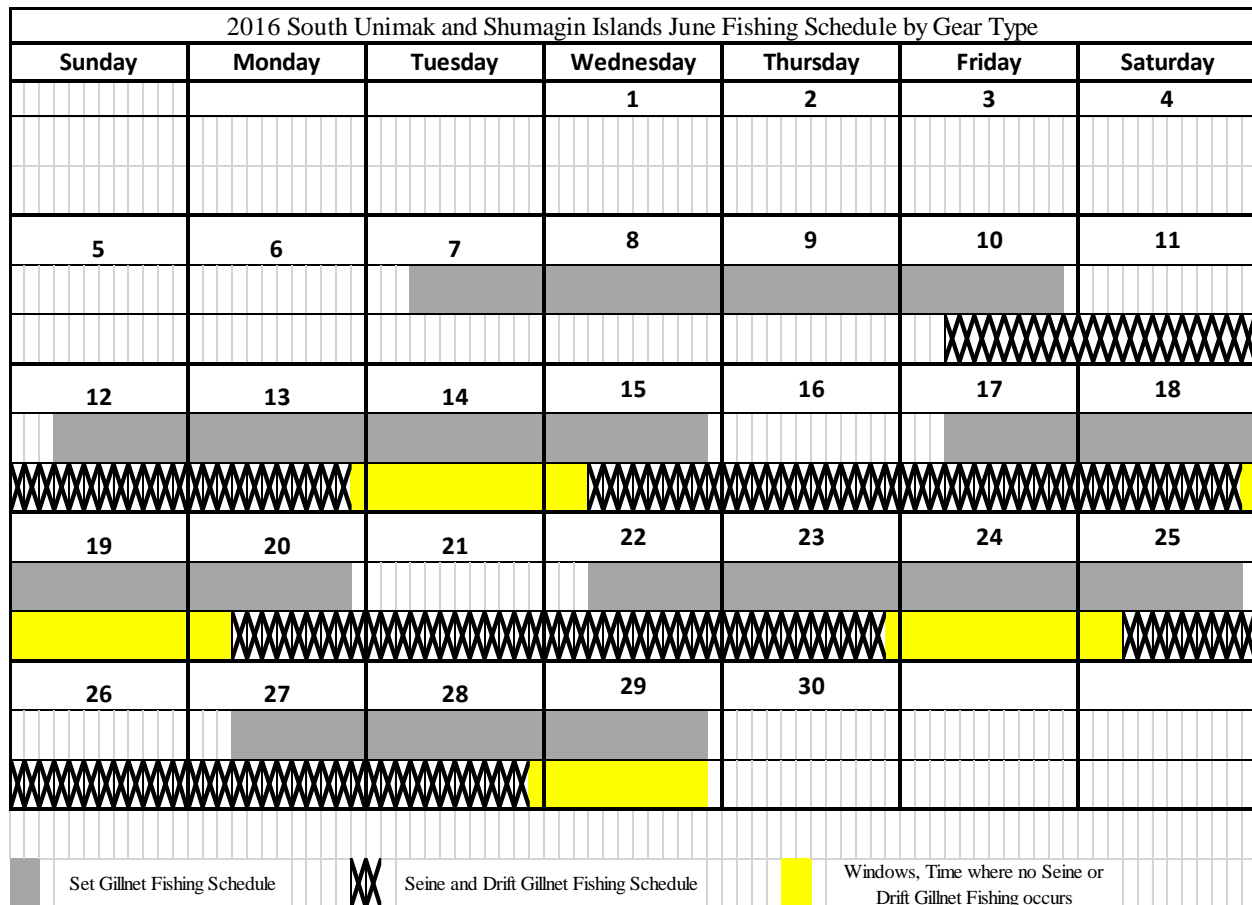


Figure 31. Fishing schedule for set gillnets and seine and drift gillnets fishing in the South Unimak and Shumagin Islands fisheries, 2016. Fishing periods of 88 hours long, except for the final set gillnet opening (64 hours). Windows of no fishing by seine and drift gillnets are 32 hours long.

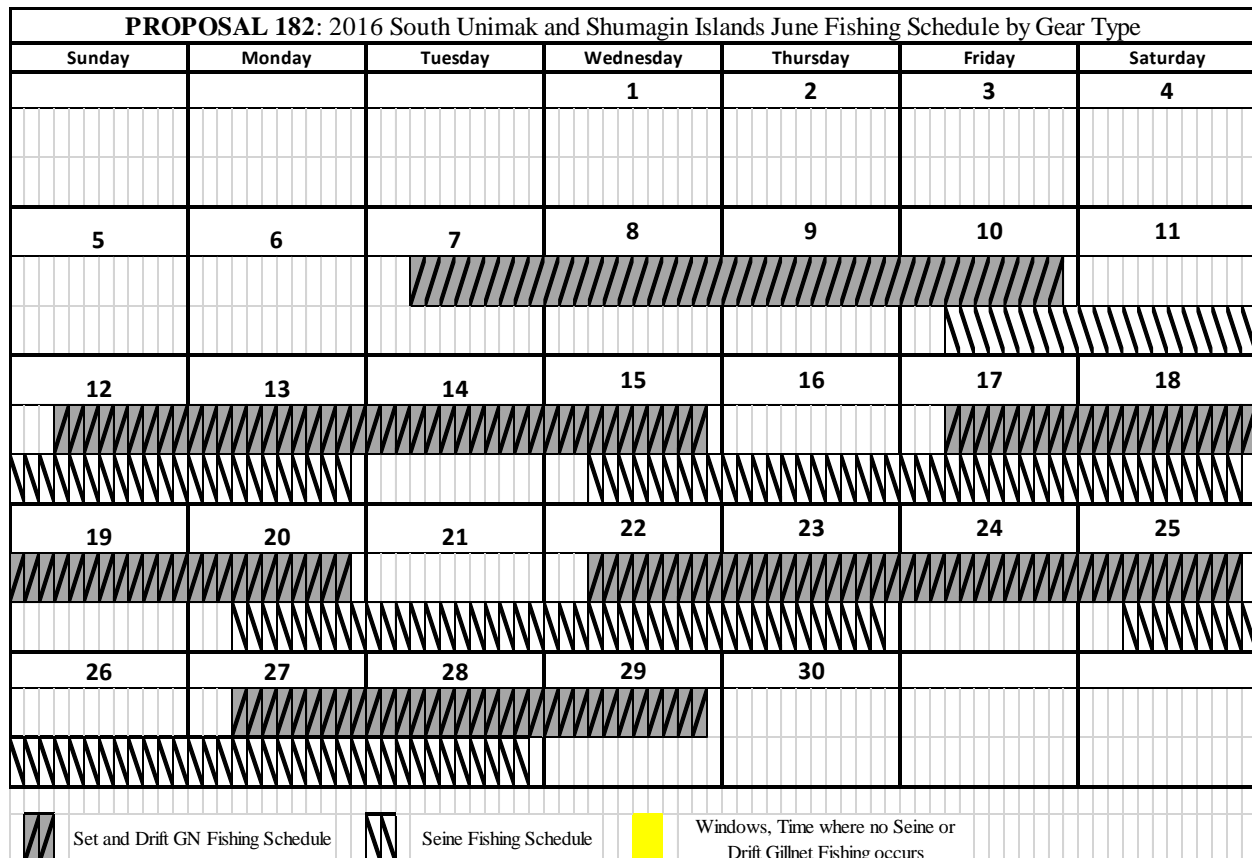


Figure 32. Proposed 182 fishing schedule for set and drift gillnets and seines in the South Unimak and Shumagin Islands fisheries, 2016. Fishing periods of 88 hours long, except for the final set and drift gillnet opening (64 hours). Windows of no fishing by seine and drift gillnets are eliminated.

ROPOSAL 183 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Modify the South Unimak and Shumagin Islands June Salmon Management Plan to stagger opening days for the drift and purse seine fisheries, as follows

PROPOSED BY: Sand Point Fish and Game Advisory Committee

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would stagger opening days for the drift and purse seine fisheries. Staggering the opening date by one day, for the seine and drift fleets would give at least one day per week without gear conflicts between the drift and seine fleets. The scheduled amount of days would remain the same; the opening day would just change. Specifically, it would alter the plan to allow drift gillnet fishing in the South Unimak and Shumagin Island

fisheries, under (d) below on June 9 instead of June 10. The purse seine fishery would start on June 10 (Figure 33).

CURRENT REGULATIONS:

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.365>

(2) for seine and drift gillnet gear,

(A) beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 28.

See Figure 29 for a graphical presentation of this regulation.

COMMENTS:

The effect of this regulation will be to allow one day during each scheduled drift gillnet and seine opening where competition between these gear types will be eliminated. The drift net fishery will have no competition from the purse seine fishery on the first day of the opening AND the purse seine fishery will have no competition from the drift fleet on the last day of the period. This scheduling scenario will no doubt increase the efficiency of the drift fleet and the purse seine fleet on the day where there is only one of these gear types fishing. This greater efficiency will probably result in higher harvests for each of these gear types. This higher harvest will no doubt increase the harvest of salmon migrating to their natal areas outside of Area M, particularly AYK chum salmon and Bristol Bay sockeye salmon. Additionally, this proposal would severely reduce the closure window when there is no drift or purse seine fishing (Figure 33). If this proposal was adopted as written, the no seine or drift gillnet fishing window would be reduced from 32 hours, as in current regulations, to 8 hours with Proposal 183 (Figure 33). Windows of no fishing were put into place by the BOF to allow salmon migrating to their natal streams to pass through some of this intensive fishery. This proposal is not as drastic a change to the management plan as Proposal 182 but still increases the efficiency of the fleet, increases the harvest of migrating AYK and Bristol Bay-origin salmon and reduces the window time where there is no fishing with seine or drift gillnet gear.

BBEDC POSITION: OPPOSE

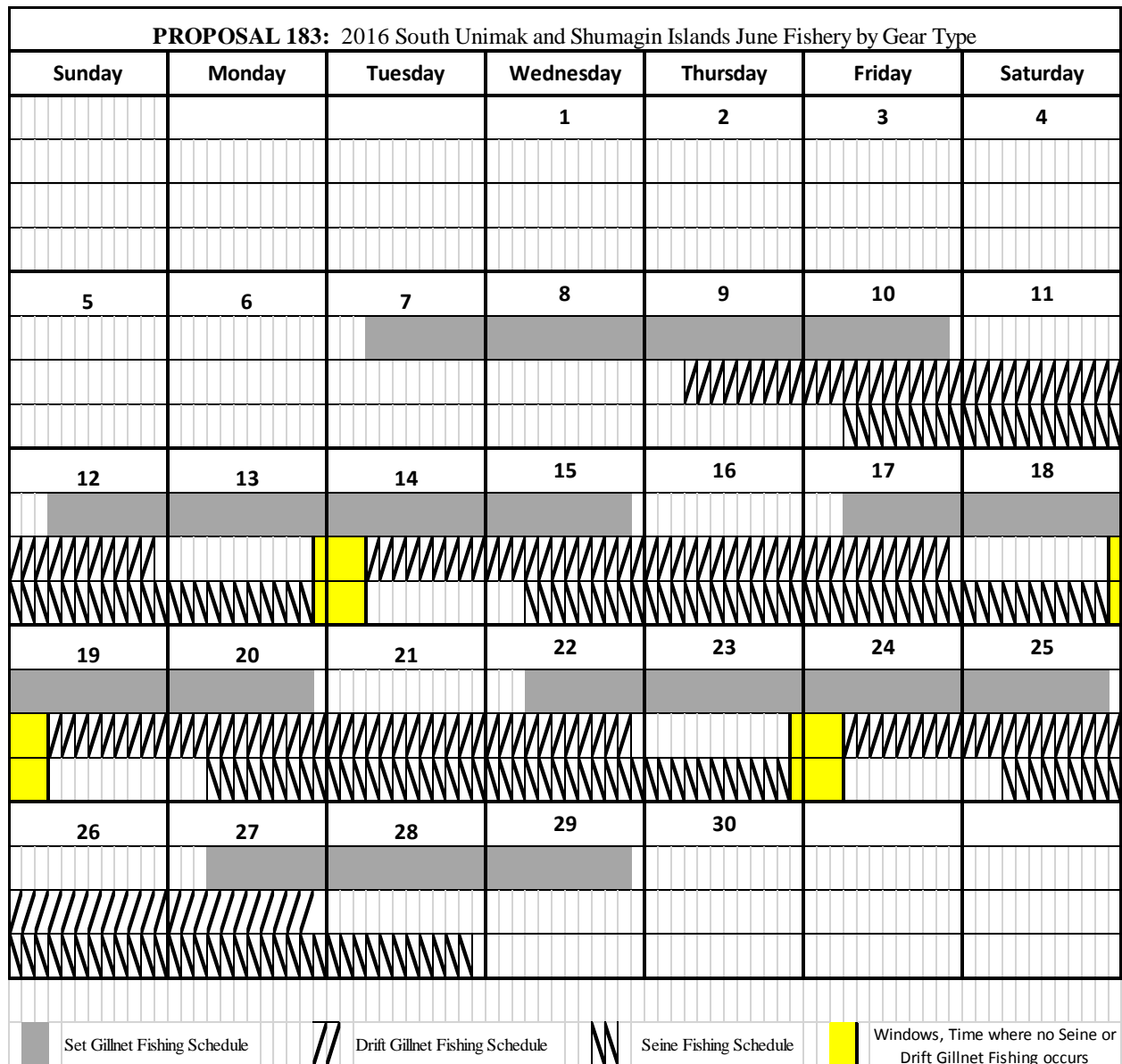


Figure 33. Proposed 183 fishing schedule for set gillnets, drift gillnets, and seines in the South Unimak and Shumagin Islands fisheries, 2016. Fishing periods of 88 hours long, except for the final set gillnet opening (64 hours). Windows of no fishing by seine and drift gillnets are 8 hours long.

PROPOSAL 184 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt the management plan in place during 2003-2004, as follows:

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

BBEDC POSITION: SUPPORT

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would alter South Unimak and Shumagin Islands June Salmon Management Plan to the changes that were put into regulations starting in 2003. These regulations reduced the time that the drift and gillnet fishery was allowed to fish and also would add regulations that based continued fishing on the chum salmon: sockeye salmon ratio in the harvest.

CURRENT REGULATIONS:

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan

<http://www.legis.state.ak.us/basis/aac.asp#5.09.365>

(2) for seine and drift gillnet gear,

(A) beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will than close for 32 hours and reopen at 6:00 a.m. two days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 28.

See Figure 29 for a graphic presentation of this regulation.

PROPOSED REGULATIONS: (TAKEN FROM Shaul, A. 2003)

<http://www.sf.adfg.state.ak.us/fedaidpdfs/RIR.4K.2003.65.pdf>

In 2001, the BOF made major changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365).

These changes included:

1. Eliminated the sockeye salmon guideline harvest levels.
2. Eliminated the chum salmon guideline harvest levels.
3. Limited fishing time to no more than 16 hours per day by any gear group.
4. Limited total fishing time by seine and drift gillnet gear to no more than 48 hours in a floating seven-day period with no more than two 16-hour periods on consecutive days in any seven-day period.
5. From June 10 through June 24 in the South Unimak and/or Shumagin Islands fisheries, set gillnet gear may fish on consecutive days for 16-hour periods as long as the set gillnet sockeye to chum salmon ratios in that fishery are equal to or greater than the recent 10-year average for that fishery.

If the set gillnet sockeye to chum salmon ratio falls below the recent 10-year average in either fishery, that fishery will be closed for one period. From June 10 through June 24, daily fishing periods for set gillnet gear will be from 6:00 AM until 10:00 PM. 6. Purse seine and drift gillnet fishing periods through June 24 will occur at the same time in the South Unimak and Shumagin Islands fisheries. After June 24, in either the South Unimak or Shumagin Islands fishery, if the ratio of sockeye to chum salmon by all gear combined is two to one or less on any day, the next fishing period shall be of six hours duration for all gear in that fishery. If the sockeye to chum salmon ratio is two or greater, a six-hour fishing period can be extended to a maximum of 16 hours. The South Unimak or Shumagin Islands fishery shall close for all gear groups if the ratio of sockeye to chum salmon is two to one or less for two consecutive fishing periods.

COMMENTS:

The effect of this regulation will be drastically reduce the fishing time for the drift and purse seine fisheries in the South Unimak and Shumagin Island June salmon fisheries. Currently, fishing time for seine and drift gillnets consists of 4 88-h periods, for a total of 352 hours of potential fishing. If this proposal is adopted as written, the maximum number of hours that the seine and drift gillnet fishery could occur is 9 16-hour periods, for a total maximum total fishing time of 144 hours. Fishing could be less than maximum dependent on the chum:sockeye salmon ratios of the harvest. Under current regulations, set nets can be fished for 4 88-h and 1-64-h period for a total fishing time of 208 hours in June. Under Proposal 184, the maximum fishing time could be as high as 21 16-h periods, or 336 h of fishing. The 2003 fishing schedule is presented in Figure 34. Starting and ending time of the fishing periods, as well as the duration, was assumed. For more information, see:

Shaul, A. 2003. South Unimak and Shumagin Islands June Salmon Fishery, Report to the Alaska Board of Fisheries, 2004. Regional Information Report No. 4K03-65. Kodiak Alaska.

The regulations adopted in 2001 by the BOF were originally designed to reduce interception of AYK chum and Bristol Bay sockeye salmon by reducing fishing effort and allowing for relatively long periods of no fishing, windows, when salmon could move through the area unmolested. This regulation only lasted one BOF cycle and then reverted to the present schedule of 4 88 hour periods for drift gillnet and purse seine gear and 4 88 hour periods and 1 64-hour period for the set net fleet. BBEDC support this proposal because the effect of this proposal would be to reduce interception of Bristol Bay sockeye salmon and AYK chum salmon.

BBEDC POSITION: SUPPORT

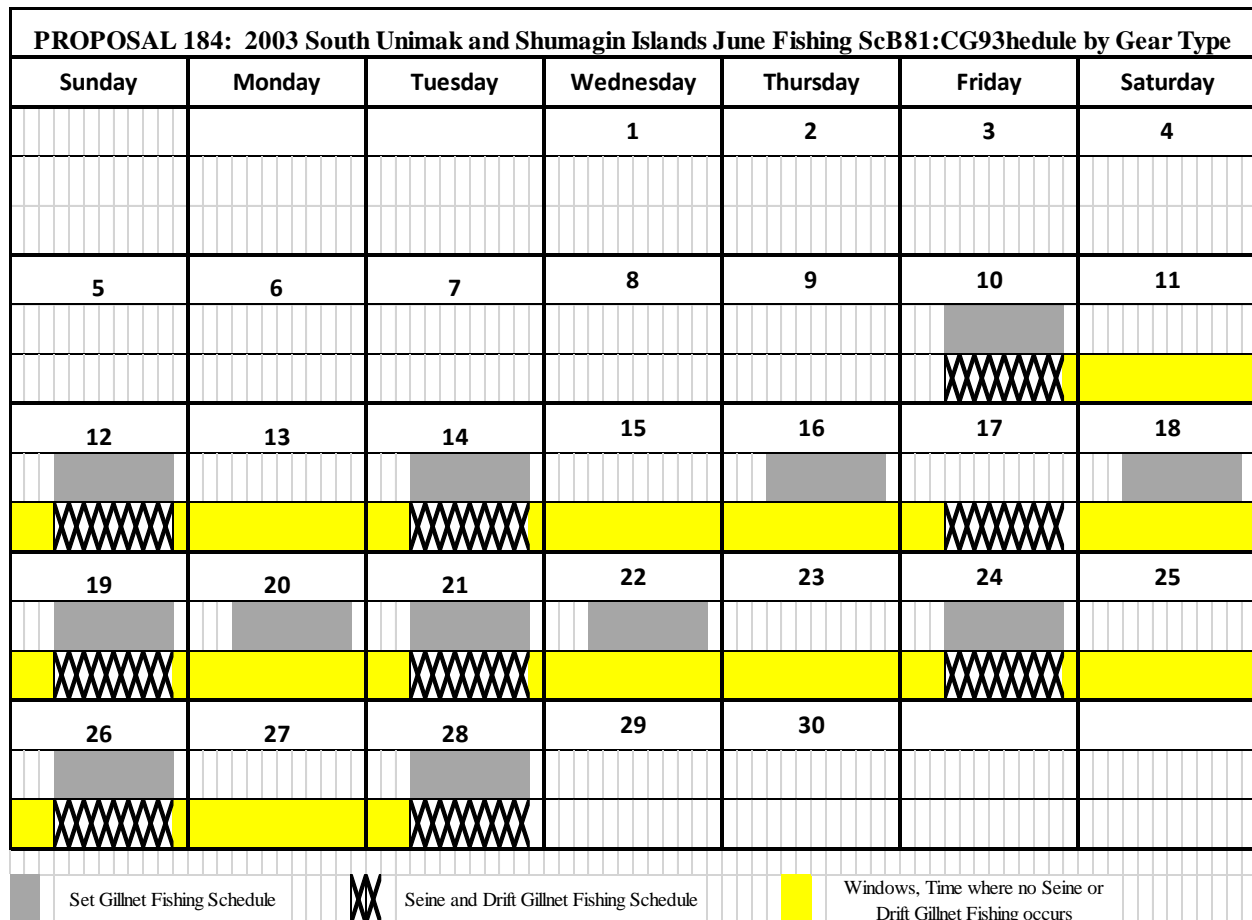


Figure 34. Approximate fishing times for set gillnets and seines and drift gillnets in the South Unimak and Shumagin Islands fisheries, 2003. Fishing periods were 16 hours or less for both gear type openings. Eight window periods of no fishing by seine and drift gillnets were interspersed throughout the period, June 10 through June 28. There were 6 window periods of no fishing with purse seines or drift gillnets of 32 hours and 2 periods of 56 hours. This is an example of the maximum allowable time for fishing with each gear type if Proposal 184 is adopted as written.

PROPOSAL 185 & 186 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.XXX Dolgoi Island Section Salmon Fisheries Management

Plan. Establish a Dolgoi Island Section and Dolgoi Island Section Management Plan, as follows

PROPOSED 185 BY: John Jones- Agent for United Chignik Salmon Fishermen

PROPOSED 186 BY: Chignik Fish and Game Advisory Committee

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would establish a Dolgoi Island Section and a Dolgoi Island Section Management salmon management plan.

CURRENT REGULATIONS:

5 AAC 09.200. Description of districts and sections

<http://www.legis.state.ak.us/basis/aac.asp#5.09.200>

(d) Southwestern District: waters on the south side of the Alaska Peninsula north and east of a line extending 115_ from Cape Pankof Light (54_ 39.60' N. lat., 163_ 03.70' W. long.) and west of a line extending 106_ from Arch Point Light (55_ 12.30' N. lat., 161_ 54.30' W. long.) to the western boundary of the Southeastern District (longitude of McGinty Point: 160_ 59.00' W. long.), including Inner Iliasik, Outer Iliasik, Goloi, Dolgoi, Poperechoi, and Deer Islands, waters of Ikatan Bay, and waters of Isanotski Strait south of a line from the False Pass cannery dock (54_ 51.35' N. lat., 163_ 24.38' W. long.) to Nichols Point (54_ 51.43' N. lat., 163_ 23.23' W. long.);

COMMENTS:

The effect of this regulation will be establish a management plan for the June and July fishery in the Dolgoi Islands of the Southwestern District. It appears that this plan was put into place to limit interception of Chignik bound sockeye salmon. Because the harvest of the Dolgoi Islands contains 25% Bristol Bay origin sockeye it would tend to reduce the interception of these stocks. However, the harvest is relatively small, 20,000 to 30,000 Bristol Bay origin fish and therefore is not a major Bristol Bay intercept fishery.

BBEDC POSITION: NEUTRAL

Alaska Peninsula Salmon Gear and Seaward Boundary (5 proposals)

PROPOSAL 189 – 5 AAC 09.332. Seine specifications and operations. Allow for dual permit vessels and increased gear limits for dual permit vessels in the Alaska Peninsula Area commercial salmon purse seine fishery, as follows

PROPOSED BY: Ray Koso and Don McCallum

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would Allow for dual permit vessels and increased gear limits for dual permit vessels in the Alaska Peninsula Area commercial salmon purse seine fishery.

CURRENT REGULATIONS:

5 AAC 09.332. Seine specifications and operations

<http://www.legis.state.ak.us/basis/aac.asp#5.09.332>

(a) Purse seines or hand purse seines may not be less than 100 fathoms nor more than 250 fathoms in length. A purse seine or hand purse seine may not exceed 375 meshes in depth. Seine mesh may not be more than three and one-half inches, except that the first 25 meshes above the leadline may not be more than 7 inches.

(b) Leads may not be less than 50 fathoms nor more than 150 fathoms in length. Only one lead may be used with a seine. A lead may be attached to only one end of a seine, and the lead may not be attached to the boat end of the seine.

COMMENTS:

The effect of this regulation will allow 2 permit holders to fish 300 fathoms of purse seine gear in the Alaska Peninsula Area commercial salmon purse seine fishery. Although it appears on the surface to be a reduction in gear, the dual permit may include fishers who did not fish or did not intend to fish in the fishery. However, the proponent states that this proposal actually seeks to reduce “latent” permits being fished with a full complement of gear. We question the authority of the BOF to “lock” the permits together so that they cannot be sold separately.

BBEDC POSITION: NEUTRAL

PROPOSAL 190 – 5 AAC 09.332. Seine specifications and operations. Change purse seine depth measurement standard from number of meshes deep to an equivalent depth measurement in feet and inches

PROPOSED BY: King Cove Fish and Game Advisory Committee

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would change purse seine depth measurement standard from number of meshes deep to an equivalent depth measurement in feet and inches.

CURRENT REGULATIONS:

5 AAC 09.332. Seine specifications and operations

<http://www.legis.state.ak.us/basis/aac.asp#5.09.332>

(a) Purse seines or hand purse seines may not be less than 100 fathoms nor more than 250 fathoms in length. A purse seine or hand purse seine may not exceed 375 meshes in depth. Seine mesh may not be more than three and one-half inches, except that the first 25 meshes above the leadline may not be more than 7 inches.

(b) Leads may not be less than 50 fathoms nor more than 150 fathoms in length. Only one lead may be used with a seine. A lead may be attached to only one end of a seine, and the lead may not be attached to the boat end of the seine.

COMMENTS:

Defer to ADF&G

BBEDC POSITION: NEUTRAL DEFER TO ADF&G

PROPOSAL 191 – 5 AAC 09.331. Gillnet specifications and operations. Repeal minimum mesh size standards for drift gillnet gear

PROPOSED BY: King Cove Fish and Game Advisory Committee

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would repeal the minimum mesh size standards for drift gillnet gear.

CURRENT REGULATIONS:

5 AAC 09.331. Gillnet specifications and operations

<http://www.legis.state.ak.us/basis/aac.asp#5.09.331>

(a) The size and operation of drift gillnets is as follows:

(1) the aggregate length of drift gillnets on a salmon fishing boat or in use by such boat shall be no more than 200 fathoms in length;

(2) the mesh size of a drift gillnet may not be less than five and one-quarter inches, except that there is no minimum mesh size

(A) in the Northern District and the Northwestern District;
(B) in the South Unimak and Shumagin Islands fisheries described in [5 AAC 09.365](#)(b) and (c) when the commissioner opens fishing periods under [5 AAC 09.365](#) (d);

COMMENTS: The BOF should fully understand the reasons for the minimum mesh size of five and one-quarter inches before repealing it.

BBEDC POSITION: NEUTRAL based on understanding why there was a minimum mesh size in regulation.

PROPOSAL 192 – 5 AAC 09.330. Gear. Allow commercial fishing for salmon with set gillnets in the area between Popof Head and Dark Cliffs any time the area is closed to commercial salmon fishing with purse seine gear

PROPOSED BY: Jim Smith

BBEDC POSITION: OPPOSE

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would change the regulation so that the set net gear would be allowed to fish this area (Popof Head) when the seine fleet is not there and are closed to fishing this area whether it be due to immature salmon or that it is closed to seining while set net is open in the Shumagin Island section.

CURRENT REGULATIONS:

5 AAC 09.330. Gear

<http://www.legis.state.ak.us/basis/aac.asp#5.09.330>

(f) In the Southeastern District, salmon may be taken only with set gillnets, purse seines, and hand purse seines, except that
(1) salmon may be taken only with purse seines and hand purse seines in the area between Popof Head and Dark Cliffs (Popof Island) from June 1 through August 31; however, salmon may be taken by set gillnet during periods when the seine fishery is closed by emergency order due to the presence of immature salmon;

COMMENTS:

The effect of this proposal if adopted as written would mainly affect the post-June fishery. However, in the June fishery, it would allow set net gear to be fished in a small area that they are currently prohibited from fishing because of gear conflicts with the purse seine fleet. The increase in gear in this area will most likely increase interception of Bristol Bay-origin salmon by an unknown amount.

BBEDC POSITION: OPPOSE



PROPOSAL 193 – 5 AAC 09.301. Seaward boundary of districts. Change the Southwestern and Unimak District seaward boundary

PROPOSED BY: Concerned Area M Fishermen

BBEDC POSITION: SUPPORT

NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would revise the state boundary so it is coterminous with the federal line, to avoid confusion and potential enforcement problems from having two different management boundaries.

CURRENT REGULATIONS:

5 AAC 09.301. Seaward boundary of districts

<http://www.legis.state.ak.us/basis/aac.asp#5.09.301>

For the purpose of managing the historical salmon net fishery in the vicinity of False Pass and Unimak Bight, the outer boundary of the Southwestern and Unimak Districts is a line drawn three miles seaward from a line commencing at 54_ 26.70' N. lat., 162_ 53.00' W. long., near the western end of Sanak Island to Cape Lutke on Unimak Island. The seaward boundary of all other districts is a line three miles seaward of the baseline, as described in [5 AAC 39.975](#) (13).

COMMENTS:

Proponent states: *The 2012 amendment to the Federal Salmon Fishery Management Plan (FMP) redefined the plan's boundaries to exclude from its West Area three historical net fisheries managed by the State of Alaska, including the Alaska Peninsula fishery (50 C.F.R. 679.2, Definition of Salmon Management Area, Subsection (2)(iii)). The current seaward boundary of the state's Southwestern and Unimak Districts does not match up with the shoreward boundary of the federal FMP, leaving a gap of unregulated waters between the state and federal management areas.*

We believe that this is a housekeeping proposal to align state and federal boundaries.

BBEDC POSITION: SUPPORT (housekeeping)

Dutch Harbor Food and Bait Herring (1 proposal)

PROPOSAL 196 – 5 AAC 27.655. Dutch Harbor Food and Bait Herring

Fishery Allocation Plan. Change the date fishermen using purse seine gear may access the Dutch Harbor food and bait herring gillnet allocation from July 25 to July 20, as follows:

PROPOSED BY: Tom Evich

BBEDC POSITION: NEUTRAL

ADF&G POSITION:

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would change the date the purse seine fishers may access the Dutch Harbor food and bait herring gillnet allocation from July 25 to July 20.

CURRENT REGULATIONS:

[5 AAC 27.655. Dutch Harbor Food and Bait Herring Fishery Allocation Plan](#)

(a) The herring available for harvest in the Dutch Harbor food and bait herring fishery under [5 AAC 27.865](#)

(b)

(7) shall be allocated as follows:

(1) 86 percent to the herring seine fishery;

(2) 14 percent to the herring gillnet fishery.

(b) Except as otherwise provided in this subsection, the allocations of herring to the herring seine fishery and to the herring gillnet fishery under (a) of this section are independent of each other. If the harvest by a fishery in a given year is greater than the amount allocated to that fishery under (a) of this section, the excess tonnage is subtracted from the following year's allocation to that fishery. If the harvest by a fishery in a given year is less than the amount allocated to that fishery under (a) of this section, no effect on future allocations to that fishery will occur. After July 25, if the herring gillnet fishery has not harvested the herring gillnet fishery allocation, the remaining herring gillnet fishery allocation may be harvested in either the herring gillnet fishery or the herring seine fishery, except that if the harvest by the herring seine fishery exceeds the herring seine fishery allocation on or before July 25, the excess amount harvested by the herring seine fishery will be subtracted from the remaining herring gillnet fishery allocation for that year after July 25 to establish the remaining allocation that may be harvested by either of the fisheries. If the harvest by the herring seine fishery exceeds the remaining allocation

established under this subsection after July 25, the excess amount harvested by the herring seine fishery will be subtracted from the following year's herring seine fishery allocation specified in (a) of this section.

COMMENTS:

Little or no gillnet effort in this fishery has prompted the proposer to submit this proposal to change the start date 5 days earlier so that purse seines can access this quota.

BBEDC POSITION: NEUTRAL

Alaska Peninsula and Aleutian Islands Subsistence

PROPOSAL 197 – 5 AAC 01.410. Fishing seasons. Clarify when commercial salmon fishing license holders may subsistence fish for salmon in the Alaska Peninsula Area

PROPOSED BY: Alaska Department of Fish and Game

BBEDC POSITION: SUPPORT

ADF&G POSITION: SUPPORT

WHAT WOULD THIS PROPSAL DO?

If adopted, this proposal as written would allow those members of the general public who do not possess a commercial salmon fishing license to subsistence fish for salmon during periods that commercial salmon fishing license holders are restricted. Additional language to this regulation will also provide clarity to commercial salmon fishing license holders as to when they may legally subsistence for salmon during commercial salmon fishing periods. Regulatory language from the Chignik Area (5 AAC 01.485) was used as precedence for the amended regulatory language provided.

CURRENT REGULATIONS:

5 AAC 01.410. Fishing seasons.

<http://www.legis.state.ak.us/basis/aac.asp#5.01.410>

(a) In the Alaska Peninsula Area, salmon may be taken at any time, except

(1) in those districts and sections open to commercial salmon fishing, salmon may not be taken during the 24 hours before and 12 hours following a commercial salmon fishing period;

COMMENTS:

Housekeeping proposal. Support

BBEDC POSITION: SUPPORT

Comments for Proposal #22, #23, and #24



The following comments were submitted as on-time comments and record copies at the 2015 Bristol Bay Meeting. Some of the minutes have been truncated to reflect only comments for Proposal #22, #23, and #24

Lake Iliamna Fish and Game Advisory Committee (minutes 11/26/15)

Lower Bristol Bay Fish and Game Advisory Committee (minutes 9/28/15)

Nushagak Fish and Game Advisory Committee (minutes 10/20-21/15)

Chris Wenzel

Peter Arnestad

Joel Ludwig

Bronson Brito and Susie Jenkins-Brito

Bristol Bay Economic Development Corporation

Naknek/Kvichak Fish and Game Advisory Committee (minutes 11/12/15)

Ronald Tavis

Thomas Tilden

Gerda Kosbruk



Lake Iliamna Fish and Game Advisory Committee
November 26, 2015
Meeting Minutes

- I. Call to Order: Randy Alvarez - 11:40am, 10-26-15
- II. Roll Call:
Members Present: Joel Jacko, Elijah Eknaty, Tim Anelon, Tinny Hedlund, Randy Alvarez, George Alexie, Billy Trefon, Lyle Wilder
Members Absent: Jim Tilly, Greg Anelon
Number Needed For Quorum on AC: 6
- III. Approval of Agenda: Tinny moves, Lyle seconds
- IV. Approval of Previous Meeting Minutes: From meeting date:
- V. Fish and Game Staff Present: Travis Lons, Travis Elison
- VI. Guests Present: Several by teleconference - sorry spelling may be incorrect - Molly Dishner, Ian Fo, Jason Dye (sport Fish), Gean Sandon, Gala Hoseth, Courtney Carty, Nancy Marfly
- VII. Old Business: none
- VIII. New Business: Comments on Proposals to follow



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	22	move the cinder river, inner port heiden sections of the northern district from the alaska peninsula area to the bristol bay area	
Support Support as Amended Oppose No Action	8	0	large intercept fishery that should be managed in conjunction with the bristol bay escapement goals and values
BOF	24	move all waters of the northern district east of the latitude of cape seniavin from the alaska peninsula area to the bristol bay area	
Support Support as Amended Oppose No Action	8	0	
BOF	25	Expand district boundary lines.	
Support Support as Amended Oppose No Action	0	8	Elevated interception levels,
BOF	26	Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.	
Support Support as Amended Oppose No Action	0	8	

Lower Bristol Bay Fish and Game A.C.

9/28/15

Teleconference



PC 12
4 of 25

I. Call to Order: Time by Mitch Seybert 12:35

II. Roll Call:

List of all members

- 1) Mitch Seybert, Chair, Pilot Point, 12/2015
- 2) Eddie Clark, Vice Chair, Undesignated-Naknek, term expired 12/2014
- 3) Hattie Albecker, Undesignated-Ugashik, term expired 12/2014
- 4) Eric Beeman, Egegik, term expired 12/2014
- 5) Roland Briggs, Ugashik, 12/2015
- 6) Tom Bursch, Undesignated-Homer, 06/2017
- 7) Emil Christiansen, Port Heiden, term expired 12/2014
- 8) John Christiansen, Port Heiden, 06/2017
- 9) Bob Dreezen, Undesignated-Ugashik, term expired 12/2014
- 10) Timothy Enright, Ugashik, 12/2015
- 11) Gerda Kosbruk, Port Heiden, 12/2015
- 12) Mark Kosbruk, Undesignated-Port Heiden, 06/2017
- 13) Myra Olsen, Egegik, 12/2015
- 14) Kim Rice, Undesignated-Girdwood, 06/2017
- 15) Tracy Vrem, Undesignated-Chugiak, 06/2017

Members Present: Mitch Sybert, Myra Olsen, Roland Briggs, Tim Enright, Gerda Kosbruk, Mark Kosbruk, Kim Rice, John Christinsen, Eric Beeman; Hattie Albecker.

Members Absent: Robert Dreeszen (excused for medical reason); Eddie Clark, Emil Christiansen, Tom Bursch, Tracy Vrem.

Number Needed For Quorum on AC: 8

Number Needed for Quorum on AC: 8

III. Approval of Agenda: Myra moves to approve agenda, Hattie 2nds, Unanimous approval.
[Click here to enter text](#)

IV. Approval of Previous Meeting Minutes from 1/27/2015 meeting and 4/6/15 Meeting:
Myra Moves to approve minutes, Mark Kosbruk 2nds, no discussion, unanimous approval [Click here to enter text](#)

V. Fish and Game Staff Present: Bob Murphy & Travis Ellison, Com-Fish, Taryn O'Connor-Brito and Kristy Tibbles, Board Support.
[Click here to enter text](#)

VI. Guests: Victoria Briggs, Courtenay Carty & Gayla Hoseth, BBNA, Chuck McCallum, Lake and Peninsula Borough.
[Click here to enter text](#)[Click here to enter text](#)

VII. Elections for 3 undesignated seats previously held by Hattie Albecker, Bob Dreeszen, and Eric Beeman:



BOF	84	Establish non-retention king salmon sport fishing in the Big Creek Naknek River drainage.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	85	Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	86	Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	87	Eliminate the use of egg-simulating lures in rainbow trout fishing.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	88	Change the regulatory description for herring purse seine and hand purse seine.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	89	Delete references to sac roe in the Bristol Bay Herring Management Plan.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	90	Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	91	Redefine the description of closed waters for the Togiak herring fishery by deleting references to department regulatory markers.	
<input checked="" type="checkbox"/> No Action	Click here to enter text	Click here to enter text	Click here to enter text
BOF	22	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
<input checked="" type="checkbox"/> Support	9	0	Myra moves to adopt, Roland seconds. All vote in favor.



BOF	23	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
<input checked="" type="checkbox"/> Support	Click here to enter text	Click here to enter text	Support based on action on #22
BOF	24	Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area.	
<input checked="" type="checkbox"/> Oppose	0	9	Gerda moves to adopt and John seconds. This proposal goes too far.

Old Business: none

Adjournment: 2:30

Minutes Recorded By: L.P.B Chuck Macalim

Minutes Approved By: L.B.B.A.C. all in favor

Date: nov.19/2015

**Nushagak Advisory Committee
October 20 & 21, 2015
Dillingham City Council Chambers**

I. Call to Order: 12:34 PM By Chairman Frank Woods.

II. Roll Call:

Members Present: Frank Woods, Chair, Gayla Hoseth, Joe Chythlook (vice Chair) , Lloyd (Tom) O'Connor, Dan Dunaway Secretary , Curt Armstrong, Dennis Andrew, Travis Ball, Glen Wysoki (arr 1:05 pm), Jonathan Forsling (by phone) , Mariano Floresta, Steve Perkins (alt), Jim Woolington (phone) .

Members Absent: Manokotak rep, Luki Akelkok (Ekwok), Chris Carr (Portage), Chris Strub (alt).

Number Needed For Quorum: 8

Full Member list: Attached at the back of these minutes is a list of all members, the seat they occupy, community of residence, and term expiration date.

List of User Groups Present: In the meeting on or the AC?

On the AC and in the public attending, most people identify with more than one of the following groups with nearly 100% being subsistence users as well as members other user groups. In no particular order:

- Subsistence fishing and hunting
- Commercial Drift
- Commercial Set
- Trapping
- Sport fishing
- Sport Fishing guide
- Big game guide
- Air Taxi
- BBEDC represented by Gene Sandone by phone

Alternate Steve Perkins was seated with the committed given absences. A quorum was declared.

III. Approval of Agenda:

Joe C. Moved to adopt, Travis B. 2nd.

There was a discussion on when to meet to prepare for the Board of Game - consensus was later by teleconference.

Dennis A. asked to add an item IV under new business to discuss CDQ Boundaries.

Gayla H. asked to add a line Public Comments to Agenda after Elections. AC agreed by consensus noting usually for these meetings, public members are encouraged and allowed to participated in discussions, especially proposals.

Tom O. expressed concern for several meetings without a Manokotak representative - consensus was to add Item V under New Business titled Vacancies on AC.



BRISTOL BAY FINFISH DECEMBER 2–9, 2015 ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	22	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
X Support	Unanimous	0	Joe Move, Dan 2nd. BBEDC invited to discuss background. Dan D. expressed his experience in the area and investigations into the minimal and very short recent commercial catch history in the Outer Port Heiden. The OPH take has really grown since starting in 2007, catch is heavily intercept of Ugashik and some other Bristol Bay systems (WASSIP) and far in excess of what can be justified by the runs into Meshik. Locals have subsistence concerns; some of our relatives live and or fish there.
BOF	23	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
X No Action	Unanimous	0	Joe Move, Tom 2nd no action based on our action in 22.
BOF	24	Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area.	
X Support as Amended	Unanimous	0	Joe Move Dan 2nd. Asked BBEDC for their position. Several AC members: Given WASSIP results we could justify fishing much farther down the north side. Joe move, Tom 2nd. to amend to exclude "3Hills" and otherwise follow recommendation of BBEDC. FRI is doing a genetics study of OPH and Ilnik. Amendment carries unanimous. Amended proposal carries unanimous.
BOF	25	Expand district boundary lines.	
X Oppose	0	Unanimous	Joe Move, Gayla 2nd; Several members had a hard time understanding how this would work. We see problems with intercepting non- terminal fish and likely allocative among districts / fishers. The current boundaries have been worked out over a long time. Late June genetics info would likely show this goes against the terminal fishery policy.
BOF	26	Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.	
X Oppose	0	Unanimous	Joe Move Tom 2nd; Discussion of the likely effects: intercept nonterminal fish. Allocative. "Back door approach to the old General District" proposal we opposed. We should be consistent if we oppose nonterminal interception other places.



RC 039

BB testimony

Hello chairman and members of the board

my name is Chris Wenzel I have been commercial fishing in Alaska since 1989, crewing until 1994

From 1994 - 2000 I was a Area M set-netter.

From 2000- present I have been an Area M Drifter.

I am a board member of CAMF Concerned Area M Fisherman

I am here to testify against proposals 22, 23, & 24

These 3 proposals suggest the Board moves the boundary line Cape Meshnikof between Bristol Bay and the Alaska Peninsula into Alaska Peninsula Waters.

What makes these proposals relevant for a Bristol Bay meeting or even Alaska peninsula meeting?

Wouldn't these proposals seem more appropriate if at all, at the statewide meeting.

ADF&G management areas and CFEC permit designations have there differences.

But the proposals are on the agenda today so I'm here to testify.

I believe Cape Meshnikof has been a Boundary between the Alaska Peninsula and Bristol Bay since the early 1900's.

Taking Alaskan Peninsula waters and making them Bristol Bay waters would create lost revenue from Alaska Peninsula processors, local communities and the Alaskan Peninsula fleet.

what kind of precedent would this set by moving this boundary line ?

If the Board wants to declare open season on regional boundaries will it be in order to propose moving Ugashik with the Alaska peninsula ; Cape Igvak into Chignik, and so forth.

What these proposals reveal is a long-standing bias that somehow the Alaska Peninsula should be subservient to Bristol Bay.

We disagree with that attitude.

Thank you for your time.

Chris Wenzel
CAMF

Chris Wenzel CAMP

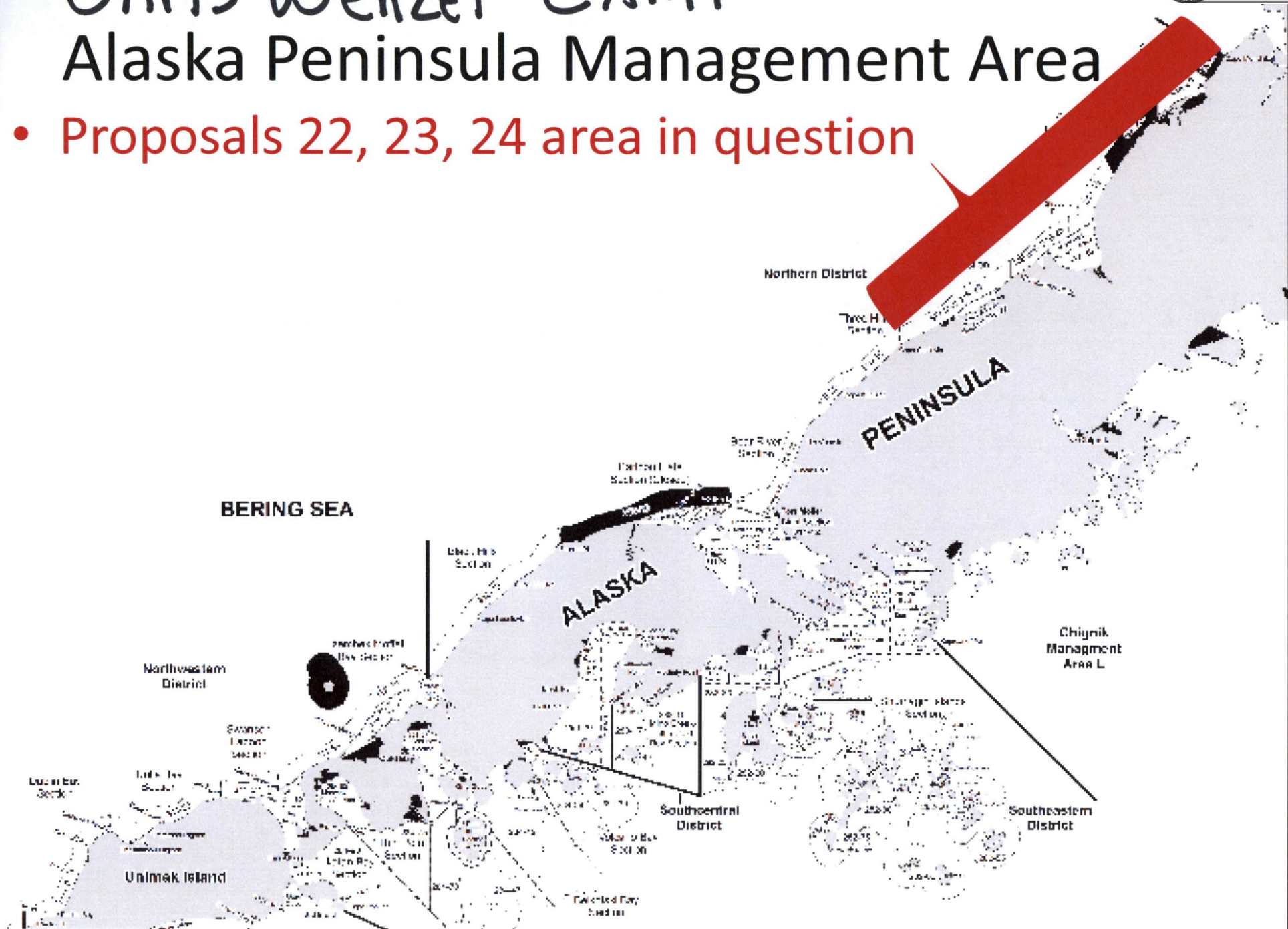
Alaska Peninsula Management Area

RC 038



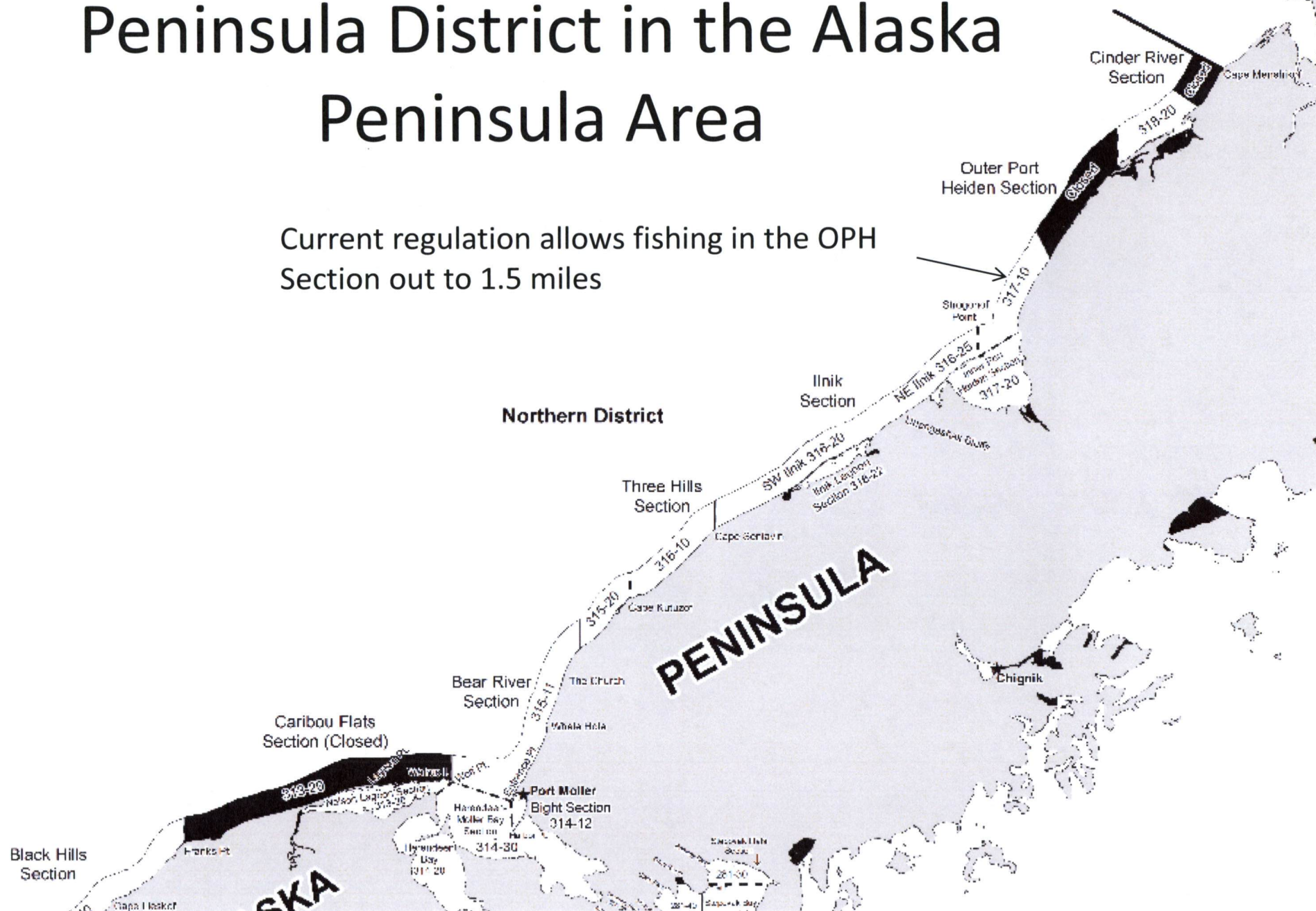
PC 12
10 of 25

- Proposals 22, 23, 24 area in question



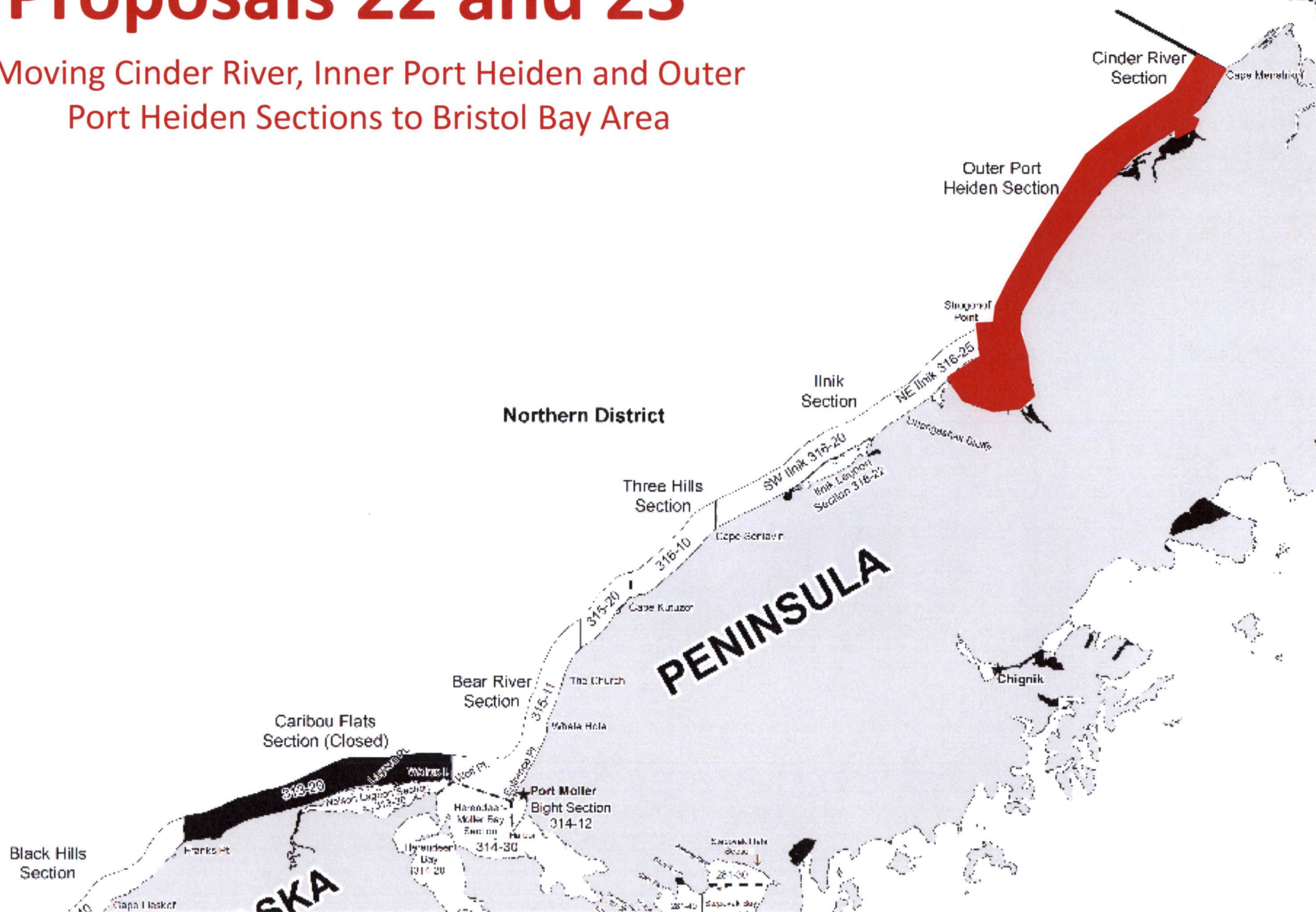
Existing Sections of the North Peninsula District in the Alaska Peninsula Area

Current regulation allows fishing in the OPH Section out to 1.5 miles



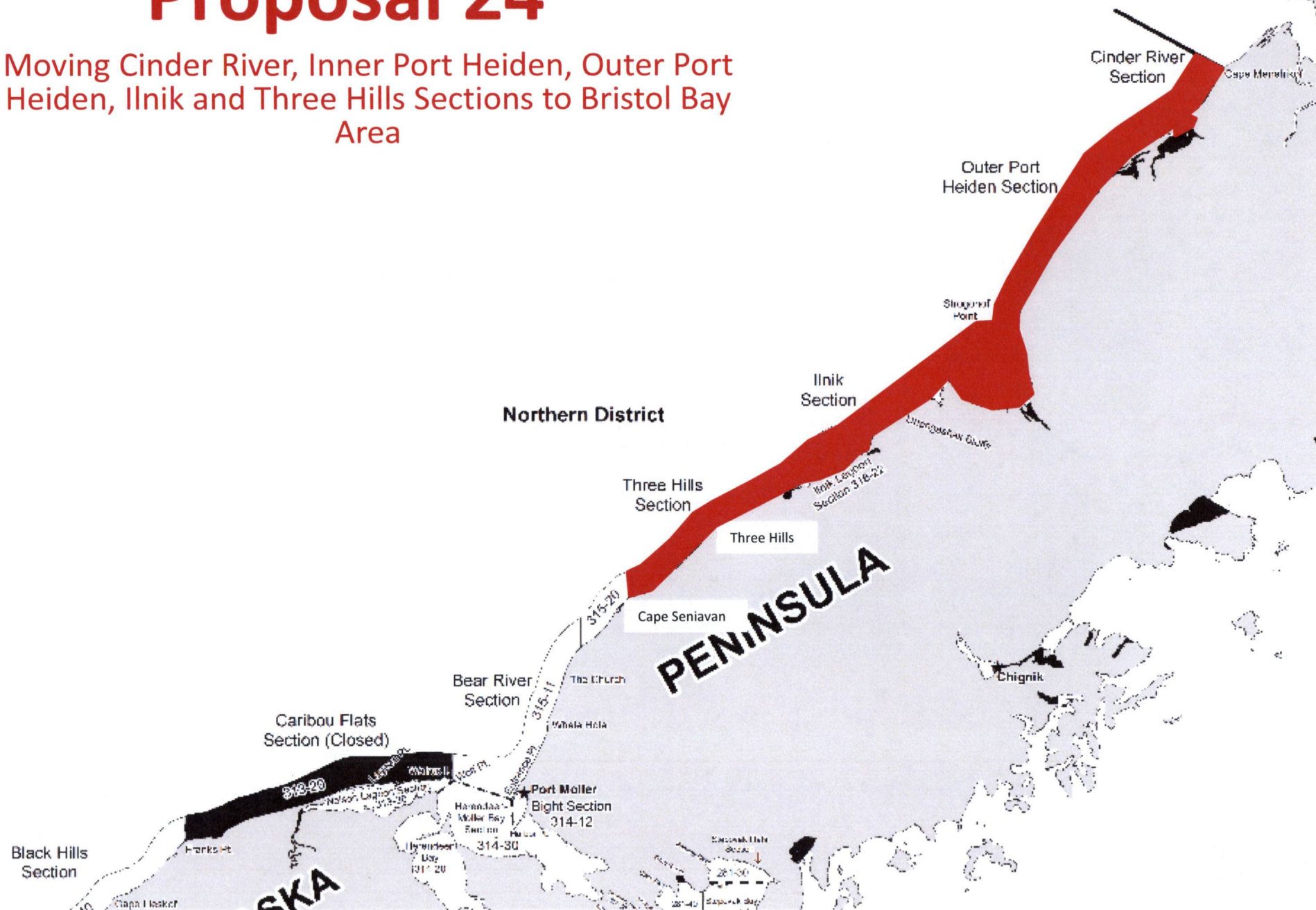
Proposals 22 and 23

Moving Cinder River, Inner Port Heiden and Outer Port Heiden Sections to Bristol Bay Area



Proposal 24

Moving Cinder River, Inner Port Heiden, Outer Port Heiden, Ilnik and Three Hills Sections to Bristol Bay Area





Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:14:53 AM
Affiliation

Phone
4258709104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth Pl
Everett, Washington 98203

I support Proposal 24. This will help managers in Bristol Bay meeting escapement and harvest goals to keep our fishery sustainable.

Thank You,

Peter Arnestad

Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:20:41 AM
Affiliation
Phone

4258709104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth Pl
Everett, Washington 98203

Please pass proposals 25 and 26 as we have invested in improving quality. Increased prices for our fish would benefit local economies.

Submitted By
Peter Arnestad
Submitted On
11/6/2015 8:07:05 AM
Affiliation
Phone

425-870-9104
Email
bonbon112@hotmail.com
Address
2312 Kenilworth Pl
Everett, Washington 98203

I support proposals 51 and 52. Permit stacking would benefit the fishery by reducing the amount of gear in the water, fleet size and improve safety. This would benefit all permit holders stacked or non stacked buy reducing gear and boats. Please implement these proposals into action.

Thank you,

Peter Arnestad



Submitted By
Joel Ludwig
Submitted On
11/5/2015 12:46:53 PM
Affiliation

Phone
4258700747
Email
jludwig581@gmail.com

Address
4018 226th PL NE
Arlington, Washington 98223

I support proposals 25 & 26. These are good proposals for the board to pass. As harvesters, we have made investments in quality, and we also need management to assist us in this venture. This will increase quality and ex vessel prices, which will increase the tax base for the local boroughs and economies. Thank you,

Joel Ludwig

I support proposal 24. Area M's indiscriminate interception of Bristol Bay-bound salmon negatively affects Bristol Bay harvest and escapement. ADF&G has recognized intercept fisheries as dangerous to the sustainability of fish stocks. Area M fisheries intercepting Bristol Bay stocks is in violation of such mandatory efforts. Passage of this proposal will support Bristol Bay managers in meeting optimum escapement and harvest goals.

Thank you,
Joel Ludwig

I support proposals 51 & 52, It's time for permit stacking to be passed by the board. These proposals will benefit the fishery by reducing the amount of gear in the water, reduce fleet size for managers to better manage fish openings and provide more fishing time because of a reduced fleet size. Passage will improve harvest methods for improved quality of fish and ex vessel pricing. Reduced fleet size will make for a safer fishery. Please pass these proposals, so that we won't have to be subjected to a expensive fleet reduction buy back program that is in the works. This can be done at the board process for free. Alaska State Legislature and CFEC has already paved the way for this to be implemented.

Thank You Joel Ludwig

Alaska Board of Fisheries
Bristol Bay Finfish Meeting
December 2-8, 2015

Bronson Brito and Susie Jenkins-Brito
Dillingham, AK

Dear Chairman Kluberton and Members of the Board:

Our family lives and works year round in the Bristol Bay community of Dillingham and are active participants in the Bristol Bay salmon fisheries. We own a drift fishing operation, the F/V Sea Breeze, with Bronson being a permit holder for the last decade and a third generation Bristol Bay fisherman. We also own and operate a marine welding business focused on improving the drift fleet. We are invested in raising our children to become commercial fishermen who understand and practice a subsistence lifestyle. Fishing for our family is certainly an economic endeavor, but, as many who fish understand, it is not merely a business but a lifestyle in which we annually participate— even when outcome is sure to be a low (or no) profit margin.

In reviewing and commenting on the following proposals we feel strongly in our role as advocates for local Bristol Bay resident's access to the fishery prosecuted outside of our front door. With the steady out migration of permits from our region, and the widening gap between the outside and local fleets capability, an equitable fishery is the goal in our approach to the proposed regulatory changes.

Proposals 22 & 23 - Support these proposal are in regards to allowing the village of Port Heiden's inclusion into the Bristol Bay Management Area and eliminating the interception fisheries especially the Outer Port Heiden district. With the inclusion of the Cinder River, Inner and Outer Port Heiden sections into the Bristol Bay Management Area T local residents of Bristol Bay would be able to access a fishery that occurs directly outside of their community and allow the fish whose stocks originated within Bristol Bay to be targeted by permit holders who have permitted access to these stocks.

Proposal 24 - Oppose as Written - We support only the inclusion of Cinder River, Inner and Outer Port Heiden Districts into Bristol Bay, but NOT the Ilnik or the Three Hills Sections.

Proposal 25 - Oppose - This proposal would NOT eliminate line fishing, it would simply move the line and lengthen the districts. We agree with the Department's comments in regards to this proposal.

Proposal 26 - Oppose - This proposal would essentially create a General District and any language that would allow for fishing on stocks in a non-terminal nature will not be supported by our family.

Proposal 27 & 28 & 29 - Neutral

Proposal 220 - Oppose - This proposal is impractical and would be unsafe for many fishers in rough weather; we agree with the Department's comments in regards to this proposal.



RC 10

Bristol Bay Finfish Proposals Summary Positions on proposals

BEDC, Nushagak AC, Iliamna AC,
Naknek/Kvichak AC, Lower Bristol Bay AC, and Togiak AC

Summarized by BBEDC

Registration

<u>Proposal Number</u>	<u>Proposal Description</u>	<u>POSITION</u>						
		<u>ADF&G</u>	<u>BBEDC</u>	<u>Nushagak AC</u>	<u>Iliamna AC</u>	<u>NaknekKvichak AC</u>	<u>Lower Bristol Bay AC</u>	<u>Togiak AC</u>
38	Change registration requirements for fisheries under emergency order conditions and change the registration date for the Naknek-Kvichak, Egegik, and Ugashik districts from June 25 to June 18.	NEUTRAL	<u>SUPPORT THE CONCEPT</u>	<u>SUPPORT THE CONCEPT</u>	NO ACTION	NO ACTION	NO ACTION	NO ACTION
39	For the Naknek-Kvichak District, eliminate the registration date of June 25, and require registration only before fishing in the district.	NEUTRAL	<u>SUPPORT THE CONCEPT</u>	<u>SUPPORT THE CONCEPT</u>	NO ACTION	NO ACTION	NO ACTION	NO ACTION
40	Change the drift gillnet registration date in the Naknek-Kvichak District from June 25 to June 17.	NEUTRAL	<u>SUPPORT THE CONCEPT</u>	<u>SUPPORT THE CONCEPT</u>	NO ACTION	NO ACTION	NO ACTION	NO ACTION
41	Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date and begin the paragraph "Before taking"	NEUTRAL	SUPPORT	SUPPORT	NO ACTION	SUPPORT	NO ACTION	NO ACTION
42	Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement.	NEUTRAL	OPPOSE	OPPOSE	NO ACTION	NO ACTION	NO ACTION	NO ACTION
43	Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District.	NEUTRAL	OPPOSE	OPPOSE	NO ACTION	NO ACTION	NO ACTION	NO ACTION
44	Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel.	NEUTRAL	SUPPORT	SUPPORT	NO ACTION	NO ACTION	NO ACTION	SUPPORT

Area Boundaries

<u>Proposal Number</u>	<u>Proposal Description</u>	<u>POSITION</u>						
		<u>ADF&G</u>	<u>BBEDC</u>	<u>Nushagak AC</u>	<u>Iliamna AC</u>	<u>NaknekKvichak AC</u>	<u>Lower Bristol Bay AC</u>	<u>Togiak AC</u>
22	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	NEUTRAL & OPPOSE	SUPPORT	SUPPORT	SUPPORT	SUPPORT	SUPPORT	NO ACTION
23	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	NEUTRAL & OPPOSE	SUPPORT	SUPPORT	NO ACTION	SUPPORT	SUPPORT	NO ACTION
24	Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area. Includes the Sections noted above but also the NW and SW Ilnik and Three Hills Sections.	NEUTRAL & OPPOSE	SUPPORT AS AMENDED	SUPPORT AS AMENDED	SUPPORT	NO ACTION	OPPOSE	NO ACTION

23 ADF&G is NEUTRAL on the allocative aspects and OPPOSED to the proposal.

Naknek/Kvichak Advisory Committee

Nov. 12, 2015

Meeting held at Bristol Bay Borough Building, Naknek, AK



PC 12
19 of 25

- I. Call to Order: William(Sonny)Regan called the meeting at 7:07
- II. Roll Call: Members Present: Sonny Regan, Everett Thompson, Ralph Zimin, Mark Watson, Joe Kluctsch. Richard Wilson and Alaxander Tallekpalek on teleconference
Members Absent: Fred Pike, Joey Kluctsch, Ryan Willson, Brian Kato
We had a quorum with 7 committee members participating. Sonny Regan Chaired the meeting, Everett was acting as Secretary since Fred Pike was absent.

There were all user groups in crowd, Subsistence, Sport, Commercial. Annette and Pete Caruso, George(Sonny) Wilson Jr, Greg Harris, Abe Williams.

Taryn **Oconnor-Brito was there for board support and we had two sport biologist from** Dillingham, our Naknek/Kvichak commercial biologist, representation from BBEDC and BBNA.

- III. Agenda was amended to include Unit 9 Caribou #1621 wildlife proposal. 9c/9e under new business III, Everett Thompson made motion to approve, Mark Watson 2nd.
- IV. Elections were held for committee members. Everett Thompson and Mark Watson were reelected. Since Ryan Wilson hadn't been participating we voted to replace him, George Wilson Jr took that seat. Brian Kato remains an alt. and also Greg Harris as alternate. Sonny Regan and Everett Thompson remain the co-chairs and George Wilson Jr. Sec.
- V. Comments on proposals for the 2015-2016 Board of Fish Cycle:



**BRISTOL BAY FINFISH
DECEMBER 2–9, 2015
ALASKA BOARD OF FISHERIES**

Mandatory- Please Summarize Your Proposal Comments in this Form

BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	22	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
<input type="checkbox"/> Support	8	0	Everett Thompson moved to accept 22-24, Mark Watson 2nd. Committee feels area M catches our fish anyway and that it should be a part of BB since many BB residents live in Port Heiden.
BOF	23	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
<input type="checkbox"/> Support	8	0	" "
BOF	24	Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area.	
<input type="checkbox"/> Support	8	0	" "
BOF	25	Expand district boundary lines.	
<input type="checkbox"/> Oppose	0	8	Everett Thompson moved to accept, Mark Watson 2nd. Committee feels this would be hard to enforce and in times of heavy fishing it would be possible to drift in between 3 mile intervals.
BOF	26	Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.	
<input type="checkbox"/> Oppose	1	7	Mark Watson moved to accept, Ralph Zimin 2nd. Committee felt all fish should be accounted for in a district they are caught. You wouldn't know where they were caught with general district. Committee also felt that it could mean longer drifts and less fish quality from not working gear.
BOF	27	Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers. (This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)	
<input type="checkbox"/> Oppose	0	8	Everett Thompson moved to accept, Joe Klutsch 2nd. We grouped 27 and 28 together. Committee felt there was a grudge against set netters and to just keep it as is.
BOF	28	Change the character size requirements for set gillnet marking signs. (This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)	
<input type="checkbox"/> Oppose	0	8	" "



R C 0 0 0

2015 Alaska Board of Fisheries

Bristol Bay Meeting

Ronald R Tavis testimony opposing Proposals 22-24

Mr. Chairman and members of the board, my name is Ron Tavis, I am a member of Concerned Area M Fishermen and also serve on its' board. I have fished Area M since 1987 and owned and operated my drift operation since 1995.

I am here today to state my opposition to proposals 22, 23 and 24. I have attended and provided testimony at the Alaska Peninsula meetings since I first became a permit holder. This is the first time I am compelled to give testimony concerning my area in another area's meeting. The time and expense to travel here to listen and take part in the unwarranted and ongoing attempt to curtail our fishery and again at the Alaska Peninsula meeting is getting very tiresome.

There are some new faces but for the most part the same individuals that have stated their goal to "Shut down Area M" are here and will be at the Alaska Peninsula meeting. I ask "To what purpose"? The North Peninsula fishery is small, orderly and well managed with minimal impact on harvest rates to any system in Bristol Bay. There are no conservation concerns and escapement and harvests continue to flourish.

The North Peninsula is a historic fishery with strong local ties and adds needed economic input. Pre Limited Entry, the 1966 ADF&G regulation book described the Alaska Peninsula area in Regulation 105.02 as "All waters of Alaska from Cape Menshikof to Unimak Pass, thence easterly to Kupreanof Point"—the same as current regulations. By regulation Area T fishers may fish the shoulder season for Chinook and Coho in the overlap area. But why does hardly anyone prosecute this fishery? There is better fishing elsewhere.

I hope the board can see what I truly believe this decade's long argument is about---"a misguided attempt to shut down Area M by the same individuals (or by proxy), to gain virtually nothing for their fishery but only for their ego.

Mr. Chair and members of the board, "Fish have Tails". No matter where they are caught—they are the State of Alaska's' resource. Sockeye salmon leave Bristol Bay the size of your thumb—with zero market value. They return from waters to the west, including waters of the Alaska Peninsula, at maturity with full market value. As long as there is minimal impact to an adjacent area I believe it would set bad precedent to re-do area boundaries on well-defined historical areas for what is tantamount to a land grab.

Thank you, Ronald R Tavis



12/2/15

RC 046

Thomas Tilden

Dillingham, AK

Good morning Mr. Chairman, Board of Fish and staff. My name is Thomas Tilden, I am a commercial fisherman and have been commercial fishing since 1965. I have fished as a crew member on both set net and drift fisheries operations. I have also fished in both fisheries as an owner of permits in both. I no longer set net fish and only drift now. I am heavily invested in the fishery by not only owning my own permit but my own boat, that I designed and had built in Hungry Harbor in the Columbia River. My sons, daughters, and grandchildren have been my crewmembers. I have my son and two grandchildren who fish with me now. They all want to be fisherman. I have fished not only salmon with my boat but have seined and gillnetted herring. I have also fished halibut with long lines. My comments are gonna focus on two issues. #1. Permit Stacking, #2. 48-hour transfer. But before I talk to these I would like to express proposals I support and those I don't.

I support proposals 22, 23, 24, 30, 41, 44, 56, 63, 64, 67, 69, 71, 72, 73, 74, 75, 77, 78, 79, 81, 82, 83, 84, 85, 86, 87, 88, 89. I don't support proposals 25, 26, 27, 28, 29, 220, 221, 34, 42, 43, 45, 46, 47, 48, 51, 52, 54, 55, 57, 58, 59, 60, 61, 62, 65, 219, 68, 70 and 90.

Regarding permit stacking, I oppose any kind of permit stacking. When you read CFEC report No. 12-02-N it shows that local Bristol Bay Fisherman are at a disadvantage in stacking permits. In 2010 only 9 permits were stacked by Bristol Bay local fisherman and in 2011 only 12 and in 2012 only 13. Now you look at non-local in 2010 were 27, in 2011 there was 39, and in 2012 there were 42. When you look at non-residents in 2010, 19 and in 2011, 44 and 2012, 50. So when you look at these numbers Bristol Bay residents are at a huge disadvantage. When the east side districts were pulled in to build up the Kvichak river, permit stacking was not allowed in the east side districts. So they all came to the Nushagak district to fish. Every once in a while fishing boats tangle, because those with dual permits tow at a slower rate than boats with only 3 nets.

It's no wonder that outside fishermen can afford to buy an extra permit. Just look in the yellow pages at the number of banks available to outside fishermen in Seattle. Pages and pages of banks are available to outside fishermen. Now look in Anchorage yellow pages. There are just a couple pages of banks available for Alaska fishermen. Another advantage they have is that all the major buyers are located within the Seattle area.

I am not in favor of any permit stacking or any proposal that will make Bristol Bay Residents at a disadvantage in their fishery.

I would like to now address transfer waiting time. I believe that this has always been a great management tool for ADF&G. It is also good for processors and fishermen. As a fisherman it takes a very serious situation to occur for me to transfer out of the Nushagak District. Nowadays with cell phones, I know what other fishermen are doing in other districts instantly. Let's keep in place the 48 hour transfer so that ADF&G knows how much gear is in the water for each district. So that processors know where their fleet is and fishermen know who all is fishing in the district that they are transferring to.

In conclusion, let's eliminate the stacking of permits and give all fishermen equal footing on the fishing grounds and let's keep the 48 hour transfer time.



Gerda Kosbruk

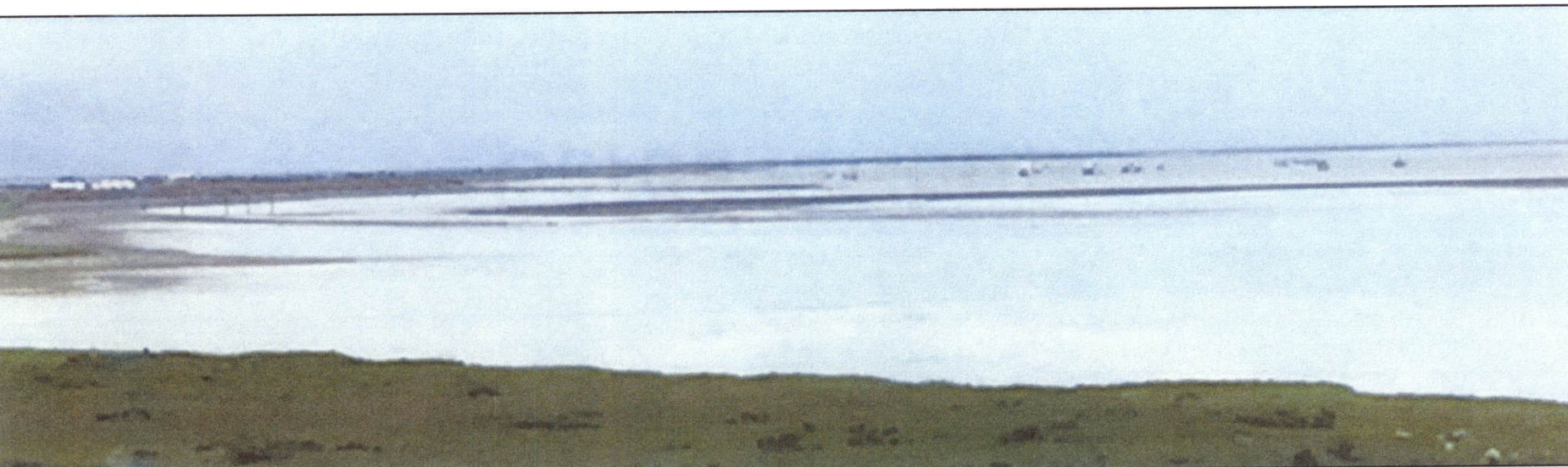
Representing myself

Life long resident of Port Heiden

Proposal 22 & 23

I support proposal 23 and proposal 22.

- We always been Bristol Bay fishermen and we would like our waters in front of our home to be managed by area T management.



Proposal 22/23 cont.



Tisha Christensen and her daughter splitting fish for home use.

- The WASSIP study showed that Area M fishermen were catching mixed stock of salmon most of which are Bristol Bay bound. This **was not** the intent when Outer Port Heiden section was opened. It was opened to manage Meshik River.
- I would recommend closing the outer waters to both Area T & Area M permits and leave the Inner waters of Port Heiden open to both area's fishers.



February 8, 2016

Alaska Department of Fish and Game
Boards Support Section – Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Attn: Alaska Board of Fisheries

Tom Kluberton, Chairman
Orville Huntington
Fritz Johnson
Bob Mumford

John Jensen, Vice Chairman
Sue Jeffry
Reed Morisky

To the Members of the Alaska Board of Fisheries,

Please accept these comments from the Aleut Corporation for proposals **22, 23, 24, 150, 151, 152, 153, 154, 155, 156, 157, 158, 181, 184, 185, 186, and 194** for the Alaska Board of Fisheries Alaska Peninsula / Aleutian Island / Chignik Finfish meeting that is occurring on February 23 - February 29, 2016. The following comments are in regard to proposals that can have an impact on fisheries within the Aleut Region; and are therefore important to the residents of the Region and the community members who fish in them.

Proposals: 22 & 23
Position: Opposed

The Aleut Corporation is opposed to **proposals 22 and 23**, which request that the fishing grounds of Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Alaska Peninsula Management Area are moved to the Bristol Bay Management Area. This would move the boundary from its current location at Cape Menshikof to Cape Seniavin.

Since approximately 1924, Cap Menshikof has been the established boarder between the Bristol Bay and Alaska Peninsula Management. Current commercial salmon harvest opportunities in Cinder River, Inner Port Heiden, and Outer Port Heiden sections is made available through an Area M commercial fishing permit. In addition, there is an overlap between the Alaska Peninsula Management Area and Bristol Bay Management Area. The overlap consists of the Cinder River Section, Inner Port Heiden Section, and Ilnik Lagoon. In this overlap area, Registration Area T permit holders have the opportunity to fish within their traditional harvest locations of Registration M. Because residents of Port Heiden can fish with Area T permits within the Inner Port Heiden Section and in the inner portion of the Cinder River, and Ilnik Lagoon there is no reason to adopt proposal 22 and 23 to change the commercial fishing boundaries or commercial fishing Permits.

Currently, the Port Moller department office manages commercial harvest in the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District. Included in management is monitoring escapement to assure escapement goals are met. If this proposal was adopted management of these districts would have to be moved to the King Salmon department office. This would add increased costs and management obligations to the King Salmon Office for managing escapement and the commercial fisheries. In addition, additional costs will be accrued through increased time and personnel that will be needed to change maps, websites, permits, moving offices and personnel, etc. The Alaska Department of Fish and Game Port Moller department office is capable of managing Area M, Cinder River, Inner Port Heiden, and Outer Port Heiden sections managing the fishery. In addition, changing Fishing Area boundaries and transferring management is unnecessary and would be costly. In the current economic state it is not practical. Moving Area boundaries is unnecessary and burdensome, especially when Alaska is facing a fiscal challenge that doesn't appear to resolve in the near term.

In proposal 22 and 23, the proponent states *“Including Port Heiden in the Bristol Bay area would facilitate enforcement efforts in the Outer and Inner Port Heiden sections.”* It is unclear how acceptance of this proposal would facilitate enforcement efforts; current management of this fishery is capable and efficient. In addition, the Alaska Department of Fish and Game Staff comments on Proposal 23 and 24, from the Bristol Bay Finfish meeting held December 2-8, 2015, stated that *“Making the Cinder River, Inner Port Heiden, and Outer Port Heiden sections part of the Bristol Bay Management Area could substantially increase the number of permits that fish these areas.”* This may in fact increase enforcement efforts in the Outer and Inner Port Heiden Sections.

In 2015, there were 163 drift gillnet commercial fishing permit holders in Registration Area M that could fish in the Outer Port Heiden section; of these 40 permits were from individuals from King Cove, Nelson Lagoon, Sand Point, Port Moller, and Unalaska. In proposals 22 and 23 the proponents state that *“Most of the commercial fishing permits that are owned by Port Heiden Residents are Area T permits, commercial Bristol Bay fishing permits.”* In 2015, there were 11 drift gillnet commercial fishing permits issued from residents of Port Heiden for Area T. Most of the drift gillnet commercial fishing permit holders that can fish in Outer Port Heiden section are individuals who live in Area M communities, such as King Cove, Nelson Lagoon, Sand Point, Port Moller, and Unalaska. The Alaska State Constitution, Section Article 8, Section 3 states *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The commercial Salmon fisheries in Area M, Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District are managed for the people not just the residents of Port Heiden.

In proposal 22 and 23, the proponent states that *“Port Heiden is a member of the community in the Bristol Bay Economic Development Corporation.”* The Western Alaskan Community Development Program (CDQ) was established in 1991, many years after the commercial fishing boundaries were established. The CDQ program is an economic development program that is associated with federally managed fisheries, not state managed salmon fisheries. The CDQ program is not managed by the State of Alaska. This program was put in place to provide Western Alaskan communities the opportunity to participate and invest in the Bering Sea and Aleutian Islands (BSAI) fisheries and to support economic development in Western Alaska. The

initial investment of these CDQ programs was commercial fisheries that are located in the BSAI and in some cases these CDQ organizations, including the Bristol Bay Economic Development Corporation, have invested in locally state managed fisheries. The fact that the community of Port Heiden is part of the Bristol Bay Economic Development Corporation has no bearing on state managed salmon fisheries and where commercial fishing district boundaries are drawn.

Therefore, we ask that you **oppose proposals 22 and 23**, which request moving the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula to the Bristol Bay Area.

Proposal: 24

Position: Opposed

The Aleut Corporation is opposed to **proposals 24**, which requests that all waters of the Northern District east of the latitude of Cape Seniavin are moved from the Alaska Peninsula Area to the Bristol Bay Area. This proposal would move the fishing grounds of Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Alaska Peninsula Management Area are moved to the Bristol Bay Management Area.

Since approximately 1924, Cap Menshikof has been the established boarder between the Bristol Bay and Alaska Peninsula Management. Current commercial salmon harvest opportunities in Cinder River, Inner Port Heiden, and Outer Port Heiden sections is made available through an Area M commercial fishing permit. If proposal 24 is adopted, registration to fish in these sections will from an Area M fishing permit to an Area T Permit.

Current management of this fishery is capable and efficient. The Alaska Department of Fish and Game Staff comments on Proposal 24, from the Bristol Bay Finfish meeting held December 2-8, 2015, stated that *“Making the Cinder River, Inner Port Heiden, and Outer Port Heiden sections part of the Bristol Bay Management Area could substantially increase the number of permits that fish these areas.”* This may in fact increase enforcement efforts and costs in the Outer and Inner Port Heiden Sections.

Currently, management of the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District is occurs through the Port Moller department office. Included in management is monitoring escapement to assure escapement goals are met. If this proposal was adopted management of these districts would have to be moved to the King Salmon department office. This would add increased costs and management obligations to the King Salmon Office for managing escapement and the commercial fisheries. In addition, additional costs will be accrued through increased time and personnel that will be needed to change maps, websites, permits, moving offices and personnel, etc. The Alaska Department of Fish and Game Port Moller department office is capable of managing Area M, Cinder River, Inner Port Heiden, and Outer Port Heiden sections managing the fishery. In addition, changing Fishing Area boundaries and transferring management is unnecessary and would be costly. In the current economic state it is not practical. Moving Area boundaries is unnecessary and burdensome, especially when Alaska is facing a fiscal challenge that doesn't appear to resolve in the near term.

In 2015, there were 163 drift gillnet commercial fishing permit holders in Registration Area M that could fish in the Outer Port Heiden section; of these 40 permits were from individuals from King Cove, Nelson Lagoon, Sand Point, Port Moller, and Unalaska. In 2015, there were 11 drift gillnet commercial fishing permits issued from residents of Port Heiden for Area T. Most of the drift gillnet commercial fishing permit holders that can fish in Outer Port Heiden section are individuals who live in Area M communities, such as King Cove, Nelson Lagoon, Sand Point, Port Moller, and Unalaska. The Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The commercial Salmon fisheries in Area M, Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District are managed for the people not just the residents of Port Heiden or Bristol Bay.

Therefore, we ask that you **oppose proposals 24**, which requests that all waters of the Northern District east of the latitude of Cape Seniavin are moved from the Alaska Peninsula Area to the Bristol Bay Area.

Proposal: 150

Position: Support

The Aleut Corporation supports **Proposals 150**. This would describe, in regulation, the area of Cinder River Lagoon that is currently open to commercial fishing for salmon prior to August 1st.

Therefore, we ask that **you support proposal 150**, which requests waters open to commercial fishing for salmon prior to August 1st in Cinder River Lagoon be described in regulation.

Proposal: 151

Position: Opposed

The Aleut Corporation is opposed to **Proposal 151**. This proposal request that the catch of non-local salmon be considered in the management of Northern District Salmon fisheries.

The Northern District is largely a sockeye salmon fishery although Chinook, coho and chum salmon fisheries can occur depending on market conditions. During even numbered years and depending on market conditions, pink salmon are frequently targeted. Escapement of systems throughout Alaska show healthy sockeye, chum, and coho runs. Chinook Salmon are typically not targeted in this fishery and hasn’t been in recent years. Current management of the Northern District Salmon fisheries is capable and sufficient. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

The Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and

Unalaska. In 2015, there were 206 drift gillnet commercial fishing permit holders in Registration for the Northern District that could fish from these communities.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for 206 people who live in the rural communities of Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska and fish in the Northern District. This income affords them the ability to live in their rural communities with their families. They have fished these waters for subsistence and commercially for many generations. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters.

Therefore, we ask that you **oppose proposal 151**, which request that the catch of non-local salmon be considered in the management of Northern District Salmon fisheries.

Proposal: 152

Position: Opposed

The Aleut Corporation is opposed to **Proposal 152**. This proposal request that from June 20 through July 20 the Northern District salmon fisheries are managed jointly with the Alaska Department of Fish and Game Alaska Peninsula and Bristol Bay Staff.

The Northern District is largely a sockeye salmon fishery although Chinook, coho and chum salmon fisheries can occur depending on market conditions. During even numbered years and depending on market conditions, pink salmon are frequently targeted. Escapement of systems throughout Alaska show healthy sockeye, chum, and coho runs. Chinook Salmon are typically not targeted in this fishery and hasn't been in recent years. Current management of the Northern District Salmon fisheries is capable and sufficient. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

Current management of Alaska Peninsula is sufficient and effective. By requiring the Northern District salmon fisheries to be managed jointly between the Fish and Game Alaska Peninsula and Bristol Bay Staff it will add on an unneeded burden to Area Managers of both Districts. In addition, salmon runs and the salmon fisheries that are operated throughout these two districts do not occur during the same time. Because of this fisheries in the Northern District would not be able to operate until all river stock that have escapement goals are met; which would shut down the Northern District fisheries indefinitely.

The Alaska State Constitution, Section Article 8, Section 3 states, *"Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska. In 2015, there were 206 drift gillnet commercial fishing permit holders in Registration for the Northern District that could fish from these communities.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for 206 people who live in the rural communities of Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska and fish in the Northern District. This income affords them the ability to live in their rural communities with their families. They have fished these waters for subsistence and commercially for many generations. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters.

Therefore, we ask that you **oppose proposal 152**, which requests that from June 20 through July 20 the Northern District salmon fisheries are managed jointly with the Alaska Department of Fish and Game Alaska Peninsula and Bristol Bay Staff.

Proposal: 153

Position: Opposed

The Aleut Corporation is opposed to **Proposal 153**. This proposal request that Northern District salmon fisheries management include information on the abundance of non-local salmon stocks as a factor in managing Northern District commercial salmon fisheries.

Commercial fishing in the Northern District is predominantly Sockeye Salmon. Harvest of Sockeye Salmon begins in early June with the peak occurring at the end of June and beginning of July. The WASSIP study examined commercial harvest from 2006-2009. The ratios found in the study may not be reflective of all commercial salmon harvests through time and in the future. Therefore this suggested management strategy would require genetic testing, with a 24 hour turn around, of Salmon harvested in the North District. This type of genetic testing is costly and requires additional staff on the grounds and in the genetic lab. Requiring information on abundance of non-local stocks as a factor in managing the Northern District Commercial salmon fisheries is not practical or feasible. Current management of Alaska Peninsula is sufficient and effective.

The Northern District is largely a sockeye salmon fishery although Chinook, coho and chum salmon fisheries can occur depending on market conditions. During even numbered years and depending on market conditions, pink salmon are frequently targeted. Escapement of systems throughout Alaska show healthy sockeye, chum, and coho runs. Chinook Salmon are typically not targeted in this fishery and hasn't been in recent years. Current management of the Northern District Salmon fisheries is capable and sufficient. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

In addition, the Alaska State Constitution, Section Article 8, Section 3 states, "*Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.*" The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand

Point, and Unalaska. In 2015, there were 206 drift gillnet commercial fishing permit holders in Registration for the Northern District that could fish from these communities.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for 206 people who live in the rural communities of Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska and fish in the Northern District. This income affords them the ability to live in their rural communities with their families. They have fished these waters for subsistence and commercially for many generations. Adoption of this proposal would target fishermen from the communities Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska and is a violation Alaska's Constitution. This would put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters.

Therefore, we ask that you **oppose proposal 153**, which requests that that Northern District salmon fisheries management include information on the abundance of non-local salmon stocks as a factor in managing Northern District commercial salmon fisheries.

Proposal: 154

Position: Opposed

The Aleut Corporation is opposed to **Proposal 154**. This proposal request that management actions of the Northern District salmon fisheries is linked with salmon abundance in adjacent Bristol Bay Area Districts.

Commercial fishing in the Northern District is predominantly Sockeye Salmon. Harvest of Sockeye Salmon begins in early June with the peak occurring at the end of June and beginning of July. The proponent used information obtained from the WASSIP study as a basis for the proposal. The WASSIP study examined commercial harvest from 2006-2009. The ratios found in the study may not be reflective of all commercial salmon harvests through time and in the future. Therefore this suggested management strategy would require genetic testing, with a 24 hour turn around, of Salmon harvested in the North District. This type of genetic testing is costly and requires additional staff on the grounds and in the genetic lab. Requiring information on abundance of non-local stocks as a factor in managing the Northern District Commercial salmon fisheries is not practical or feasible. Current management of Alaska Peninsula is sufficient and effective.

The Northern District is largely a sockeye salmon fishery although Chinook, coho and chum salmon fisheries can occur depending on market conditions. During even numbered years and depending on market conditions, pink salmon are frequently targeted. Escapement of systems throughout Alaska show healthy sockeye, chum, and coho runs. Chinook Salmon are typically not targeted in this fishery and hasn't been in recent years. Current management of the Northern District Salmon fisheries is capable and sufficient. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

Current management of Alaska Peninsula is sufficient and effective. By requiring the Northern District salmon fisheries to be managed jointly between the Fish and Game Alaska Peninsula and Bristol Bay Staff it will add on an unneeded burden to Area Managers of both Districts. In addition, salmon runs and the salmon fisheries that are operated throughout these two districts do not occur during the same time. Because of this fisheries in the Northern District would not be able to operate until all river stock that have escapement goals are met; which would shut down the Northern District fisheries indefinitely.

The Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska. In 2015, there were 206 drift gillnet commercial fishing permit holders in Registration for the Northern District that could fish from these communities.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for 206 people who live in the rural communities of Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska and fish in the Northern District. This income affords them the ability to live in their rural communities with their families. They have fished these waters for subsistence and commercially for many generations. Adoption of this proposal would violate Alaska’s Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters.

Therefore, we ask that you **oppose proposal 154**, which requests that management actions of the Northern District salmon fisheries is linked with salmon abundance in adjacent Bristol Bay Area Districts.

Proposal: 155

Position: Opposed

The Aleut Corporation is opposed to **Proposals 155 and 156**. This proposal requests that Outer Port Heiden section of the Northern District be closed to commercial fishing.

At the February/March 2013 board meeting, new regulations were adopted to open the Port Heiden Section to commercial salmon fishing 1.5 nmi from the baseline and no longer 3 nmi. This change is for the entire commercial salmon fishing season in the Outer Port Heiden Section from June 20 through July 31.

Commercial fishing in the Outer Port Heiden section reopened in 2007 and is predominantly Sockeye Salmon. The Outer Port Heiden section may open to commercial fishing from June 20 through July 31. In 2014, a total of 90 permit holders fished and harvested 420,959 Sockeye Salmon. Harvest of Sockeye Salmon begins in early June with the peak occurring at the end of June and beginning of July. This fishery is not large and does not pose any threat to Sockeye

Salmon populations. Escapement of Sockeye Salmon populations throughout Alaska are healthy. Current management of this fishery is capable and sufficient. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

The proponents state that the Outer Port Heiden section of the Northern District be closed to commercial fishing due to the harvest of salmon that are not bound for the Meshik River. Policy for the management of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

If mixed stock fisheries are not allowed, fisheries within Bristol Bay should be closed. According to the WASSIP study commercial fisheries operated in Bristol Bay harvest non-local salmon populations, with Naknek, Egigik, and Ugashik Districts harvesting a substantial amount of non-local salmon. Examples of non-local harvest according to the WASSIP study from Bristol Bay commercial salmon fisheries include:

The Ugashik District harvests Sockeye Salmon from the Wood, Nushagak, Naknek, and Egigik rivers. Between 2006 and 2009, the mean harvest of Egigik bound Sockeye Salmon in the Ugashik District ranged between 7.3% and 25.5%. In 2008, Egigik bound Sockeye salmon harvested in the Ugashik District accounted for 25.5% of the Sockeye Salmon harvested; with a range of 18.4% - 33.9% Sockeye Salmon harvested in the first Stratum (6/16-6/29).

The Egigik District has also seen harvest of non-local Sockeye Salmon in their fisheries. In 2007, non-local salmon accounted for 41% of Egigik District's harvest between 6/16/2007-6/29/2007.

The Alaska State Constitution, Section Article 8, Section 3 states, *"Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for the rural residents that fish in the Outer Port Heiden section. This income affords them the ability to live in their rural communities with their families. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters. In addition it would violate Alaska State Policy for the management and allowance of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

Therefore, we ask that you **oppose proposals 24**, which requests that Outer Port Heiden section of the Northern District be closed to commercial fishing.

Proposal: 157

Position: Opposed

The Aleut Corporation is opposed to **Proposal 157**. This proposal requests that commercial fishing for salmon in the Inner and Outer Port Heiden sections of the Northern District be restricted to no more than four days in any seven-day period.

Area Managers are capable to open and close fisheries. In 2015 there was no commercial fishing effort in the Inner Port Heiden section. By regulation, the Outer Port Heiden Section may open to commercial salmon fishing from June 20 through July 31. Fishing time in the Outer Port Heiden Section is based on Meshik River sockeye salmon abundance unless management actions are taken for the conservation of Ugashik River sockeye salmon in the Egegik District. The weekly fishing period in the Outer Port Heiden Section allows 2.5 days of fishing time per week. In 2015, commercial salmon fishing opened in the Outer Port Heiden section on June 24 for the first 2.5-day fishing period. This schedule was followed through July 29 when the area closed for the duration of the 2015 season.

The proponent states that the issue being addressed “*is Conservation, subsistence harvest concerns, (Kings, Chums, Sockeye)*”. In addition the proponent is the Lower Bristol Bay Fish and Game Advisory Committee. Currently there are no stocks of concern for Kinds, chum, or Sockeye Salmon in the Bristol Bay region. In addition, the Northern District is largely a sockeye salmon fishery although Chinook, coho and chum salmon fisheries can occur depending on market conditions. During even numbered years and depending on market conditions, pink salmon are frequently targeted. Escapement of systems throughout Alaska, including Bristol Bay show healthy Chinook, Sockeye, Chum, and Coho Salmon runs. Chinook Salmon are typically not targeted in this fishery and hasn’t been in recent years. The majority of subsistence harvest in the Bristol Bay region is Chinook and Sockeye Salmon. Subsistence harvest has not been closed and subsistence needs have been met.

Current management of the Northern District Salmon fisheries is capable and sufficient. They are able to assure that the Inner and Outer Port Heiden sections are managed appropriately and they are capable in deciding when openings can and cannot occur. Managers assure that the salmon are not harvested wastefully and that they are harvested at a sustainable rate.

The proponent also states that the issue being addressed “*High interception of Bristol Bay’s migrating stock*”. Policy for the management of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

If mixed stock fisheries are not allowed, fisheries within Bristol Bay should be closed. According to the WASSIP study commercial fisheries operated in Bristol Bay harvest non-local salmon populations, with Naknek, Egegik, and Ugashik Districts harvesting a substantial amount of non-local salmon. Examples of non-local harvest according to the WASSIP study from Bristol Bay commercial salmon fisheries include:

The Ugashik District harvests Sockeye Salmon from the Wood, Nushagak, Naknek, and Egegik rivers. Between 2006 and 2009, the mean harvest of Egegik bound Sockeye

Salmon in the Ugashik District ranged between 7.3% and 25.5%. In 2008, Egegik bound Sockeye salmon harvested in the Ugashik District accounted for 25.5% of the Sockeye Salmon harvested; with a range of 18.4% - 33.9% Sockeye Salmon harvested in the first Stratum (6/16-6/29).

The Egegik District has also seen harvest of non-local Sockeye Salmon in their fisheries. In 2007, non-local salmon accounted for 41% of Egegik District's harvest between 6/16/2007-6/29/2007.

The Alaska State Constitution, Section Article 8, Section 3 states, *"Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for the rural residents that fish in the Outer Port Heiden section. This income affords them the ability to live in their rural communities with their families. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters. In addition it would violate Alaska State Policy for the management and allowance of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

Therefore, we ask that you **oppose proposal 157**, which that commercial fishing for salmon in the Inner and Outer Port Heiden sections of the Northern District be restricted to no more than four days in any seven-day period.

Proposal: 158
Position: Opposed

The Aleut Corporation is opposed to **Proposal 158**. This proposal request that commercial fishing in the Three Hills, Ilnik, and Outer Port Heiden sections of the Northern District be restricted to no more than one and one-half miles offshore based on run strength of Ugashik and Egegik.

There are already management actions to conserve salmon migrating to the Egegik and Ugashik districts. In 2013, the fishing area in the Outer Port Heiden Section was reduced by one-half at the BOF meeting in February/March. The 2013 commercial fishing season was the first season that harvest was not allowed from 1.5 nmi out to 3 nmi. Currently, management action may be taken in the Ilnik and Outer Port Heiden sections for conservation of Ugashik River sockeye salmon if that portion of the Egegik District specified in 5 AAC 06.359(c) is closed for the conservation of Ugashik River sockeye salmon in the Bristol Bay Management Area.

These additional restrictions are unwarranted and are targeting a fishery that many rural Alaskan residents from the Alaska Peninsula depend on. Policy for the management of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries. If mixed stock fisheries are not allowed, fisheries within Bristol Bay should be closed. According to the WASSIP study commercial fisheries operated in Bristol Bay harvest non-local salmon populations, with Naknek, Egigik, and Ugashik Districts harvesting a substantial amount of non-local salmon. Examples of non-local harvest from Bristol Bay commercial salmon fisheries, according to the WASSIP study, include:

The Ugashik District harvests Sockeye Salmon from the Wood, Nushagak, Naknek, and Egigik rivers. Between 2006 and 2009, the mean harvest of Egigik bound Sockeye Salmon in the Ugashik District ranged between 7.3% and 25.5%. In 2008, Egigik bound Sockeye salmon harvested in the Ugashik District accounted for 25.5% of the Sockeye Salmon harvested; with a range of 18.4% - 33.9% Sockeye Salmon harvested in the first Stratum (6/16-6/29).

The Egigik District has also seen harvest of non-local Sockeye Salmon in their fisheries. In 2007, non-local salmon accounted for 41% of Egigik District's harvest between 6/16/2007-6/29/2007.

The Alaska State Constitution, Section Article 8, Section 3 states, *"Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for the rural residents that fish in the Outer Port Heiden section. This income affords them the ability to live in their rural communities with their families. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters. In addition it would violate Alaska State Policy for the management and allowance of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

Therefore, we ask that you **oppose proposal 158** which requests that commercial fishing in the Three Hills, Ilnik, and Outer Port Heiden sections of the Northern District be restricted to no more than one and one-half miles offshore based on run strength of Ugashik and Egigik.

Proposal: 181

Position: Opposed

The Aleut Corporation is opposed to **Proposal 181**. This proposal request that the South Unimak and Shumagin Island's June Salmon Management Plan be repealed.

The proponent states that the issue being addressed “*close commercial salmon intercept fishery, for conservation of Yukon Kuskokwim salmon.*” According to the WASSIP study little to no salmon harvested South Unimak and Shumagin Island's salmon fishery were from the Kuskokwim and Yukon region. Commercial fishing in the South Unimak and Shumagin Island's June Salmon is predominantly Pink, Sockeye, and Chum Salmon; however Chum Salmon harvest has decreased considerably over the years and Sockeye and Pink Salmon are predominantly targeted. The harvest of Yukon and Kuskokwim Salmon in the Shumagin Islands post-June fishery, based on WASSIP, is less then 5%.

In the Shumagin Islands post-June fishery the largest contributor of fish is the South Peninsula reporting group. The South Unimak and Shumagin Island's commercial salmon fisheries are regulated and actively managed, so repealing and closing these fisheries is unwarranted and would cause significant economic hardships on individuals involved in the commercial fishery and the rural Alaskan communities who benefit financially from them.

The average commercial fishing permits the South Unimak and Shumagin Island fished from 2005-2014 is purse seine (47 permits), drift gillnet (109 permits), and set gillnet (57 permits); many of whom are residents in rural Alaskan communities. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska. The Alaska State Constitution, Section Article 8, Section 3 states, “*Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.*” The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just a select few.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for the rural residents that fish in the Outer Port Heiden section. This income affords them the ability to live in their rural communities with their families. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters. In addition it would violate Alaska State Policy for the management and allowance of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

Therefore, we ask that you **oppose proposal 181**, which requests the South Unimak and Shumagin Island's June Salmon Management Plan be repealed.

Proposal: 184

Position: Opposed

The Aleut Corporation is opposed to **Proposal 184**. This proposal request that the South Unimak and Shumagin Island's June Salmon Management Plan be repealed and the 2003 – 2004 management plan be readopted in its place.

The proponent states that the issue being addressed is *“fishing on stocks of concern when the harvest of discrete stocks is unknown.”* According to the WASSIP study little to no salmon harvested South Unimak and Shumagin Island's salmon fishery were from the Kuskokwim and Yukon region. Commercial fishing in the South Unimak and Shumagin Island's June Salmon is predominantly Pink, Sockeye, and Chum Salmon; however Chum Salmon harvest has decreased considerably over the years and Sockeye and Pink Salmon are predominantly targeted. The harvest of Yukon and Kuskokwim Salmon in the Shumagin Islands post-June fishery, based on WASSIP, is less than 5%.

In the Shumagin Islands post-June fishery the largest contributor of fish is the South Peninsula reporting group. The South Unimak and Shumagin Island's commercial salmon fisheries are regulated and actively managed, so repealing and closing these fisheries is unwarranted and would cause significant economic hardships on individuals involved in the commercial fishery and the rural Alaskan communities who benefit financially from them.

The average commercial fishing permits the South Unimak and Shumagin Island fished from 2005-2014 is purse seine (47 permits), drift gillnet (109 permits), and set gillnet (57 permits); many of whom are residents in rural Alaskan communities. Current commercial salmon fisheries in the Northern District provide a source of income for many individuals that live in the rural communities from Cold Bay, Dutch Harbor, False Pass, King Cove, Port Moller, Sand Point, and Unalaska. The Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* Alaskan salmon resources are managed for the people of Alaska not just a select few.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for the rural residents that fish in the Outer Port Heiden section. This income affords them the ability to live in their rural communities with their families. Adoption of this proposal would violate Alaska's Constitution and put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters. In addition it would violate Alaska State Policy for the management and allowance of mixed stock salmon fisheries, 5 AAC 39.220 allow for the operation of mixed stock fisheries.

Therefore, we ask that you **oppose proposal 184**, which requests that the South Unimak and Shumagin Island's June Salmon Management Plan be repealed and the 2003 – 2004 management plan be readopted in its place.

Proposal: 185 & 186

Position: Opposed

The Aleut Corporation is opposed to **Proposal 185 & 186**. This proposal request that a Dolgoi Island Section and Dolgoi Island June management plan, as described in the proposal, be established.

Current management of Dolgoi Island Section is sufficient and effective. In addition, the Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The commercial Salmon fisheries in Northern District are managed for the people of Alaska not just the residents where salmon return to spawn. Current commercial salmon fisheries in the Dolgoi Island Section provide a source of income for many individuals that live in the rural communities on the Alaska Peninsula.

Many rural communities throughout Alaska do not have thriving economies to support the residents of those communities. If this proposal was adopted it would decrease a vital source income for people in this region. This income affords them the ability to live in their rural communities with their families. They have fished these waters for subsistence and commercially for many generations. This would put an unwarranted economic burden on the communities within the Alaska Peninsula and the families and fishermen who fish these waters.

Therefore, we ask that you **oppose proposals 185 and 186**, which requests that a Dolgoi Island Section and Dolgoi Island June management plan, as described in the proposal, be established.

Proposal: 194

Position: Support

The Aleut Corporation is in support of **Proposal 194**. This proposal requests that all waters of Unalaska Bay be closed to commercial fishing for groundfish with pelagic trawl gear.

Since 2002, trawling in Unalaska Bay has adversely impacted local subsistence, sport, and smaller non-trawl commercial fisher and hunters. Many rural communities throughout Alaska do not have thriving economies and many individuals who live in these communities live a subsistence lifestyle to provide sustenance and a link to their culture. Local residents from Unalaska have seen a decrease in halibut, herring, crab, and sea mammals in Unalaska Bay. They have reported seeing wildlife scatter as trawling is occurring. Because of these changes in the local ecology of Unalaska Bay many local fishermen and hunters have had to venture farther out to fulfill their subsistence needs. This not only costs more money, it takes more time, and is dangerous. In addition, local small commercial vessels have had to leave the safety of Unalaska Bay in order to make a living.

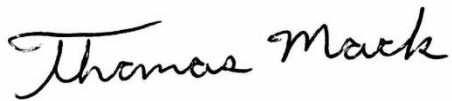
The Alaska State Constitution, Section Article 8, Section 3 states, *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* Alaskan resources should be managed for Alaskan residents. Allowing out of state, large scale, trawl

fisheries to operate Unalaska Bay, in state waters, has decimated the resources for rural Alaskan residents.

Not adopting this proposal would go against Alaska's Constitution. This would be an action against managing Alaska's resources for Alaskan residents. It would also put an unjustifiable economic and social burden on the local rural residents who fish and hunt in Unalaska Bay. If this proposal is adopted it would allow local fish and wildlife populations to recover so that local rural Alaskan residents can have a safe place to subsist and provide food for their families. This would allow small-scale local commercial fisherman to fish in closer, safer waters so that they can have a source income for themselves and their families.

Therefore, we ask that you **support proposals 194**, which requests that all waters of Unalaska Bay be closed to commercial fishing for groundfish with pelagic trawl gear.

Sincerely,



Thomas Mack
President
Aleut Corporation



IN REPLY REFER TO:

United States Department of the Interior Fish and Wildlife Service



Office of Subsistence Management
1011 East Tudor Road M/S 121
Anchorage, Alaska 99503-6199

FWS/OSM 16001.GP

FEB 08 2016

Mr. Tom Kluberton, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Kluberton:

The Alaska Board of Fisheries will deliberate 59 proposals, among other issues, at its Alaska Peninsula / Aleutian Island / Chignik Finfish meeting from February 23-29, 2016. We have reviewed the proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that have potential impacts on Federal subsistence users and fishery resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,



Eugene R. Peltola Jr. *Acting*
Assistant Regional Director, OSM

Enclosure

cc: Sam Cotten, ADF&G
Tim Towarak, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Scott Kelly, ADF&G, Juneau
Tom Brookover, ADF&G, Anchorage

Glenn Haight, ADF&G, Juneau
Drew Crawford, ADF&G, Anchorage
Jill Klein, ADF&G, Anchorage
Stewart Cogswell, OSM, Anchorage
Interagency Staff Committee
Administrative Record



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS**

ALASKA PENINSULA / ALEUTIAN ISLANDS / CHIGNIK FINFISH

**State of Alaska
Board of Fisheries Meeting
February 23 – 29, 2016
Anchorage, Alaska**



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Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation in the Alaska Peninsula, Aleutian Islands, and Chignik Areas.

Proposal 172 requests an increase of the passage of late-run Sockeye Salmon above the Chignik River weir to provide for additional late-season subsistence fishing opportunity. The proposal requests 50,000 Sockeye Salmon be added to the existing escapement schedules in August and an additional 50,000 Sockeye Salmon in September. If this proposal is adopted as written, the Chignik River late-run Sockeye Salmon goal range will be 350,000 to 550,000 fish.

Existing and proposed Chignik River late-run Sockeye Salmon escapement goals in thousands

Existing Goals

Sustainable	Inriver Goal	Inriver Goal	Total Escapement
Escapement Goal	August	September	Goal
200-400	25	25	250-450

Proposed Goals

Sustainable	Inriver Goal	Inriver Goal	Total Escapement
Escapement Goal	August	September	Goal
200-400	75	75	350-550

Proposed Goals with Modification offered by the Chignik Area AC

Sustainable	Inriver Goal	Inriver Goal	Total Escapement
Escapement Goal	August	September	Goal
200-400	50	25	275-475

Existing State Regulations:

5 AAC 15.357 Chignik Area Salmon Management Plan

(b)(3) from the end of the transition period, described in (2) of this subsection until September 14,

(B) the department shall manage the commercial fishery to allow for the passage of at least 50,000 sockeye salmon above the Chignik River weir, in addition to late-run sockeye salmon escapement needs, to provide an in river harvestable surplus above the Chignik River weir in August and September of

at least 25,000 fish in August and 25,000 fish from September 1 through September 15;

Existing Federal regulations:

50 CFR 100.27 (e)(8) Chignik Area.

(i) You may take fish other than salmon, rainbow/steelhead trout, or char at any time, except as may be specified by a subsistence fishing permit. For salmon, Federal subsistence fishing openings, closings and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action. Within the Chignik Area, depending upon the area that you may fish, in addition to a State subsistence fishing permit, you may be required to also have a Federal subsistence permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations through April 1, 2016.

Impact to Federal subsistence users/fisheries: Yes. The adoption of this proposal as written could result in an additional 100,000 late-run Sockeye Salmon to escape into the Chignik River watershed above currently established goals. This additional late season escapement could result in additional opportunity for Federally qualified subsistence fishermen for fall to early winter harvest of “redfish”. If the proposal is adopted as written and a total additional 150,000 Sockeye Salmon are allow to escape through the Chignik weir above the Sustainable Escapement Goal (SEG) of 200,000-400,000.

Adoption of the September escapement goal portion of the proposal as written is unlikely to impact Federal subsistence users or fisheries. During the month of September, little, if any, commercial exploitation is focused on the latest arriving portion of the Sockeye Salmon return to the Chignik River watershed. As such, fisheries managers have limited tools to increase escapement into the system because the Sockeye Salmon commercial fishery, fishermen, and processors have normally ceased operations for the season.

Federal Position/Recommended Action: The Office of Subsistence Management **supports this proposal with modification offered by the Chignik Area Local Advisory Committee.** The Office of Subsistence Management supports the modifications offered by the Chignik Local Advisory Committee. The Office of Subsistence Management supports modifying the proposal to increase the existing August escapement schedule through the addition of 25,000 Sockeye Salmon. If adopted with the recommended modification, the new late-run escapement schedule for the month of August would be approximately 99,000 to 116,000 late-run Sockeye Salmon through the weir. The Office of Subsistence Management recommends keeping the escapement schedule for September unchanged. The new late-run Sockeye Salmon goal would be 275,000 to 475,000 fish.

According to Fisheries Manuscript Series No. 13.06¹ the Chignik River late-run Sockeye Salmon escapement, which will provide maximum sustained yield (Smsy), is 315,000 fish. Adoption of this

¹ Sagalkin, N. H., A. St. Saviour, J. W. Erickson, and H. Finkle. 2013. Review of salmon escapement goals in the Chignik Management Area, 2013. Alaska Department of Fish and Game, Fishery Manuscript Series No. 13-06, Anchorage.



proposal with the recommended modification will result in an escapement goal range with a lower end which is 40,000 fish below Smsy and an escapement goal range with an upper end of 85,000–160,000 fish above Smsy, depending upon how 5 AAC 15.357 (b)(3)(B) is interpreted by managers. From the same document, the escapement producing recruitment equal to escapement (Seq – or replacement) for the Chignik River Sockeye Salmon late run is 855,000 fish or 540,000 fish above Smsy.

Adoption of this proposal with the recommended modifications should not result in significant impacts to the Chignik River Sockeye Salmon late run when managed towards the lower half of the escapement goal range. The impacts of managing the late run towards the recommended modified upper end goal of 475,000 fish should result in increased subsistence opportunity.

Additionally, the Office of Subsistence Management seeks clarification of the intent of 5AA 15.357 (b)(3)(B) regarding the regulatory verbiage “*in addition to late-run sockeye salmon escapement needs.*” The current escapement schedule published by the Alaska Department of Fish and Game indicates the SEG is 200,000 to 400,000 late-run Sockeye Salmon and the inriver goal of 50,000 above the escapement needs has been added to the lower end of the SEG but not the upper end of the SEG. We seek clarification to determine if the inriver goal for subsistence purposes was established to direct fisheries managers to target at a minimum the lower end of the SEG plus the inriver goal (250,000 fish) or if the inriver goal was established to provide for additional subsistence opportunity during years when the upper end of the SEG is attained (450,000 fish).

Proposal 197 seeks to remove the prohibition of subsistence fishing 24 hours before, during, and 12 hours after a commercial salmon fishing period in the Alaska Peninsula Area.

Existing State Regulations:

5 AAC 01.410. Fishing seasons

- (a) In the Alaska Peninsula Area, salmon may be taken at any time, except*
 - (1) in those districts and sections open to commercial salmon fishing, salmon may not be taken during the 24 hours before and 12 hours following a commercial salmon fishing period;*

Existing Federal Regulations:

50 CFR 100.27 (e)(7)(iv) You may take salmon at any time, except in those districts and sections open to commercial salmon fishing where salmon may not be taken during the 24 hours before and 12 hours following each State open weekly commercial salmon fishing period, or as may be specified on a subsistence fishing permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no fisheries proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence fishing regulations through April 1, 2016.

Impact to Federal subsistence users/fisheries: Yes. Eliminating the subsistence fisheries restrictions based on commercial fishery open and closed periods for commercial salmon fishing license holders and subsistence users in the Alaska Peninsula area will allow Federally qualified users to harvest fish during preferred weather, tide, vocational schedules, and other beneficial



conditions. Allowing subsistence users to harvest fish during times they select will allow users to subsistence fish during less inclement weather, preferred conditions for processing fish, potentially spread out subsistence user effort, and reduce competition for successful fishing sites.

Federal Position/Recommended Action: The Office of Subsistence Management **supports** this proposal. Annual Sockeye Salmon abundance of the Alaska Peninsula watersheds as well as the commercial salmon harvests of stocks returning to these systems is exponentially larger than subsistence salmon harvests by Federally qualified users. Adoption of this proposal will likely not increase overall harvest by subsistence users but could potentially increase efficiency of harvesters, as well as reduce loss of harvest during processing due to spoilage and insects. If this proposal is adopted, a proposal could be submitted to the Federal Subsistence Board to realign State and Federal regulations to reduce regulatory complexity. Additionally, adoption of this proposal will reduce regulatory complexity as the new regulations would mirror the recent changes made to the Bristol Bay Area subsistence fisheries by the Board of Fisheries.



Submitted By

kim rice

Submitted On

2/8/2016 8:03:26 PM

Affiliation

Bristol Bay Setnet fisher and Lower Bristol Bay Advisory Committee member

Dear Mr. Chairman and Members of Alaska Board of Fish, My name is Kim Rice, I am a Bristol Bay setnet permit holder who fishes in Egegik with my family. We fish 3 Setnet permits and 1 Drift permit. I am also a member of the Lower Bristol Bay Advisory Committee. I am writing comments for our family. I have been a part of the Board process since 1987. I was a committee member during deliberation on outer Port Heiden area in 2007. We tried to stop the expansion of the Northern District in the outer Port Heiden area. We were armed with local knowledge but no science on our part. Today things have changed, we have the science of the WASSIP Studies that prove how big the intercept really is. All Bristol Bay stocks are fully allocated. we need to stop all intercept of Bristol Bay stocks in the North Peninsula Outer Port Heiden area. We want our salmon back. We support proposal 155 and 163 and all proposals put forth by Lower Bristol Bay Advisory board. we feel all Bristol Bay salmon need to be harvested in Bristol Bay. we also feel salmon destined for rivers in North Peninsula should be harvested near their River of Origin, in terminal areas to avoid intercept of all Bristol Bay salmon.

thanks Kim Rice , Debra Rice, Cody Rice, Alannah Rice



Submitted By
Catherine Bursch
Submitted On
2/8/2016 4:51:27 PM
Affiliation
Ugashik Setnetters Association

Phone
9072355111
Email
tcbursch@gmail.com

Address
2233 Mt. Augustine Dr.
Homer, Alaska 99603

I support Proposals #155 and #157 .

I believe that when the fishing districts in Bristol Bay were designed and boundries were drawn up, the conservation and management of salmon was a priority. The districts are basically boxes around river mouths encouraging terminal fisheries. These boundries have proven to be managable and have contributed to the conservation of Bristol Bay salmon runs over the years. Why is the same rational not used on the North Peninsula of Area M? When (not if) salmon runs are of concern, we need to give the managers every advantage possible to save our runs for the future. As we look at the rest of the world and how they lost salmon runs, do we really want to gamble with our runs by not employing the safest possible management practices? Interception should be avoided when possible. Catie Bursch

**Alaska Independent Fishermen's
Marketing Association**

P.O. Box 60131
Seattle, WA 98160
Phone/Fax (206) 542-3930
aifma1@seanet.com



February 8, 2016

ATTN: BOF COMMENTS

Alaska Department of Fish and Game
Boards Support Section
PO Box 25526
Juneau, Alaska 99802-5526

Dear Board of Fisheries Members:

AIFMA (Alaska Independent Fishermen's Marketing Association) has positions on three proposals:

- We support proposal number 22 drafted by the Native Village of Port Heiden.
- We support proposal numbers 152 and 153 drafted by Roland Briggs.

The genetic stock identification body of work has clearly indicated that Bristol Bay sockeye salmon stocks are dominant in the North Peninsula fishery. However, the salmon stocks in question are not currently managed for catch and escapement by the ADF&G staff operating out of King Salmon, Alaska that manages Bristol Bay sockeye salmon.

We request that a Bristol Bay management plan be adopted to regulate catch and escapement that would include the North Peninsula of Area M. The Bristol Bay ADF&G staff would work in co-operation with the Area M ADF&G staff to implement the plan.

The apportionment of catch and the burden of conservation of Bristol Bay salmon stocks should be regulated for the benefit of the watershed communities and fishermen that work in Bristol Bay.

AIFMA was founded in 1966 and is an Alaska registered non-profit representing and funded by fishermen who own permits and operate on the waters of Bristol Bay.

Thank you for the opportunity to provide comment on these proposals.

Sincerely,



David Harsila
President



Alaska Board of Fisheries

Comment on: Committee on Coastal Erosion Impacts on Set Gillnet Operations

Subject: Revise

As you consider this landmark decision on how to hear proposals related to historical fishing and erosion concerns please keep in mind the following general considerations:

1. Generally: The only proposals you will hear on this matter will be brought to the board by those expecting to directly benefit from your decision, and since the information you will be presented with does not have to be fact-checked it will often represent just one side of the story and every person presenting it will have a financial motivation to skew the facts in order to convince you of the merits of their proposal. The rest of the fishermen likely might not even be in the room.
2. Regarding bullet point # 2: Historical fairness is another slippery subject because as mentioned in #1 above, you are likely only getting half of the story. As a specific example regarding Proposal 59 that came before the board at the Bristol Bay Finfish meeting in 2015: Please see the attached map of the Kvichak eastern boundary marker. The earliest recorded history (1989) we have of that line is that less than a full site could be fished there. Certainly at some point in the 50's this might not have been the case, but we just have are memories (sometimes conflicting) to support that. [As an aside I'm all for figuring out how to let the Armstrongs fish this Tract A as a full site if there can be a way to do it without adding additional sites to the North East.]
3. Regarding bullet points #3 and #8: As you hear proposals related to erosion concerns the adjacent sites will always be negatively impacted by your decision - unless you have unanimous support from all sites within say 1,200 feet on either side. Please consider putting some concrete wording in there. For example: "The proposal would not adversely impact another leaseholder, and the proposal has unanimous support from all leaseholders within 1,200 feet of the affected tract."
4. Regarding bullet point #7: Please remove this bullet point from your list. I don't think the Board will be able to collect all the facts in order to decide what is historically "fair". The topography of Bristol Bay is constantly changing, cutbanks come and go, creek mouths move, and banks erode and fill in. For example, my sister's leased site was historically along the mouth of graveyard creek. That creek mouth moved, and when it did, it greatly reduced her catch, but gave opportunity to other fishermen who likely have been hoping and praying that creek mouth would move over time. The same thing with sites near the marker, as the bank changes over time it changes the distribution of the fish between fishermen naturally. I think we all could foresee and expect this when we started our fishing careers and sank our first screw anchors. Fishing is a gamble. In my opinion "fair" is being protected from having other fishermen do things that are illegal and therefore catch fish that were otherwise likely to get caught in your net.

Please see diagram attached as TenKley_RC1.

Thank you,

Reid Ten Kley, permit holder

Kvichak district Graveyard Point since 1989

S04T65887I

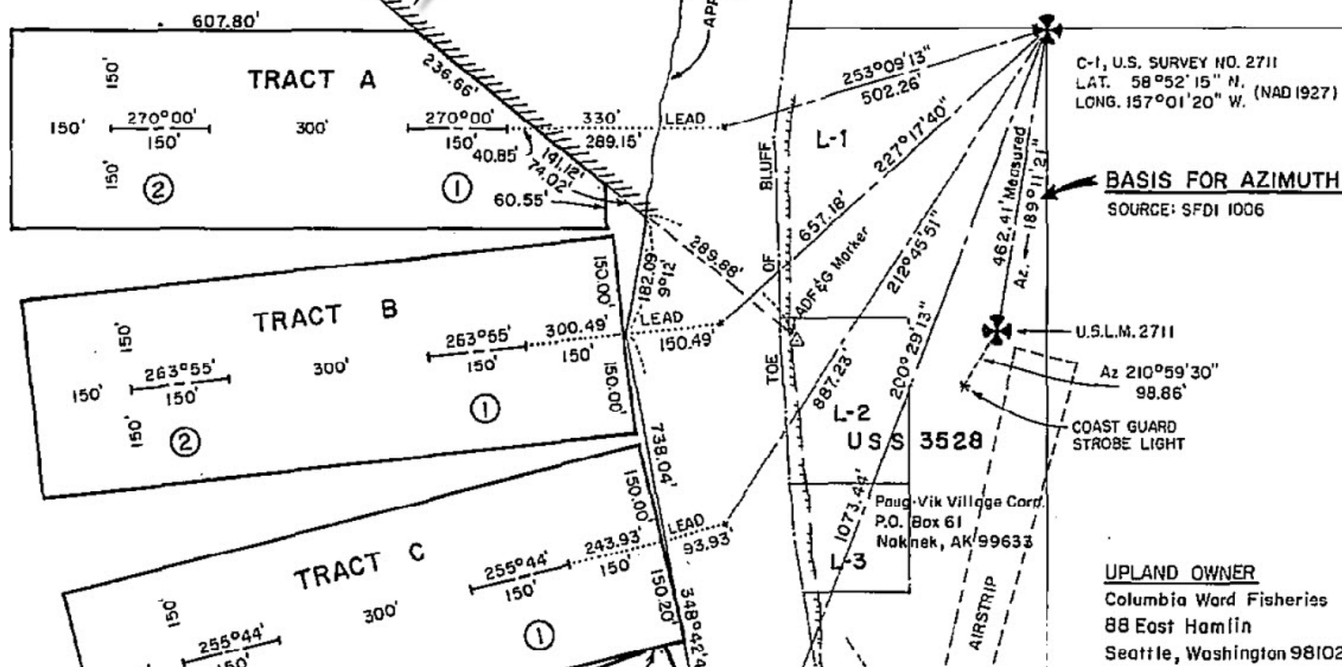
WE, THE UNDERSIGNED, DO HEREBY CERTIFY THAT WE HAVE REVIEWED SHORE FISHERY DIAGRAM NO. 1333 AND HAVE FOUND IT TO BE AN ACCURATE DEPICTION OF OUR SHORE FISHERY TRACTS.

TRACT A ADL 224515	RICHARD K. ARMSTRONG P.O. BOX 204 DILLINGHAM, ALASKA 99576	DATE 6/20/89
TRACT B ADL 224516	LYLE J. SMITH P.O. BOX 178 DILLINGHAM, ALASKA 99576	DATE 6/20/89
TRACT C ADL 224514	NEIL CURTIS ARMSTRONG P.O. BOX 898 DILLINGHAM, ALASKA 99576	DATE 6/20/89
TRACT D ADL 224517	LYLE TIEL SMITH P.O. BOX 178 DILLINGHAM, ALASKA 99576	DATE 6/20/89

This is the line currently in contention. The oldest recorded history we have of a setnet site on this line is 1989. At that time, the site was unable to be fished legally all the way up to the beach. Not much has changed since then in this regard.

ALASKA DEPARTMENT OF FISH & GAME CLOSURE LINE
20' Azimuth (Approximate) Source: DNR Computation

DATE OF SURVEY AUGUST 19, 1988	NAME OF SI Fred Walcott 3107 W. 29th Av Phone: (907)	PC 18 2 of 2
STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES		
SHORE FISHERY DIAGRAM No. 1333		
SITUATED IN Protracted Section 19, T.15 S., R. 46 W. SEWARD MERIDIAN, ALASKA		



the signature block has been moved to the upper corner to show the date. Note that this originally is in the lower right corner of the diagram.



PROPOSAL 194

5 AAC 28.650.

Closed waters in the Bering Sea- Aleutian Islands Area

Presented by: Unalaska Native Fisherman's
Association and Qawalangin Tribe of Unalaska

February 2016



Proposal 194

5 AAC 28.650.

- Close all waters of Unalaska Bay to commercial fishing for groundfish with pelagic trawl gear, as follows:
- (b) The waters of Unalaska Bay are closed to groundfish fishing with pelagic trawl gear, [as follows:] south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. to Cape Cheerful at 54° 01' N. lat., 166° 40' W. long.
 - [(1) FROM JUNE 10 THROUGH AUGUST 31, SOUTH OF A LINE FROM CAPE KALEKTA AT 54° 00.50' N. LAT., 166° 22.50' W. LONG. TO CAPE CHEERFUL AT 54° 01' N. LAT., 166° 40' W. LONG.];
 - [(2) BEGINNING SEPTEMBER 1 UNTIL THE CLOSURE OF THE PARALLEL BERING SEA WALLEYE POLLOCK 'B' SEASON, SOUTH OF A LINE FROM **CAPE KALEKTA** AT 54° 00.50' N. LAT., 166° 22.50' W. LONG. TO A POINT NEAR HOG ISLAND AT 53° 55.42' N. LAT., 166° 34.25' W. LONG. TO A POINT IN BROAD BAY AT 53° 55.42' N. LAT., 166° 38.80' W. LONG.; FOR THE PURPOSES OF THIS PARAGRAPH, "PARALLEL BERING SEA WALLEYE POLLOCK 'B' SEASON" MEANS THE PARALLEL SEASON CONDUCTED FROM JUNE 10 THROUGH NOVEMBER 1]

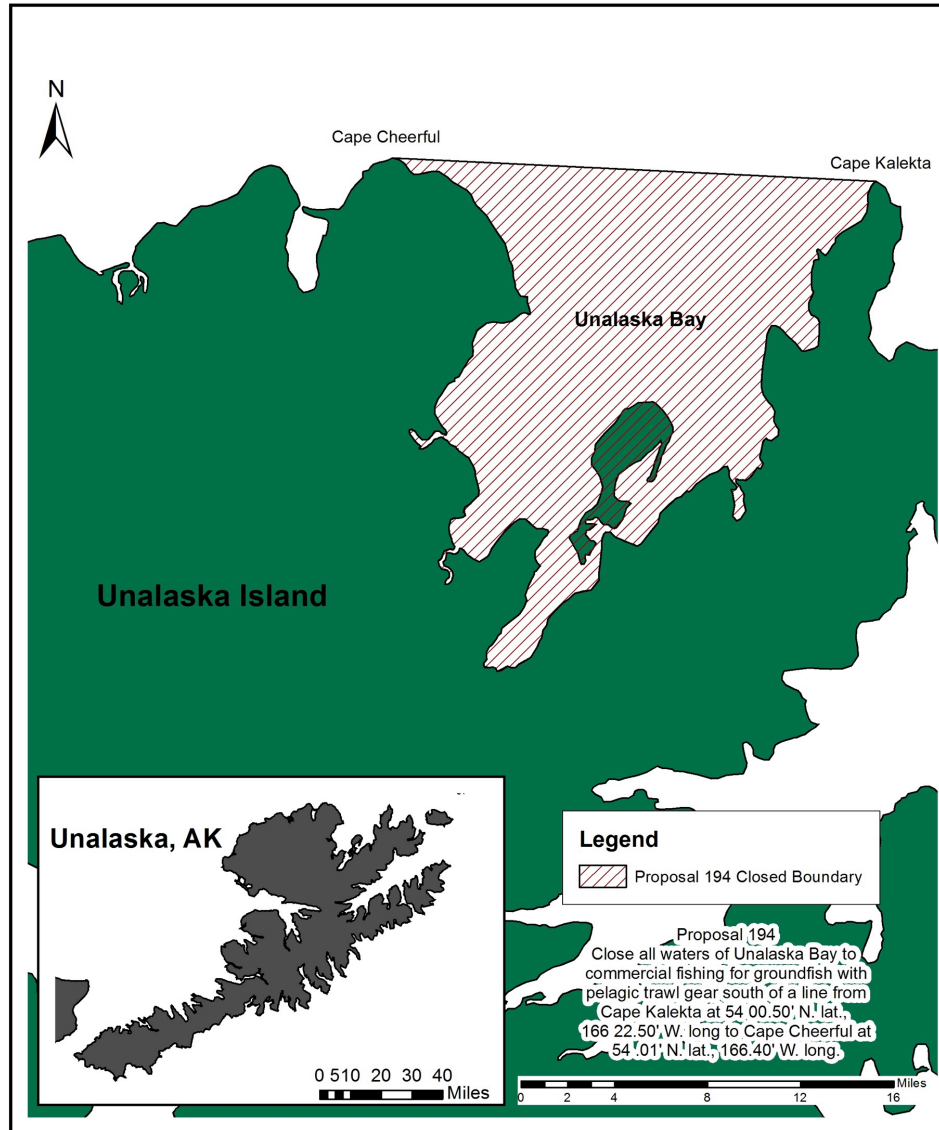
Unalaska/Dutch Harbor Alaska



Proposal 194

Proposal 194 - 5 AAC 28.650. Closed Waters in the Bering Sea-Aleutian Islands Area

5 AAC 28.650.





Proposal 194

5 AAC 28.650.

Primary Concerns:

- The State of Alaska opens these waters to trawling from September 1 to November 1 as a parallel fishery to the eastern Bering Sea catcher vessel Pollock fishery that is managed by NMFS.
 - Large-scale trawling in Unalaska Bay has unacceptably impacted an area traditionally used by subsistence, sport, and smaller non-trawl commercial fishers and hunters since 2002.
 - There is no cap on what amount of the B season pollock trawl quota can come out of Unalaska Bay.
 - According to residents of Unalaska Bay, pressure by the pollock trawlers has displaced or impacted most subsistence species: salmon, halibut, herring, crab, and sea mammal hunting.
 - Largely known that habitat destruction occurs where trawl gear touches the seafloor
 - Large trawlers are built for fishing outside of bay in stormy weather; whereas locals are sacrificing their safety by fishing outside of Unalaska Bay to feed their families for subsistence.



Proposal 194

5 AAC 28.650.

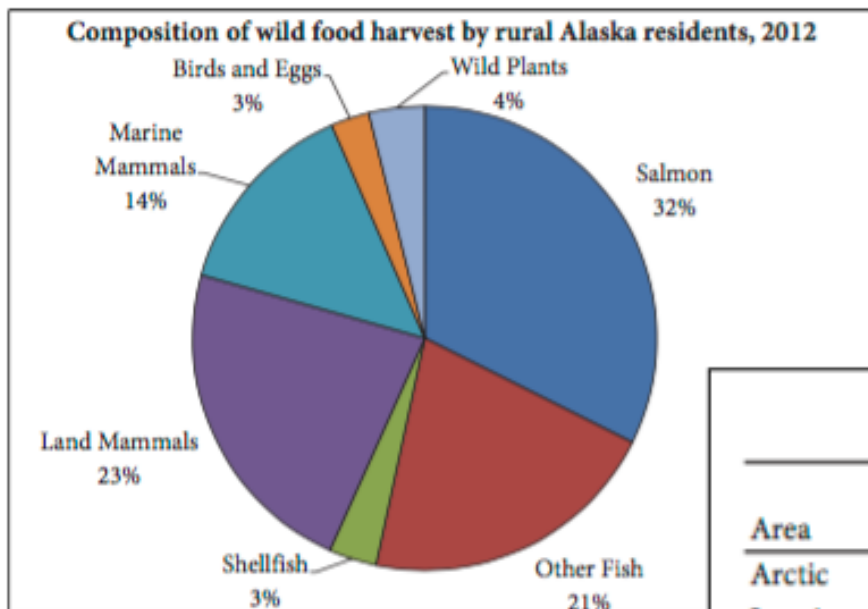
Looking back in the recent past...

- In 2010 the board closed inner Unalaska Bay during the Bering Sea pollock B season and allocated outer portion of Unalaska Bay.
- UNFA board members, Qawalangin Tribal members, and others participated in the similar proposal 194 (Proposal 162) in the meetings held on February 26th- March 4th, 2013.
 - Board of Fish carried the proposal as amended to move the trawl start date from August 1st to September 1st in Unalaska Bay.

Proposal 194

5 AAC 28.650.

Subsistence & Harvest in Rural Alaska



Source: ADF&G Division of Subsistence, 2012

Roughly ~70% of marine related resources are harvested by rural Alaska residents.

Percentage of households participating in subsistence activities in rural areas				
Area	Harvesting game	Using game	Harvesting fish	Using fish
Arctic	63%	92%	78%	96%
Interior	69%	88%	75%	92%
Southcentral	55%	79%	80%	94%
Southeast	48%	79%	80%	95%
Southwest	65%	90%	86%	94%
Western	70%	90%	98%	100%
Total rural	60%	86%	83%	95%

Source: ADF&G Division of Subsistence, 2012

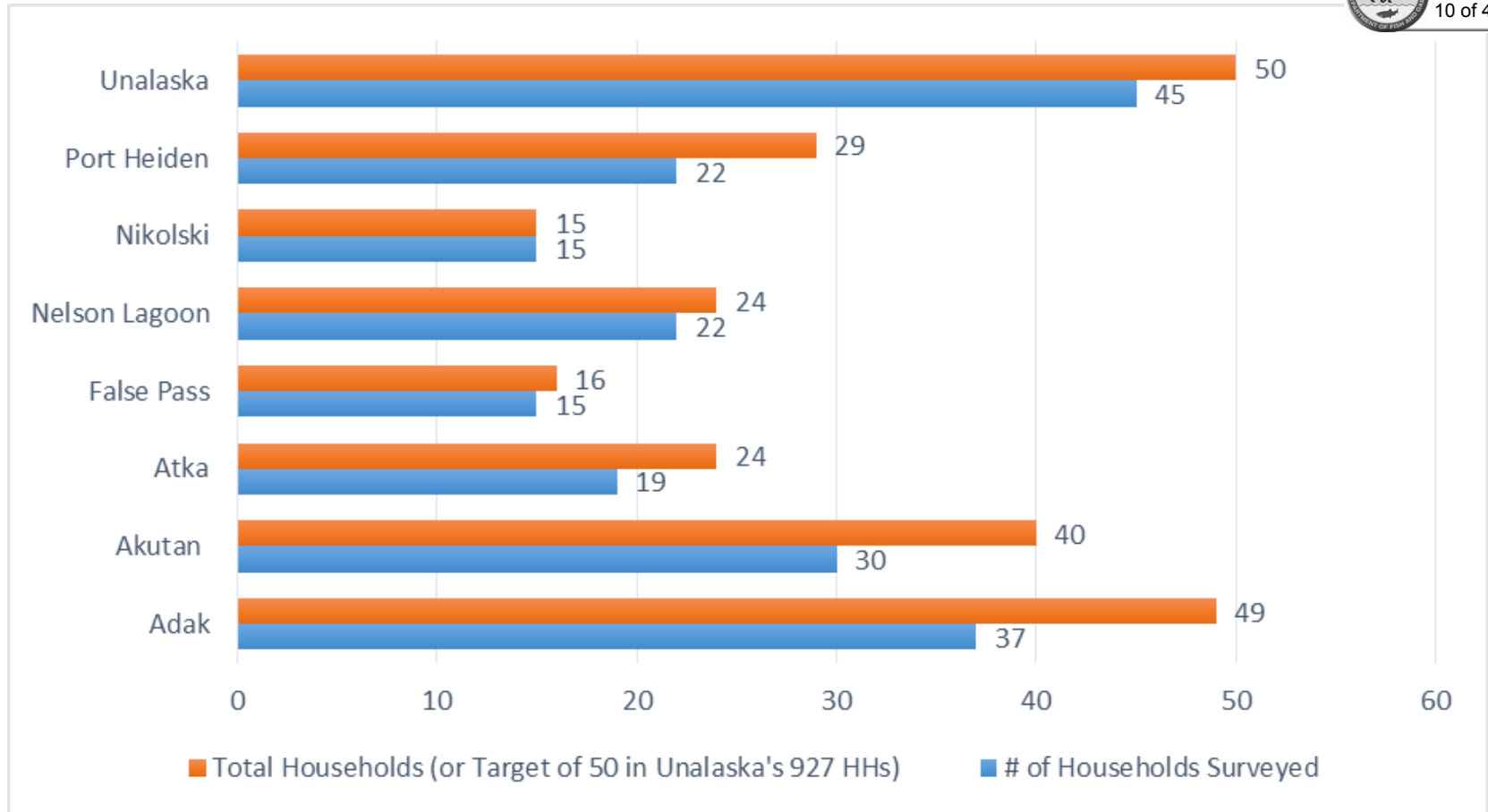
A way of life...



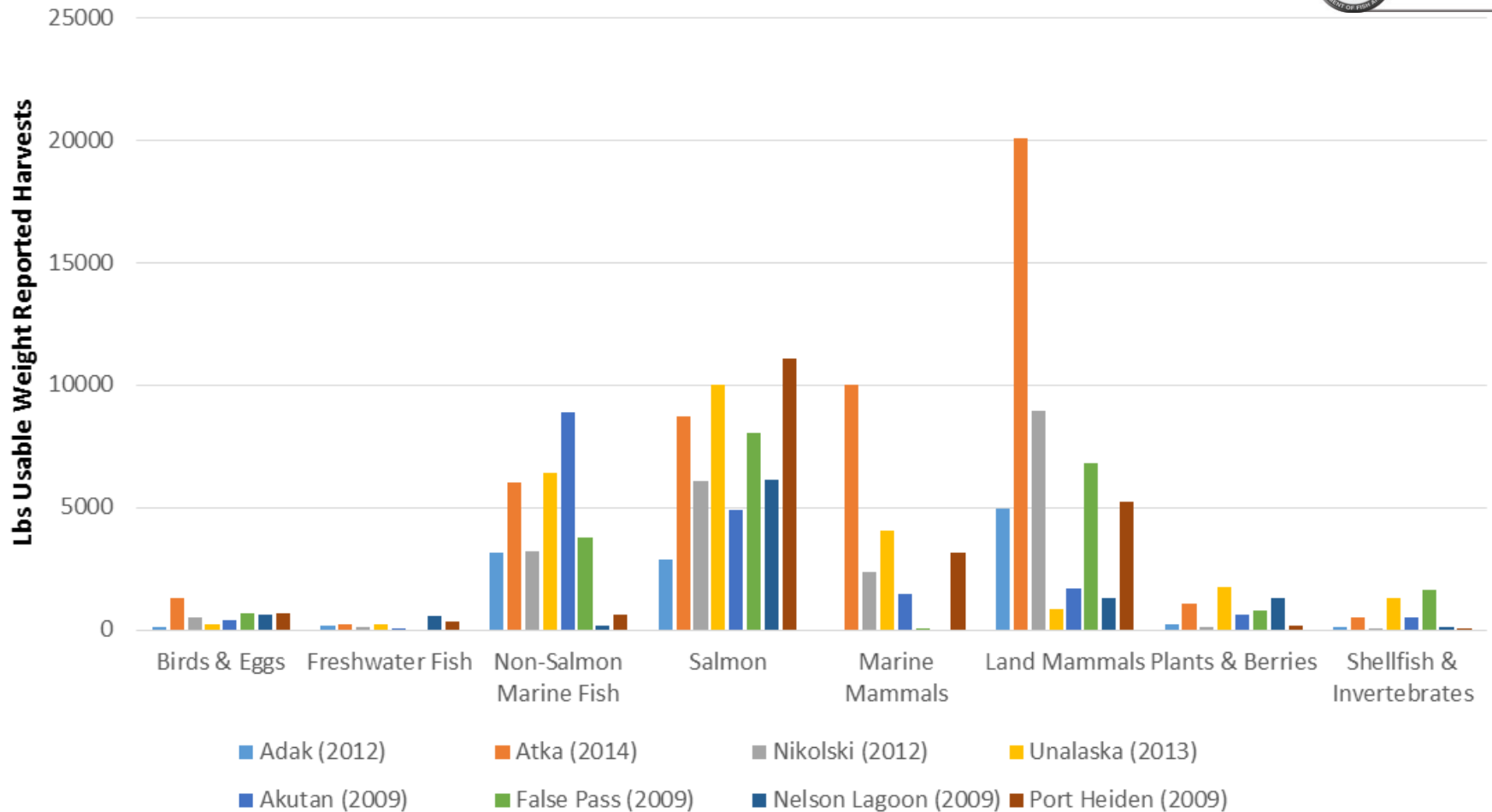


INFORMATION FOR PROPOSAL #194 PRELIMINARY SUBSISTENCE DATA

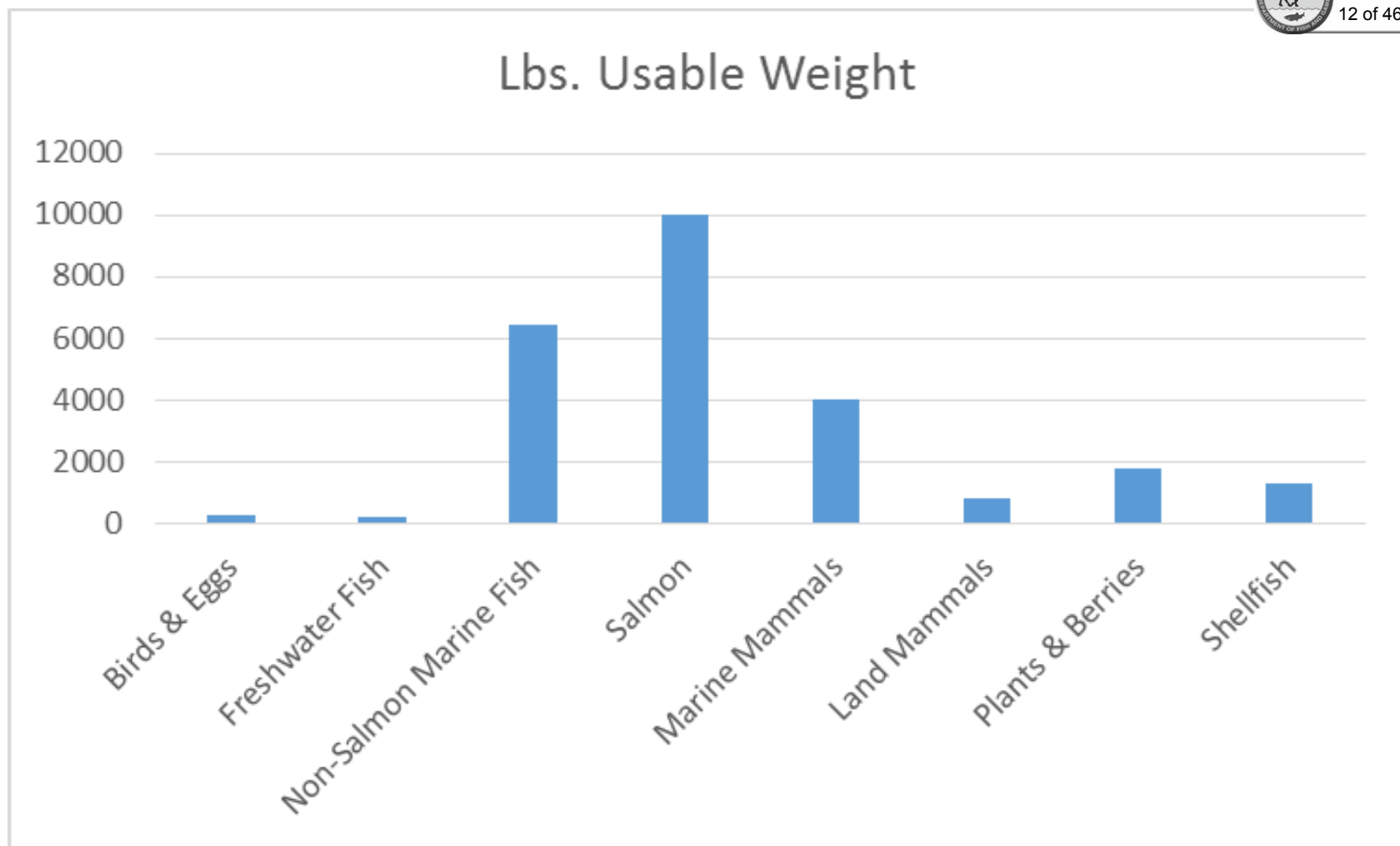
K. Reedy, In prep. Aleutians Islands Salmon & Other Subsistence Harvests. USFWS Office of Subsistence Management Grant (#12-420)



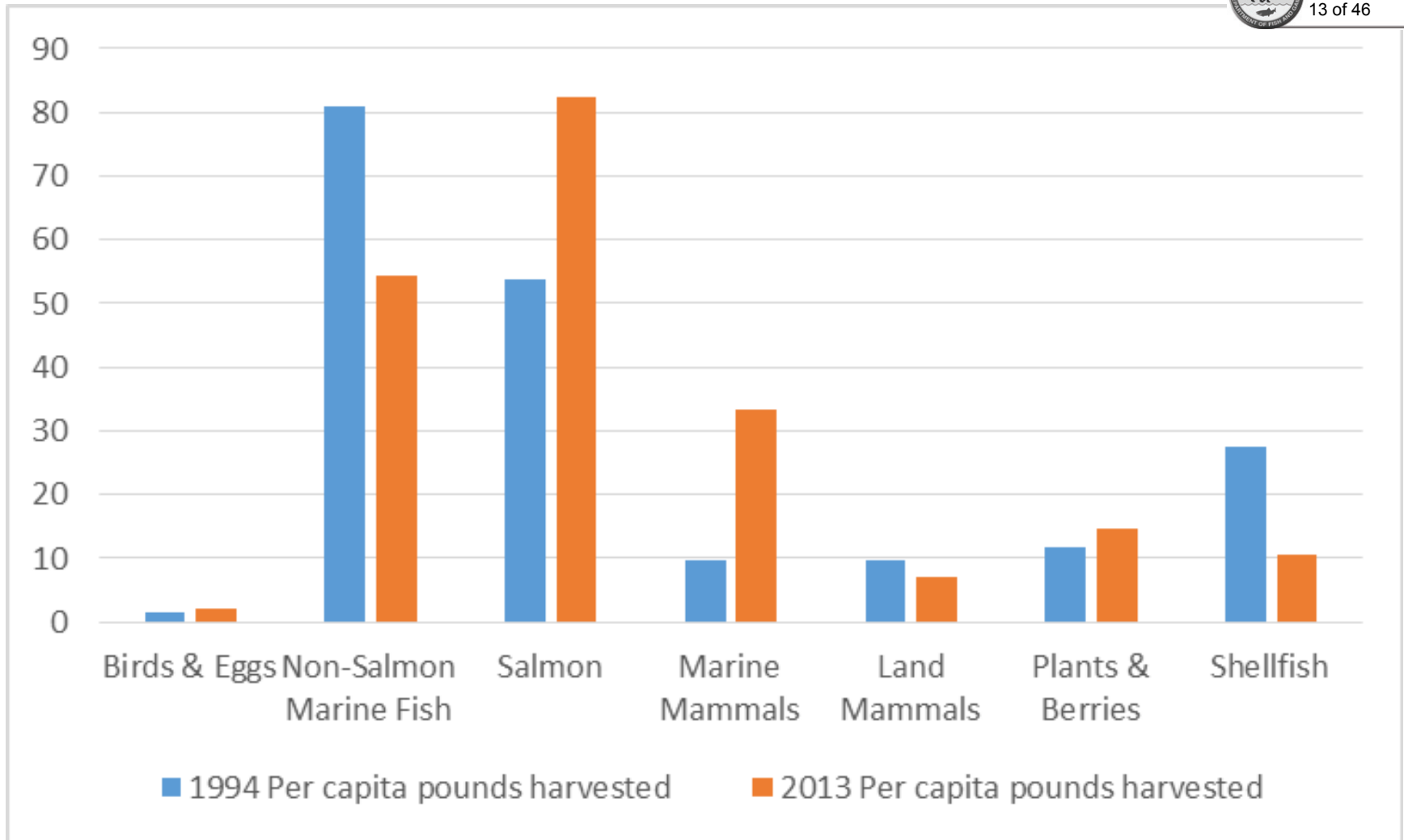
Unalaska was surveyed in 2014 for 2013 harvest and sharing data And interviews about the subsistence economy. 45 of 50 targeted resident households completed the survey.



Unalaska's harvest data are shown for the 45 households relative to the other seven surveyed communities in pounds usable weight.

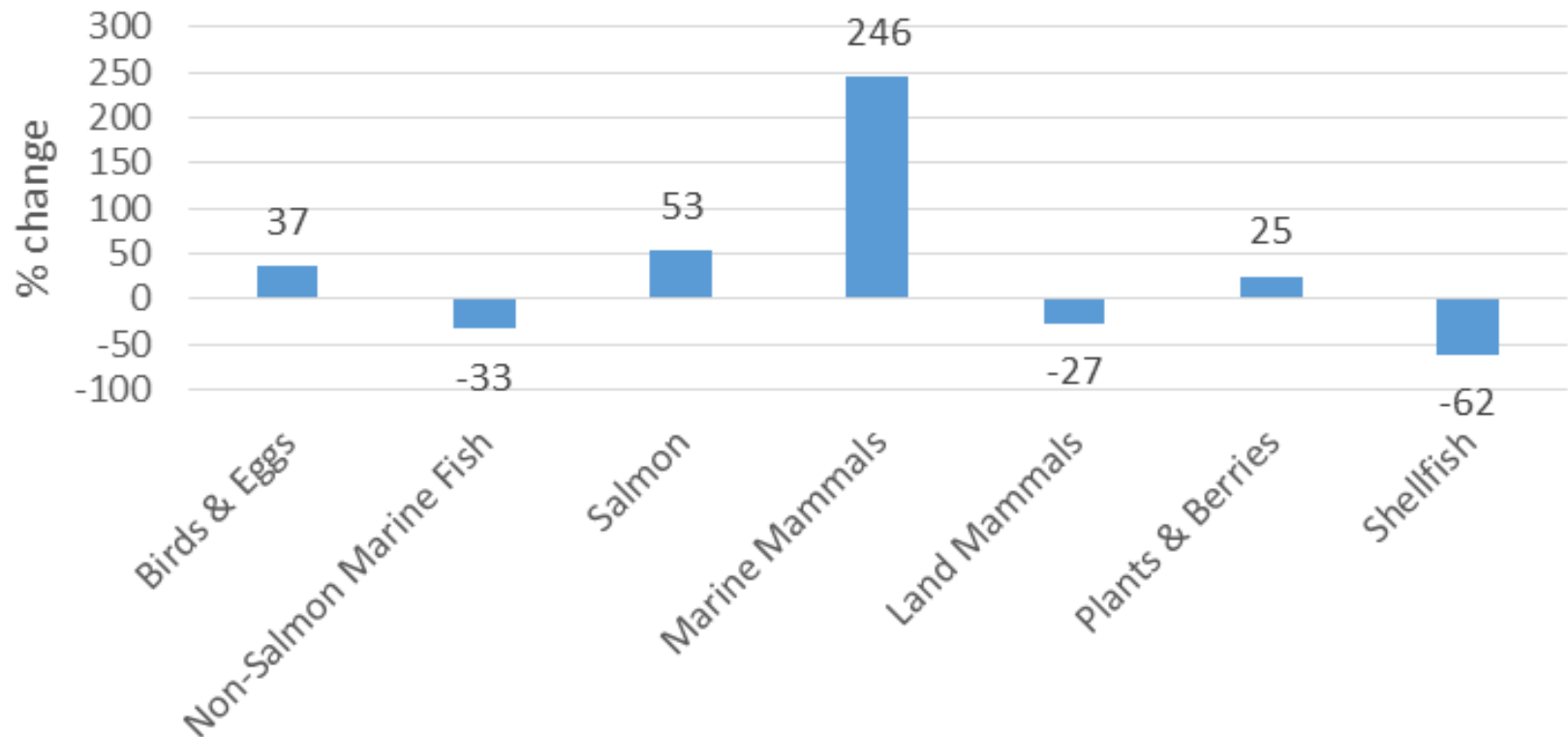


Unalaska's harvests for 45 households in pounds usable weight by species category.



Per capita harvests between two studies and between two decades.
ADFG Subsistence Division for 1994 and Reedy (USFWS grant) for 2013.

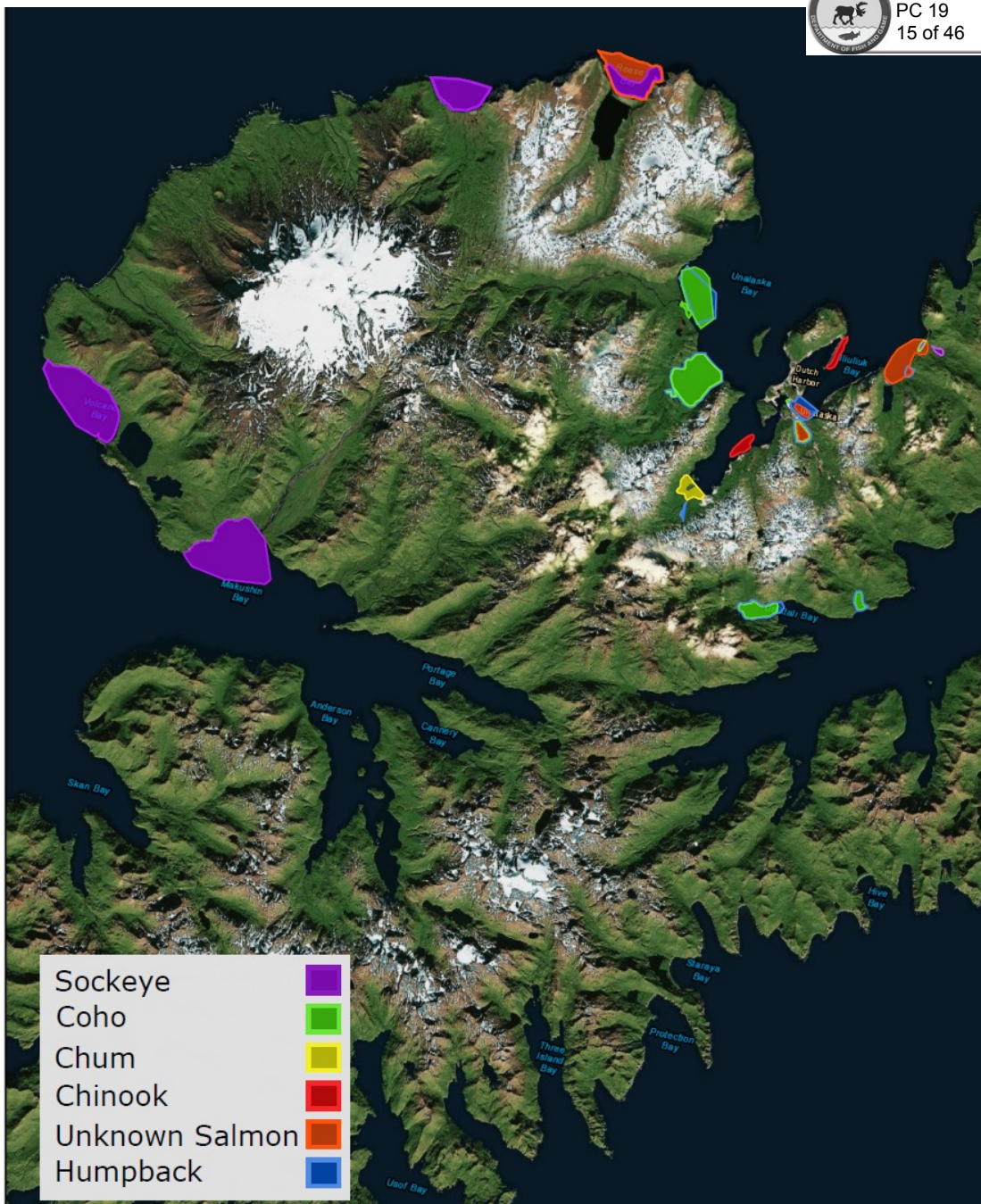
Percent Change in Per Capita Harvests by Species category between 1994 and 2013



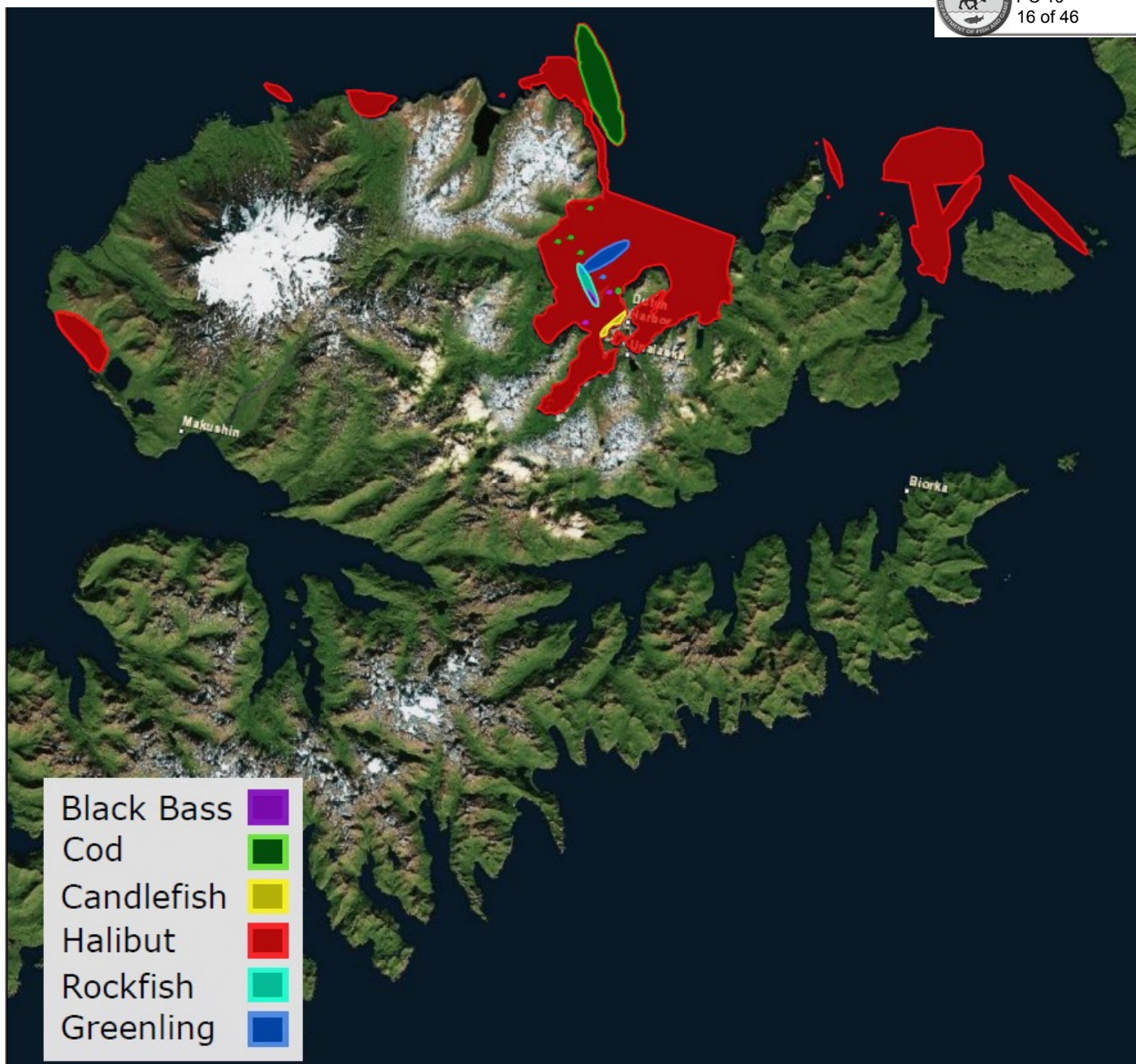
Percent change in per capita harvests by species category between two studies and two decades.



Locations of Subsistence Salmon Harvesting, 2013



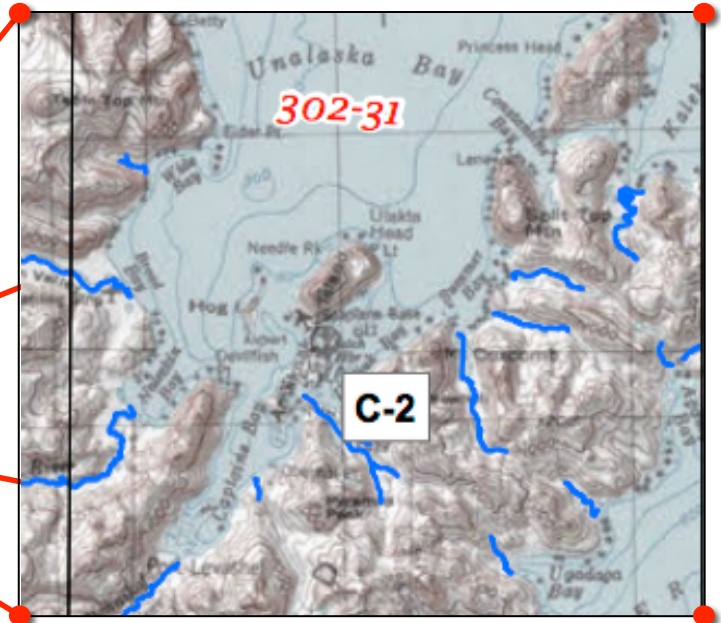
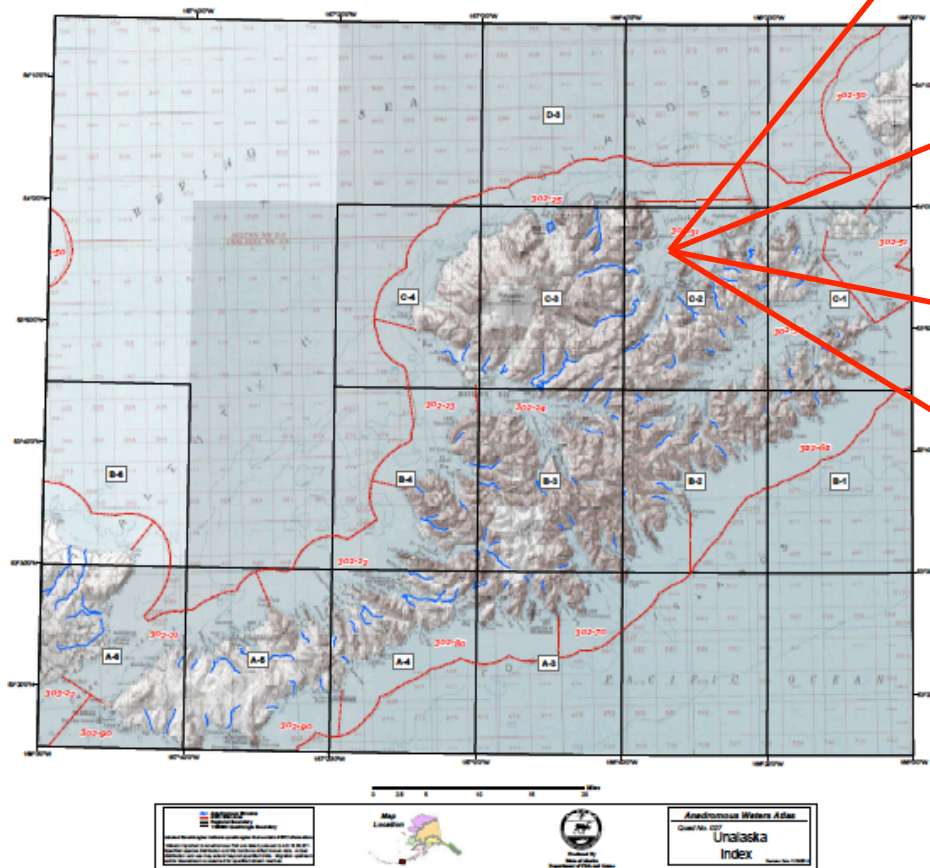
Locations of Subsistence Marine Fish Harvests, 2013



Proposal 194

5 AAC 28.650.

Anadromous Waters Atlas Unalaska Index



Source: ADF&G

“Sockeye and Coho salmon runs returning to Unalaska Bay streams are relatively small and fully exploited by local fisheries.”
–Unalaska Fish & Game

Proposal 194

5 AAC 28.650.

- Harvest of Walleye Pollock in Unalaska Bay over the past 10 years has ranged from 0.9 to 7.3 million pounds taken by an average of 8 vessels
- Based on fish ticket records the following estimated bycatch of the past 5 years:
 - 55,822lbs of Pacific Cod
 - 2,165lbs Atka Mackerel
 - 1,379lbs of Pacific Herring
 - 1,484lbs of Pacific Halibut
 - 2,343lbs of Pacific Salmon

– Source: 2015 Unalaska Fish & Game



Proposal 194

5 AAC 28.650.

1993-2013 Pollock B Season in Closure Areas

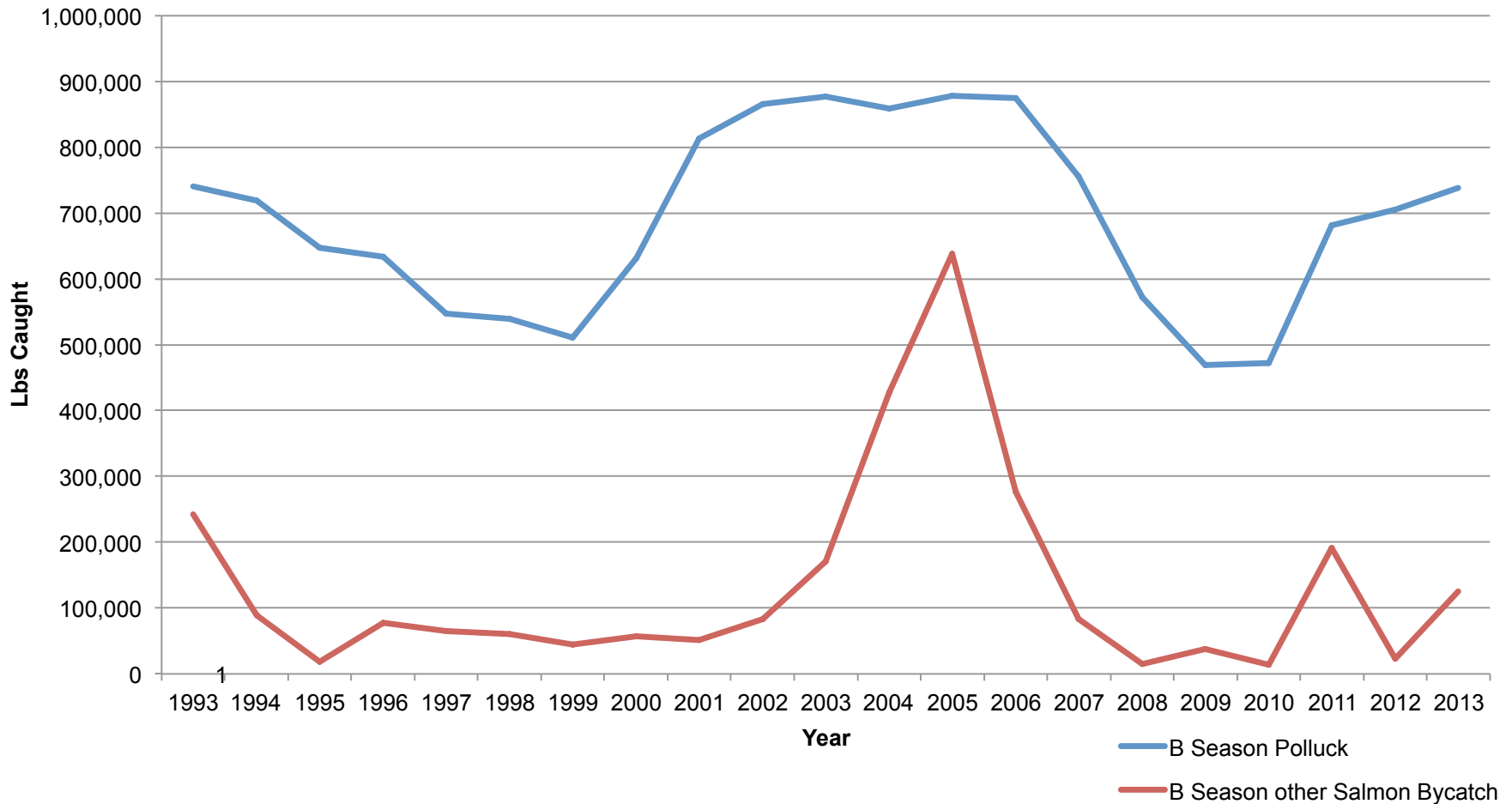


Figure 1. Catch and bycatch of pollock and "other" salmon in the directed pollock fishery B season
Source: 2013 Salmon ICA Report

Proposal 194

5 AAC 28.650.

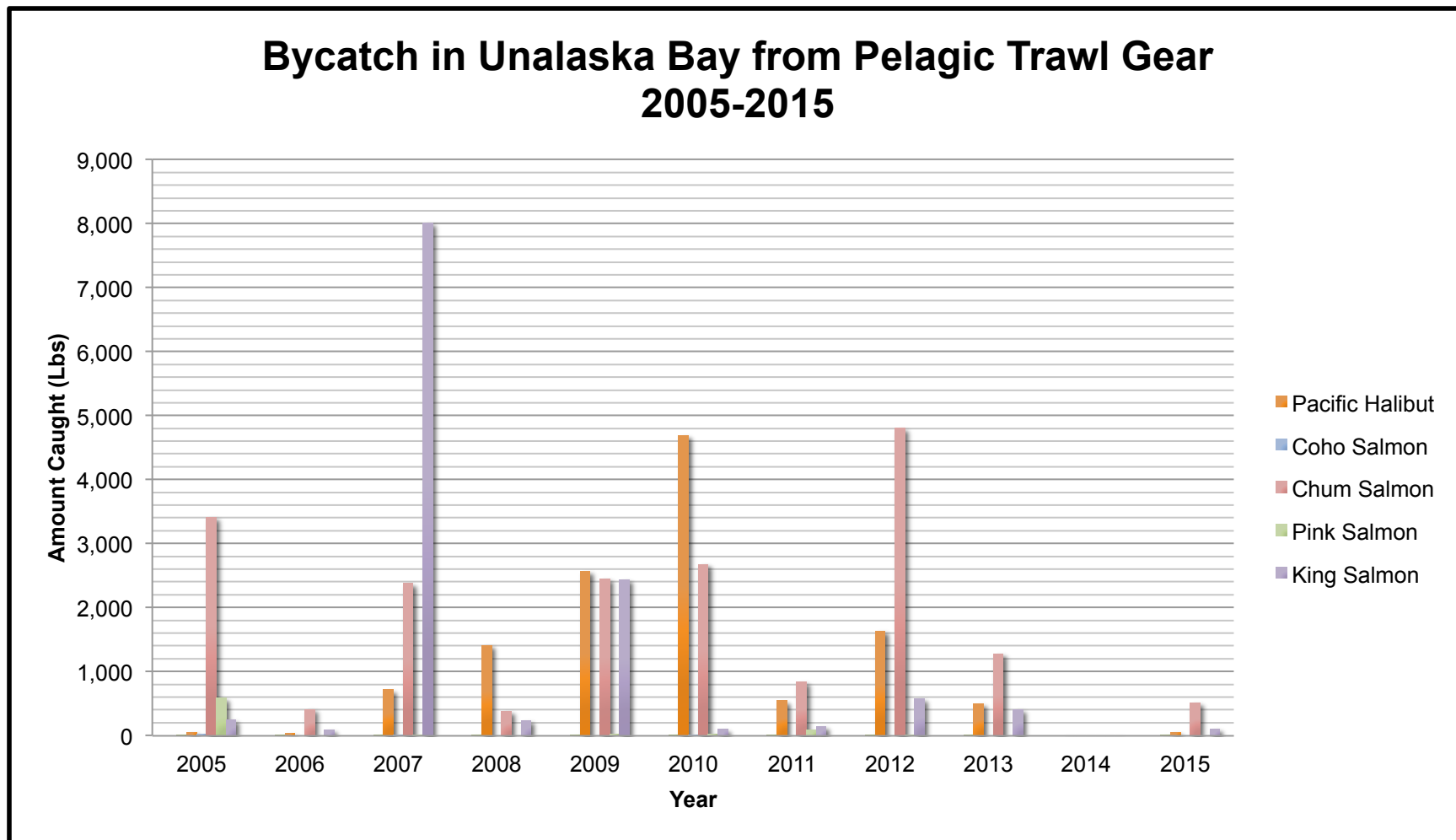


Figure 2. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary

Proposal 194

5 AAC 28.650.

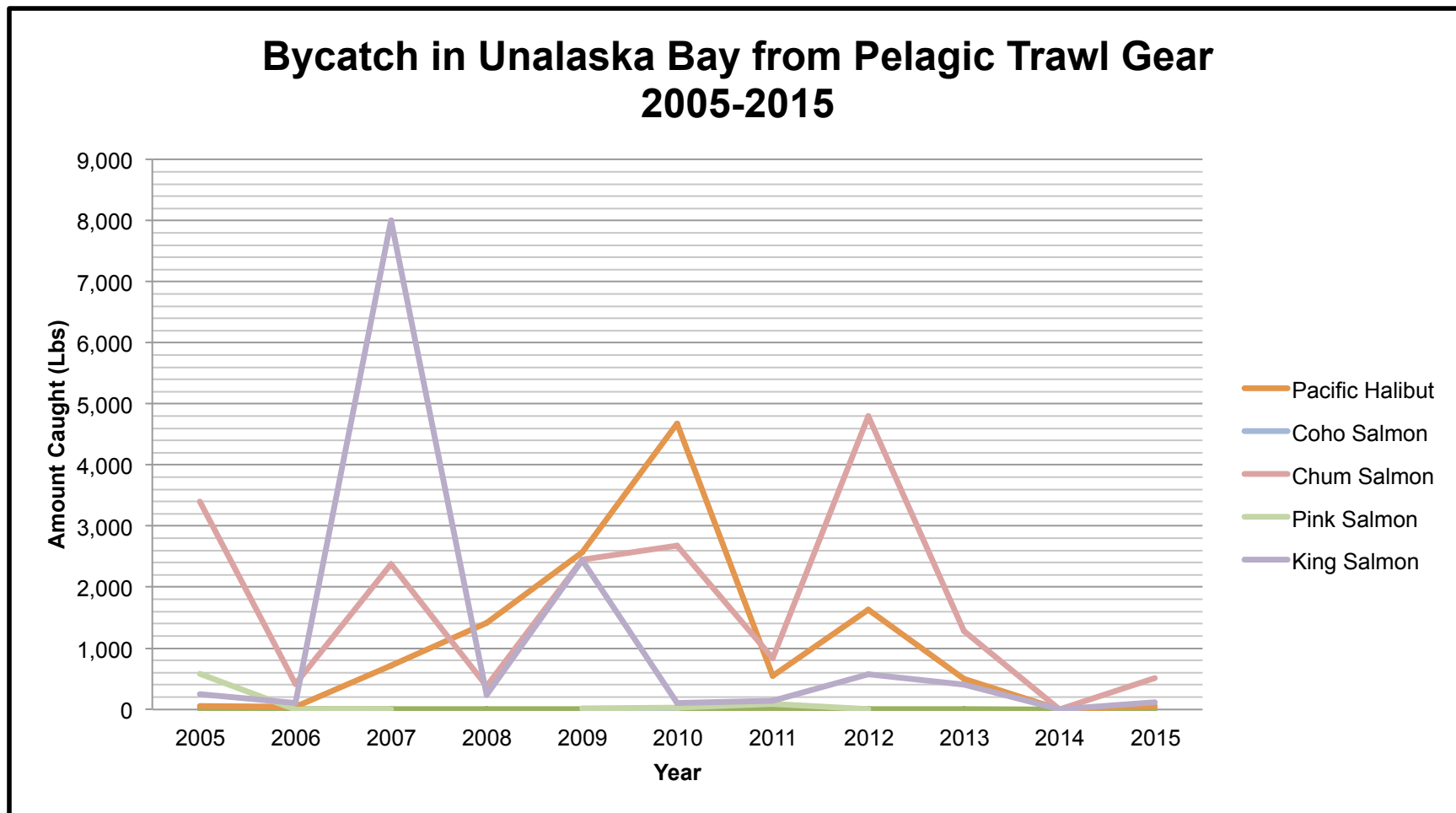


Figure 3. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary

Proposal 194

5 AAC 28.650.

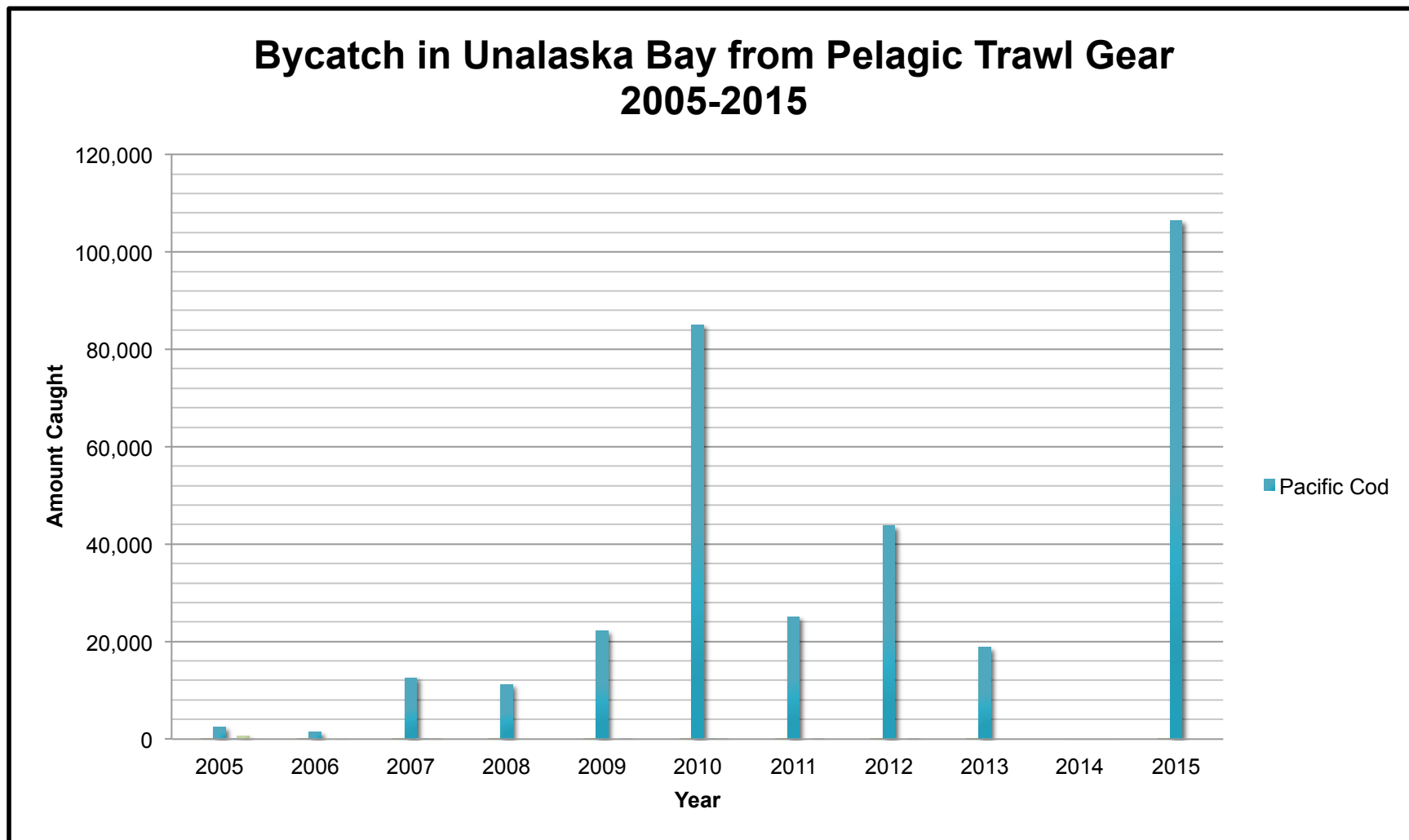


Figure 4. Source: department fish ticket database, department statistical area 665335
*2015 data are preliminary, no data for 2014.

Proposal 194

5 AAC 28.650.

- “This proposal will allow fish and game to **recover** and **return** to areas closer to our community enabling us to be able to continue harvest and process our **local resources**. We considered limiting all commercial fishing vessels under 35 feet lengths, but so few of them bother fishing inside the bay and their impacts are not nearly that of the trawl vessels. Trawlers are large vessels that are built to handle the stormy weather of the Bering Sea. They did not historically fish in Unalaska Bay and restricting them from these waters would alleviate many problems.”
– UNFA Proposal 194



UNALASKA/DUTCH HARBOR
FISH AND GAME ADVISORY COMMITTEE
PO BOX 162 UNALASKA, AK 99685

May 9, 2008

Denby Lloyd, Commissioner,
Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811

Subject: B-Season Pollock trawl closer in Unalaska Bay; this is a portion of the Bering Sea Pollock Restriction Area.

Dear Mr. Lloyd:

As Chairman of the local the Unalaska/ Dutch Harbor Fish and Game Advisory Committee, the Unalaska Fish and Game Advisory board has instructed me to write letters to you; Mr. Robert Mecum, NOAA Acting Administrator, Alaska Region; Mr. Eric Olson, Chairman of the North Pacific Fishery Management Council, and Mr. Mel Morris, Chairman State of Alaska Board of Fisheries. The Advisory committee would like to have a trawl closer considered in the Unalaska Bay area from a point at (54°00.314'N. lat 166°37.674 W long.) to Priest Rock (54°00.487 N. lat.166°22.900W.long). This area is a part of the Bering Sea Pollock Restriction Area and is only open to Pollock trawling by catcher vessels during the Pollock B season from June 10th to November 1st of each year; we would propose that this area in Unalaska Bay be closed permanently to trawling.

Trawling inside of Unalaska Bay has been an issue for local residents in this community for many years. I would like to point out that this area has not been an area that the Pollock trawl fleet has used traditionally or depended on. In the last few years, as Pollock stocks have moved further to the North, and Pollock catches have declined in areas near Unalaska and Akutan Islands, we have seen trawlers come into Unalaska Bay to top off a load, or to see if they might get lucky and get a tank of fish. The concern for the local residents is that the influx of large trawlers into this very small area during the summer time will impact local residents who are engaged in commercial, subsistence, and personal-use fishing activities in the Unalaska Bay area. The concerns we have heard are of salmon bycatch by these trawl vessels that are trawling adjacent to some of the bay's most productive river systems, just as the returns of Reds, Pinks and Silvers Salmon are coming into the Unalaska Bay area. This area isn't very large, and there really isn't a lot of room for many different fishery activities to take place at the same time. Furthermore, almost all commercial fishing in Unalaska Bay area is being done by vessels in the 58-foot and under class.



We feel that a closer of this size in the Unalaska Bay area shouldn't be major inconvenience to the Pollock fleet; just a few catcher vessels during the B season come into this area. I should also point out that most of the Pollock catcher vessels that deliver to Unalaska processing plants have already heard about the local concern regarding trawling in Unalaska Bay and have quit working the area a few years ago.

We have enclosed map of the area for your review, and we thank you for the consideration of this request, and if you need further information or have questions my contact numbers are listed below.

Sincerely

A handwritten signature in black ink, appearing to read "Frank Kelty", written over a horizontal line.

Frank Kelty
Chairman

Unalaska/Dutch Harbor Fish and Game Advisory Committee

CC: Robert Mecum, NOAA Acting Administrator, Alaska Region
Mel Morris, Chairman State of Alaska, Board of Fisheries
Eric Olson, Chairman North Pacific Fishery Management Council

Contact Numbers for Frank Kelty
Unalaska/Dutch Harbor Fish and Game Advisory Committee
PO Box 162
Unalaska, AK 99685
E-Mail fkelly@ci.unalaska.ak.us
Phone 907-581-7726

=====

MEMORANDUM TO COUNCIL

=====

TO: MAYOR AND CITY COUNCIL MEMBERS

THRU: CHRIS HLADICK, CITY MANAGER

FROM: FRANK KELTY, RESOURCE ANALYST

DATE: JANUARY 7, 2010

RE: SUPPORTING THE ADOPTION OF RESOLUTION 2010-02 IN SUPPORT OF
BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF
UNALASKA BAY TO GROUND FISH TRAWLING GEAR YEAR ROUND

SUMMARY: The Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries the advisory committee supported and adopted this year round trawl closure unanimously. This proposal would close Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.)

PREVIOUS COUNCIL ACTION: The Unalaska City Council discussed this issue in the fall of 2008 and Mayor Marquardt wrote a letter of support for this proposal to the Board of Fisheries when the Unalaska /Dutch Harbor Fish and Game Advisory committee submitted the proposal in the spring of 2009.

BACKGROUND: The City of Unalaska supports the need to address issues of interest to the local residents, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years. This area is not traditionally used or depended on by the Pollock trawl fleet and is only open to trawling during the Pollock B season June 10th to November 1st annually. Trawling adjacent to some of Unalaska Island's most productive, sensitive and largest river systems is a major concern to local residents that fish this area. The concern for the local residents is that the influx of trawlers into this very small and important area during the summer has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area

DISCUSSION: Local residents have long voiced concerns regarding bycatch of salmon and halibut, gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year. Proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay. This closure may also have a positive impact on habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area. It should also be noted that the majority if not all of the vessels trawling this area do not deliver to local processing plants, the local Pollock vessels are well aware of the sensitivity of the local residents to trawling in the Unalaska Bay area and have chosen to stay out of this area at some cost to there fishing operations. The adoption of Resolution 2010-02 will show the Board of Fisheries that City Unalaska supports actions that will have a positive impact on this very important area to local residents.

ALTERNATIVES:

A. Unalaska City Council may choose to adopt Resolution 2010-02.

B. Unalaska City Council may choose to oppose Resolution 2010-02

C. Unalaska City Council may choose not to comment on this issue.

FINANCIAL IMPLICATIONS: I don't see any financial impacts to Unalaska fishery revenues, as I stated earlier, the vessels fishing Pollock in Unalaska Bay do not deliver their catch to the Unalaska shoreplants. They sell their catch to processing operations in Akutan and Beaver Inlet and will continue to do so, even if Unalaska Bay is closed to Pollock trawling during the B season.

LEGAL: N/A

STAFF RECOMMENDATION: Staff recommends that the City Council adopt Resolution 2010-02

PROPOSED MOTION: The Unalaska City Council moves to adopt Resolution 2010-02 in support of State of Alaska Board of Fisheries Proposal 111

CITY MANAGER'S COMMENTS:



CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION NO. 2010-02

A RESOLUTION OF THE UNALASKA CITY COUNCIL SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

WHEREAS, the Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries, the advisory committee supported this proposal unanimously; and

WHEREAS, this proposal would close year round Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.) ; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the Pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area ; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river systems is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year ; and

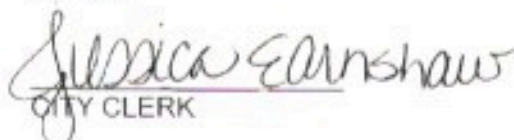
WHEREAS, proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area.

NOW THEREFORE BE IT RESOLVED THAT, the Unalaska City Council strongly urges the Alaska Board of Fisheries to adopt Proposal 111 for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

PASSED AND ADOPTED BY A DULY CONSTITUTED QUORUM OF THE UNALASKA CITY COUNCIL THIS 12th DAY OF January, 2010.


MAYOR

ATTEST:


CITY CLERK



**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

BOARD OF FISHERIES REGULATIONS

- ☒ Fishing Area – Bering Sea/Aleutian Islands
☐ Subsistence ☐ Personal Use
☐ Sport ☒ Commercial

JOINT BOARD REGULATIONS

- ☒ Advisory Committee ☐ Regional Council ☐ Rural

BOARD OF GAME REGULATIONS**Game Management Unit (GMU)**

- ☐ Hunting ☐ Trapping
☐ Subsistence ☐ Other
☐ Resident
☐ Nonresident

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

1. Alaska Administrative Code Number: 5 AAC 28.650 closed waters in the Bering Sea – Aleutian Islands area. **Regulation Book Page No.** 419

2. What is the problem you would like the Board to address?

The Unalaska/Dutch Harbor Advisory Committee would like to see waters of Unalaska Bay closed to commercial fishing for groundfish with trawl gear from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.) (See attached map). This area is a part of the Bering Sea Pollock Restriction Area and is only open to pollock pelagic trawling by catcher vessels during the pollock B season from June 10 to November 1 of each year. We propose that this area in Unalaska Bay be closed year round to commercial fishing for groundfish with pelagic trawl gear. Trawling inside of Unalaska Bay has been an issue for local residents in this community for many years. Unalaska Bay has not been an area that the pollock trawl fleet has traditionally used or depended on. But in the last few years, as pollock stocks have moved further to the north, during the B season, we have seen trawlers come into Unalaska Bay either to top off a load, or to see if they might get lucky and get a tank of fish out of Unalaska Bay.

The concern for the local residents is that the influx of large trawlers into this very small area during the summer time has impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area. The concerns we have heard are of salmon and halibut bycatch by trawl vessels that are trawling adjacent to some of the most productive and largest river systems in the Aleutian Islands, just as the returns of red, pink and silver salmon are coming into the Unalaska Bay area. We have also heard of concerns by residents of gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year. Unalaska Bay is currently closed year round to non pelagic trawling (5 AAC 39.164)

3. What will happen if this problem is not solved?

Unalaska Bay will continue to see an influx of large trawlers into this very small area between June 10 and November 1 that will continue to impact local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay. These vessels are trawling adjacent to some of Unalaska Island's most productive and largest river systems. Local residents that fish in this area will continue to have concerns of bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

5 AAC 28.650 (b). All waters of Unalaska Bay from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.) are closed to commercial fishing for groundfish with trawl gear.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

This proposal may reduce habitat impacts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and may have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area.

6. Solutions to difficult problems benefit some people and hurt others:**A. Who is likely to benefit if your solution is adopted?**

Unalaska residents and others that are engaged in subsistence, sport and non-Pollock commercial fishing activities in Unalaska Bay area.



6. Who is likely to suffer if your solution is adopted?

Pollock catcher vessels that fish Unalaska Bay during the Pollock B season.

7. List any other solutions you considered and why you rejected them.

None.

DO NOT WRITE HERE

Submitted By:

Name / Signature

Frank Kelty,

Chairman Unalaska /Dutch Harbor ADF&G Advisory Committee

Individual or Group

P. O. Box 162

Unalaska, Alaska

99685

Address

City, State

ZIP Code

907-581-1424

907-581-7726

fkelly@ci.unalaska.ak.us

Home Phone

Work Phone

Email



GENERAL PROVISIONS

STATE REGS

serves.

(d) When sufficient reliable data has been collected to determine times and locations where non-pelagic trawl gear can be operated without significant detrimental impact on prohibited species, the limitations in this section and 5 AAC 39.164 will be appropriately modified.

* 5 AAC 39.164. **NON-PELAGIC TRAWL GEAR RESTRICTIONS.** (a) Non-pelagic trawl gear may be operated in all waters of Tanner crab Registration Area J (5 AAC 35.500) only if, as may be required under 5 AAC 39.163(c), an onboard observer is present on the vessel when gear is being operated, only under the conditions of a permit issued by the commissioner, and only in locations and during periods not otherwise closed to non-pelagic trawling under (b) or (c) of this section. The permit

(1) must specify the locations and times when non-pelagic trawl gear may be operated;

(2) may restrict the amount of fish and shellfish that may be harvested within a specified location; and

(3) must be obtained in person at a department office located within the statistical area.

(b) Non-pelagic trawl gear may not be operated in waters of Alaska as follows:

(1) in the following waters of king crab Registration Area K (5 AAC 34.400) from January 1 through December 31:

(A) Chirikof Island closure, all waters within three miles of Chirikof Island;

(B) Alitak, Towers, and Geese Islands closure, all waters of Alitak Bay, Olga Bay, Alitak Flats, and Sitkinak Island enclosed by a line from Low Cape (57° N. lat., 154° 31' W. long.), to 57° N. lat., 154° 37.50' W. long., then a line following the three mile contour around Tugidak Island to 56° 28.50' N. lat., 153° 52' W. long., then a straight line to Cape Sitkinak (56° 33.50' N. lat., 153° 52' W. long.), to 56° 37' N. lat., 153° 48.50' W. long., then a line following the three mile contour to 56° 49' N. lat., 153° 38' W. long., then a straight line to the easternmost point of Twoheaded Island (56° 54.50' N. lat., 153° 33' W. long.), to a point on Kodiak Island at 56° 56' N. lat., 153° 36' W. long.;

(C) Barnabas closure, all waters of Sitkalidak Strait, Kiliuda Bay, and Ugak Bay east of 153° 16' W. long., in Sitkalidak Passage and enclosed by a line from Black Point (56° 59.50' N. lat., 153° 18.50' W. long.) to 56° 57.50' N. lat., 153° 13.50' W. long., then a line along the three mile contour to 57° 20' N. lat., 152° 23' W. long., then a straight line to the southernmost tip of Ugak Island (57° 22' N. lat., 152° 18.50' W. long.), and west of a line from the northernmost tip of Ugak Island (57° 23.50' N. lat., 152° 17.50' W. long.) to Narrow Cape (57° 26' N. lat., 152° 19' W. long.);

(D) Chiniak Bay closure, all waters of Chiniak Bay and Monashka Bay enclosed by a line from Cape Chiniak (57° 37' N. lat., 152° 09' W. long.) to 57° 37' N. lat., 152° 02' W. long., then a line along the three mile contour to 57° 58' N. lat., 152° 17' W. long., then a straight line to East Cape on Spruce Island (57° 55' N. lat., 152° 19.50' W. long.) and east of 152° 30' W. long. in Ouzinkie Narrows;

(E) Marmot Island closure, all waters enclosed by a line from Pillar Cape on Afognak Island (58° 09' N. lat., 152° 06.50' W. long.), to Marmot Cape on Marmot Island (58° 10' N. lat., 151° 52' W. long.) and from Cape St. Hermogenes (58° 15' N. lat., 151° 47.50'

W. long.) to 58° 08' N. lat., 151° 47.50' W. long., then a line to 05' N. lat., 152° 09.50' W. long., to Pillar Cape (58° 09'

(F) West Side closure, all waters of Uyak Bay, Strait, Raspberry Strait, Malina Bay, Paramonof Bay, line from Cape Uyak (57° 38.33' N. lat., 154° 20.33' W. lat., 153° 50.67' W. long.) to Raspberry Cape (58° 03.5 Cape (58° 24.50' N. lat., 152° 53' W. long.) to Party C lat., 152° 34' W. long.), west of 152° 30' W. long. in S long. in Whale Pass and Afognak Strait;

(G) Northeast Afognak closure, all waters Strait and enclosed by a line from Point Banks on Shuy long.) to 58° 42' N. lat., 152° 19' W. long., then a line to 08' N. lat., 151° 47.50' W. long., then a straight line to Island (58° 15' N. lat., 151° 47.50' W. long.) and north lat., 152° 07' W. long.) to Marmot Cape (58° 10' N. lat.

(H) Marmot Bay closure, all waters east of Afognak Strait, west of a line across Ouzinkie Narrows a line from Pillar Cape on Afognak Island (58° 09' N. lat., 152° 09.50' W. long., then a line following the three 17' W. long., then a straight line to East Cape on Spruce W. long.), including waters of Marmot, Kizhuyak, Ka:

(I) Cape Chiniak closure, all waters enclosed N. lat., 152° 09' W. long.) to 57° 37' N. lat., 152° 02' W. mile contour to 57° 20' N. lat., 152° 23' W. long., then a of Ugak Island (57° 22' N. lat., 152° 18.50' W. long.) and tip of Ugak Island (57° 23.50' N. lat., 152° 17.50' W. lat. 152° 19' W. long.);

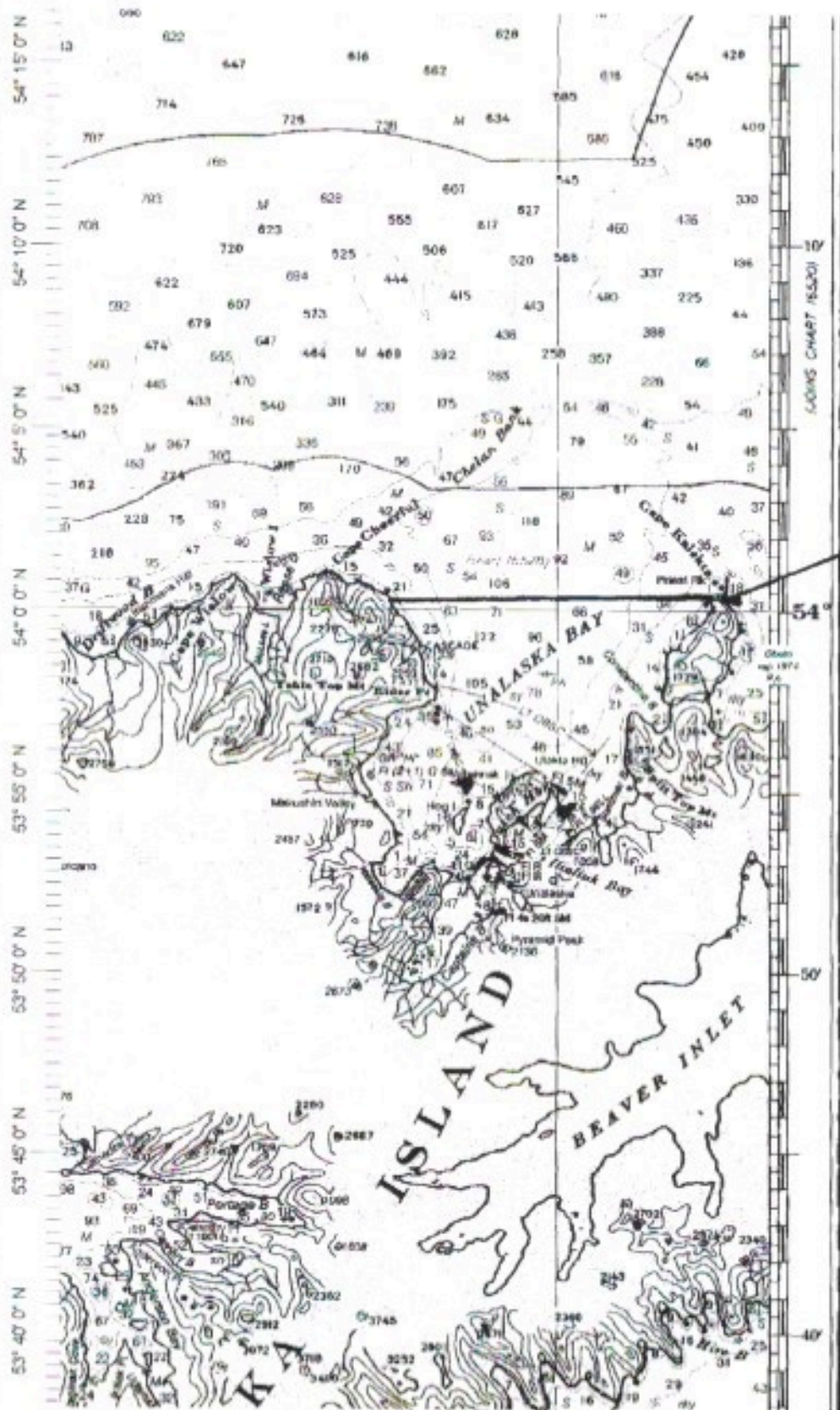
(J) South Sitkalidak Strait closure, all waters (56° 59.50' N. lat., 153° 18.50' W. long.) to 56° 57.50' N. following the three mile contour to 56° 50' N. lat., 153° easternmost tip of Twoheaded Island (56° 54.50' N. lat. Kodiak Island at 56° 56' N. lat., 153° 36' W. long., and Sitkalidak Passage;

(K) Cape Ikolik closure, all waters enclosed 17.40' N. lat., 154° 55.60' W. long. then a line following 154° 37.40' W. long., then a straight line to Low Cape

(L) West Shuyak Island closure, all waters enc Shuyak Island (58° 38' N. lat., 152° 19' W. long., to 58° a line following the three mile contour southwest to 58° to Shuyak Island;

(M) Alaska Mainland closure, all state waters the latitude of Cape Douglas (58° 51' 10' N. lat.) and ea: (156° 19' W. long.);

(N) East Sitkinak closure, all waters enclosed



all pass
south of the
line.

Chart Name: UNALASKA I TO AMUKTA I
Chart ID: 16500 1
Top Left: 54° 16' 22" N 166° 52' 52" W
Bottom Right: 53° 37' 52" N 165° 58' 10" W



CITY OF UNALASKA
UNALASKA, ALASKA
REGULAR MEETING
JANUARY 12, 2010

The regular meeting of the Unalaska City Council was called to order by Mayor Shirley Marquardt at 7:00 p.m., January 12, 2010, in the Unalaska City Hall Council Chambers. Roll call was taken and the following members were present:

Mayor	-Shirley Marquardt
Members	-Katherine McGlashan -Dick Peck -Dennis Robinson -Zac Schasteen -David Gregory -Roger Rowland
Absent	-None

PLEDGE OF ALLEGIANCE: Mayor Marquardt led the Pledge of Allegiance.

RECOGNITION OF VISITORS: None

APPROVAL OF AGENDA: Hearing no revisions, Mayor Marquardt approved the agenda.

MINUTES: Hearing no revisions, Mayor Marquardt declared the minutes of December 22, 2009 regular meeting adopted.

FINANCIAL REPORT: None

BOARD/COMMISSION REPORTS: None

AWARDS/PRESENTATIONS: None

MANAGER'S REPORT: City Manager's report included in packet.

COMMUNITY INPUT/ANNOUNCEMENTS:

1. Thank you to everyone that worked on the fireworks show, very good show.
2. Martin Luther King Jr. Community Celebration Monday, January 18, 2010 at 7:00 p.m. at the community center.
3. Council Member Schasteen would like to encourage community members to donate money to Anchorage Police Officer, Jason Allen support fund at Key Bank.
4. National Ocean Sciences Bowl competition against council members will be on Wednesday, January 13, 2009 at the City Hall Council Chambers.
5. World War II Center will be showing Ending Jim Crow Days in Alaska, Sunday at 6 p.m.

PUBLIC TESTIMONY ON AGENDA ITEMS:

Public Testimony on resolution 2010-01 taxicab rates would like the resolution to clarify the charter rate to be exclusive.

PUBLIC HEARING: None

WORK SESSION: Rowland move to adjourn to work session at 7:08 p.m., Schasteen second. Unanimous vote. Meeting reconvened to regular session at 8:30 p.m. Items discussed in the work session:

1. **QUARTERLY FISHERIES UPDATE**
2. **FY11 BUDGET – REVENUE PROJECTIONS**
3. **FY11 COUNCIL BUDGET GOALS**

CONSENT AGENDA

1. **RESOLUTION NO. 2010-01:** ESTABLISHING TAXICAB RATES FOR THE CALENDAR YEAR 2010 AS REQUIRED BY UNALASKA CITY CODE.

Hearing no objections, Mayor Marquardt declared the Consent Agenda adopted.

UNFINISHED BUSINESS: None

NEW BUSINESS:

1. **RESOLUTION NO. 2010-02:** SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

McGlashan move to adopt Resolution No. 2010-02, Gregory second.

Public Testimony: Support this resolution, have commercial fished for 20 years; currently sit on UNFA board; this has been a topic for us. Appreciate the work Alaska Department of Fishing Game has done; thank you for your support on this issue.

Public Testimony: Oppose this resolution; Westward Seafoods buys Pollock from boats that catch part of their quota from the bay. We rely on that revenue which also supports the City. Believe it's an extraordinary measure to close the bay.

Public Testimony: Currently serve on Fish and Game Advisory Committee; support this resolution; believe this is good for the resource.

Discussion: Council discussion supports this resolution; closing this bay has a direct affect on subsistence fishing.

Council discussion supports this resolution; this will help local subsistence fishing.

Council discussions support this resolution; minimum we can do before the resource is gone.

Council discussion believes we should adopt this resolution; It's difficult to keep taking away from industry; this has a direct benefit if we close the bay.

VOTE: Unanimous

COUNCIL DIRECTIVES:

Rowland move to direct the City Manager to research a sliding rate tax on diesel fuel that diminishes the rate as price per gallon goes up or caps the dollar per gallon figure that the current 3% applies to and bring back a recommendation, Schasteen second.

Discussion: Council discussions feel we should lessen the tax on high fuel costs, to save fisherman money.

Council discussion would like to have City Manager bring back several options on this directive.

Council discussion would like to find an option to help the fisherman out; do not believe this is the way to help them.

VOTE: AYES-4, NAYS-2. Motion passes 4-2.

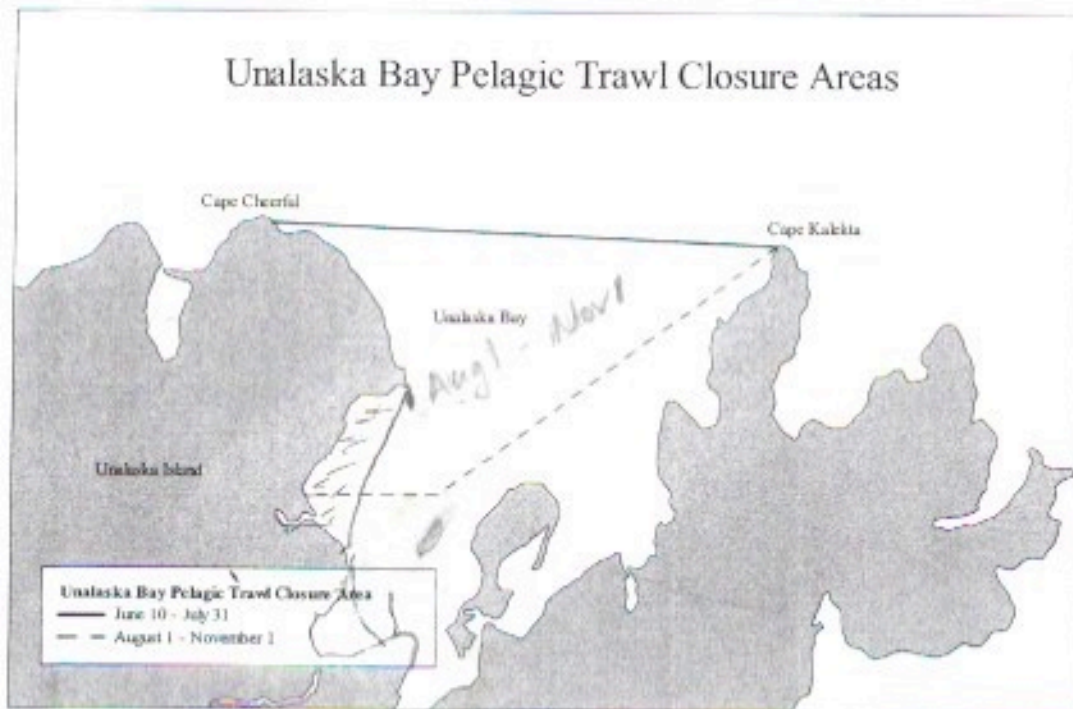
COMMUNITY INPUT/ANNOUNCEMENTS: None

Mayor Marquardt adjourned the meeting at 9:06 pm.



Jessica Earnshaw
Acting City Clerk

APPROVED
1/12/2010



5 AAC 28.650 (b) The waters of Unalaska Bay are closed to groundfish fishing with pelagic trawl gear, as follows:

(1) from June 10 through July 31, south of a line from Cape Kakeka at 54° 00.50' N. lat., 166° 22.50' W. long. to Cape Cheerful at 54° 01' N. lat., 166° 40' W. long.;

(2) beginning August 1 until the closure of the parallel Bering Sea walleye pollock 'B' season, south of a line from Cape Kakeka at 54° 00.50' N. lat., 166° 22.50' W. long. to a point near Hog Island at 53° 55.42' N. lat., 166° 34.25' W. long. to a point in Broad Bay at 53° 55.42' N. lat., 166° 38.80' W. long.; for the purposes of this paragraph, "parallel Bering Sea Walleye Pollock 'B' season" means the parallel season conducted from June 10 through November 1.



February 12, 2013

ADF&G, Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposal 162 – Unalaska Bay Closure

To Whom it May Concern;

I support Proposal 162 to the Board of Fisheries, to close Unalaska Bay to trawl fishing.

I'm a lifelong resident of Unalaska for over 50 years and have commercial fished and subsistence fished and hunted here during this time as my family has done for many generations.

We've witnessed a huge decline in fish, seals, ducks in Unalaska Bay where my many relatives and neighbors gather our food for our tables. It is a very important part of our life that we need to protect. At the same time we see these big trawlers towing around us in our traditional areas we hunt and fish and then seeing the fishes washed up on the beaches.

We are having to go outside the bay in our small skiffs to find fish and game nowadays which is dangerous and burns up a lot of fuel too. A lot of times we can't even set our groundlines and other gear because we have lost it in the past few years since the trawlers have been coming up inside the bay and we don't want to risk getting run over by them.

We need to protect our rights to be able to continue to fish and hunt and hope you can support this proposal also.

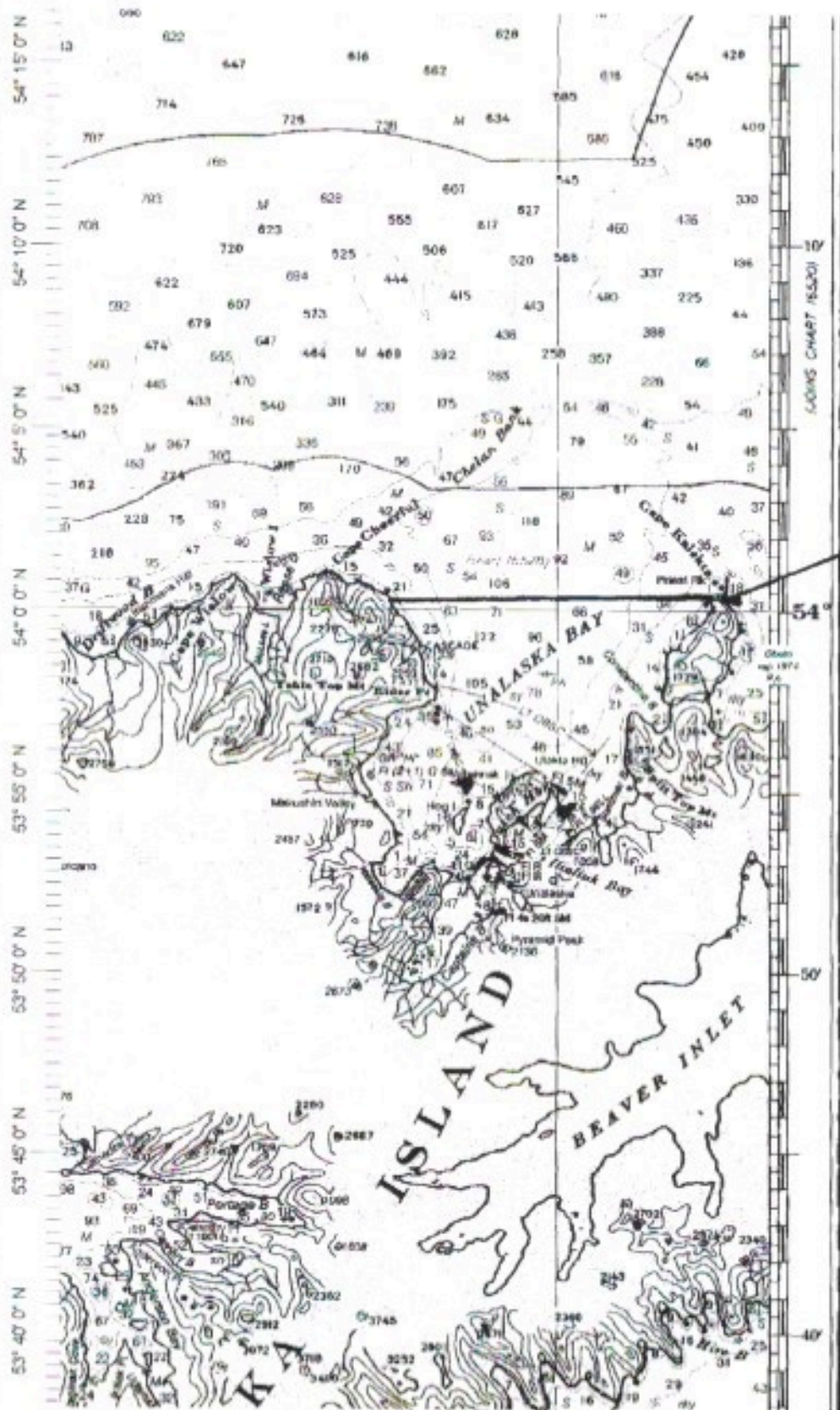
Thank You,

A handwritten signature in cursive script that reads "Boris Galaktionoff".

Boris Galaktionoff

PO Box 1414

Unalaska, AK 99685



all pass
south of the
line.

Chart Name: UNALASKA I TO AMUKTA I
Chart ID: 16500.1
Top Left: 54° 16' 22" N 166° 52' 52" W
Bottom Right: 53° 37' 52" N 165° 58' 10" W



February 16, 2013

To Whom It May Concern;

I support Proposal 162 to the Board of Fisheries, to close Unalaska Bay to trawl fishing.

I'm a lifelong resident of Unalaska for over 32 years and have sport fished, subsistence fished and hunted here during this time as my family has done for many generations. It was passed down to me and I am excited at the chance to someday pass it onto my children.

I've witnessed a tremendous decline in fish and game in Unalaska Bay where we gather fish and game for subsistence and our livelihoods. It is a very important part of our life that we need to protect. At the same time we see these big trawlers towing around us in our traditional areas we hunt and fish and then seeing the dead fish floating and washed up on the beaches. It's very discouraging to say the least when I am out on my boat fishing and hunting for the next season's supply and see a trawler dragging its nets right in front of me heading out through our inner bay.

I now have to go outside the bay in my smaller boat to find fish and game now which is dangerous and is expensive. The weather has a tendency of picking up quick with the tides once we exit our bay for fishing and if we don't plan for it with the short windows of opportunity during the summer months we risk not being able to fill our freezers for the winter. I have seen a huge decline in my experiences as the years have gone on in our inner bays. I have had to go out farther and farther and we are starting to notice the decline in all of the outer areas as well.

Everyone in our community supports this closure. The residents who call Unalaska home and are here to stay. There are companies and corporations that are about a profit and not preserving the way of life that Unalaska has made so unique to itself and region. We have made great strides in preserving what we have through all these booms in fishing industries, yet we are really starting to forget that the local residents who are not seeing to profit from these waters, but sustain a way of life are becoming jeopardized for future generations. Throughout the state of Alaska many other communities have been given this protection around their communities and it is time for us to do the same. We need to protect our rights to be able to continue to fish and hunt and I formally request you support to this proposal.

Thank You,

Fredrick Constantine Lekanoff

907-359-3990

Email: Fredrick@AriCorp.us



UNALASKA NATIVE FISHERMAN ASSOCIATION

PO Box 591
Unalaska, Alaska
99685-0591
Ph/Fax (907) 581-8292
Cell (907) 359-3117

February 17, 2013

Alaska Board of Fish

RE: Letter In Support of a Trawl Ban in Unalaska Bay Prop 162

To Whom It May Concern,

Within the Bering Sea there is a biological system comprised of millions of animals, birds, mammals, fishes and crabs, etc. Left alone it remains healthy, self correcting and sustainable due to an incredible force we call the balance of nature.

The reason man must regulate the harvest of species within this system is so things don't get out of whack. We've known this for millennia.

Unalaska Bay is a system within a system. Pollock being the most prevalent here it stands to reason every other creature in the bay interacts with it in some form or fashion. The removal of such a large portion of the Pollock in this micro system is having a negative impact and the health of the bay is suffering. We see the signs of this, in that, fishes used for subsistence and sport fishing no longer flourish here, something is happening.

Do we need a Pollock quota set for Unalaska Bay so as to reset it's balance? UNFA members have determined the health of Unalaska Bay as a top priority, not only for it's own sake, but also as it relates to the quality of life for it's residents. We have identified Pollock over fishing and by catch, as well as pollution, as primary points of concern.

Please help us in our endeavor to put the pieces back together in regards to the health and well being of this beautiful area by voting for a trawl ban in Unalaska Bay.

Sincerely,

Dustan Dickerson, UNFA Vice President

Alaska Board of Fisheries

February 18, 2013

RE: Proposal 162, Closure of Unalaska Bay

Dear Members,

I am a resident of Unalaska; I operate a small commercial fishing boat out of Unalaska and I fish for salmon, halibut, cod, and crab in this area. My livelihood has been commercial fishing since 1969. My crew is my family and we depend on healthy fisheries for our economic and physical well-being.

It is my position that Unalaska Bay should be closed to trawling because of the potential impact on the ecosystem in general, and the specific impact trawling has on bycatch species. The compromise action in February 2010 was not reasonable and did not address issues such as the lack of a sound management plan for both directed fisheries and bycatch species.

Unalaska Bay is a separate ecosystem from the Bering Sea and is unique, with a diversity of species not found in many Alaskan bays. There are directed fisheries in the Bay for halibut, salmon, crab, herring, pollock, and pacific cod and there are not many bays in Alaska that can support such an array of fishing pressure. These species are interdependent, and what is detrimental to one can affect the others' survival.

The Trawl Fleet has an overall pollock total allowable catch (TAC) for Bering Sea Aleutian Islands (BSAI) and none specific to Unalaska Bay. The Trawl Fleet has an allowed bycatch amount for BSAI and none specific to Unalaska Bay. There is no management plan for the harvest of pollock specific to the bay and no management plan for bycatch in the bay. The pollock in Unalaska Bay are suitable for fillet lines and produce a premium-finished product, a prized fish - but a prize catch without a management plan is a recipe for overfishing both pollock and bycatch species.

Halibut are opportunistic feeders. Their diet consists of, among others, salmon and pollock, two pelagic species, and so it is common to find halibut in the pelagic zone. They have been caught on salmon troll gear, in salmon seine gear, and pelagic trawl gear.

The halibut bycatch for this area is based on an overall cap for the trawlers in the BSAI (areas 4ABCDE). The bycatch cap for 2013 is 3675 mt /7,350,000 lbs. and has remained unchanged for at least the last 4 years. The catch limit for the directed halibut fishery in the BSAI (Areas 4ABCDE) was

- 8,310,000 lbs. in 2011;
- 5,901,000 lbs. in 2012, and;
- set at 4,710,000 lbs. for 2013, a reduction of 43% in the last 2 years.

More specifically, in area 4A, an area encompassing Unalaska Bay, the catch limit for the directed halibut fishery has been reduced from

- 2,410,000 lbs. in 2011, to
- 1,567,000 lbs. in 2012, and to
- 1,330,000 lbs. in 2013, a reduction of 45% in the last 2 years.

These are drastic reductions, yet the allowed bycatch of halibut for the trawlers remain the same. I do not think the trawl bycatch of halibut is adequately being addressed, surely not in Unalaska Bay. Note that the International Pacific Halibut Commission (IPHC) sets the catch limits for the directed halibut fishery, with stock conservation being the primary consideration. The IPHC has no authority to manage bycatch. That authority lies with the North Pacific Fisheries Management Council. Before the IPHC adopts fishery catch limits, bycatch is subtracted first.

A few years ago, there were at least four halibut charter boats working out of Unalaska. They were doing robust business, making two trips a day of six passengers, people limiting out. Today there is but one left struggling. The sport fishers and subsistence fishers now have to leave the Bay in search of a legal fish to catch.

We are fast approaching a situation where the benefit from the halibut resource is changing hands. What was once an important source of income and sustenance for the people who invested in the fishery - commercial fishers, sport fishers, and subsistence fishers, people with an economic dependency on the fishery - has become nothing but bycatch and waste to grease the wheels of trawling. This situation is not unlike that in the late 1970's when after the crash of the red crab population in the Bering Sea, and during a time when ADFG was trying to rebuild the stocks, the red crab fleet was not allowed a directed fishery but the trawlers were allowed to fish with a considerable red crab bycatch.

I am not opposed to the fishing of pollock in Unalaska Bay, but I am opposed to any fishing whether it being a directed fishery or bycatch without sound management plans.

Sincerely,



Donald Aus
F/V Good Deal

CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION NO. 2010-02

A RESOLUTION OF THE UNALASKA CITY COUNCIL SUPPORTING THE ADOPTION BOARD OF FISHERIES PROPOSAL 111 TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING WITH TRAWL GEAR YEAR ROUND.

WHEREAS, the Unalaska/ Dutch Harbor Fish and Game advisory committee has submitted Proposal Number 111 to the Alaska Board of Fisheries, the advisory committee supported this proposal unanimously; and

WHEREAS, this proposal would close year round Unalaska Bay to groundfish trawling with trawl gear year round from a point at (54° 00.314' N lat., 166° 37.674 W long.) to Cape Kalekta (54° 00.50' N lat., 166° 22.50 W long.) ; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the Pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay area ; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river systems is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year ; and


WHEREAS, proposal 111 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area.

NOW THEREFORE BE IT RESOLVED THAT, the Unalaska City Council strongly urges the Alaska Board of Fisheries to adopt Proposal 111 for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

PASSED AND ADOPTED BY A DULY CONSTITUTED QUORUM OF THE UNALASKA CITY COUNCIL THIS 12th DAY OF January, 2010.


MAYOR

ATTEST:


CITY CLERK

**Qawalangin Tribal Council
Regular Meeting
April 19, 2013**

Kate Maschner, Idaho State University, Subsistence survey;

President D. Rankin introduces Kate Maschner. (letter included)

Kate is a Sociocultural anthropologist and Associate Professor at Idaho State University. A couple of weeks ago, Kate sent some material for the Council to look over on a study she will be doing, through a grant she received from the U.S. Fish and Wildlife Services office of Subsistence Studies, which is supported by the Kodiak/Aleutians Subsistence Regional Advisory Council. The project will address priority information need for harvest data of salmon for subsistence use and expanding the study to place salmon in a broader subsistence and socioeconomic conditions of Unalaska, Nikolski, Atka, and Adak.

The reason for her study is to gather information on subsistence harvest to be able to manage these species, to fill the data gaps that are apparent to the Board of Fisheries. Kate stated that she had funding to hire a couple of workers, possibly students, to interview, and she has funds (\$40.00 each person) to pay the interviewees, a small amount for each interview. She asked when was a good time to return to do the interviews. Council Member T. C. Robinson suggested that September would be a good time. Vice-President N. E. Lekanoff asked if she was trying to get data from last year also, or starting from this year. Kate stated that we could start the time line to what ever is appropriate, the way that Fish and Game does it, is it takes the previous year but it would probably be easier to take it from the previous 12 months from when she actually came in, that would probably be easier. She would like to get a full seasonal cycle.

Council Member W. Lekanoff asked who this information goes to. Kate stated that it is funded by the Office of Subsistence Management, which is part of the Fish and Wildlife Service, it's Federal. They are based in Anchorage. She stated that she wrote the proposal because this information was identified as a research need by the Kodiak/Aleutian Regional Advisory Rack. Kate stated that a comprehensive study has not been done here since around the 1990's.

Vice-President N. E. Lekanoff asked if she talked to Fish and Game in Kodiak, they are the ones that require us to have a permit to get subsistence salmon, to catch halibut, crab, and everybody that does that is required to fill out the forms. Kate stated that she will be using these reports to compare. President D. Rankin stated as Council Member W. Lekanoff always stated is that there is a difference between traditional and subsistence, with subsistence, you need a permit and with traditional gathering, it should be our inherent right. It should be different then when someone who has just moved here for a year, but can get a permit and put a net out. Kate agreed. Council Member W. Lekanoff stated there are a lot of people here from different parts of the world, and when I see them on the beach at low tide, and when it is insisted I have a subsistence license, I am not against any survey, in fact I approve. Project Manager/ Roads Coordinator V. Tutiakoff stated that if you talk to Fish and Game here, you will find that there are about 295 permits issued here and out of that there are only ten local people who actually have them. So, you can see that there are processors here who catch fish and send it out of here. People know this and Fish and Game know about it, you can't complain because of what would happen. They are basically killing of our culture by allowing this new culture in. Atka, Nikolski are about 95% native, Adak is about 20%, but here, we are about 8%, as far as local users. President D. Rankin stated that it is not really regulated, there is no one here to regulate all those people, everything here is commercial fishing.

Project Manager/ Roads Coordinator V. Tutiakoff stated that when you talk about a subsistence survey here, there are two different types of subsistence here, we, (the Unangan people), have the need for it, and we've been doing it for thousands of years. The subsistence now days, really hurts me, when I sit on the on the Aleutian/Kodiak, the reason it came up was in the Kodiak area, was the Military was like 60%, 20%



processors, and 10% local. They were basically put in the same pot, like we are done here. So surveying, depending on who you survey, you will get different answers from Native and non-native. Kate stated that we should be able to see that and that the survey is anonymous and she should have said that up front, but she does collect demographic data. Project Manager/ Roads Coordinator V. Tutiakoff stated that he doesn't think Fish and Game does a breakdown of who's there, but we requested that at the Rack. Some one here on vacation doesn't even get checked when they request a subsistence permit.

President D. Rankin stated she was glad this was getting done because we have had ship wrecks here and we have no idea what has been damaged, we have no base line. Council Member T. C. Robinson stated we have no base line and you can't even catch a halibut in the bay. We will be able to give you a list of tribal users. Council Member T. C. Robinson stated there is a lot of sharing with the people here, but you can not even catch a halibut in this bay for nothing now days. Council Member T. C. Robinson stated that Fish and Game is not here for us, or the Bay would be closed. We have to go far to catch halibut. It is easier to get a sport fishing license to go catch a halibut then it is to get a subsistence permit.

Vice-President N. E. Lekanoff asked Kate about who she was going to get to help her, are they going to be high school kids? Yes, that would be good.

President D. Rankin asked when she would be the initial interviews. How long was she here for? Kate stated she will be trying to get to Atka on Monday, so she will be here for the weekend. Project Manager/ Roads Coordinator V. Tutiakoff will be leaving tomorrow. We could have a meeting with Kate on Sunday at 2 pm, along with a few other subsistence users.


The Council discussed some possible candidates for her to meet and made list of providers and users. A meeting was set up for Sunday, April 21, 2013, at the Tribal Office at 2 pm.

Kate asked if you can eat off the beach here, Council stated, No, you have to go at least 10 miles away to get good clams and such. Project Manager/ Roads Coordinator V. Tutiakoff stated there needs to be a sampling taken because PCBs is a growing hazard here and the beaches here are dead and the Captain's Bay is totally dead, and that he could get clams at Captains bay about 5-6 years ago and I opened one up just this past week, and they smelled like diesel fuel. Any thing within ten mile of this community worth gathering here is not worth it unless you're really staving.

President D. Rankin suggested Kate talk to Reid Brewer, and George Pappas who is with Fish and Game in Kodiak. He would like to come out this summer. His wife is on the Federal Board as an advisor, for the State, the subsistence Department. She's from the Bristol Bay area.

Council thanks Kate for coming. Kate left some cards.

Kate stated that she was in Akutan and did a survey of the Village and tried to survey persons from a cannery because she saw them on the beach, and the plant manager would not let her talk to them. Council Member T. C. Robinson stated that the whole Akutan Bay has 56 acres of Hydrogen chloride 18 inches deep in it and it has to be mediated by Trident. It's a dead bay, and it's happening here.



QAWALANGIN

Tribe of Unalaska

RESOLUTION #13-04

**A RESOLUTION OF THE QAWALANGIN TRIBE OF UNALASKA
SUPPORTING THE ADOPTION OF UNALASKA NATIVE FISHERMANS
ASSOCIATION'S (UNFA) PROPOSAL 162 TO THE BOARD OF FISHERIES,
TO CLOSE THE WATERS OF UNALASKA BAY TO GROUND FISH FISHING
WITH TRAWL GEAR, YEAR ROUND.**

WHEREAS, the Qawalangin Tribal Council is a duly elected governing body of the Federally recognized Qawalangin Tribe of Unalaska (Q. T.); and

WHEREAS, the UNFA has submitted proposal 162 to the Alaska Board of Fisheries; and

WHEREAS, this proposal would close Unalaska Bay year round to groundfish trawling with trawl gear from a point at south of a line from Cape Kalekta at 54° 00.50' N. lat., 166° 22.50' W. long. To Cape Cheerfull at 54° 01' N lat., 166° 40' W. long.; and

WHEREAS, trawling inside of Unalaska Bay has been an issue of concern for local residents in this community for many years, and this area is not traditionally used or depended on by the local pollock trawl fleet; and

WHEREAS, the concern for the local residents is that the influx of trawlers into this very small area during the summer time has negatively impacted local residents who are engaged in commercial, subsistence, and sport fishing activities in the Unalaska Bay; and

WHEREAS, trawling adjacent to some of Unalaska Island's most productive and largest river system is a major concern to local residents that fish in this area; and

WHEREAS, local residents have long voiced concerns regarding bycatch of salmon and halibut as well as gear conflicts, habitat impacts and lost gear in the Unalaska Bay area during this time of year; and

WHEREAS, Proposal 162 is intended to reduce habitat impacts, gear conflicts, bycatch of salmon, halibut, herring, and other species in Unalaska Bay and is expected to have a positive impact on habitat, subsistence, sport, and commercial fishing activities in this area; and





NOW THEREFORE BE IT RESOLVED THAT; the Qawalangin Tribal Council strongly urges the Alaska Board of Fisheries to adopt Proposal 162, for the positive impacts it will have on bycatch reduction, gear conflicts, habitat, subsistence, sport, and commercial fishing activities in the Unalaska Bay area.

We do certify, that the above Resolution was approved and passed at a Regular Meeting of the *Qawalangin* Tribal Council therefore called and held the 25 day of January, 2013, at which a quorum was present and resulted in a vote of 5 ayes, 0 nays, and 0 abstaining.

Denise M Rankin

Denise Rankin
President

Lillian A. Ford

Lillian A. Ford
Secretary/ Treasurer



Feb 7, 2016

ADF&G, Board of Fisheries

Re: Proposal 194, Unalaska Bay Trawl Closure

Dear Board of Fisheries,

I am a 36 year resident of Unalaska with children and grandchildren and am part of a large family of multi generation members of the local native tribe with a long participation in fish and game use in Unalaska Bay. I also serve on the local Unalaska Native Fisherman's Association board, whose members also strongly support this closure.

I've fished here commercially and for subsistence most of my life and have witnessed a drastic decrease in most if not all fish and game species in Unalaska Bay. It's been hard financially and culturally when we cannot find enough to feed our family. It is also unsafe to go outside the bay in open skiffs into the island passes and open Bering Sea, which is becoming a common practice lately and we anticipate an accident is likely to happen.

There are numerous commercial fisheries being permitted to occur inside Unalaska Bay, all the while there is little to no research, data, or understanding by the state fishery managers of this small, (a few square miles) but special area. We feel there are so few halibut and salmon now that it is little wonder bycatch rates are low. This bay needs time to recover. We find it unreasonably permissive to allow a Pollock trawl fishery to occur inside the bay, when they can safely fish just a few miles outside, considering the importance of this area to our community.

This proposal represent one of several attempts by folks locally to ask for your support to help keep our people safe and allow our bay to become healthy again and fish and game stocks to recover. Donald (Butch) Aus, a longtime Area M commercial fisher and UNFA member asked me to share with you again his letter from our last proposal to close the bay. He stated all the points he raised then still apply. Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Walter Tellman", with a long horizontal line extending to the right.

Walter Tellman

**Alaska Board of Fisheries****February 18, 2013****RE: Proposal 162, Closure of Unalaska Bay****Dear Members,**

I am a resident of Unalaska; I operate a small commercial fishing boat out of Unalaska and I fish for salmon, halibut, cod, and crab in this area. My livelihood has been commercial fishing since 1969. My crew is my family and we depend on healthy fisheries for our economic and physical well-being.

It is my position that Unalaska Bay should be closed to trawling because of the potential impact on the ecosystem in general, and the specific impact trawling has on bycatch species. The compromise action in February 2010 was not reasonable and did not address issues such as the lack of a sound management plan for both directed fisheries and bycatch species.

Unalaska Bay is a separate ecosystem from the Bering Sea and is unique, with a diversity of species not found in many Alaskan bays. There are directed fisheries in the Bay for halibut, salmon, crab, herring, pollock, and pacific cod and there are not many bays in Alaska that can support such an array of fishing pressure. These species are interdependent, and what is detrimental to one can affect the others' survival.

The Trawl Fleet has an overall pollock total allowable catch (TAC) for Bering Sea Aleutian Islands (BSAI) and none specific to Unalaska Bay. The Trawl Fleet has an allowed bycatch amount for BSAI and none specific to Unalaska Bay. There is no management plan for the harvest of pollock specific to the bay and no management plan for bycatch in the bay. The pollock in Unalaska Bay are suitable for fillet lines and produce a premium-finished product, a prized fish - but a prize catch without a management plan is a recipe for overfishing both pollock and bycatch species.

Halibut are opportunistic feeders. Their diet consists of, among others, salmon and pollock, two pelagic species, and so it is common to find halibut in the pelagic zone. They have been caught on salmon troll gear, in salmon seine gear, and pelagic trawl gear.

The halibut bycatch for this area is based on an overall cap for the trawlers in the BSAI (areas 4ABCDE). The bycatch cap for 2013 is 3675 mt /7,350,000 lbs. and has remained unchanged for at least the last 4 years. The catch limit for the directed halibut fishery in the BSAI (Areas 4ABCDE) was

- 8,310,000 lbs. in 2011;
- 5,901,000 lbs. in 2012, and;
- set at 4,710,000 lbs. for 2013, a reduction of 43% in the last 2 years.



More specifically, in area 4A, an area encompassing Unalaska Bay, the catch limit for the directed halibut fishery has been reduced from

- 2,410,000 lbs. in 2011, to
- 1,567,000 lbs. in 2012, and to
- 1,330,000 lbs. in 2013, a reduction of 45% in the last 2 years.

These are drastic reductions, *yet the allowed bycatch of halibut for the trawlers remain the same.* I do not think the trawl bycatch of halibut is adequately being addressed, surely not in Unalaska Bay. Note that the International Pacific Halibut Commission (IPHC) sets the catch limits for the directed halibut fishery, with stock conservation being the primary consideration. The IPHC has no authority to manage bycatch. That authority lies with the North Pacific Fisheries Management Council. Before the IPHC adopts fishery catch limits, bycatch is subtracted first.

A few years ago, there were at least four halibut charter boats working out of Unalaska. They were doing robust business, making two trips a day of six passengers, people limiting out. Today there is but one left struggling. The sport fishers and subsistence fishers now have to leave the Bay in search of a legal fish to catch.

We are fast approaching a situation where the benefit from the halibut resource is changing hands. What was once an important source of income and sustenance for the people who invested in the fishery - commercial fishers, sport fishers, and subsistence fishers, people with an economic dependency on the fishery - has become nothing but bycatch and waste to grease the wheels of trawling. This situation is not unlike that in the late 1970's when after the crash of the red crab population in the Bering Sea, and during a time when ADFG was trying to rebuild the stocks, the red crab fleet was not allowed a directed fishery but the trawlers were allowed to fish with a considerable red crab bycatch.

I am not opposed to the fishing of pollock in Unalaska Bay, but I am opposed to any fishing whether it being a directed fishery or bycatch without sound management plans.

Sincerely,

A handwritten signature in black ink that reads "Donald Aus".

Donald Aus
F/V Good Deal



PETITION

To Whom It May Concern:

We the undersigned residents of Unalaska and Dutch Harbor, Alaska, support and request your support for the Unalaska Native Fisherman's Association's 2016 AK Dept. of Fish & Game Proposal 194, Closed waters in Bering Sea-Aleutian Islands Area (see attached).

Unalaska Bay is a small but important sheltered area in our community providing a safe area for smaller vessels to obtain fish and game to put on our table and harvest for our livelihoods. Increased large vessel fishing pressure and traffic is making it difficult for our local fishers and hunters to be successful in using this traditional area to harvest our fish and game resources. Closing this area to trawling will help the area recover and keep our small boats safe.

Thank You.

Name	Address	Signature
1. THOMAS CLYDE ROBINSON	PO BOX 111 UNALASKA, AK 99685	Thomas Clyde Robinson
2. Margaret 'Angie' Kochuten	Box 625 Unalaska, AK 99685	Angie Kochuten
3. SUSAN BRUSHING	PO BOX 921064, DUT, AK 99692	Susan Brushing
4. DONALD ANG	P.O. BOX 151 UNALASKA, AK	Donald Ang
5. Brady Jacobs	PO Box 932 Unalaska AK	Brady Jacobs
6. Mike Dawiel	PO BOX 467 UNALASKA AK	Mike Dawiel
7. ROSEMARY RUSHING	PO BOX 921064 DUTCH HARBOR AK 99692	Rosemary Rushing
8. Carolyn Reed	PO Box 198 Unalaska AK. 99685	Carolyn Reed
9. Robert W Deffenall	PO Box 226 UNALASKA AK. 99685	Robert W Deffenall
10. Dan Rankin	PO Box 401 UNALASKA AK 99685	Dan Rankin
11. Steve Engman	P.O. Box 921474 Dutch Harbor AK	Steve Engman
12. Cheryl Parsons	PO Box 42 Unalaska 99685	Cheryl Parsons
13. Rod Daniels	P.O. Box 920293 Dutch Harbor 99692	Rod Daniels
14. LANCE HENNING	PO Box 920524 D.H. AK 99692	Lance Henning
15. Lynn Kargel	PO Box 921074 Dutch Harbor AK 99692	Lynn Kargel
16. Roberta Telanoff	Box 332 Unalaska AK 99685	Roberta Telanoff
17. Glennday Duffley	BOX 921203 Dutch Harbor AK 99692	Glennday Duffley
18. RICHARD ST	PO Box 921477 Dutch Harbor	Richard St
19. Maria Caray	P.O. Box 920532 Dutch Harbor	Maria Caray
20. Geraldine Palbano	P.O. Box 920691 Dutch Harbor	Geraldine Palbano

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Thank You.

Name	Address	Signature
1. Cody Lokanoff	Box 534 Unalaska AK	[Signature]
2. Jeff Gerth	PO Box 921541 Dutch Harbor	[Signature]
3. Jake Williams	PO Box 921270 Dutch Harbor	[Signature]
4. KANOLA, I BOWEN	PO Box 7 UNALASKA AK	[Signature]
5. Doug Leggett	Box 176 UNALASKA AK	[Signature]
6. Bill Murray	Box 194 Unalaska AK	[Signature]
7. John Farkhan PO Box 920233 DUT. AK		[Signature]
8. Laura Botton	PO Box 542 Unalaska AK	[Signature]
9. Yudelka Lechere	P.O. Box 921365 Dutch Harbor AK	[Signature]
10. Jim Villa	PO Box 921194 Dutch Harbor AK	[Signature]
11. Milana Gustafson	Box 921554 Dutch Harbor, AK	[Signature]
12. Brian Gustafson	" "	[Signature]
13. John Adams	P.O. Box 920923 DH, AK	[Signature]
14. Wayne Tam	920921 Dutch Harbor	[Signature]
15. Kip Dean	920884 DUTCH HARBOR	[Signature]
16. John	Box 504 UNALASKA 99685	[Signature]
17. DENNIS ROBINSON	Box 504 UNALASKA 99685	[Signature]
18. Raul Garcia	Box 921511 Dutch Harbor 99692	[Signature]
19. Mark Shae	PO Box 242 Unalaska 99685	[Signature]
20. MIKE HAZEN	BOX 920493 Dutch Harbor	[Signature]

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Thank You.

Name	Address	Signature
1. Arland Sether	P.O. Box 920805 Dutch Harbor 99692	[Signature]
2. James Gregory	P.O. Box 156 Unalaska, AK 99685	[Signature]
3. Cecil Magone	P.O. Box 221 Unalaska AK 99685	[Signature]
4. John Nordin	P.O. Box 920563 D.H. 99692	[Signature]
5. Kisty Corbett	P.O. Box 920134 DH 99692	[Signature]
6. Jeff Helman	P.O. Box 921446 DH 99692	[Signature]
7. Hilary Simms	P.O. Box 461, Unalaska, AK 99685	[Signature]
8. USC Lee	P.O. Box 921531 Dutch Harbor 99692	[Signature]
9. Maricel Kobashikawa	P.O. Box 920367 Dutch Harbor 99692	[Signature]
10. Lee Constanti	P.O. Box 920601 Dutch Harbor AK 99692	[Signature]
11. [Signature]	P.O. Box 7	[Signature]
12. Heather Miller	P.O. Box 921505	[Signature]
13. Irene Oliveras	P.O. Box 920194	[Signature]
14. [Signature]	P.O. Box 920727 DH 99692	[Signature]
15. HERMIE RIODIZ	P.O. Box 921276 DH 99692	[Signature]
16. Keren Sorenson	P.O. Box 5	[Signature]
17. Steven Ugale	P.O. Box 921089	[Signature]
18. Jordan Kahleka	P.O. Box 920536	[Signature]
19. Linda Pineda	P.O. Box 921144	[Signature]
20. Alma Rollin	P.O. Box 920269	[Signature]

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Thank You.

Name	Address	Signature
1. Suzi Golodoff	P.O. Box 11 Unalaska	
2. Marilyn McCracken	P.O. Box 16 Marilyn McCracken	
3. Joseph Patron	P.O. Box 920491 Dutch Harbor AK	
4. William Brown	P.O. Box 304 Unalaska AK	
5. ALVIN CHARLES Bereskin	P.O. Box 138 Unalaska, AK 99685	
6. Rodrigo Caudillo	P.O. Box 684 Unalaska, AK 99685	
7. SAMANTHA TELLMAN	Box 1373 UNALASKA	
8. Candice Santana	P.O. Box 1373 Unalaska	
9. Felicia Tunugul	P.O. Box 492 Unalaska	
10. Carlos Tanyag	Box 762 Unalaska	
11. Rose Sevilla	P.O. Box 921324 Dutch Harbor	
12. HARRIET BERIKOFF	P.O. 81 Unalaska	
13. Julia Dushkin	Box 232 Unalaska, AK	
14. Arnold Dushkin	Box 232 NIKOLSKI, AK	
15. Brandon Allen	Box 232 UNALASKA, AK 99685	
16. Agnes Shashnikoff	Box 313 Unalaska, AK 99685	
17. Jim Shashnikoff	Box 313 Unalaska, AK 99685	
18. Bill Shashnikoff	Box 196 Unalaska, AK 99685	
19. Eugenie LeKamoff	P.O. Box 344, Unalaska	
20. Robin Walker	P.O. Box 921012 Dutch Harbor	
Ariel Gustafson	P.O. Box 15 Unalaska	



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Thank You.

Name	Address	Signature
1. Juna Am Oiachan-shabih	PO Box 153, Unalaska, AK	[Signature]
2. Mercedes Cannon	PO Box 33 Unalaska	M. Cannon
3. Anna Jean Bereston	Box 114 Unalaska AK 99685	[Signature]
4. Lorraine Swinney	P.O. Box 920242, Dutch Harbor, AK 99692	[Signature]
5. Helen Brown	P.O. Box 1363 Unalaska AK 99685	[Signature]
6. Jackie Kerkoff	P.O. Box 794 Unalaska AK 99685	[Signature]
7. Robert Kerkoff	P.O. Box 794 Unalaska, AK 99685	[Signature]
8. Emil Berikoff Jr	P.O. Box 81 Unalaska AK 99685	[Signature]
9. Timothy Schliebe	P.O. Box 1092 unalaska AK 99685	[Signature]
10. Ypprie Schliebe	P.O. Box 1092 Unalaska, AK 99685	[Signature]
11. Genee Shaishnikoff	Box 612 Unalaska, AK 99685	[Signature]
12. Russell Shaishnikoff	Box 612 unalaska AK 99685	[Signature]
13. Catina Shaishnikoff	PO Box 920473	[Signature]
14. Elaine Shaishnikoff		[Signature]
15. Pauline Tuhakut	PO Box 51	[Signature]
16. Doree McLaughlin	P.O. Box 103 Unalaska AK	[Signature]
17. Gold Mercedes	PO Box 103 unalaska, AK 99685	[Signature]
18. Michael Dirks Jr	PO Box 153 unalaska AK 99685	[Signature]
19. Kandise A.R. Williams	PO Box 153 Unalaska AK 99685	[Signature]
20. Stacy Berman-Akharado	P.O. Box 21531 AK 99692	[Signature]



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Thank You.

Name	Address	Signature
1. Sergie Kinkoff Sr.	Unalaska AK	Sergie Kinkoff Sr.
2. Brenda Telfman	Unalaska	Brenda Telfman
3. JOHANNA TELLMAN	PO BOX 684 UNALASKA	Johanna Telfman
4. DORISS RUFINA SLAISHNIKOFF	Box 23 Unalaska	Doriss Rufina Slaishnikoff
5. Vlast G. Shabalin	PO BOX 153 Unalaska AK 99685	Vlast G. Shabalin
6. TIMOTHY MOYER	P.O. BOX 302 UNALASKA, AK 99685	Timothy Moyer
7. APIMY MOYER	P.O. BOX 302 UNALASKA AK 99685	Apimy Moyer
8. Johanna Telfman	Bx 88 Unalaska AK 99685	Johanna Telfman
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Thank You.

Name	Address	Signature
1. <u>Chris Chanks Steektan</u>	<u>40 Loop Rd Unalaska AK 99685</u>	<u>[Signature]</u>
2. <u>Caroline S. Webb</u>	<u>Box 186 Unalaska, AK 99685</u>	<u>Caroline S. Webb</u>
3. <u>Curt Thompson</u>	<u>PO Box 189, Unalaska, AK 99685</u>	<u>[Signature]</u>
4. <u>Augusta L. Dushkin</u>	<u>Box 453 Unalaska 99685</u>	<u>[Signature]</u>
5. <u>Natalia P. LekanoFF</u>	<u>Box 921271 D.H. AK 99692</u>	<u>[Signature]</u>
6. <u>Cleve Roll</u>	<u>PO Box 64 Unalaska AK 99685</u>	<u>[Signature]</u>
7. <u>Katherine Whines</u>	<u>PO Box 86, Unalaska, AK. 99685</u>	
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PETITION

To Whom It May Concern:

We the undersigned residents of Unalaska and Dutch Harbor, Alaska, support and request your support for the Unalaska Native Fisherman's Association's 2016 AK Dept. of Fish & Game **Proposal 194, Closed waters in Bering Sea-Aleutian Islands Area** (see attached).

Unalaska Bay is a small but important sheltered area in our community providing a safe area for smaller vessels to obtain fish and game to put on our table and harvest for our livelihoods. Increased large vessel fishing pressure and traffic is making it difficult for our local fishers and hunters to be successful in using this traditional area to harvest our fish and game resources. Closing this area to trawling will help the area recover and keep our small boats safe.

Thank You.

Name	Address	Signature
1. Judy G. Morrison	Pb. box 920992	
2. GEMMALYN MATEO	P.O. Box 105	
3. Barry Fredericks	P.O. Box 920931	
4. MARY FABIANI	PO BOX 442	
5. RICHARD CAMPBELL	498 SALMON WAY	
6. BETH MEKONEN	88 Salmon Way	
7.		
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Comments for Erosion Committee



PC 21
1 of 106

The following comments were submitted as on-time comments and record copies at the 2015 Bristol Bay Meeting , the January 2016 Erosion Committee Teleconference, and the 2016 Arctic-Yukon-Kuskokwim Meeting. Some of them have been truncated to reflect only comments for the Erosion Committee

On-Time Comments and Record Copies received for the 2015 Bristol Bay Finfish Meeting:

Lake Iliamna Fish and Game Advisory Committee (minutes 11/26/15)

Nushagak Fish and Game Advisory Committee (minutes 10/20-21/15)

Curt Armstrong

Janet Armstrong Schlagel

Bristol Bay Economic Development Corporation

Diane Wetter

Barbara Nunn

Alannah Hurley

Janet Armstrong Schlagel at Request of Board Chair Kluberton

ADF&G Request of Board Chair Kluberton

On-Time Comments Received for the 2016 Erosion Committee Teleconference:

Jeff Bassett, Karluk Drafting

Diane Wetter

Janet Armstrong Schlagel

On-Time Comments and Record Copies received for the 2016 Arctic-Yukon-Kuskokwim Finfish Meeting:

Kristina Kurtz

Alannah Hurley

Bristol Bay Economic Development Corporation



Lake Iliamna Fish and Game Advisory Committee
November 26, 2015
Meeting Minutes

- I. Call to Order: Randy Alvarez - 11:40am, 10-26-15
- II. Roll Call:
Members Present: Joel Jacko, Elijah Eknaty, Tim Anelon, Tinny Hedlund, Randy Alvarez, George Alexie, Billy Trefon, Lyle Wilder
Members Absent: Jim Tilly, Greg Anelon
Number Needed For Quorum on AC: 6
- III. Approval of Agenda: Tinny moves, Lyle seconds
- IV. Approval of Previous Meeting Minutes: From meeting date:
- V. Fish and Game Staff Present: Travis Lons, Travis Elison
- VI. Guests Present: Several by teleconference - sorry spelling may be incorrect - Molly Dishner, Ian Fo, Jason Dye (sport Fish), Gean Sandon, Gala Hoseth, Courtney Carty, Nancy Marfly
- VII. Old Business: none
- VIII. New Business: Comments on Proposals to follow



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	22	move the cinder river, inner port heiden sections of the northern district from the alaska peninsula area to the bristol bay area	
Support Support as Amended Oppose No Action	8	0	large intercept fishery that should be managed in conjunction with the bristol bay escapement goals and values
BOF	24	move all waters of the northern district east of the latitude of cape seniavin from the alaska peninsula area to the bristol bay area	
Support Support as Amended Oppose No Action	8	0	
BOF	25	Expand district boundary lines.	
Support Support as Amended Oppose No Action	0	8	Elevated interception levels,
BOF	26	Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.	
Support Support as Amended Oppose No Action	0	8	



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	27	Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers. <i>(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)</i>	
Support Support as Amended Oppose No Action	0	8	
BOF	29	Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's setnet site.	
Support Support as Amended Oppose No Action	8	0	
BOF	30	Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers.	
Support Support as Amended Oppose No Action			no action due to 31
BOF	31	Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay.	
Support Support as Amended Oppose No Action	7	1	Opted to vote on 31 as most favorable of 30,31,32,35,37,41 due to similar proposals. felt that earlier registration for districts would encourage drifters to decide earlier where they were going to be for the season, Lyle opposed the idea



BRISTOL BAY FINFISH
DECEMBER 2–9, 2015
ALASKA BOARD OF FISHERIES

Mandatory- Please Summarize Your Proposal Comments in this Form

BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	32	Change the area registration date requirement for the Bristol Bay commercial salmon fishery.	
Support Support as Amended Oppose No Action			see 31
BOF	35	Require drift gillnet operations to register the day of fishing during emergency order periods.	
Support Support as Amended Oppose No Action			see 31
BOF	37	Change the area registration date requirement from June 25 to June 1 for the Naknek-Kvichak, Egegik, and Ugashik districts for the drift gillnet fleet.	
Support Support as Amended Oppose No Action			see 31
BOF	41	Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date.	
Support Support as Amended Oppose No Action			see 31
BOF	42	Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement.	



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
Support Support as Amended Oppose No Action			no comment
BOF	44	Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel.	
Support Support as Amended Oppose No Action			no comment
BOF	45	Reauthorize Bristol Bay set gillnet permit stacking.	
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.
BOF	46	Allow permit stacking for set gillnet operations.	
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.
BOF	47	Permit stacking	
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	48	Allow permit stacking for set gillnet operations in the Bristol Bay Area.	
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.
BOF	49		
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.
BOF	50	Allow permit stacking for set gillnet operations in the Egegik District.	
Support Support as Amended Oppose No Action	0	8	permit stacking on set net sites is unfair to the people up and down stream of their neighbors as a drifter can move.
BOF	51	Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay.	
Support Support as Amended Oppose No Action	0	8	Moving the industry in the wrong direction, limited entry was designed for a reason to keep the permits in individuals hands, do not want incremental steps backwards
BOF	52	Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay and the operation of 200 fathoms of drift gillnet gear from a vessel with an individual holding two drift gillnet permits.	



BRISTOL BAY FINFISH
DECEMBER 2–9, 2015
ALASKA BOARD OF FISHERIES

Mandatory- Please Summarize Your Proposal Comments in this Form

BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
Support Support as Amended Oppose No Action	0	8	Moving the industry in the wrong direction, limited entry was designed for a reason to keep the permits in individuals hands, do not want incremental steps backwards
BOF	53	Increase the amount of drift gillnet gear allowed when two permit holders are jointly operating.	
Support Support as Amended Oppose No Action	0	8	Not a healthy solution for the bay
BOF	54	Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing.	
Support Support as Amended Oppose No Action	0	8	too ambiguous, no time or restrictions on when where and how the move is to happen
BOF	55	Modify set gillnet operations in the Ugashik District.	
Support Support as Amended Oppose No Action			no action
BOF	56	Create an inriver Alagnak River Salmon Fishery Management Plan.	
Support Support as Amended Oppose No Action	8	0	If a means to harvest the resource responsibly can be managed then it should be tried
BOF	57	Create an inriver Kvichak River Salmon Fishery Management Plan.	



BRISTOL BAY FINFISH
DECEMBER 2–9, 2015
ALASKA BOARD OF FISHERIES

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BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
Support Support as Amended Oppose No Action	0	8	the outer river boundaries do a good job of killing salmon when they are opened and letting different parts of the run through is important for the genetics up stream
BOF	58	Expand the boundaries of the Naknek Section of the Naknek-Kvichak District.	
Support Support as Amended Oppose No Action	4	4	moving the boundary out would provide for better fishing of the west line in the Naknek with current changes. some discussion on how the expansion of the boundary would increase interception effecting escapement and allocation
BOF	59	Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District.	
Support Support as Amended Oppose No Action	0	7	Discussion on how the boundaries have some variance from the loran days and now GPS has come and possibly moved the boundary. Didn't feel it was possible that it would have moved that much and erosion is more the culprit for the issue. Lyle abstained from voting
BOF	60	Create a special harvest area in the Graveyard Creek area.	
Support Support as Amended Oppose No Action	0	8	
BOF	78	Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage.	
Support Support as Amended Oppose No Action	8	0	need to align state and federal regs



BRISTOL BAY FINFISH			
DECEMBER 2–9, 2015			
ALASKA BOARD OF FISHERIES			
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BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	79	Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time.	
Support Support as Amended Oppose No Action	8	0	felt this would be wise as subsistence should be the priority
BOF	80	Re-describe the subsistence fishing area in the Nushagak District that is restricted to three days per week by removing references to regulatory markers.	
BOF	83	Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River.	
Support Support as Amended Oppose No Action	support as amended - 8	0	Make an exemption to people under the age of 16 can fish as specified
BOF	84	Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage.	
Support Support as Amended Oppose No Action			no comment at this time
BOF	85	Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage.	
Support Support as Amended Oppose No Action			no comment at this time



BRISTOL BAY FINFISH
DECEMBER 2–9, 2015
ALASKA BOARD OF FISHERIES

Mandatory- Please Summarize Your Proposal Comments in this Form

BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	86		Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries.
Support Support as Amended Oppose No Action			no comment at this time
BOF	87		Eliminate the use of egg-simulating lures in rainbow trout fishing.
Support Support as Amended Oppose No Action	0	8	not necessary and would remove a majority of lures that are effective for the sport industry

Old Business:
Adjournment:

Minutes Recorded By: Lyle Wilder
Minutes Approved By: Randy Alvarez
Date: 11/10/15

**Nushagak Advisory Committee
October 20 & 21, 2015
Dillingham City Council Chambers**

I. Call to Order: 12:34 PM By Chairman Frank Woods.

II. Roll Call:

Members Present: Frank Woods, Chair, Gayla Hoseth, Joe Chythlook (vice Chair) , Lloyd (Tom) O'Connor, Dan Dunaway Secretary , Curt Armstrong, Dennis Andrew, Travis Ball, Glen Wysoki (arr 1:05 pm), Jonathan Forsling (by phone) , Mariano Floresta, Steve Perkins (alt), Jim Woolington (phone) .

Members Absent: Manokotak rep, Luki Akelkok (Ekwok), Chris Carr (Portage), Chris Strub (alt).

Number Needed For Quorum: 8

Full Member list: Attached at the back of these minutes is a list of all members, the seat they occupy, community of residence, and term expiration date.

List of User Groups Present: In the meeting on or the AC?

On the AC and in the public attending, most people identify with more than one of the following groups with nearly 100% being subsistence users as well as members other user groups. In no particular order:

- Subsistence fishing and hunting
- Commercial Drift
- Commercial Set
- Trapping
- Sport fishing
- Sport Fishing guide
- Big game guide
- Air Taxi
- BBEDC represented by Gene Sandone by phone

Alternate Steve Perkins was seated with the committed given absences. A quorum was declared.

III. Approval of Agenda:

Joe C. Moved to adopt, Travis B. 2nd.

There was a discussion on when to meet to prepare for the Board of Game - consensus was later by teleconference.

Dennis A. asked to add an item IV under new business to discuss CDQ Boundaries.

Gayla H. asked to add a line Public Comments to Agenda after Elections. AC agreed by consensus noting usually for these meetings, public members are encouraged and allowed to participated in discussions, especially proposals.

Tom O. expressed concern for several meetings without a Manokotak representative - consensus was to add Item V under New Business titled Vacancies on AC.



Dennis A. asked the meeting be run on an "Open Agenda" - consensus the flexibility is needed.

Agenda adopted unanimously with modifications discussed above.

IV. **Approval of Previous Meeting Minutes: From March 20, 2015:**

Joe C Moved to adopt, Dan D 2nd.

Dan D. said he'd found a deficiency in the minutes on Page 9 regarding the motion by Jon Forsling (Togiak rep) for the Nush AC to develop a proposal for super-exclusive vessel registration in the Togiak District. The minutes on the motion might seem a little out of place and inconsistent with the format of the rest of the minutes. Dan wanted to make clear that Jon had moved, Gayla 2nd and the motion failed (1Y, 8 N, 1A). But only because the Nush AC felt the proposal should come from the Togiak AC; several Nush AC members had said they support the concept but wanted the Togiak AC to take the lead.

AC members by consensus felt the issue was duly noted.

Minutes adopted Unanimously.

V. **Fish and Game Staff Present:**

Tim Sands, Matt Jones ADFG Com Fish

Jason Dye, Ian Fo Sport Fish

Ted Krieg, Subsistence

Taryn Brito, Boards.

VI. **State Trooper Wildlife:**

Scott Quist, King Salmon by phone for proposal 29.

VII. **Guests Present:**

See sign in sheet collected by Boards.

As noted earlier: BBEDC represented by Gene Sandone participated by phone.

Kevin McCambly, set netter participated by phone

Laura Zimin by phone

VIII. **Introductions:**

All people present gave their name and a brief introduction (usually just community of residence) starting with the AC members present.

IX. **Elections:**

Brito noted that Manokotak has been contacted several times encouraging them to elect a representative to the AC. No word at the time of the meeting.

She also noted that Travis Ball had been recently elected to again represent Aleknagik.

And the term of alternate Steve Perkins was expired requiring an election at this meeting to fill the seat which will expired June 2016:

Frank Woods turned the chair over to Taryn to conduct the election.

Taryn opened nominations.

Dan D nominated Steve Perkins

Jennifer Skarada nominated David (Opie) Hilley from the floor.

Nominations were closed, Brito distributed, collected and counted ballots.

Perkins - 14

Hilley 9

Perkins remained seated with the AC for the duration of the meeting.

Chair returned to Frank Woods who thanked other candidate for being willing to serve.

X. **Public Comments:**

Gene Sandone for BBEDC said he was participating as a resource and was ready to provide that agency's draft comments on selected proposals.

XI. **ADFG Staff Updates:**

Chair invited ADFG leadership to give brief season summaries and other information.

Tim Sands, com fish handed out the season summaries for the 2015 Salmon and Herring fisheries; outlined management of the Nushagak salmon management, and enumeration programs. The run came in very late; above forecast at 5.77 million sockeye.

Commercial: Sands described the BOF process that resulted in delayed opening the Togiak salmon district to fishers from other districts until August 5.

There was a discussion of climate change; Sands no obviously unusual animals or other stuff known to show up in the bay.

Funding is grim. Expect Togiak and Igushik towers to be cut; all herring funding cut, sonar cut after reds (no coho count for management). Igushik might be easier to adjust to than Togiak due to the remoteness of Togiak. Sport Fish can't just move funds to help given the Federal funds and regulations for them. Extensive discussion of funding. Some suggest seeking private funds to help with towers. Potential for video counting in the future but techniques are "not there yet".

Gayla asked if our letter to the Commissioner regarding funding was ever answered. NO. The letter was sent just as we were transitioning to the new commissioner. There was a discussion of cuts to Com fish in recent years, steady decrease in staff, duration of projects or total cuts of some projects.

One person noted that recent strong fall fisheries for humpies and cohos should have produced raw fish taxes well in excess of costs of fall management programs : "Its really dumb to cut towers first and live local data collection essential to management of these valuable, tax producing resources."

New Com Fish Director Scott Kelley starts work Oct 21.

Sport Fish: Ian Fo, gave a brief outline of the sport fisheries and projects. Kings were ok, not great but good (Nushagak and Bay-wide). 98K estimated passed the sonar, so no in-season restrictions or liberalizations done. The Mark recapture project went well. Coho fishing was



good Bay-wide, no Nushagak Sonar though. There seems to be a small shift from guided to unguided fishing in recent seasons.

Several members of the AC expressed their ongoing discomfort that Sport Fishing catch and harvest data is not available to use for 1 to 2 years later. This is a perennial issue.

Gayla moved that the AC should prepare questions and present them to ADFG well before these meetings to help them come prepared to answer.

Subsistence: Ted Krieg very briefly outlined their activities and appealed to all to turn in their salmon permits ASAP so the data can be compiled.

BREAK 1:40 PM

RESUME MEETING 1:56 PM

Dennis Andrew asked to withdraw his agenda item IV "as this is not the time to discuss BBEDC boundaries."

Committee agrees by consensus.

BBEDC offered to help committee work through the proposals.

Joe C. noted the proposal book is organized by the log numbers and suggested we start with proposal 22.

Addressed proposals 22- 41 see table.

Tabled 29 until FWP and Proposer could be put on the phone.

BREAK Lunch 3:50 PM

RESUME MEETING 4:00 PM

FWP Quist and Proposer of 29 (Zimin) on the phone.

Proposal 29 discussion resumed.

Worked thru proposal 42 and recess for the night.

Break for Night 5:30 PM to resume 9 AM tomorrow.

October 21, 2015

Meeting Resumed 9:03 AM

XII. **Roll Call Second Day:**



Members Present: Frank Woods, Chair, Gayla Hoseth, Joe Chythlook (vice Chair) , Lloyd (Tom) O'Connor, Dan Dunaway Secretary , Curt Armstrong, Dennis Andrew, Travis Ball, Glen Wysoki, Jonathan Forsling (by phone 9:15) , Mariano Floresta, Steve Perkins (alt), Jim Woolington (phone 9:15) .

At some unknown time in the day Woolington dropped out of the meeting.

XIII. **Members Absent:** Manokotak rep, Luki Akelkok (Ekwok), Chris Carr (Portage), Chris Strub (alt).

Began with proposal 43.

Worked through proposal 53 - in several cases 2 or more proposals were taken together.

BREAK 10:40 AM

RESUME MEETING 10:53 AM

Addressed proposals 54 to 63 some with very long discussions.

BREAK for Lunch 12:25 PM

RESUME MEETING 1:03 PM

Continue very long discussion of 63 and 64

BREAK 2:50 PM

RESUME MEETING 3:11 PM

worked through remaining fish proposals to 90.

XIII. Establish Committee to address Area M and Statewide proposals. Need a separate meeting to address area M and Statewide proposals in January - out of time in this meeting. Must be done by teleconference. Need to form a committee empowered to review, develop positions, provide comments on Area M and Statewide proposals. Must have all stakeholders represented. Appointed Frank Woods, Tom O'Connor, Curt Armstrong, Gayla Hoseth, Travis Ball, Mariano Floresta, Jonathan Forsling. Pass unanimous. Committee is empowered to represent the greater Nushagak AC. Public and other AC members encouraged to attend and contribute information.

XIV. Federal Subsistence Wildlife Proposals: AC took up Federal Subsistence Wildlife proposals WP16 -25/26, 27/28, 29/30 and 31/32. Nushagak AC supported all proposals unanimously. Several were generated by the Nushagak and Togiak ACs. Sec. Dunaway (sits on BBRAC) directed to convey these actions to the October 28/29 Bristol Bay Federal Subsistence Regional Advisory Council in Dillingham.

XV. Final Approval of Minutes



Since the BOF wants Approved final minutes by the meeting. Nushagak AC delegated Gayla Hoseth to review, work with the secretary and approve the final copy of the minutes of this meeting. No time to sufficiently advertise another meeting. Many members not available for another meeting soon.

XVI. Other Business

The Nushagak AC agreed to address statewide BOF proposals by teleconference at a later date. Make sure to include our Togiak member Jonathan Forsling.

XVII. Adjourn 6:20 PM

BRISTOL BAY FINFISH DECEMBER 2–9, 2015 ALASKA BOARD OF FISHERIES			
Mandatory- Please Summarize Your Proposal Comments in this Form			
BOG or BOF	Proposal Number	Proposal Description	
Supports or Opposes?	Number Support	Number Oppose	Comments/Discussion (list Pros and Cons)/Amendments to Proposal
BOF	22	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
X Support	Unanimous	0	Joe Move, Dan 2nd. BBEDC invited to discuss background. Dan D. expressed his experience in the area and investigations into the minimal and very short recent commercial catch history in the Outer Port Heiden. The OPH take has really grown since starting in 2007, catch is heavily intercept of Ugashik and some other Bristol Bay systems (WASSIP) and far in excess of what can be justified by the runs into Meshik. Locals have subsistence concerns; some of our relatives live and or fish there.
BOF	23	Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.	
X No Action	Unanimous	0	Joe Move, Tom 2nd no action based on our action in 22.
BOF	24	Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area.	
X Support as Amended	Unanimous	0	Joe Move Dan 2nd. Asked BBEDC for their position. Several AC members: Given WASSIP results we could justify fishing much farther down the north side. Joe move, Tom 2nd. to amend to exclude "3Hills" and otherwise follow recommendation of BBEDC. FRI is doing a genetics study of OPH and Ilnik. Amendment carries unanimous. Amended proposal carries unanimous.
BOF	25	Expand district boundary lines.	
X Oppose	0	Unanimous	Joe Move, Gayla 2nd; Several members had a hard time understanding how this would work. We see problems with intercepting non- terminal fish and likely allocative among districts / fishers. The current boundaries have been worked out over a long time. Late June genetics info would likely show this goes against the terminal fishery policy.
BOF	26	Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.	
X Oppose	0	Unanimous	Joe Move Tom 2nd; Discussion of the likely effects: intercept nonterminal fish. Allocative. "Back door approach to the old General District" proposal we opposed. We should be consistent if we oppose nonterminal interception other places.



BOF	27	Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers. (This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)	
X Oppose	0	Unanimous	Tom Move Joe 2nd TO TAKE UP 27 & 28 TOGETHER. Extended discussion on requirements. This has been an occasional topic for set netters. Already a hassle to keep Coast Guard happy with buoy markings and FWP happy with cork/ buoy markings. Signs are not required just Set net permit number and name be present on net. FWP say we much have buoys or corks with the active permit number(s). Signs in some places may address leases but that might not be the permit fishing there at any time. Not needed. Sometimes we have several permit numbers on the corks. How would we fit all 6 inch or 12 inch letters on a buoy ? Get on the phone or VHF.
BOF	28	Change the character size requirements for set gillnet marking signs. (This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)	
X Oppose	0	Unanimous	Tom Move Joe 2nd TO TAKE UP 27 & 28 TOGETHER. See discussion of 27 above.
BOF	29	Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's set net site.	

X Support as Amended	11	1	<p>Joe Move Dan 2nd: Proposer wants a short gap between 25f sections of net. I do this in Ekuk as long as using legal total net or going out beyond legal distance. Kevin McCambly initially opposed, others as well for fear of "leap Frogging" nets at a site to get farther out. Concern if she wants to reach out farther or add more gear. Reference to 50 fathoms confusing. 3:13 Tabled discussion until proposer and FWP could be reached. 4:00 PM took up with proposer and FWP on phones. Zimin: proposal originally to address Egegik only where she has a long tradition of having 2 25 f nets on a single set of lines with a gap between the 2 nets for safety and to aid handling the gear. Does not want to go out farther than she can now. Someone called troopers thinking she was not following letter of the law. Troopers seek clarity ,FWP - no tickets known to have been issued on this.. She is not seeking more gear or to leap frog it farther out - just continue long traditional practices and safety. Concerns if it changes separation of nets along the beach. Make sure intent is very clear. Total gear may not add up to more than 50 Fathoms. 1) Suggest new language. 2) Joe C. Move, Gayla 2nd: Add proposal 29 language to the END of paragraph (a) as a new sentence and include language "up to 50 fathoms" as the last line in 5AAC 06.335 (a). INTENT of the Nushagak AC is to allow a single permit's full complement of gear (up to 50 f) to be fished as the permittee chooses in a seaward manner and within the current off shore limits or boundaries. Comment: enforcement on this is not uniform around the Bay, we need to include ALL districts. Motion Carries 11 Y / 1 N. Motion on proposal as amended 11 Y/1 N. SUGGESTED LANGUAGE: 5AAC. 06.335. Minimum distance between units of gear. (a) In the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts - - - - -of another set gillnet. [add NEW LANGUAGE: Except a CFEC set net permit holder in Egegik and Nushagak Districts may operate seaward of their own set gillnet; total net length not to exceed 50 fathoms. Single NO vote felt no fix is needed; matter of interpretation by FWP needs to be consistent.</p>
BOF	30	<p>Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers.</p>	
X- Support	10	3	<p>Joe Move, Travis 2nd. ADFG has not maintained marker sign for years. More of a housekeeping proposal and ADFG never going back to marker signs. We have not been using markers since there was LORAN, with these coordinates, the boundary doesn't move, like old markers could. Discussion of how proposed GPS coordinates were determined. Some old markers were found and GPS'd other spots they had to take their best "guess". ADFG needs a more rigorous process. Some concern, even distrust due to GPS errors up to 20 -30 ft. radius which can make a very big difference to a fishing site. ADFG needs to do a better job and survey them in- make sure they are where they should be. Sands, Com Fish said there is a chance the BOF will address this in their October meeting and it won't come up in the December meeting.</p>
BOF	31, 32, 33, 35-40	<p>Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay.</p>	



X- Support In Concept see 41	Unanimous	0	Want to go back to registering BEFORE any fishing is done Bay-wide. BBEDC noted that there are many proposals on registration that Prop 41 is the most straight forward. BBEDC supported 41 as it removed the registration starting date of June 25, supports related proposals "in concept". Joe Move, Tom 2nd: to support proposals 31, 32, 33, 35, 36, 37, 38, 39, 40 "in concept" but prefer 41. Discussion generally supported "going back to the old way pre 2010". As a set netter I like this approach.
BOF	34	Reduce the required waiting period when registering for a new district from 48 hours to 12 hours.	
X - Oppose	0	Unanimous	Joe Move, Glen 2nd. ADFG expects to be neutral did not think there is a biological concern. BBEDC opposes. AC member opposed as it could allow district hopping, too much of the fleet moving around too fast. "I think it WOULD make it hard for ADFG to manage, aren't some openings decided based on fleet size?" This would make it free week all season in Nushagak by Egegik, maybe Naknek fleet. Drifter opposed to this- could have whole Egegik /Naknek fleet swoop into Nushagak or vice versa. 48 hours works, makes people think. Stabilizes fleet and registration can be waived after they get escapement.
BOF	41	Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date.	
X- Support	Unanimous	0	Joe Move, Travis & Gayla 2nd. This is the simplest and most straightforward solution. Removes the June 25 registration date. When asked, BBEDC says they support it. Goes back to pre 2010 registration regulations. Simple is good. Prefer this solution but refer to discussions in 31-40.
BOF	42	Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement.	
X- Oppose	4	8	Curt Move, Tom 2nd. Proposer spoke to his proposal; 48 hrs. really restricts set netters to fish and economically. No other B Bay districts have this. This would make it more fair for set netters to fish unused sites. Others are concerned how this would affect gear allocation. Concerns if roving set netters would use other peoples' lines - mess them up and it could cost someone a season. ADFG sees no biological issue. Concerns for separation of gear groups, drift and set. Drifters have given up a lot. Now some individual set netters have multiple permits and are very aggressive this would make it easier for them. Late season a lot of sites are empty this would give some set netters more opportunity - especially small guy.
BOF	43	Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District.	
X- Oppose	3	9	Curt Move Dan 2nd: Similar to 42. BBEDC Opposes due to allocative concerns among sub- districts. Concerns for potential of interference among gear types. Rules of who can fish a set net site discussed. First net in the water rule. Considerable discussion of how set netting changed with the boom of the 1980s. Concerns for disorder if this passes. Concerns for 1 or 2 rapid very mobile aggressive set net group. Current regs are result of long worked out compromises. Supporter feels the 48 hr. rule is more about maintaining a social order than managing the fishery. Would allow more opportunity for some set netters when they can find an unoccupied site or when fish are on the other side of the bay.



BOF	44	Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel.	
X- Support	11	1	Jonathan move, Joe 2nd: Problems is if there is 1 boat and 2 permit holders one can register for elsewhere in the bay then 2nd permittee can register in Togiak whenever they want, defeating the intent of this regulation designed to aid the smaller boats common to Togiak. Adding this language would get to the original intent of the regulation. Some feel July 27 is plenty head start. Dunaway reminded AC that we had supported this in concept when submitting proposals but wanted Togiak to take the lead and we would support. If the big boats are allowed into Togiak early, the local small boats & skiffs basically have no chance and are cut off. This would add protection.
BOF	45-48, 50	Reauthorize Bristol Bay set gillnet permit stacking.	
X - Oppose	1	11	Joe Move, Travis 2nd: To take up 45, 46, 47, 48, 50 at one time. Set net stacking has been voted down the last several BOF cycles and we don't need it to come up again. Opposed, disrupted the permit market, drew permits out of state, puts prices out of reach for local, favors big money people. Stacking allows processors to take over the fishery, stackers get big advantage with processors screws little guys. Supporter formerly opposed but it could be good - people have already bought up permits and found a way around this and it hasn't disrupted the fishery as bad as expected. Another person supports as its a hassle, expensive, and precarious to transfer permits out of the family hope they'll be returned at the end of the season. Also wants to be able to fish full 50 f gear side-by-side on individual sites but not farther out than now. Modify so gear can't be fished end to end farther off shore.
BOF	49 & 53	Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign.	
X - Oppose	0	Unanimous	Tom Move, Travis 2nd, to consider 49 and 53 together. This would create a lot of strife. We have opposed similar but much less drastic proposals. Its bad enough for drifters between the 1 permit 150 fathoms vs. D boats with 200 fathoms - to go to 300 fathoms would be much worse. Allowing longer set nets would put them into drifts and really conflict with drift fleet. All our comments opposing 51 & 52 apply here too.
BOF	51 & 52	Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay.	



X - Oppose	0	Unanimous	Joe C. Moved Gayla 2nd to consider 51 and 52 together. Opposed, we have been here before, it cuts out some permit holders. The D boat system we have now is designed to help permit holders who don't have boats or break downs - it works, helps those with no or low capital. This proposal would not help in those situations. This could really hurt the small boat 1 permit operations. Besides won't this still have to go to Legislature to allow 1 person to own 2 of the same type of permit? Maybe we should go to the legislature to put an end to this perennial idea. It would over-capitalize the fishery. This type of proposal goes too far from original D permit idea. Some spoke opposing even the current D permit system - go back to 1 permit one boat / site. Too hard to fish against 200 fathoms of net if I only have 150. This will cause more of our fishery move outside. Processors already play favorites with D boats - this year they got to deliver 7,000 pounds while a 1 permit boat was only allowed 4,000 pounds - not fair or proportional. NO person present spoke in favor.
BOF	54	Close the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing.	
X - Oppose	1	11	Joe Move, Travis 2nd; Allocative, when asked, BBEDC said they were opposed. This is not a problem nor is it the right way to address it. Who is supposed to determine the interception? We have worked out these boundaries over a long time with info from ADFG.
BOF	55	Modify set gillnet operations in the Ugashik District.	
X - No Action			Joe Move Travis 2nd to take no action by unanimous consent. Out of area. This only affects 5 set netters who have sites above where drifters go. BOF addressed in 2012, then an out of cycle ACR but no fix. Part of the issue is navigational at low water.
BOF	56	Create an in-river Alagnak River Salmon Fishery Management Plan.	
X - Support	11	1	Joe Move, Travis 2nd; There will be no tower in the river, ADFG has gone to aerial surveys. There is a management plan already for the Alagnak - but no way to harvest surplus. They have already had a special harvest area and provisions for it - fishery went ok can still open by EO. This would fish a little lower in the river than the old area. This would be for special circumstances. Alagnak recently had huge escapements and this could be a real boost to a small village. Problem with markets in past. Concerns for impacts on kings and sport fishery. ADFG in openings in past did not seem to be a big issue. Peak of king run is mid July. Could tap into Kvichak milling fish?
BOF	57	Create an in-river Kvichak River Salmon Fishery Management Plan.	
X - Oppose	0	Unanimous	There is already a mgt. plan for the system and this could really disrupt that plan. The existing plan took a lot of work to develop and the Kvichak hasn't been healthy all that long. I agree w BBEDC don't want to mess with Kvichak R. Doesn't make as much sense as Alagnak proposal.
BOF	58	Expand the boundaries of the Naknek Section of the Naknek-Kvichak District.	
X - Oppose	0	Unanimous	Joe move Travis 2nd Might change / cause interception and affect management. Current boundaries have been worked out for a long time. Too risky. We've had serious problems in the Kvichak don't mess with it.



BOF	59	Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District.	
X - Support as Amended	Unanimous	0	<p>Tom Move, Joe 2nd</p> <p>Very long discussion. Not allocative. This "problem" is relatively recent for a site that has been fished 60+ years without problem. Just a marker or boundary location confusion. Nushagak AC set precedence in Igushik and we should support this. Big concern is GPS doesn't always come to the exact same spot it moves around from day to day. Old ADFG marker was moved in the 1980's -source of some dispute. Current marker is wrong place now - possibly by accident or erosion needs to be moved back to right place. ADFG's current GPS markers may have been set with minimal rigor - local fisherman should know best. "State should survey in the markers." Some disagreement from nearby set netters. Proposal maker Curt Armstrong was asked to provide exact position he thinks is right; he gave the point: 58 degrees, 52. 141 min North and 157 degrees, 00.774 min West for the Upper East Marker of the Kvichak. <i>NOTE coordinate appearing here is very slightly different from the one provided in the meeting - author provided correction after the meeting.</i> Per attached email (sister of author).</p> <p>Nushagak AC amends this proposal to recommend the BOF set the boundary to preserve the traditional fishing sites and allow continued fishing at the coordinates 58 deg, 52. 141 min North and 157 deg, 00.774 min West (as provided by the proposer) - supported unanimously</p> <p>Nush AC supported amended proposal: author and AC member Armstrong abstained.</p> <p>The intent of the Nushagak AC is to set the upper east boundary to preserve a traditional long used legal historical fishing site. We do not believe that changing the system of district boundaries from physical markers to LORAN and later GPS were intended or should reduce or eliminate a long used fishing site that has been in compliance. In addition, we recognize that adjustments have to be made for erosion and changing channels.</p>
BOF	60	Create a special harvest area in the Graveyard Creek area.	
X - Support	Unanimous	0	<p>Joe move, Tom 2nd.</p> <p>Erosion has nearly eliminated the original site. This is an attempt to provide a fishing site for a long time legal fishing operation. There is no spawning in the proposed location but fish mill in there. Don't want to disenfranchise a long time traditional use spot. Same intent as we supported in Igushik last cycle and prop 59 here - just adjusting to erosion changes. We are seeing erosion problems around the bay and we'll need to address other places too. Erosion caused DNR to eliminate a former lease site we need to support this.</p>
BOF	61	Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.	
X- Oppose	1	11	<p>Joe Move Travis 2nd</p> <p>Sympathize but only addresses a few "bad apples". One set netter has lost 6 buoys -very frustrating but realizes the limitations of the drift and location. Almost seems unenforceable. Could really displace drifters on traditional drift area, too divisive.</p>

BOF	62	Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.	
X- Oppose	0	Unanimous	<p>Joe Move Travis 2nd</p> <p>Proponent - designed to prevent drifters from fishing at the INSIDE end of sent nets. Asking for drifters to respect the 100 feet rule INSIDE end. If drifters get inside it might prevent set net from being set. Sometimes a drifter gets inside, goes dry and interfere with a set net operation. This asks drifters to respect shore leases. Long discussion of the law it appears there is sufficient laws that generally favor the set netter already and liability mostly falls on the drifter. Current regs already accomplish what this tries to do - current regs makes drifter liable. Current regs are sufficient.</p>
BOF	63	Change the seaward minimum distance between set gillnet gear in the Clark's Point area in the Nushagak District.	
X- Support as amended to: SUPPORT IN CONCEPT	10	2	<p>Joe Move, Gayla 2nd.</p> <p>Very, very long discussion to explain situation and to explore solutions. Several affected set-netters present and active in discussion - potential for conflicts. Erosion is changing the area and reducing the time some set nets can reach water to fish. Historically modest to low producing sites. Some solutions may encroach on other sites. This mainly involves a limited number of sites and they need to get together to work out a solution. Could affect drifters if the set nets get to move out too far. This is a small area and a very few sites. Let affected users work something out.</p> <p>Formed and authorized a stakeholder committee to seek consensus, and develop recommendations to bring before the Board.</p> <p>Nushagak AC amends proposal to: Nushagak AC Supports a solution to address the changing beach contours In Concept.: adjustments to regulations that would address the changing beach contours brought on by erosion. The AC s hopes a consensus can be reached by the concerned stakeholders. The concerned stakeholders are highly recommended by the Nushagak AC to provide a report of the details and their recommendations to the BOF meeting in December. Nushagak Committee's intent is to support the stakeholders' recommended solution.</p> <p>Potential stakeholders include affected set net site holders, Alannah Hurley (author of 63), Diane Wetter, Eddie Heyano, Nick Smeaton, Opie, a drift fisher, AC members Mariano Floresta (Clarks Pt.), Tom O'Connor, and other interested stake holders..</p>
BOF	64	Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District.	



X- Support as Amended	6	4	<p>Joe Move, Travis 2nd.</p> <p>Several drifters says they don't like so much fishing on the ebb - they end up running too much and against the tide too much, no time to rest, get ice, deliver. More productive fishing. Supporters think fish will get distributed evenly thru the district well enough. One supporter says ebb fishing reduces fish to set nets. One supporter (drift): with ebb fishing drifters don't get as much fish or get their fish but have to burn much more fuel, run more to get them; believes ebb openers starves set netters. One person would support flood fishing but with windows to make sure fish reach the upper district. Claims flood fish stay on the surface, ebb fish sound, harder to catch. Allocation plan part of problem esp. in those years when we had 700 drifters here. Anything that might give a little more time to drifters might help. Sending a message to Dept. to do something different. Supporter believes ebb openers actually create line fishery.</p> <p>ADFG explained the length of most openers are over 6 even 7 hours provide some flood fishing and the ebb openers seem to reduce line fishery, put fish throughout the district and assure escapement; seems to work. Lets fish flood into the district unmolested. At one time got lots of support for the ebb openers. Still have to meet the allocations.</p> <p>One opposed says "as written" will result in ADFG always opening 1 hour before book high and really does not give flexibility. Likely to create line fishery. This could really tie hands of ADFG make it hard for them to do their job. ADFG has been getting fish thru the district better with this system and more fishers seem a lot more happy with it overall - hear far fewer complaints vs. previous managers fishing the flood. Some set netters agreed.</p> <p>AMENDED Adopted amendment 6-4 to make proposal more flexible: Add language: <u>To the extent practical, drift gillnet openings will begin at least one hour before book high water:</u></p> <p>Final vote on amended proposal 6-4. 3 members not present at vote.</p>
BOF	65	In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches.	



X- Oppose	3	6	<p>Joe Move Tom 2nd; Some say not necessary, don't like or need small gear, "this wasn't well discussed by AC " before going to BOF last time. No good public comment opportunity. Originally to protect kings and to prevent us going into the Wood River. Adds another expense. Concerns for drop-outs and lost fish.</p> <p>Others oppose - when we have big runs and small fish this is a good tool (in '06 and '10, especially this year) and now its available. Most of us have some, many use it, its a good tool. Many spoke that it is another useful tool available. Seems like it worked to reduce over escapement to Wood R and helped to harvest in-district and not in the less popular special harvest area. Another tool to protect larger Nushagak reds yet harvest smaller Wood R reds when there is a concern - a main reason for original reg. Can target & harvest pinks and offers protection to coho.</p> <p>About this time it was found 2 Nushagak AC members had dropped out of the meeting. Jonathan had rejoined.</p>
BOF	66 & 67	<p>Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement. (67) ADFG Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals that have previously been implemented.</p>	
X- Support	8	1	<p>Joe Move, Tom 2nd to address 66 and 67 together; Since sonar is going away for coho season its hard to know how the plan would work. ADFG version (67) addresses new sonar data and updates plan numbers. July 23 old conservative date when coho were poor. After August 1 there is still time to make up coho if needed. July 23 knocks out late red fishing. 66 would allow a pink fishery, may keep markets around. Doesn't make sense to mention pinks in a coho plan when cohos won't be counted. Already fishery is shut down when we are trying to start. Recent coho runs are strong. I tend support 66 over 67. But need both 66 doesn't address all points of the plan.</p> <p>Opposing vote concerned for coho - need to be really cautious. Supports 67 not 66. Could affect coho escapement in years of low runs. Some years a significant portion of coho came in before August 1. Sport anglers were concerned that pink fishery was impacting the coho escapement significantly. I support 67.</p>
BOF	68	<p>Repeal Wood River Sockeye Salmon Special Harvest Area Management Plan.</p>	



X - Support	6	5	<p>Joe Move, Gayla 2nd</p> <p>This is a valuable tool, its a mistake to discard it. Important for years when Nushagak reds are not doing well but Wood River is strong. Or when there are really large surpluses in the Wood R. like 2014 run. Without this tool we could be sitting on the beach if Nushagak reds are bad. This gives some folks another chance to take surplus fish. Could be a lost opportunity if closed - shouldn't throw it out. Don't just close it because some processors won't buy; that's their choice; let others make the choice.</p> <p>ADFG: used in 2010, 2012 to protect Nushagak red escapement, 2014 to take large surplus. Could have used it in 2015 but didn't to respect this proposal. A tool to reduce/ prevent foregone harvest, protect Nushagak reds.</p> <p>Supporters say some processors won't buy fish from there - won't let their fishermen to fish there. No tenders up there. Not a good place to fish. Many hate fishing in WRSWA. Only benefits a few. I support because recently, WRSWA was used as an allocation tool and I object to that; not the original purpose of it; not managed like it should be; I like the next proposal better.</p> <p>Very strong feelings both pro and con on this proposal.</p> <p>Asked for hand count of votes. On phone: one voter " which one has the majority?" Initial vote 5 yeah to 5 no.</p> <p>Chair casts the tie breaking vote.</p>
BOF	69	Amend the Wood River Sockeye Salmon Special Harvest Area Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations.	
X - No Action	-	-	No action based on our action on 68.
BOF	70	Modify the Wood River Sockeye Salmon Special Harvest Area Management Plan to open separate drift and set gillnet fishing periods based on achievement of gear allocation instead of a fixed seasonal fishing period ratio.	
X - No Action	-	-	No action based on our action on 68.
BOF	71, 72, 73, 74	Update the description of the various boundaries by deleting references to regulatory markers.	
X - Support	Unanimous	0	<p>Tom Move, Joe 2nd to support 71 - 74</p> <p>They are just ADFG house keeping and we haven't been using old fashioned makers for many years. We already agreed to other GPS points proposals should be consistent.</p>
BOF	75	Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet.	



X - Support	8	2	<p>Jon Move Joe 2nd</p> <p>King run in poor condition. Originally adopted conservative date and line voluntarily for a King Management Plan that never will get made due to lack of critical elements. Proposal date July 11 is a compromise worked out locally between July 9 wanted by some in Togiak and July 15 used by ADFG. Togiak doesn't think the restrictive boundary helped kings much; that line is overboard. Togiak originally supported dates and lines to avoid having a stock of concern.</p> <p>Boundary is also a compromise to help small boats. Points chosen for ease of identification without electronics, in open skiffs.</p> <p>Formerly too extreme this is a compromise. Togiak is trying to be proactive asks Nushagak AC support.</p> <p>ADFG king run in tough shape. Recent aerial surveys only count 3,000 to 3,500 kings when goal used to be 9,000 and earlier 10,000.</p> <p>One processor pays a \$3.00/lb. incentive to biggest king each day but most kings earn \$1.75 / lb.</p> <p>No official goal as there is no way to accurately assess run strength.</p> <p>Opposed person, Channel into Togiak River is a very narrow only 20 feet wide, a choke point, most of the outlet is really shallow, king run has been touchy and vulnerable, source of worry for a long time; too risky.</p>
BOF	76	Change the current description of the Osviak Section in the Togiak District by correcting a GPS coordinate in the description.	
X - Support	Unanimous	0	<p>Travis move, Joe 2nd to support by unanimous consent. No objection, recognize house keeping character. No discussion.</p>
BOF	77	Change the Togiak District Salmon Management Plan to reflect recent department escapement goal changes, and remove coho and king salmon goals.	
X - Support	Unanimous	0	<p>Joe Move Travis 2nd</p> <p>Catches Togiak up to the rest of Bay management, with management goals established in 2010 and 2012. Togiak was left out in previous board actions. Discussion on management will be without a tower or other tools. Shocking, there was a tower in 1973 before oil money.</p> <p>Keep this in place in case funds become available for tower and other tools. There are serious discussions looking for funding. Might have to be private funded.</p> <p>Concerns, if no management tools or tower are available the goals and plans are moot, useless.</p> <p>Support as it directs Dept. to manage for a diversity of escapements vs a single escapement point.</p>
BOF	78	Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage.	
X- No Action	-	-	<p>Travis, move no action. Joe 2nd.</p> <p>Out of area no action.</p>
BOF	79	Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time.	



X- No Action	-	-	Travis, move no action. Joe 2nd. Out of area no action.
BOF	80, 81	Re-describe the subsistence fishing area in the Nushagak District that is restricted to three days per week by removing references to regulatory markers. (81) Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers.	
X - Support	Unanimous	0	Travis Move to take 80 and 81 together and support by unanimous consent. Joe 2nd. House keeping. Problem with old boundary cut across Grassy Island. Clarify boundaries for Dillingham beaches and practices across rivers bays from town. Still some concerns for GPS boundaries as GPS can move around.
BOF	82	Establish and adopt amounts reasonable & necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District.	
X - Support	Unanimous	0	Tom Move Travis 2nd ADFG provided preliminary estimates of harvest for various years and communities. Ranged from 1,035 to 10,000 pounds; expects final number to be 5,000 to 10,000 pounds. C&T finding is for many of the communities nearby - Togiak Twin Hills, Clarks, Aleknagik, Manokotak, Dillingham, others. Hard to get complete harvest amount. Togiak AC member appreciates ADFG & Nushagak AC supporting his community with proposal. We have been doing better in recent years. Some years no harvest because access problems bad weather or no money for gas to get to grounds. I know a lot of roe on kelp came over to Manokotak, Dillingham, and Aleknagik some years. I'm glad to see this long a concern in Togiak, some years this issue has gone in front of the Federal RAC - highly sought subsistence product. I want to make sure they get enough - err on the side folk get plenty. Encouraged supporters to present good information to BOF.
BOF	83	Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River.	
X- No Action	Unanimous	0	Travis Move, Tom 2nd no action out of area. Deals w sport fishing / subsistence fishing over near L. Clark and no bait areas. Concerns for anti-chumming regs impacting traditional fishing near cleaning tables at Nondalton.
BOF	84, 85	Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage. 85) Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage.	
X- No Action	Unanimous	0	Travis Move, Tom 2nd no action out of area.
BOF	86	Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries.	



X - Support	9	1	Gayla Move, Joe 2nd Several members are unhappy that annual sport fish harvest data is always 1 to 2 years behind, maybe this would be quicker. Others tried to explain there is no better tool for ADFG. This proposal would be like a big game harvest ticket. Guides must fill out daily log but it takes a long time to collect compile and analyze. Harvest ticket still will take time.
BOF	87	Eliminate the use of egg-simulating lures in rainbow trout fishing.	
X- No Action	Unanimous	0	Travis Move, Joe 2nd take no action out of area.
BOF	88	Change the regulatory description for herring purse seine and hand purse seine.	
X - Support	Unanimous	0	Joe Move, Travis 2nd to support with unanimous consent. House keeping. Herring fishermen present support this.
BOF	89	Delete references to sac roe in the Bristol Bay Herring Management Plan.	
X - Support	9	1	Tom Move, Joe 2nd Need to broaden market for the fish - sac roe market is declining. Might want to catch & sell Togiak herring for bait or other uses; this is more flexible. One plant is using males for low grade surimi. Fish and Game doesn't manage it like they did when the sac roe market was big. Norton Sound was getting more money for some alternate (non sac roe) use of their fish up there. Could this change open this fishery up to wanton waste rules because the males are discarded in the sac roe use? No vote: Togiak Rep opposed with no explanation.
BOF	90	Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets.	



X - Support As Amended	9	1	<p>Tom Move, Gayla 2nd to adopt WITH amended language recommended by Robert Heyano.</p> <p>Proposal author supports amended language - this is clearer than my original proposal effort. Current fishery very different from time when this regulation originated. Now nearly impossible to manage current fishery in manner directed by the regulation. Does not eliminate the allocation, as amended allows seiners and drifters to fish at their own pace. Amended language here keeps "shalls" in.</p> <p>I want to make sure this will not hurt the gillnetters. If gillnetters can't get their allocation it will stay in the water.</p> <p>Might hurt gillnetters if seiners get their 70% and then the processors drop out of the fishery not waiting for the gillnetters.</p> <p>Not enough money in the fishery to try to force processors to work a certain way or take somebody's fish. Most companies ran their fish thru their salmon plants in Naknek.</p> <p>Recommended Language: (b)(8) After the spawn-on-kelp harvest and the Dutch Harbor Food And Bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. <u>The department shall manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet.</u></p> <p>No vote: Togiak Rep opposed with no explanation.</p>
BOF	91	Redefine the description of closed waters for the Togiak herring fishery by deleting references to department regulatory markers.	
X - Support	Unanimous	0	<p>Travis Moved to adopt by unanimous consent. Joe 2nd.</p> <p>No objections. More house keeping, consistent with our other actions on these types of proposals.</p>

Old Business:
Adjournment:

Minutes Recorded By:
Minutes Approved By:





Regarding Proposal 59

I (D Dunaway Nush AC Secretary) received the following Email from Janet Schlagel, sister to Curt Armstrong and party authoring proposal 59 regarding the best coordinate to use to preserve their fishing site.

RE: Kvichak boundary point.

Dan,

The correct coordinates are:

58 52 141 N
157 00 774 W

Thank you,

Janet Schlagel

NUSHAGAK ADVISORY COMMITTEE

Updated: 10-20- 2015

Officer terms (2016)

Chairman: Frank Woods
Dunaway

Vice Chair: Joe Chythlook

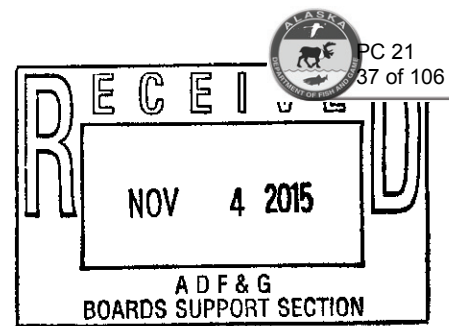
Secretary: Dan

MEMBER NAME	Community of Residence	Seat??	User Group??	TERM EXPI
Dan Dunaway <i>At Large</i>	Dillingham,	at large	Subsistence, sport, trapping.	June 2017
Gayla Hoseth <i>At Large</i>	Dillingham	at large		June 2016
Joe Chythlook <i>Dillingham</i>	Dillingham,	Dillingham		Dec 2015
Jim Woolington <i>Dillingham</i>	Dillingham	Dillingham		June 2017
Thomas O'Connor <i>Dillingham</i>	Dillingham	Dillingham		June 2017
Frank Woods III <i>Dillingham</i>	Dillingham	Dillingham		June 2017
Curt Armstrong <i>Dillingham</i>	Dillingham	Dillingham		June 2017
Dennis Andrew <i>New Stuyahok</i>	New Stuyahok			June 2016
(Vacant)	Manokotak,	Manokotak	Manokotak	Dec 2014 L Called VC 3 Letter sent t
Travis Ball <i>Aleknagik</i>	<i>Aleknagik</i>	<i>Aleknagik</i>	<i>Aleknagik</i>	June 20?? Re-elected
Lukie Akelkok Sr.	Ekwok,	Ekwok	Ekwok	June 2016



<i>Ekwok</i>				
Glen Wysocki <i>Koliganek</i>	Koliganek	<i>Koliganek</i>	<i>Koliganek</i>	June 2016
Jonathan Forsling	Togiak	<i>Togiak</i>	<i>Togiak</i>	June 2016
Mariano Floresta (Clarks Pt.)	Clarks Pt	Clarks Pt.	Clarks Pt.	Dec 2015
Chris Carr (Portage Creek)	Portage Creek	<i>Portage Creek</i>	<i>Portage Creek</i>	Dec 2015
Christopher Strub Alternate	Dillingham or Aleknagik ?	Alternate		June 2016
Steve Perkins Alternate	Dillingham	Alternate		June 20?? Re-elected

Alaska Board of Fisheries
November 3, 2015



My comments will be brief and specific with regards to proposal 59 which I submitted.

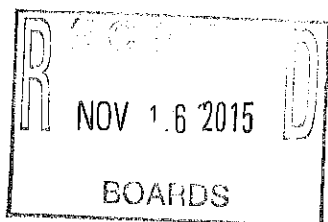
On June 26, 2015 I was extremely proud to witness my grandson Preston become a bona fide member of our fishing "Crew". He is the 4th (fourth) generation of Armstrong's to do so since his great-grandfather obtained this site in 1954.

We are here today because our set net sites that we have fished for 55 years and 35 years are outside the district. How can this be?

Thank you for listening,

A handwritten signature in black ink, appearing to read 'Curt Armstrong'.

Curt Armstrong



Janet Armstrong Schlagel
POB 714
Dillingham, AK 99576
bayair@hughes.net
H. 907-842-2570
C. 907-843-0585

Re: Board of Fisheries' December 2015 agenda item, Proposal 59, to change the Northern Naknek-Kvichak boundary line (5 AAC 06.350)

November 11, 2015

Dear Alaska Board of Fisheries' Member:

Five generations of the Armstrong Family have lived and worked in Alaska, starting in the early 1930's. Four generations of my family continue to live and work in Bristol Bay. We are blessed to be able to provide for our families with our natural resources through subsistence and commercial means. We pick berries, smoke and can fish and we hunt birds and big game. We also work very hard at and rely economically on commercial fishing.

The December agenda item that we initiated is Proposal 59, to change the East-side, Northern Naknek-Kvichak line to:

58.52.141 N
157.00.774 W

(See Shore Fishery Plat, Proposed ADF&G Closure Line, Red.)

My family and I would very much appreciate the Board of Fisheries' help with furtherance of our proposal that the latitude-longitude coordinates for the East-side Graveyard boundary line be amended so that our family can resume fishing all three of our set-net sites that we have fished since 1954 and 1981. (See SFP, Site 1/Tract C, Site 2/Tract B and Site 4/Tract A, Armstrong.)

The following history should aid the Board of Fisheries regarding Proposal 59:

- My father, Dick Armstrong, began fishing at Graveyard Point in 1954.
- In 1954 there were no sites between my father and Ray & Pomela O'Niel who fished sites 8 & 9. (See SFP, Site 8/Tract J, Grossi and Site 9/Tract K, Grossi.)



- In 1955 my father brought his friend Lyle Smith to Graveyard Point and together they "staked" four sites. (See SFP, Site 2 Armstrong, Site 3 Smith, Site 4 Armstrong and Site 5 Smith.)
- My brothers, Curt and Ross, started fishing with Dad at Graveyard in 1971.
- My brother, Ross, died in a plane crash in 1978.
- My mom and my sisters and I had always set-netted on South Naknek beach but we moved to Graveyard Point in 1979.
- We established Site 1 in 1981 and fished 50-fathoms of gear inside the ADF&G boundary line. Our latitude/longitude proposal will allow us to fish Site 1 and Site 2 as we have in the past, but will not create room for any site above Site 1. (See SFP Site 1/Tract C, Armstrong.)
- None of the topmost five East-side Graveyard sites has ever been fished by anyone other than an Armstrong or a Smith family member.
- Until 1992 there existed no coordinates for the East-side North Naknek-Kvichak boundary line, the Board of Fisheries' boundary regulation designating the boundary line merely as follows: "a line from Graveyard Point to a point on the opposite shore at 58° 53' 22" N lat., 157° 04' 16" long."
- Unlike the West side which had latitude/longitude coordinates, the East-side had no coordinates. There was a physical marker establishing the East-side boundary line which fell over the bank a long time ago.
- Fish & Game has acknowledged to the Board (1) that in 1992, upon changing from the West-side's Loran C coordinates to latitude/longitude coordinates and again in 2001 using GPS coordinates, about a 1000 foot-to-southward error was made and (2) that the Board of Fisheries should expand the fishing district Northward to rectify that error. (See ADF&G BOF Meeting (Excerpt), March 20, 2014, page 4.)
- Fish & Game's acknowledged West-bank error regarding the 2001 GPS regulation, a mistake that happened even though the West-bank had Loran C coordinates until the 1992 change to latitude/longitude coordinates, makes considerably more apparent the inadvertent mistake concerning the East-side latitude/longitude coordinates.
- A letter dated April 11, 1990 from F&W Protection's Richard Dykema and ADF&G's Don Bill states, "we have noted Mr. Armstrong's set-net sites, and they have always appeared to be in waters open to fishing, South of the ADF&G markers. (See April 11, 1990 Rendi Patterson.)



- Regarding our Armstrong petition to have the East-side Northern Naknek-Kvichak boundary line moved Northward, Fish & Game informed the Board at the Board's March 2015 meeting that "The department is NEUTRAL on considering shoreline erosion to establish new coordinates."

My family has been trying to resolve this issue by working within the State system. We have had discussions with DNR, with ADF&G and with the Troopers. We have attended the ADF&G Board of Fisheries meetings; first the ACR on October 16, 2014, then the March 2015 BOF meeting and we will be at the meeting in December 2015.

We believe that the significant erosion that has taken place at Graveyard Point causing buildings to fall completely over the bluff and graves to wash out to sea is a factor in our sites being lost; however, the lack of surveyed markers and the general confusion by the ADF&G regarding their historical markers is, in my opinion, a more relevant factor hindering a resolution for us. When asked at the October 16, 2014 BOF meeting, "how are the environmental variables out there, are those sites stable as far as environment goes, water, erosion, channel change? the ADF&G staff member responded, "that is also part of the comment is that that area has been eroding and the entire bank has been moving backwards and it further complicated the interpretation of it and, as we kept looking for additional clarity doing additional background research, it just got more confusing and that adds another layer of confusion." (See ADF&G BOF Meeting (Excerpt) October 16, 2014, page 7.)

So it is that no one can say with any certainty, it was there and now it is here and it needs to go back to there.

We are asking you to restore us to fishing our historical sites.

My family and I thank you for adjusting the latitude/longitude coordinates so that four generations of our family can continue to provide for their families.

Sincerely,

Janet Armstrong Schlager



STEVE COWPER, GOVERNOR

DEPARTMENT OF FISH AND GAME

P.O. BOX 37
KING SALMON, ALASKA 99613-0037

April 11, 1990

Rendi Patterson
Dept. Natural Resources
Div. of Land and Water Mngt.
3601 C Street
Box 107005
Anchorage, AK. 99510-7005

Dear Rendi:

In reference to your inquiring on placement of the regulatory markers near Graveyard on the North East side of the Kvichak River. Don Bill and I have discussed it thoroughly and to the best of our knowledge, this marker has not been moved in at least 10 years. We have noted Mr. Armstrongs set net sites, and they have always appeared to be in waters open to fishing, south of the A.D.F. & G. markers. It appears to us that the surveyors mistook the Coast Guard marker for the A.D.F. & G. marker.

Sincerely,

Richard Dykema

Richard Dykema
Fish & Wildlife Protection

Don Bill

Don Bill
Alaska Dept. Fish & Game

RECEIVED
APR 13 1990
SUBMITTED
TO: [illegible]
BY: [illegible]



ALASKA DEPARTMENT OF FISH AND GAME
BOARD OF FISHERIES MEETING (EXCERPT)
OCTOBER 16, 2014



1 CHAIR: Staff have comments, please.

2 MR. LEWIS: Good morning, Mr. Chairman, members of the
3 Board. My name is Bert Lewis. I'm their regional management
4 coordinator for Bristol Bay and Prince William Sound. ACR
5 No. 11 changed the Naknek-Kvichak District boundary line at
6 Graveyard Point to include two historically-fished setnet
7 sites and this relates to regulation 5 A.A.C. 06.350.

8 Present situation, two historically-fished setnet sites
9 at Graveyard Point are outside of the Naknek-Kvichak district
10 boundary as established by GPS coordinates. The staff comment
11 on this propo -- ACR were based on the possibility that the
12 location of the boundary line may have changed when the
13 location identification method changed from Loran to GPS.

14 The Armstrong's have fished on the boundary line for
15 decades and claim that the change in the way it was defined
16 resulted in the boundary line moving shoreward. There was a
17 pending open citation case related to this ACR and, because of
18 that, the Department is going to defer to Department of Public
19 Safety, Alaska Wildlife Troopers, Mr. Chairman.

20 CHAIR: Defer what to them?

21 MR. LEWIS: Comment.

22 CHAIR: Sergeant, do you have any comments to make on
23 this? I hate to put you on the spot like this but they're not
24 going to give us any assistance at this point so maybe you
25 can.



1 SERGEANT: Mr. Chair, on -- far as the Department is
2 concerned, we know of no changes in this line. It switched in
3 2001 from Loran to GPS and that's what the line's been and
4 that's how we've been enforcing it since 2001 off the GPS
5 coordinates.

6 CHAIR: Can we assume from that comment that the
7 Department of Public Safety believes that these people have
8 been fishing in closed water all these years then?

9 SERGEANT: The Department won't say they have not been
10 fishing in closed, we just haven't observed them until
11 recently. 2012 was the first time. People have been observed
12 above the line and then, as the staff said, 2014, the citation
13 was issued.

14 CHAIR: Well, we'll have to flesh this out among ourselves
15 here I think. Any comments? Mr. -- now Mr. Johnson.

16 MR. JOHNSON: If I were to, by some error, find myself
17 fishing over the line, I think I would get a citation
18 immediately, not to say that that's never happened. The fact
19 that a number of years, at least since 2000 when the line was
20 redefined, no one discovered this supposed error baffles me.
21 That's just a comment. I, you know, haven't drawn any
22 conclusions from that but -- except to say that it would seem
23 that if someone were fishing in closed waters for all these
24 many years, there would have been some indication, you know,
25 prior to now.



1 CHAIR: Mr. Kluberton.

2 MR. KLUBERTON: Thank you, Mr. Chairman. I -- a question
3 for the Department. How long has this site been fished?
4 We're talking about a change from Loran to GPS in 2000
5 whatever but my understanding is that the families fished this
6 same site for some 60 years. Is that correct?

7 MR. LEWIS: There are two sites in question and one has
8 been fished, I believe, since 1954 is what was submitted in
9 part of the ACR documentation and a second site we know that
10 there was a DNR lease application submitted in the eighties.
11 So, yes, they have been fished for a considerable amount of
12 time.

13 MR. KLUBERTON: Okay. So when the Loran line -- there was
14 never a citation issued under the Loran line. Do we know for
15 certain that the GPS coordinates accurately reflect where the
16 Loran line was and that, under the Loran line, these sites
17 were never cited?

18 MR. LEWIS: I feel the need to be cautious here because,
19 as we were having these discussions and making a determination
20 which is actually an opinion about whether the line moved or
21 not, could influence or bias the case when this comes up and
22 in our comment -- for example, additional information -- we
23 state however, changes in how the boundary line is defined
24 unintentionally resulted in changing the location of the
25 boundary line and that is likely an error and something that



1 we cannot stand by because we do not know that and should read
2 how the boundary line is defined may have unintentionally
3 resulted in changing location. So by us taking a position on
4 if it changed during the translation could influence the case
5 and this is where we started being advised to back off of
6 commenting on this.

7 MR. KLUBERTON: So we have no idea what reality is here?

8 MR. LEWIS: That's a deep philosophical question and --

9 MR. KLUBERTON: The Department does not know whether the
10 line was accurately translated?

11 MR. LEWIS: We haven't made a determination on that,
12 correct.

13 CHAIR: I'm confused. You've made a statement and then
14 you say it was incorrect and you've corrected it?

15 MR. LEWIS: Well, it was published and then as we had
16 additional discussions about this ACR, it came to light it was
17 more complicated than we thought and, as we were looking for
18 clarity, it got more confusing and then when we also were
19 informed that we had this open pending case. We were advised
20 to step back from taking a firm stance on where the line is
21 and if it changed --

22 CHAIR: When you made the first statement, did you mean it
23 at the time? Was it an --

24 MR. LEWIS: I would assume --

25 CHAIR: In your opinion, it was an accurate statement or



1 MR. LEWIS: I believe it is under your authority, yes.

2 CHAIR: Okay. Any other comments? Mr. Huntington.

3 MR. HUNTINGTON: Yes, I'm not sure where we're going with
4 this but it seems to me the criteria of unforeseen, how are
5 the environmental variables out there, is -- are those sites
6 stable as far as environment goes, water, erosion, channel
7 change?

8 MR. LEWIS: Through the Chair, that is also part of the
9 comment is that that area has been eroding and the entire bank
10 has been moving backwards and it further complicated the
11 interpretation of it and, as we kept looking for additional
12 clarity doing additional background research, it just got more
13 confusing and that adds another layer of confusion, Mr.
14 Chairman.

15 CHAIR: Mr. Kluberton.

16 MR. KLUBERTON: Yeah, thank you, Mr. Chairman. When I
17 think about this issue moving to court and trying to imagine
18 how might the court resolve it, it occurs to me that I have
19 complete lack of faith that the court's going to dig back, fly
20 a helicopter out there and decide whether this was a mistake
21 or not. The court's going to look at the existing regulation
22 which is expressed in GPS coordinates. They're going to look
23 at the location that the wildlife troopers observed the
24 fishing taking place and render a decision based on those two
25 points. It's not, I believe, the responsibility of the court



**ALASKA BOARD OF FISHERIES
BRISTOL BAY FINFISH
DECEMBER 2-8, 2015**

**Alaska Board of Fisheries Proposals
WRITTEN COMMENTS**

BY

The Bristol Bay Economic Development Corporation

NOVEMBER 2015





Board Meeting: Bristol Bay Finfish: 11/19/2015

Name: Gene J Sandone

Affiliation: Bristol Bay Economic Development Corporation (BBEDC)

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Email: gjsandone@gci.net

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City: Dillingham,

State: Alaska

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Do you consent to your contact information being included on printed copies of your comment? Yes

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District Boundaries/Gear (6 proposals; Proposals 25-30)

PROPOSAL 25--5 AAC 06.100. Description of area.

RECOMMENDATION: OPPOSE (increases interception; allocative between BB Districts)

BBEDC COMMENTS:

BBEDC opposes Proposal 25. The largest concern with this proposal is the possibility of intercepting fish bound for other districts. Since the suggested new fishing district lines are situated both north and south of the established fishing district, except for Ugashik (only north extension; Figure 9), there is a good probability that expanding the fishing area will result in additional interceptions, especially for the northern expansion.

There is no doubt that expanding the fishing area would give the fishers more opportunity to fish and would probably result in less crowding. However, the fishers may pile up against the new line, as they did in the original fishing district.

This proposal may change salmon catch allocation to the various districts through increased interception.

Enforcement leaves and there is much illegal fishing. Boundaries are meaningless...Illegal fishers benefit and legal fishers are left with left overs.

We agree with the Department's position to Oppose.

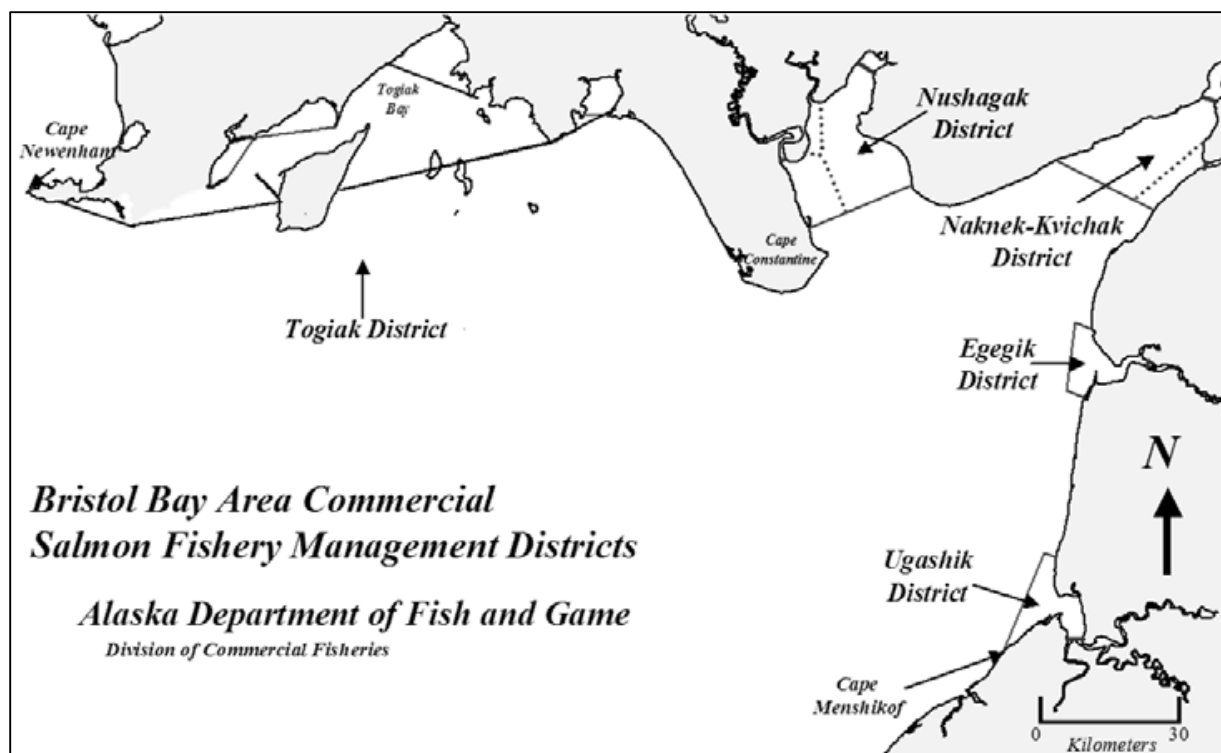


Figure 1. Map of the Bristol Bay Management Area showing fishing Districts.

PROPOSAL 26 – 5 AAC 06.200. Fishing districts and sections.

RECOMMENDATION: OPPOSE (increased interception; allocative between Districts)

BBEDC COMMENTS: BBEDC opposes Proposal 26. The concern would be elevated interception of fish bound for other districts. See map above in Proposal 25 (Figure 9) for reference.

There may also be district allocation changes because of the possible increased interception of fish bound for other districts. This proposal may change salmon catch allocation to the various districts through increased interception.

We agree with the Department’s position to OPPOSE.

PROPOSAL 27 – 5 AAC 39.280. Identification of stationary fishing gear.

RECOMMENDATION: NEUTRAL (SUPPORT PROPOSAL 28)

Require that a CFEC permit holder’s name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers (***This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.***)

Set net markings signs shall include the name of the permit holder in letters at least 6" high and 1" wide, the same as the vessel name for drift vessels. The permit holder may include a phone number for contact.

BBEDC COMMENTS:

BEDC is Neutral on Proposal 27. BBEDC supports a similar proposal, Proposal 28.

There already are number size requirements for the CFEC number, but not the letters of the name. This proposal will specify that the letters of the name appear the same as for the numbers. ***Numbers must be at least six inches in height with lines at least one-inch-wide and of a color contrasting with the background.*** Some may argue that the CFEC number is identification enough because it is tied to the name of the fisherman operating the gear. The owner or operator of a set gillnet in operation shall have at each end of the set gillnet a red keg, buoy, or cluster of floats, or, in the case of set gillnets anchored to land, shall have a red keg, buoy, or cluster of floats at the outer end of the net. The CFEC number is required on the kegs, buoys, or clusters of floats may bear only a single number - that of the permit holder operating the gear.

This proposal will have state-wide implications. Although the proposal will be probably heard in each area BOF meeting, it will be deliberated on in the March state fin fish meeting. Testimony and written comments can be provided to the BOF for the March meeting.

PROPOSAL 28 – 5 AAC 39.280. Identification of stationary fishing gear.

RECOMMENDATION: SUPPORT

Change the character size requirements for set gillnet marking signs, as follows

Insert "twelve inches" where now says "six inches" and add "with lines at least one inch wide."

(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)

BBEDC COMMENTS:

BBEDC supports Proposal 28. Proponent cites discrepancy between drift boats and set gillnets. He states that the drift boats and set net skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, but shore side set net markings are only required to be six inches. He would like consistency. He also cites that it is difficult to read CFEC numbers on a set net beyond 200 feet.

This proposal will have state-wide implications. Although the proposal will be probably heard in each area BOF meeting, it will be deliberated on in the March state fin fish meeting. Testimony and written comments can be provided to the BOF for the March meeting.

PROPOSAL 29 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: SUPPORT AS AMENDED (include only Egegik District; no extension of offshore set net limit)

Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's set net site, as follows: 5 AAC 06.335 Minimum distance between units of gear needs to include the wording "**Except that a CFEC permit holder may operate seaward of their own set gillnet.**"

BBEDC COMMENTS: BBEDC supports Proposal 29 as amended. We support restricting this proposal to the Egegik District. Other area fishermen should testify if this practice needs to be codified in other districts.

This practice of having a short break between a couple nets of 25 fa each has been done for a while in the Egegik District and has just come to the attention of Public safety. Public Safety is now issuing citations for this practice because the break between these nets is less than 300 feet. We understand that a CFEC permit holder may split their 50 fathoms of net into two 25-fa nets and fish them separately with a short break between them. Under current regulations this practice is illegal; the break needs to be at least 300 feet. This proposal would allow the same permit holder to break up his 50 fathoms of net in to different sized nets and fished closer together than 300 feet apart. This practice has been going on for years; it is not an allocative issue.

PROPOSAL 220 – 5 AAC 06.XXX. Vessel specifications and operations.

RECOMMENDATION: OPPOSE

Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods.

BBEDC COMMENTS: BBEDC opposes Proposal 220. This proposal seeks to have the stated exclusions applicable only to the Egegik District during driftnet fishing periods. Proposal 221 is similar but only seeks to prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites within all Districts. This proposal (220) seeks to exclude those vessels but also includes hard fixed buoys in the exclusion. Additionally, Proposal 220 seeks to exclude these vessels and hard fixed buoys from the district for a specified time, 30 minutes before the start of the fishing period to 1 hour after high tide. BBEDC opposes this proposal because it will have serious impacts to the delivery process. It will negatively affect fishermen as well as tenders and those who have net barges in the area.

PROPOSAL 221 – 5 AAC 06.XXX. Vessel specifications and operations.

RECOMMENDATION: SUPPORT WITH MODIFICATION (apply to Togiak District only)

This proposal seeks to prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites, as follows with suggested language

5 AAC 06.341 Vessel specifications and operations.

(c) No tender, buyer or fish transport vessel shall willfully or intentionally interfere with commercial fishing operations, sites and gear. No tender, buyer or fish transport vessel shall not take mooring, anchor or remain stationary for an extended period within 1,500 feet of an operational set net site.

BBEDC COMMENTS: BBEDC supports Proposal 221 only for the Togiak District. Other area fishermen should testify as to applicability of this proposal to other districts.

The proponent sites conflict in the Togiak District between set netters and a tender barge. However, this proposal appears to seek that the regulation apply to all districts. BBEDC supports this proposal within the Togiak District only. BBEDC does not support an Area-wide regulation.

Replace Reference to Regulatory Markers with GPS Coordinates (8 proposals: Proposal 30, 71, 72, 73, 74, 76, 80, and 91

PROPOSAL 30 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: SUPPORT (housekeeping)

Remove reference to department regulatory markers from the regulations describing gillnet specifications and operations. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

BBEDC COMMENTS:

BBEDC conditionally supports Proposals 30. This is an ADF&G housekeeping proposal. However, before the members of the BOF support and pass this innocuous-appearing proposal, BBEDC suggests that all GPS locations using latitude and longitude be verified by an ADF&G staff member using an appropriate sensitive GPS navigational device. Comments heard while attending various Bristol Bay AC meetings seem to indicate that many of the coordinates for the locations of the regulatory markers were provided by members of the public based on their personal knowledge of the location of the regulatory marker. We suggest that ADF&G verify all coordinates before the start of the 2016 fishing season.

We agree with the Department’s position to support this proposal, contingent on verification of the coordinates.

PROPOSALS 71 – 74, 76, 80, and 91 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan; 5 AAC 06.370. Registration and reregistration; 5 AAC 06.200. Fishing districts and sections; 5 AAC 06.350. Closed waters; 5 AAC 01.310. Fishing seasons and periods; 5 AAC 27.850. Closed waters in Bristol Bay Area.

These proposals would clarify regulations by removing reference to Department regulatory markers and inserting latitude and longitude coordinates for area boundaries.

BBEDC COMMENTS: BBEDC conditionally supports these proposals These are ADF&G housekeeping proposals. However, before the members of the BOF support and pass this innocuous-appearing proposal, BBEDC suggests that all GPS locations using latitude and longitude be verified by an ADF&G staff member using an appropriate sensitive GPS navigational device. Comments heard while attending various Bristol Bay AC meetings seem to indicate that many of the coordinates for the locations of the regulatory markers were provided by members of the public, based on their personal knowledge of the location of the regulatory



marker. If this is true, then we suggest that ADF&G verify these coordinates before the start of the 2016 fishing season.

We agree with the Department's position to support this proposal, contingent on verification of the coordinates.

Registration (14 proposals; Proposals 31-54)

PROPOSAL 31, 32, 33, 35, 36, 37, 38, 39, 40 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT THE CONCEPT

Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay, as follows:

BBEDC COMMENTS:

BBEDC supports the concept in these proposals. We recommend that the BOF take no action on these proposals and deliberate on Proposal 41.

Several proposals, Proposals 31-33 and 35-40, address this issue of no transfer restrictions before June 25. All are in favor of registration for a specific district and thereby instituting the 48-h transfer restrictions. BBEDC suggests that the BOF take no action on Proposals 31-33 and 35-40.

Proposal 32 seeks to return to regulations prior to 2010. However, this may not be the most appropriate solution because it would eliminate regulations that do not need to be eliminated to solve this problem. The language in Proposal 32 seeks to eliminate **5 AAC 06.370** (a)(1) through (a)(6). There is merit in keeping regulations that specifically address each district because there are several important regulations contained in (a)(1) through (a)(6).

Proposal 37 lists the problems with the late registration (June 25) and offers how early registration eliminates the problems.

See also comments and recommendation found in Proposal 41.

PROPOSAL 41 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT

Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date, as follows:

In 5 AAC 06.370 (a) (4) delete the words "Beginning June 25" and begin the paragraph "Before taking"

BBEDC COMMENTS: BBEDC supports Proposal 41. Since there are several proposals addressing this issue, the BOF will most likely choose one of the proposals to discuss and deliberate on. The final proposal may or may not look exactly like the one proposal they choose as a vehicle for the discussion and deliberation. We support registration of permit holders to a specific fishing district prior to June 25th and include transfer restrictions. BBEDC supports passage of Proposal 41.

Proposal 41 suggests the most expedient method of eliminating the June 25 registration date so that before taking salmon a CFEC permit holder must register in the district where he intends on fishing is just deleting the phrase in (a)(4), [BEGINNING JUNE 25,]. This phrase deletion would not affect the other regulations in this section and will eliminate the delay of registration until June 25. Although Proposal 41 suggests this change, it doesn't provide suggested language. SEE SUGGESTED LANGUAGE BELOW.

SUGGESTED LANGUAGE:

5 AAC 06.370. Registration and reregistration

(a) Before taking salmon in the Bristol Bay Area, a commercial salmon CFEC permit holder shall register for a district described in 5 AAC 06.200, as follows:

(4) [BEGINNING JUNE 25, b] Before taking salmon in the Naknek, Kvichak, Egegik and Ugashik Districts, a commercial salmon drift gillnet CFEC permit holder shall register for one of these districts;

PROPOSAL 34 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Reduce the required waiting period when registering for a new district from 48 hours to 12 hours, as follows:

Modify the language in the regulation to reflect a waiting period of 12 hours instead of 48 hours. Draft language. Substitute

BBEDC COMMENTS: BBEDC opposes Proposal 34. Replacing the 48-h transfer restriction to 12 hours would effectively be similar to no waiting time to transfer to another district. It may result in the type of complains that no transfer restrictions caused in Proposals 31-33 and 35-41. We support keeping the 48-h transfer restriction.

We agree with the Department's position to oppose this proposal.

PROPOSAL 42 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement, as follows:

BBEDC COMMENTS: BBEDC opposes Proposal 42. In 2009, the BOF removed all transfer restrictions for set netters within a fishing district except for the Nushagak District. It was the set net fishers of this Nushagak District that wanted the 48-h transfer restriction to remain. There are 6 statistical Areas within the Nushagak District that are open to commercial fishing. The 48-h transfer restriction does benefit some set netters because it deters the immediate influx of set netters from a poor area to a good fishing area. Eliminating this transfer requirement will no doubt alter the allocation among set netters within a statistical area when fishing is good in one

area and poor in another. Additionally, note that the notification period may be reduced by commissioner's announcement.

PROPOSAL 43 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: OPPOSE

Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District

BBEDC COMMENTS: BBEDC opposes Proposal 43. This proposal retains the 48-hour transfer for initial registration for set netters. However, after registering for a statistical area, there is no waiting period to transfer to a new statistical area within the Nushagak District. BBEDC is opposed to this proposal. BBEDC seeks to have the 48-hour waiting period as currently in regulation.

PROPOSAL 44 – 5 AAC 06.370. Registration and reregistration.

RECOMMENDATION: SUPPORT

Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 44. Although legal, it may not be in the spirit of the law that a permit holder who fishes another district with his vessel can fish with another permit holder who has registered in Togiak with the same vessel. Permits that fish in other districts cannot transfer to Togiak until a set date and likewise permits that fish in Togiak cannot transfer to other districts until the same set date, July 27. Having a fisher register in the Togiak District and then use a boat that has fished in another district, tends to circumvent the spirit of the law. The owner of the boat can fish in the Togiak District prior to July 27 by having another permit holder register in Togiak District.

Permit Stacking (9 proposals; Proposals 45-53)

PROPOSAL 45, 46, 47, 48, 50 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: OPPOSE (allocative between gear types and districts)

PROPOSAL 45, 46, 48, 50:

Reauthorize Bristol Bay set gillnet permit stacking to allow one permit holder to operate 100 fa of set gillnet gear in the aggregate

BBEDC COMMENTS: BBEDC opposes all set net permit stacking proposal. Although there are minor differences among these proposals, **Proposals 45, 46, 48 and 50** seek to reestablish permit stacking for set gillnet permits. These proposals, however, limit the amount of gear at one site to 50 fa. **Proposal 47** seeks to establish permit stacking also, but seeks to allow 75 fa of gear to be fished at a single site. We oppose all these proposals and believe that it is not in the best interest of the watershed fishermen nor the fishery to allow permit stacking. Specifically, we believe that allowing permit stacking will cause reallocation between different gear types and among districts. BBEDC also believes that permit stacking will increase the demand for permits, increase the price of a permit and will add additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.

We agree with the Department's position to oppose Proposal 47.

PROPOSAL 49 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: OPPOSE

Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign, as follows:

BBEDC COMMENTS: BBEDC opposes Proposal 49. BBEDC believe that it is not in the best interest of the fishermen nor the fishery to allow dual operation of set net gear. Specifically, we believe that allowing dual operation of set net gear will cause reallocation between different gear types and among districts. BBEDC also believes that the dual operation of set net gear will increase the demand for permits, increase the price of a permit and will add additional difficulty for a new person to enter into the fishery. Additionally, the operation of 75 fa of set net gear on one set net site will present problems associated with allocation within the gear type. It would probably negatively affect neighboring set gill net operations.

PROPOSAL 51, 52 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

RECOMMENDATION: OPPOSE (allocative between gear types and districts)

PROPOSAL 51 and 52:

This proposal would allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay. These proposals seek to operate 200 fa of gear using two permits rather than the 150 fa allowed using one permit.

BBEDC COMMENTS: BBEDC opposes Proposals 51 and 52. These proposals (51 and 52) would allow one permit holder to operate 200 fa of drift gillnet gear instead of 150 fa as in regulation. BBEDC opposes this proposal and believe that it is not in the best interest of the fishermen nor the fishery to allow permit stacking using drift gillnet permits. Specifically, we believe that allowing permit stacking for drift gillnet permits will cause reallocation between different gear types and among districts. BBEDC also believes that permit stacking will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.

PROPOSAL 53 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

RECOMMENDATION: OPPOSE

Increase the amount of drift gillnet gear allowed to 300 fa when two permit holders are jointly operating

COMMENT: BBEDC opposes Proposal 53. This proposal seeks to allow the use of 300 fathoms of gear when two CFEC permit holders are fishing from the same vessel. Currently, only 200 fathoms of gear can be used in Dual operations. We oppose this proposal and believe that it is not in the best interest of the fishermen nor the fishery to increase the amount gear under dual operation. Specifically, we believe that allowing in increase in the amount of drift gillnet gear used under dual operation will cause reallocation between different gear types and among districts. BBEDC also believes that an increase in the dual operation of drift gillnet gear will increase the demand for permits, increase the price of a permit and will additional difficulty for a new person to enter into the fishery. BBEDC is committed to retaining permits within the watershed and facilitating watershed residents to enter the fishery as new permit holders. These proposals are contrary to these efforts.

MANAGEMENT PLANS: Egegik/Ugashik Districts

PROPOSAL 54 – 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE (takes away opportunity; allocative between districts)

Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing, as follows:

COMMENTS: BBEDC opposes Proposal 54. Tables 4, 5, and 6 present the information from the WASSIP study regarding the catch of Bristol Bay stocks within the Egegik, Ugashik, and Naknek/Kvichak Districts, respectively. Note that while the percent interception of other BB salmon stocks within the Naknek/Kvichak District are very low, (mean=5.1%; range: 3.3% - 6.4%), the mean percent interception rate within the Ugashik District (mean=16.3%; range 12.3% - 21.2%) is not that dissimilar to the Egegik District interception rate (mean=21.2%; range 13.3% - 27.5%) (Tables 4, 5, 6). Additionally if adopted, the regulations may impede ADF&G's ability to manage the Egegik fishery. There would be substantial loss of management flexibility along with loss of harvest. This must be weighed in relation to the benefits gained by reducing interception through by closing the District for 5 days through this proposal. Additionally, the closing of the Egegik District for 5 days will most likely effect allocation among districts. BBEDC opposes this proposal because it basically takes away opportunity with no substantial benefit to reduce interception.

We agree with the Department's position to Oppose this proposal.

Table 1. Estimated median catch of Bristol Bay sockeye salmon stocks in Egegik District, 206-2008

	Median Catch of Bristol Bay Stocks			Egegik District Harvest Composition (%) of Bristol Bay Stocks			Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008	2006	2007	2008	2006	2007	2008
Togiak	0	10,585	1,674	0.0	0.2	0.0	0.0	1.0	0.2
Igushik	1,370	15,916	33,169	0.0	0.2	0.4	0.2	1.9	1.9
Wood	16,224	47,540	42,172	0.2	0.7	0.6	0.1	0.6	0.6
Nushagak	2,516	7,165	18,278	0.0	0.1	0.2	0.1	0.3	0.9
Kvichak	158,605	518,635	686,044	2.1	8.0	9.3	2.8	8.9	10.9
Alagnak	73,314	245,324	221,340	1.0	3.8	3.0	2.2	5.1	4.9
Naknek	227,783	427,387	730,498	3.1	6.6	9.9	4.3	4.9	8.3
Egegik	6,412,241	5,015,799	5,358,613	86.7	77.4	72.5	74.5	66.6	67.3
Ugashik	507,177	202,540	300,359	6.9	3.1	4.1	12.2	2.6	9.5
Total	7,397,000	6,478,290	7,388,790	100.0	100.0	100.0			
Total interceptions of OTHER BB stocks	986,989	1,475,092	2,033,534	13.3	22.8	27.5			

Table 2. Estimated median catch of Bristol Bay sockeye salmon by stock in the Ugashik District, 2006-2008.

	Median Catch of Bristol Bay Stocks				Ugashik District Harvest Composition (%) of Bristol Bay Stocks				Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008		2006	2007	2008		2006	2007	2008
Togiak	73	0	186		0.0	0.0	0.0		0	0	0
Igushik	97	4,427	1,249		0.0	0.1	0.1		0	0.5	0.1
Wood	22,718	5,147	5,136		0.9	0.1	0.2		0.2	0.1	0.1
Nushagak	641	0	5,344		0.0	0.0	0.2		0	0	0.3
Kvichak	40,817	106,958	43,674		1.7	2.1	1.9		0.7	1.8	0.7
Alagnak	12,544	41,729	35,306		0.5	0.8	1.5		0.4	0.9	0.8
Naknek	37,748	93,246	40,457		1.6	1.9	1.7		0.7	1.1	0.5
Egegik	180,775	513,071	358,024		7.6	10.3	15.5		2.1	6.8	4.5
Ugashik	2,103,104	4,250,184	1,832,096		87.9	85.0	79.2		50.5	53.9	57.6
Total	2,392,509	5,001,014	2,312,506		100.0	100.0	100.0				
Total interceptions of other BB stocks	295,413	764,578	489,376		12.3	15.3	21.2				

Table 3. Estimated median catch of Bristol Bay sockeye salmon by stock in the Naknek/Kvichak District, 2006-2008.

	Median Catch of Bristol Bay Stocks			Naknek-Kvichak District Harvest Composition (%) of Bristol Bay Stocks			Bristol Bay Stock Harvest Rate (%)		
	2006	2007	2008	2006	2007	2008	2006	2007	2008
Togiak	391	0	1,923	0.0	0.0	0.0	0.1	0.0	0.3
Igushik	3,656	9,674	7,273	0.1	0.1	0.1	0.5	1.1	0.4
Wood	46,016	45,496	106,578	0.6	0.5	1.0	0.4	0.6	1.5
Nushagak	11,467	89,256	28,790	0.2	1.0	0.3	0.4	3.4	1.4
Kvichak	2,322,878	2,146,599	2,517,895	32.5	23.8	24.3	40.9	36.8	39.9
Alagnak	1,464,145	1,852,336	1,961,095	20.5	20.5	18.9	43.1	38.3	43.3
Naknek	2,962,182	4,726,847	5,227,813	41.5	52.4	50.5	55.4	54.4	59.3
Egegik	291,406	144,811	468,007	4.1	1.6	4.5	3.4	1.9	5.9
Ugashik	45,089	5,874	47,892	0.6	0.1	0.5	1.1	0.1	1.5
Total	7,138,829	9,014,702	10,358,237	100.0	100.0	100.0			
Total interceptions of other BB stocks	398,025	295,111	660,463	5.6	3.3	6.4			

PROPOSAL 55 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: OPPOSE

Modify set gillnet operations in the Ugashik District to extend to 1,000 feet from the 18-foot high tide mark in statistical area 321-50 (Ugashik Village), with the provision that all gear farther than 600 feet from the 18-foot east bank high tide mark, except anchors and buoys, would be removed during closed periods.

BBEDC COMMENTS: BBEDC opposes Proposal 55. This proposal has been before the BOF several times before and in different forms. The problem is that the Ugashik River is approximately 1,500 feet across where the proponent fishes. Allowing the set net to be 1,000 feet from shore has caused navigational problems and has been classified as a navigational obstruction. After the last Bristol Bay finfish BOF meeting, ADF&G submitted an Agenda Change Request (ACR) to shorten the distance to the original 600 feet after the BOF allowed the set gillnet to extend to 1,000 feet from the 18-foot high tide mark. The community and the proponent have not been able to agree on a compromise. We oppose this proposal because it appears to benefit only a few individuals and, if adopted, would impede navigation.

We agree with the Department's position to oppose this proposal.

Management Plans: Naknek/Kvichak (5 proposals; Proposals 56-60)

PROPOSAL 56 – 5 AAC 06.XXX. Alagnak River Salmon Fishery Management Plan. **RECOMMENDATION: SUPPORT**

Create an inriver Alagnak River Salmon Fishery Management Plan

BBEDC COMMENTS: BBEDC supports Proposal 56. However, there is already an Alagnak River Sockeye Salmon Special Harvest Area Management Plan. The Levelock Village Council should work with ADF&G and the BOF within this plan. The plan could be changed to allow for the harvest of excess Alagnak River salmon but determining the excess could be difficult because no assessment tower is presently operated. The information may have to come from aerial survey information.

PROPOSAL 57 – 5 AAC 06.XXX. Kvichak River Salmon Fishery Management Plan. **RECOMMENDATION: OPPOSE**

Create an inriver Kvichak River Salmon Fishery Management Plan to harvest surplus Kvichak River salmon.

BBEDC COMMENTS: BBEDC opposes Proposal 57. There is already a good management plan for Kvichak River salmon that addresses the harvest of surplus Kvichak River salmon.

We agree with the Department’s recommendation to oppose this proposal.

PROPOSAL 58 – 5 AAC 06.200. Fishing districts and sections. **RECOMMENDATION: OPPOSE** (increases interception rates; allocative between districts)

Expand the boundaries of the Naknek Section of the Naknek-Kvichak District

BBEDC COMMENTS: BBEDC opposes Proposal 58. Adjusting the boundary lines will most likely increase the harvest of salmon bound for the Kvichak River and other districts. Additionally, this may affect the allocation of fishers of other districts.

We agree with the Department’s recommendation to oppose this proposal.

PROPOSAL 59 – 5 AAC 06.350. Closed waters

RECOMMENDATION: NEUTRAL

Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District, as follows:

Change the GPS numbers on the east (Graveyard Point) side of the river.

BBEDC COMMENTS: BBEDC is neutral on Proposal 59. This issue was fully addressed at the Statewide meeting in March. We believe that this is an issue between set netters near Graveyard Point. Therefore, BBEDC is neutral on this proposal.

PROPOSAL 60 – 5 AAC 06.XXX. Graveyard Creek Special Harvest Area Management Plan.

RECOMMENDATION: NEUTRAL

Create a special harvest area in the Graveyard Creek area, as follows:

We request the Board of Fisheries to create a special harvest area or something similar to allow certain right(s) to be protected and preserved or simply restore our right to fish. We request this be done via grandfathered rights or creating special provisions created for cases similar in nature.

COMMENT: BBEDC is neutral on Proposal 60. Fishermen fishing in Graveyard Creek have been informed that they are fishing illegally. They would like to create a special harvest area within the creek to allow them to fish their set net sites. The stream is non anadromous stream and has no spawning stock of salmon.

Management Plans: Nushagak (14 proposals; Proposals 61-74)¹

PROPOSAL 61 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: OPPOSE

Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

5 AAC 06.335 (b) Minimum distance between units of gear is amended to read:

No part of a drift gillnet may be operated within 300 feet of the side of a set gillnet and within 100 feet of the offshore end of a set gillnet. [THE 100-FOOT RESTRICTION DOES NOT APPLY SEAWARD OF THE OFFSHORE SETNET DISTANCE RESTRICTIONS SET OUT IN 5 AAC 06.331 (M) AND (N).]

-OR-

(e) In the Nushagak District, from the cannery dock at Clark’s Point to an ADF&G regulatory marker at First Creek, no part of a drift net (including a drift gillnet vessel while operating fishing gear) may be within 100 feet of the offshore end of a set gillnet anchoring device, or outermost marker buoy.

BBEDC COMMENTS: BBEDC opposes Proposal 61. This proposal is allocative in nature in that it seeks to reduce the available area that drift gillnets can operate. If a set netter sets their net to the limit of the offshore set net distance restrictions, a drift netter could legally drift right next to the outer limit of the set net (**5 AAC 06.335 (b)**). Requesting an additional 100 feet of space between the offshore end of the set gillnet and the drift gillnet in this scenario encroaches on the drifter’s fishing area. This proposal requests that the 100-foot restriction applies to the drift gillnetter no matter where the set netter places his net. Note that if a drift gillnetter entangles a set net he may receive a citation from Public Safety. BBEDC opposes this proposal.

PROPOSAL 62 – 5 AAC 06.335. Minimum distance between units of gear.

RECOMMENDATION: OPPOSE

Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

Prohibit the operation of a drift gillnet inshore of a set gillnet within the entire Nushagak District or a specified area within the Nushagak District.

BBEDC COMMENTS: BBEDC opposes Proposal 62. This proposal requests that drift gillnetting be prohibited inshore of the inshore limit of a set gillnet. This proposal is allocative in nature in that it seeks to reduce the available area that drift gillnets can operate. Requesting that a drift gillnet cannot be operated inshore of the inshore end of a set gillnet either within the

entire District or within a specific area encroaches on the drifter's fishing area. Note, however, if a drift gillnetter entangles a set net he may receive a citation from Public Safety. BBEDC opposes this proposal.

PROPOSAL 63 – 5 AAC 06.331. Gillnet specifications and operations.

RECOMMENDATION: NEUTRAL

Change the seaward minimum distance between set gillnet gear in the Clark's Point area in the Nushagak District from, 500 feet to 750 feet to compensate for a mud bar that is filling in.

BBEDC COMMENTS: BBEDC is neutral on Proposal 63. This proposal is allocative in nature in that it reduces the area that the drift gillnets can fish and gives it to the set netters. It reallocates resources. However, we understand that environmental changes have caused these sites to have insufficient water for adequate fishing time. Therefore, BBEDC is neutral on this proposal. We urge the BOF to consider the possible allocative aspects of this proposal between gear types and within the set net gear types when deliberating on this proposal.

PROPOSAL 64 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet
Sockeye Salmon Fisheries Management and Allocation Plan.

RECOMMENDATION: SUPPORT

Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District. Drift gillnet openings will begin at least one hour before book high water.

BBEDC COMMENTS: BBEDC supports Proposal 64. This proposal seeks to schedule the drift gill net opening at least one hour before the high tide. Fishers would rather fish on the flood rather the high tide or the ebb. There is more productive and more efficient fishing on the flood. BBEDC supports this proposal.

PROPOSAL 65 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet
Sockeye Salmon Fisheries Management and Allocation Plan.

RECOMMENDATION: OPPOSE

In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches, as follows:

BBEDC COMMENTS: BBEDC Opposes Proposal 65. The regulation, 5 AAC 06.367(e), was adopted during the previous Bristol Bay finfish BOF meeting. The main purpose of the original proposal and subsequent regulation was to be able to harvest one stock of sockeye salmon over another (Nushagak River vs. Wood River sockeye salmon stocks). Fishermen presented it and lobbied for it. However, some fishermen believe that stock specific harvests of

sockeye salmon are not possible through mesh size restrictions. BBEDC believes that ADF&G can use different mesh size nets to differentially harvest the two runs of sockeye salmon. Therefore, BBEDC opposes this proposal.

PROPOSAL 66 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: PARTIALLY SUPPORT (support date changes, and reference to pink salmon fishery management)

Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement:

BBEDC COMMENTS: BBEDC partially supports Proposal 66. ADF&G has submitted Proposal 67 to change the trigger points in the management plan based on newly adopted sustainable escapement goals. We recommend **SUPPORTING ADF&G’s changes in the trigger points** in Proposal 67. However, we also **SUPPORT other changes to the Coho Salmon Management Plan contained in this proposal, Proposal 66.**

A projection of a run size depends on passage through a date and the historic proportion that passed through that date. Projections of run size can be extremely variable from day to day, especially in the early portion of the run. Confidence in the projection increases as the run progresses and the historic proportion of run passage increases. There is very little confidence in a run size projection of any salmon run at the 6% historic proportion passage. Therefore, BBEDC agrees with the problem statement in this proposal. There is much more confidence at the historic quartile point or when 25% of the run has passed, but obviously not as much confidence after the historic median (50% passage point) or the third quartile (75% passage point). **Accordingly, BBEDC agrees with moving the start date of the Coho Salmon Management Plan from July 23 to August 1 and altering all dates in the Coho salmon management plan accordingly. BBEDC also supports removing all references to pink salmon fishery management.**

However, the Nushagak Sonar for the fall season has been eliminated because of budget cuts. Therefore, the management plan is useless and will not be used to manage the coho salmon fishery. ADF&G management will most likely depend on their subjective assessment of the run through catch rates. Prosecution of the fishery will also depend on the demand for fish.

PROPOSAL 67 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: PARTIAL SUPPORT (support trigger points based on SEGs)

Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals for coho and pink salmon that have previously been implemented.

BBEDC COMMENTS: BBEDC partially supports Proposal 67. ADF&G has submitted Proposal 67 to change the trigger points in the management plan based on newly adopted

sustainable escapement goals. We recommend **SUPPORTING ADF&G's changes in the trigger points** in Proposal 67. However, we also **SUPPORT other changes to the Coho Salmon Management Plan contained in this proposal, Proposal 66.**

A projection of a run size depends on passage through a date and the historic proportion that passed through that date. Projections of run size can be extremely variable from day to day, especially in the early portion of the run. Confidence in the projection increases as the run progresses and the historic proportion of run passage increases. There is very little confidence in a run size projection of any salmon run at the 6% historic proportion passage. Therefore, BBEDC agrees with the problem statement in this proposal. There is much more confidence at the historic quartile point or when 25% of the run has passed, but obviously not as much confidence after the historic median (50% passage point) or the third quartile (75% passage point). **Accordingly, BBEDC agrees with moving the start date of the Coho Salmon Management Plan from July 23 to August 1 and altering all dates in the Coho salmon management plan accordingly. BBEDC also supports removing all references to pink salmon fishery management.**

However, the Nushagak Sonar for the fall season has been eliminated because of budget cuts. Therefore, the management plan is useless and will not be used to manage the coho salmon fishery. ADF&G management will most likely depend on their subjective assessment of the run through catch rates. Prosecution of the fishery will also depend on the demand for fish.

PROPOSAL 219 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

RECOMMENDATION: NO ACTION

Address allocation impacts that may come from potential changes in escapement goals and trigger points in the Nushagak River Coho Salmon Management Plan, as follows:

BBEDC COMMENTS: BBEDC took no action on Proposal 219. This proposal seeks to have a discussion regarding possible allocation changes with the changes in the trigger points for coho salmon within the Nushagak River Coho Salmon Management Plan. It also seeks to possibly alter Section C 1 and makes a comment regarding pink salmon escapement goals. While we support having discussions regarding all concerns raised in this proposal, this proposal does not specifically seek to change any sections of the Management plan. However, we believe that all concerns raised in Proposal 219 will be addressed during discussions surrounding Proposals 66 and 67.

PROPOSAL 68 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE

Repeal the Wood River Sockeye Salmon Special Harvest Area Management Plan

BBEDC COMMENTS: BBEDC opposes Proposal 68. This proposal would eliminate the opportunity to fish on the Wood River sockeye and coho salmon stock when the Nushagak sockeye or coho salmon stock needs protection and the Nushagak commercial fishing district is closed or restricted. BBEDC opposes this proposal because it takes opportunity away to harvest surplus fish.

PROPOSAL 69 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: SUPPORT

Amend the Wood River Sockeye Salmon Special Harvest Area Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 69. When the Wood River Special Harvest Area is open under 5 AAC 06.358 (c) (3), there are surplus Wood River sockeye salmon and the general Nushagak fishing district is open. There is commercial fishing in both the general commercial district and within the Wood River. The intent of the management plan is to provide the extra fishing in Wood River to the gear type that is behind in their allocation.

In years when the Nushagak River run is low and fishing is not allowed in the general Nushagak fishing district, and the Wood River Special Harvest Area is open, there is no gear that is below allocation. They both start at 0 because there was no harvest in the general district. Therefore, the 3:1 seasonal fishing period applies.

The proposer seeks to delete 5 AAC 06.3588 (5), along with reference in of 5 AAC 06.3588 (5) in of 5 AAC 06.3588 (4) so that the fishing periods in the Wood River Special Harvest Area are prosecuted in a seasonal ratio of 3 drift fishing periods to 1 set net fishing period, regardless of the catch proportion for drift and gillnet fisheries. Accordingly, the proposer seeks that the allocation proportions stipulated in 5 AAC 06.367(b)(1) of 74% drift gillnet, and 26% set gillnet does not apply to the Wood River Special Harvest Area catch. The proposer seeks to have the fisheries prosecuted solely on a seasonal fishing period ratio of 3 drift net periods to 1 set net fishing period. Because of the inherent problems associated with fishing and delivering fish in the Wood River Special Harvest Area, BBEDC believes that this approach would provide both viable options for both gear types to harvest the surplus sockeye salmon.

PROPOSAL 70 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

RECOMMENDATION: OPPOSE

BBEDC COMMENTS: BBEDC opposes Proposal 70. The proposer seeks to eliminate the seasonal ratio of 3:1 drift to set gillnet fishing periods in the Wood River Special Harvest Management Area (WRSHA). The proposer seeks to have the allocation percentages dictates which gear type is allowed to fish in the WRSHA. However, in 5 AAC 06.358. (d)(4) the general district would probably not be open prior to the opening of the WRSHA. Therefore, there would not be a gear type that is below allocation. They would both start at harvest allocation of 0. The seasonal ratio of 3:1 would be initiated and continue through the season. The alternative would to keep track of the allocation after the first set of 3:1 ratio fishing periods and then determine what gear type was below allocation and proceed accordingly to achieve the 74%: 26% allocation criteria for drift and set net gear types, respectively. BBEDC believes that the fair and most efficient method of harvesting surplus Wood River sockeye salmon is to conduct the fishery in a seasonal 3 drift periods to 1 set net period throughout the fishery in the Wood River Special Harvest Management Area. Because of the inherent problems associated with fishing and delivering fish in the Wood River Special Harvest Area, BBEDC believes that this approach would provide both viable options for both gear types to harvest the surplus sockeye salmon.

Management Plans: Togiak (3 proposals; Proposals 75-77)

PROPOSAL 75 – 5 AAC 06.350. Closed waters.

RECOMMENDATION: SUPPORT

Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet, as follows:

5 AAC 06.350. Closed Waters is amended to read:

...

(e)(3) from June 1 through **July 11** [JULY 15], those waters of the Togiak District inside a line from 59° 03.19' N lat., 160° 20.18' W. long. to 59° 01.76' N. lat., 160° 28.17' W. long. are closed to commercial fishing for salmon with a drift gillnet.

COMMENT: BBEDC supports Proposal 75. This proposal would allow an additional 4 days of fishing in the currently closed area when sockeye salmon are numerous. The Togiak Fishery is a primarily a small boat fishery. The closed area restricts fishing in shallower, calmer waters during the peak sockeye salmon fishing. We believe that relatively a small amount of Chinook salmon would be taken and these Chinook would probably be mainly small male salmon because of the selectivity of the small mesh gear used in this fishery. It is interesting to note that the sport fishery probably high grades their catch most often for the largest fish which are primarily female salmon. We believe this to be unfair to the commercial fishers during the most productive portion of the sockeye salmon run. Having the ability to fish at the narrows would result in an unknown catch of kings but possibly a large catch of sockeye in waters that are fishable during the peak of the sockeye run. With the king run returning better, it may be appropriate to open those waters that were previously closed because of a king salmon concern. Although the department cites the Togiak Chinook salmon escapement goal, that goal has been discontinued.

PROPOSAL 77 – 5 AAC 06.369.

Togiak District Salmon Management Plan

RECOMMENDATION: SUPPORT AS AMENDED (alter language; suggested language provided)

BBEDC COMMENTS: BBEDC supports Proposal 77 as amended. Change the Togiak District salmon management plan to reflect the sockeye salmon sustainable escapement goal established by the department and remove coho and king salmon escapement goals from regulation to reflect recent department escapement goal review changes. These changes will reflect the current escapement management directives the department follows, removing any confusion and clarifying the regulations.

New regulatory language, 5 AAC 06.355(d)(1) that instructed the department to manage escapements, to the extent practicable, commensurate with run size was passed by the BOF in

March 2015. This new language was included in the [5 AAC 06.355. Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan](#). However, the Togiak District is not included in this allocation plan. Therefore, this BOF management directive does not apply to Togiak River sockeye salmon management. However, it makes sense to include this language in the Togiak Management plan so that the management of the sockeye salmon fishery is consistent throughout the Area.

We propose that this a portion of the same language **5 AAC 06.355(d)(I)** be substituted for portions of **5 AAC 06.369(b)**. It is rare to have an actual SEG range specified in regulation because escapement goals change from time to time and regulations should be consistent and not have to be changed to reflect escapement goal changes. Currently, the Togiak River SEG is the only SEG range specifically defined in a Bristol Bay Area management plan.

SUGGESTED LANGUAGE:

5 AAC 06.369(b) is amended to read:

The department shall manage the commercial fishery in the Togiak River Section of the Togiak District **to achieve adequate escapement from all segments of the run by spacing openings throughout the run and, to the extent practicable, manage for escapements within the lower or upper portions of escapement goals proportional to the run size based on the preseason forecast and inseason assessment of the run size.**
[FOR A BIOLOGICAL ESCAPEMENT GOAL OF 150,000 SOCKEYE SALMON
PAST THE COUNTING TOWER AT TOGIAC LAKE AND BIOLOGICAL
ESCAPEMENT GOALS OF 50,000 COHO SALMON, AND, 10,000 KING SALMON
IN THE TOGIAC RIVER]

Bristol Bay Subsistence (5 proposals; Proposals 78-82)

PROPOSAL 78 – 5 AAC 01.320. Lawful gear and gear specifications.

RECOMMENDATION: SUPPORT AS AMENDED (SUGGESTED LANG)

Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage, as follows:

5 AAC 01.320 is amended to read:

From August 30 through DECEMBER 31 by spear, dipnet, gillnet, AND BEACH SEINE. Along a 100-yard length of shoreline near the outlet of Naknek River as marked by ADF&G regulatory markers; at Johnny's Lake on the Northwestern side of Naknek Lake; at the outlet of Idavians Creek on the North side of Naknek Lake; at the mouth of Brooks River from September 18 through December 31.

Suggested language:

5 AAC 01.320. Lawful gear and gear specifications

(b) Outside the boundaries of any district, salmon may only be taken by set gillnet, except that salmon may also be taken as follows:

(2) from August 30 through **December 31** [SEPTEMBER 30], by spear, dip net, [AND] gillnet **and beach seine** along a 100-yard length of the west shore of Naknek Lake near the outlet to the Naknek River as marked by ADF&G regulatory markers;

(3) from **August 30** [AUGUST 15] through **December 31** [September 15], by spear, dip net, [AND] gillnet, **and beach seine** at Johnny's Lake on the northwestern side of Naknek Lake;

(4) **from August 30 through December 31, by spear, dip net, gillnet, and beach seine at the outlet of Idavians Creek on the North side of Naknek Lake**

(5) from **September 18** [October 1] through **December 31** [November 15], by spear, dip net, [AND] **beach seine, and** gillnet at the mouth of Brooks River at Naknek Lake;

BBEDC COMMENTS:

BBEDC supports Proposal 78 with the suggested language. BBEDC provided this substitute language to the BBRAC and they accepted this language. We support this proposal with the addition of the suggested language.

Spawned out sockeye have traditionally been harvested for personal (subsistence) use by the Katmai descendants. Harvest of spawned-out salmon occurs when the commercial/sport fishing season are inactive. It makes fall red fish (spawned out salmon) available to traditional and cultural descendants of Naknek Lake and its river drainages for all Naknek Lake and River descendants.

The current methods, dates, and places do not reflect the proper access to our traditional and cultural foods. The harvest of spawned-out sockeye salmon has no significant commercial value,

but is a traditional food source for local residents. There is no threat to the resource and there are no allocation problems.

Title 36 CFR, Part 13. Alaska regulations. Katmai National Park and Preserve Special Regulations 13.1204 allows for a traditional redfish fishery for “Local residents who are descendants of Katmai residents who lived in the Naknek Lake and River Drainage...” Seasons and methods for the take of redfish will be set by the Alaska Department of Fish and Game in the annual Subsistence and Personal Use Statewide Fishing Regulations booklet.

Rural residents of King Salmon, Naknek, South Naknek have traditionally had access to their traditional foods (subsistence resources) in Naknek Lake and its surrounding drainages. The current dates in regulation will not allow access to traditional food supply (resources) traditionally practiced by local traditional tribes. The current dates in regulation will not allow access to traditional food supply (resources) traditionally practiced by local traditional tribes.

May want to include beach seine specifications.

BBEDC agrees with the department’s position to support this proposal.

PROPOSAL 79 – 5 AAC 01.310. Fishing seasons and periods.

RECOMMENDATION: SUPPORT

Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time, as follows:

BBEDC COMMENTS: BBEDC supports Proposal 79. Naknek River is the focus of this proposal. The location where the subsistence harvest takes place is easily accessible in the Naknek River while subsistence fishing in the Egegik and Ugashik Rivers in the subsistence harvest area required some travel. In the Bristol Bay Area, commercial fishing and subsistence fishing is allowed concurrently in the commercial fishery area. Most residents get their subsistence fish during these concurrent openings. However, there may not be enough space between commercial sites for subsistence nets. In recent years, ADF&G has opened the Ugashik River special harvest area for subsistence fishing 24-h a day, 7 days a week, under Emergency Order (EO) authority. The proponent would like this practice to be codified. The subsistence harvest is relatively small compared to run size and commercial harvests. BBEDC supports this proposal.

BBEDC agrees with the department’s position to support this proposal.

PROPOSAL 81 – 5 AAC 01.320. Lawful gear and gear specifications.

RECOMMENDATION: SUPPORT (housekeeping)

Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers

BBEDC COMMENTS

housekeeping proposal. **BBEDC supports Proposal 81.** This proposal corrects an error in regulation.

BBEDC agrees with the department's position to support this proposal.

PROPOSAL 82 – 5 AAC 01.336.

Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.

RECOMMENDATION: NEUTRAL

Establish and adopt amounts reasonably necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District, as follows:

5 AAC 01.336(b) is amended by adding a new paragraph to read:

(b) The board finds that

(3) X, XXX – X, XXX pounds of herring spawn on kelp in the waters of the Togiak District as described in 5 AAC 27.805(a) are reasonably necessary for subsistence uses in the Bristol Bay Area.

BBEDC COMMENTS: BBEDC is neutral on Proposal 82, This proposal established the reasonable amounts necessary for spawn on kelp in the waters of Togiak District. Subsistence is the priority consumptive use of the resource and establishing this amount will facilitate management of the Togiak herring fishery. Data are available but level of amounts necessary for subsistence is unknown. We are neutral because we do not know what level the department will suggest.

BRISTOL BAY SPORT FISHERIES (5 PROPOSALS: 83-87)

PROPOSAL 83 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

RECOMMENDATION: NEUTRAL

Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River

BBEDC COMMENTS:

BBEDC is neutral on Proposal 83. This issue should be solved between the BOF, the Department and those affected in the Nondalton and Newhalen area. It appears that public safety will not issue violations for local fishermen fishing with rod and reel below where fish are either processed or kept in the water. This appears to be against regulation and should be dealt with by the BOF. Additionally, this area is beyond the area serviced by BBEDC

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

PROPOSED BY: Nanci Morris Lyon

RECOMMENDATION: NEUTRAL

Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage, as follows:

5 AAC 67.022(d) (11) is amended to read:

(11) the Big Creek drainage [, INCLUDING WATERS WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER] is closed to **the retention of all** [SPORT FISHING FOR] king salmon year round.

BBEDC COMMENTS: BBEDC is neutral on Proposal 84. This proposal would allow people to fish for king salmon but not retain king salmon. Currently, the ¼ mile radius around the confluence of Big Creek and the Naknek River extends all the way across the Naknek River. This causes people sport fishing and drifting the Naknek River to stop fishing through this section of river. One solution is to draw a straight line somewhere on Big Creek from shore to shore where the non-retention of king salmon starts.

PROPOSAL 85 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

RECOMMENDATION: NEUTRAL

Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage, as follows:

5 AAC 67.022(d) (11) is amended to read:

(11) the Big Creek drainage, including waters **from the confluence of Big Creek with the Naknek River** [WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER:].

Closed all year round to all king salmon fishing.

BBEDC COMMENTS: BBEDC is neutral on Proposal 85.

PROPOSAL 86 – 5 AAC 67.020.

Bag limits, possession limits, annual limits, and size limits for Bristol Bay.

RECOMMENDATION: SUPPORT

Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries, as follows:

This proposal would require anglers to record their harvest (and catch?) data on a department provided mail-in harvest ticket much like that for big game hunting in Alaska. The cards must be returned to ADF&G at the end of the Chinook salmon season in Bristol Bay.

BBEDC COMMENTS:

BBEDC supports Proposal 86. BBEDC believes that the collection of these data would provide the department with more timely data to manage the fisheries.

PROPOSAL 87 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay area.

RECOMMENDATION: NEUTRAL

Eliminate the use of egg-simulating lures in rainbow trout fishing, as follows:

5 AAC 67.022(d) is amended to read: Only unbaited, single-hook artificial lures excluding plastic, rubber, neoprene, fiber, or any other material that simulates a fish egg or egg cluster may be used year round.

BBEDC COMMENTS: BBEDC is neutral on Proposal 87 and has no comments.

BRISTOL BAY HERRING (4 PROPOSALS; PROPOSALS 88-91)

PROPOSAL 88 – 5 AAC 27.832. Seine specifications and operations for Bristol Bay Area.

RECOMMENDATION: SUPPORT (housekeeping)

Change the regulatory description for herring purse seine and hand purse seine

BBEDC COMMENTS: BBEDC supports Proposal 88. ADF&G Housekeeping proposal. Minor change to regulations to correct an editing error and to conform to industry standards. BBEDC supports this change in regulation.

PROPOSAL 89 – 5 AAC 27.865. Bristol Bay Herring Management Plan.

RECOMMENDATION: SUPPORT

Delete references to sac roe in the Bristol Bay Herring Management Plan.

BBEDC COMMENTS: BBEDC supports Proposal 89. This proposal may provide an incentive to fish for herring for other purposes than sac roe. BBEDC also believes that the elimination of the term sac roe will allow the department flexibility to manage the fishery for other purposes.

PROPOSAL 90 – 5 AAC 27.865. Bristol Bay Herring Management Plan.

RECOMMENDATION: SUPPORT AS AMENDED (new language).

Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets, as follows:

5 AAC 27.865 is amended to read:

(b)(8) After the spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. The department **may** [SHALL] manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet. To maintain those percentages inseason, the commissioner **may** [SHALL] make adjustments to fishing periods and fishing areas by emergency order. After the gillnet and purse seine fleet have harvested at least 50 percent of each gear group's allocation, the commissioner may allow either fleet to harvest its remaining allocation without further restrictions.

BBEDC COMMENTS: BBEDC opposes Proposal 90 as written. Substituting the first “may” for “shall” effectively transfers the responsibility of determining allocation from the BOF to ADF&G. This is not acceptable since all allocation decisions are made by the BOF. ADF&G,

through their management of the resource, follows the BOF's direction. Substituting the second "may" for "shall" is less problematic because this is the role of ADF&G, to follow allocation directions from the BOF.

BBEDC supports Proposal 90 with suggested language. The current regulation was adopted when the price for a ton of herring was much higher than the price paid today. Although the first portion of the regulation sets the allocation, the second portion of the regulation specifically establishes the management of the resource between the user groups for the first 50% of each gear group's allocation. Because the current price per ton is so low, approximately \$50 per ton, the gillnet fleet has dwindled to only a few fishers. With so few gillnetters on the grounds, it is nearly impossible to manage the first 50% of each gear group's harvest so that the harvest percentages are close to the allocation percentages. Therefore, we propose to eliminate the entire second portion of the regulation but retain that portion of the regulation that speaks to the allocation of the resource between the two gear type users. In this way, the purse seine and the gillnet fleet can harvest their portion of the allocation at their own speed, regardless of the number of gillnetters or purse seiners on the grounds.

Suggested Language

5 AAC 27.865 is amended to read:

(b)(8) After the spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. The department shall manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet. [TO MAINTAIN THOSE PERCENTAGES INSEASON, THE COMMISSIONER SHALL MAKE ADJUSTMENTS TO FISHING PERIODS AND FISHING AREAS BY EMERGENCY ORDER. AFTER THE GILLNET AND PURSE SEINE FLEET HAVE HARVESTED AT LEAST 50 PERCENT OF EACH GEAR GROUP'S ALLOCATION, THE COMMISSIONER MAY ALLOW EITHER FLEET TO HARVEST ITS REMAINING ALLOCATION WITHOUT FURTHER RESTRICTDIONS]

The suggested language does not alter the allocation between the user groups. It eliminates the unnecessary management direction to maintain those allocation percentages inseason for the harvest of the first 50% of each gear group's allocation.

December 2, 2015

Mr. Chair and Board Members, Thank you for this time to speak.

My name is Diane Wetter and I am a life long commercial set fisher on Ekuk beach.

I am against proposal #63

My family has a site on the spit that runs perpendicular to Clark's Point beach. Our site has the same lack of water issues as the Clark's Point beach. We were not consulted or included on this proposal. This proposal will adversely affect me in following ways:

1. We would be excluded from future participation of the 250 ft. extension for our lease and Robert Heavener's lease would literally box in Cristine Heavener's lease and could also possibly intersect with Robert Heavener's lease.
2. Referencing a photo submitted earlier, there is a slough that curls around near Clark's Point beach. Our site fishes a back eddy and in my opinion extending their sites 250 ft on Clark's Point would now cause fish that were traditionally caught on my site to be intercepted.
3. If passed, this proposal would now give an extra advantage to 6 sites and disadvantaging or taking away from 4 (there are two sites at the spit).

I believe a proposal that picks and chooses from a small concentration of participants that are on an equal playing field now and selectively giving an advantage while creating a disadvantage is wrong.

Please vote no on proposal 63.

Proposal #42 & #43 I oppose

Nushagak is a large district. We need district registrations. As a set gillnetter, I believe this will benefit those with skiffs and would cause an issue with enforcement ultimately benefiting rule breakers.

Proposals 45 through 53 I oppose.

I believe that they will hinder local participation.

Proposals 61-62 I oppose.

I don't believe these proposals put forth a valid reason to increase the distance and the space between gear types; these proposals would take away fishing space from drifters.

I thank you for taking the time to participate on the board hope you consider the history of past agreements and negotiations between set and drift fishers. Ultimately, I urge you to always put local participation at the forefront in your decision-making.

Thank you.



State of Alaska

User Guide Support Recorders Office ASGDC Visiting Alaska SDMI

Natural Resources > IRM GPU > Alaska Mapper > Map Selection > Land Estate Map (public)

Switch to Lite Mapper

Logout (Logged in as: public)

Tools Layers Legend

Base Map

OpenStreetMap

Map Functions

Navigation Tools

Query by Feature (none)

Feature Modify / Other

Run Query

Partial

Map Info

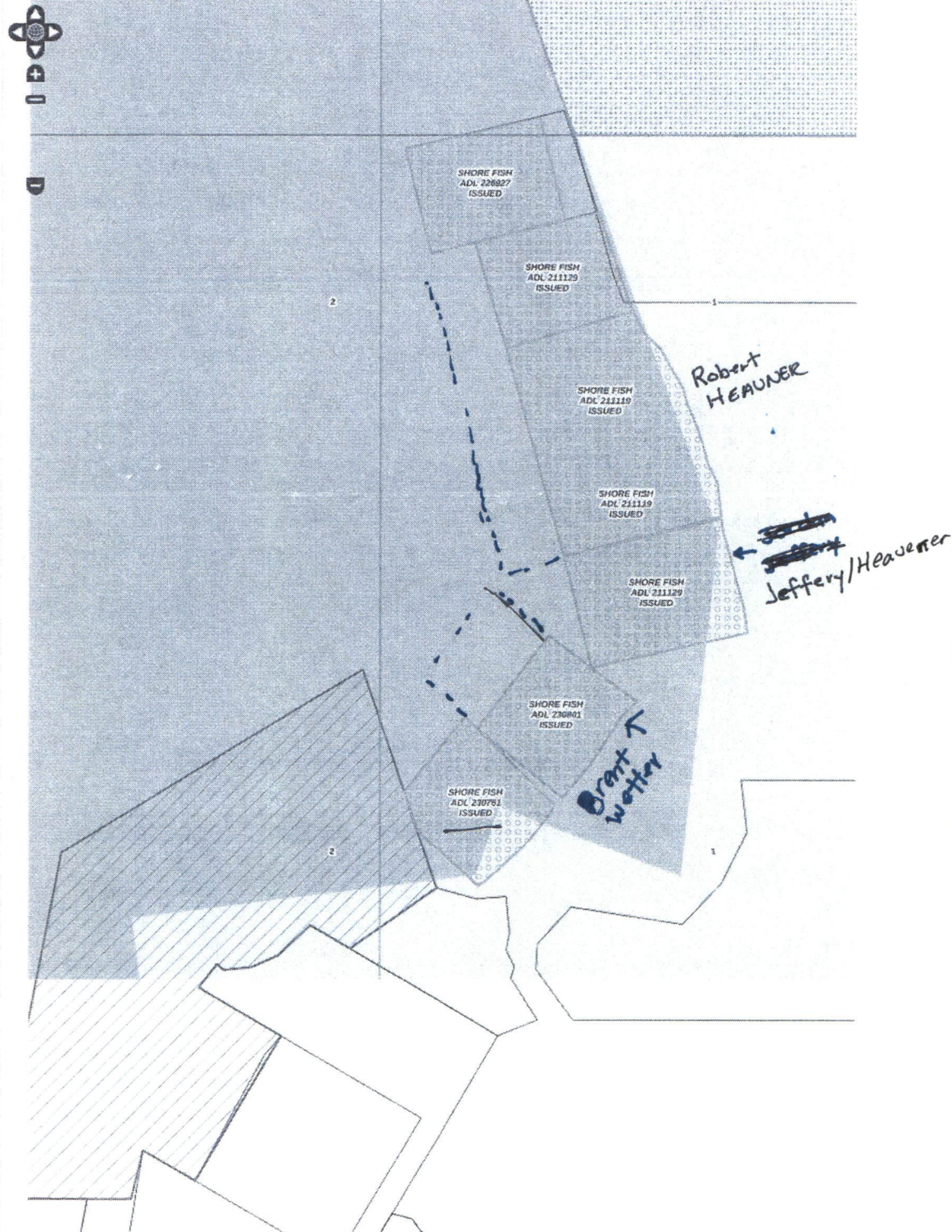
Mouse position (DD):

Lat: 58.82245N

Long: 156.54587W

Map Center Township

TWP Links (S016S056W)





↑ CLARK'S BEACH



RC 024

Alaska Board of Fisheries
In regards to Proposal 63
December 2, 2015

Barbara Nunn
Dillingham, AK
Clarks Point/Igushik Setnet Fisherman/Permit Holder

Chairman Kluberton and Members of the Board:

I am a Dillingham resident and Bristol Bay setnet fisherman and permit holder. I currently fish at Clarks Point and am in **Support of Proposal 63**. My site is one that would be affected by this proposal if it were to pass. The mudflats over the years have changed and on the smaller tides there isn't enough water to fish. By extending the limit out to 750 ft this would allow for myself and others in this area to have enough fishing time for a productive setnet season.

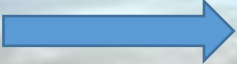
Alannah
Hurley

Proposal #63

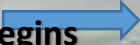
Extension of Clark's Point Bluff
Mudflat Set Net
Seaward Distance from 500ft. To
750 ft.



Combine Flats 1000ft.Limit

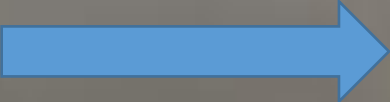


Clark's Point Dock 500ft. Limit Begins



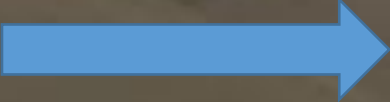
Clark's Point

Proposal Extension Area



Clark's Point Bluff Mudflat 500ft. Limit

Ekuk



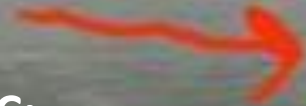
Ekuk Beach 500ft.

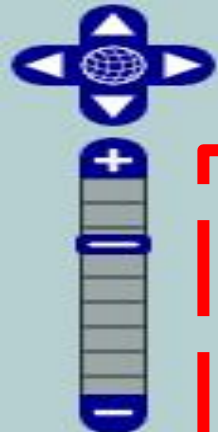
Photo A: Taken at ½ tide on the incoming (coming in from a -2 low tide to a 18 foot high tide)



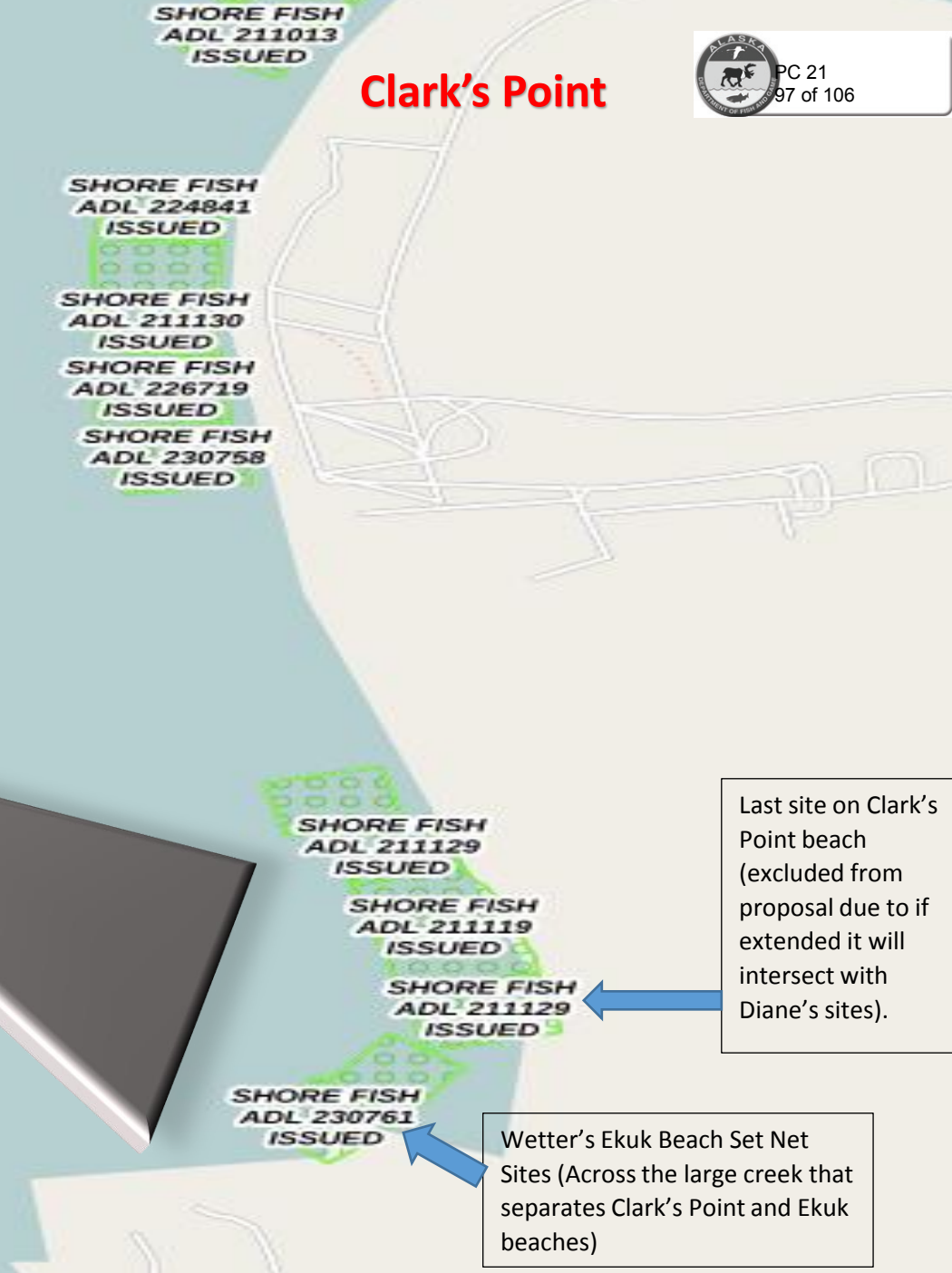
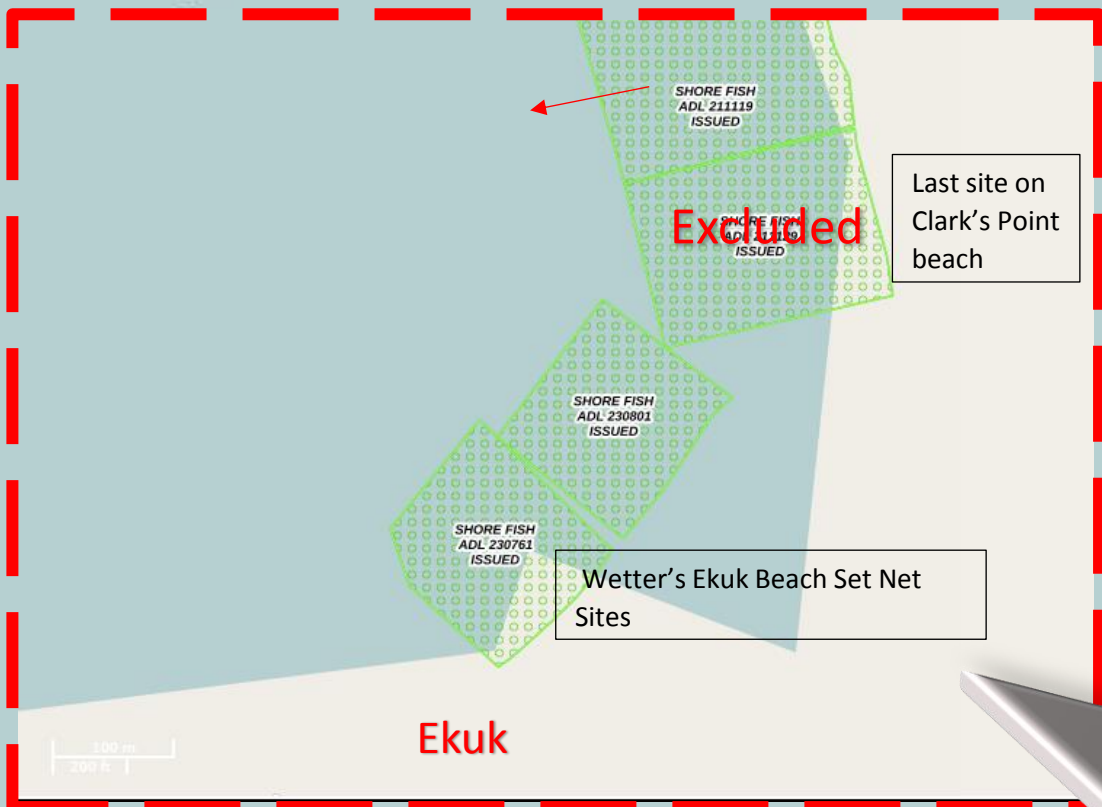
Photo C:

**Buoy at 500 ft. limit
at a 0 outgoing tide
in the middle of
Clark's Point Bluff
Mudflat.**





Clark's Point



Last site on
Clark's Point
beach

Excluded

Wetter's Ekuk Beach Set Net
Sites

Ekuk

Last site on Clark's
Point beach
(excluded from
proposal due to if
extended it will
intersect with
Diane's sites).

Wetter's Ekuk Beach Set Net
Sites (Across the large creek that
separates Clark's Point and Ekuk
beaches)

★ Ekuk Spit 2 Sites

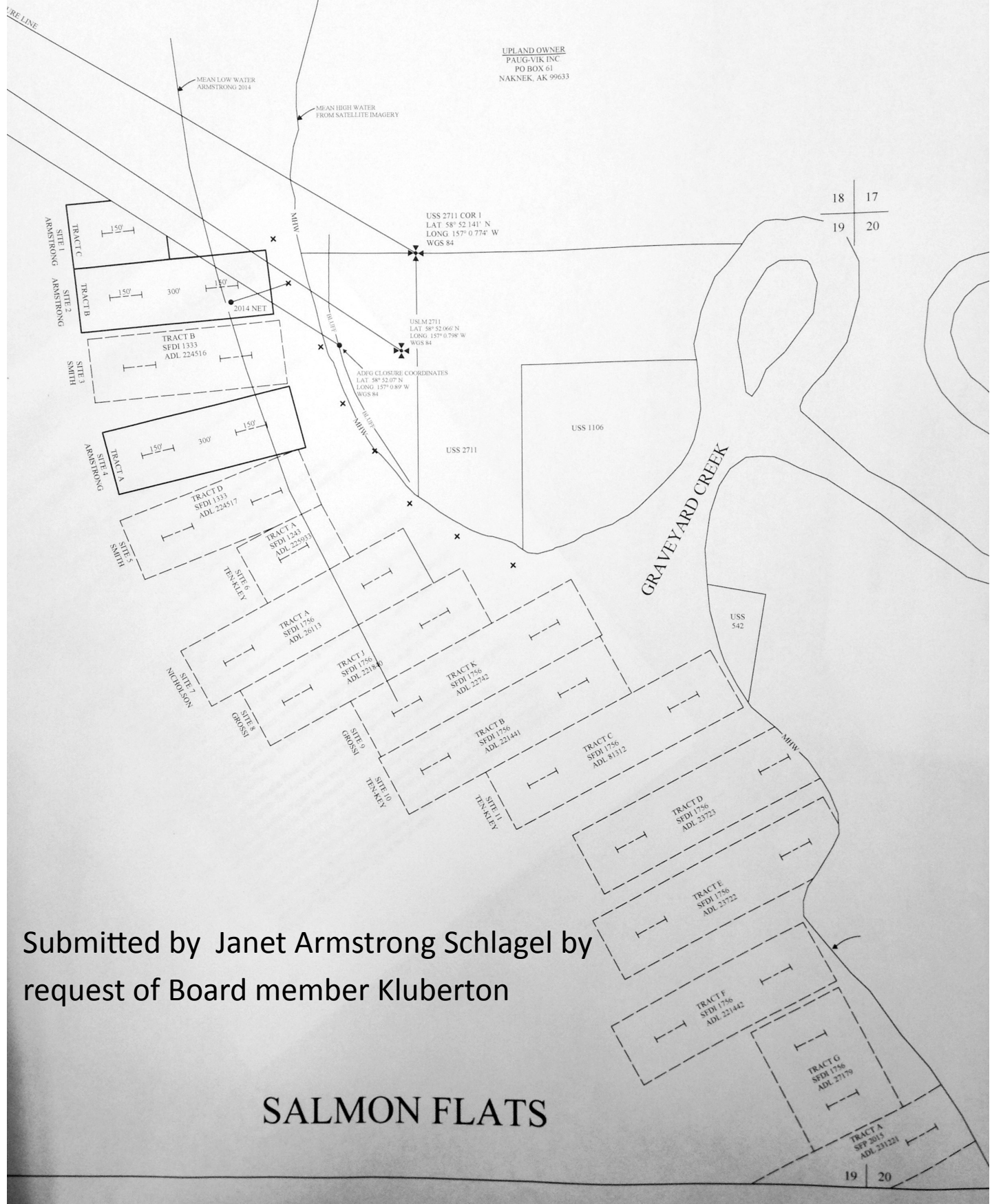
Ekuk

2nd to Last Clark's Point Site
(southern extension
border)

Ekuk Spit 2 Sites



RC 125



Submitted by Janet Armstrong Schlagel by
request of Board member Kluberton

SALMON FLATS

Submitted by the Alaska Department of Fish and Game at the request of Board Chairman Kluberton

December 5, 2015



To: Committee on Coastal Erosion Impacts on Set Gillnet Operations

From: Jeff Bassett, Karluk Drafting
5000 East 98th Ave
Anchorage, AK 99507
907-717-3355

I have been preparing shore fishery plots for fishermen throughout the state since 2003 and I have become familiar with the current erosion/boundary line situation at Graveyard Point. I am pleased to hear that the Board of Fish is addressing the issue of erosion and the ever-changing dynamics of the setnet fisheries throughout the state.

There is no doubt that there is rapid erosion occurring on the beaches near Graveyard point. The area is very dynamic and has created great challenges for the fishermen in the area. Setnet fishermen are getting pinched because the fishing area available is decreasing due to erosion changes. The solution to erosion issues is complex and will have to be examined by individual areas with some common goals. Ultimately, consideration should be made so fishermen are able to maintain their fishing areas without increasing the number fishermen along the given section of beach.

In the case of Graveyard Point this can be accomplished by moving the closure line northeast by approximately 550 feet. This would allow for some breathing room for fishermen to the south who are getting pinched off due to erosion; because the same number of permits are currently being fished within a shortened length of beach. Additionally, there seems to be a great deal of uncertainty regarding the history of the closure line because the signs have changed locations in the past due to bank erosion.

I would like to point out that uncertainty exists within other areas of the state, albeit for different reasons, with regard to the location of closure lines and should be included in this discussion. In my experience as a shore fishery lease mapping contractor these are my observations.

In many cases the coordinates listed in the Commercial Fishing Regulations do not match the physical location of the sign marking the closure line or a geographical feature that has been known on the grounds to be the historical point of closure. The coordinates listed in the State of Alaska Commercial Fishing Regulations, from my experience; do not match the known historical line or signs on the fishing grounds. There have been conflicts among fishermen in Prince William Sound, Cook Inlet, Bristol Bay, and Togiak because physical markers/geographical reference points do not match the coordinates listed in the State of Alaska Regulation booklets. Many of the points when plotted ended up hundreds of feet away from the historical line. How the coordinates marking closure lines and by what methods they were determined seems to be unknown in most cases. The points were determined before advancements in technology so naturally they are not accurate by today's standards. This is no fault of ADFG. It's a result of changing times with relation to technology.

It has been ADFG's position at times to use the coordinates listed in the regulations book even when there is a physical sign present marking the closure line which does not match the coordinates listed. This happened in the Main Bay set-net/drift fishery of Prince William Sound. It created a tremendous amount of conflict when suddenly the historical line changed within a setnet fishery. One can imagine the chaos that is created when suddenly a historical line marking a closure boundary is moved. Changing closure lines have far more implications to setnet fleets when compared to the drift or seine fleets. I would like to see ADFG do two things to prevent future conflicts.

1. Update the coordinates in the State of Alaska Regulations to match the signs and known historical closure lines.
2. Make a statewide regulation that closure signs take precedent over coordinates listed in regulation booklets until updates are complete.

Diane Wetter
Commercial Setnetter
PO Box 336
Dillingham, Alaska 99576
ekukalaska@hughes.net
907-843-1432

December 30 2015

Board of Fisheries
Committee on Coastal Erosion
P.O.Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov
fax-(907) 465-6094.

RE:Comments to the Erosion Committee

Members of the Erosion Committee,

I am writing concerning the development of policy addressing erosion and build up.

Careful consideration should be given when making policy to address acts of nature. Policies to address the problems caused by nature should not take away or hinder other participants in the fishery. I believe it is almost impossible to regulate acts of nature.

Thank you for taking time to address this issue.

Sincerely



Diane Wetter

January 5, 2016

To The Alaska Board of Fisheries Committee on Coastal Erosion Impacts on Set Gillnet Operations:

Thank you for listening to my recommendations regarding set net sites that are affected by erosion.

The set gillnet operations at Graveyard Point are affected not just by erosion but by a boundary line issue and my suggestions speak to both of those considerations. I ask the BOF to consider the broader impact and assess all proposals on a case-by-case basis.

I have suggested the following criteria:

- 1) Would the proposed change not adversely impact escapement?
- 2) Would the proposed change not increase the number of sites historically fished legally?
- 3) Would the proposed change not adversely affect those who historically fished this area?
- 4) Is the history of the site such that fairness calls for making the proposed change?
- 5) Is there any evidence to suggest that the historical point of closure has ever been inadvertently shifted in a way that adds to the erosion's adverse impact on the site?

Assessing proposal 59, to change the boundary line at Graveyard Point, under that criteria:

- 1) ADF&G has acknowledged to the Board that changing the boundary line will not adversely impact escapement.
- 2) The boundary change would not increase the number of sites historically fished legally.
- 3) No one who historically fished this area would be adversely affected by the proposed change. Erosion has shortened the length of beach that is fished but there are the same number of permits currently fishing. So, other sites are in jeopardy of becoming illegal as erosion continues.
- 4) The previous Board Chair and other Board Members have, on the record, expressed their opinions that not changing the boundary line to restore our historical sites would be unfair.
- 5) Please refer to Mr. Jeff Bassett's submitted comments.

Sincerely,

Janet Armstrong Schlagel

POB 714
Dillingham, AK 99576
907-842-2570

RC 034

Alaska Dept of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-6094

January 13th, 2016

Re: Committee on Coastal Erosion

Dear Board Members,

I am concerned with some of the starting points drafted by the BOF Committee on Coastal Erosion; specifically 4aiii-"the proposal indicates involvement of others."

- Many sites exist in this state in relative isolation.
- How many people would have to be affected?
- I feel this may be unnecessarily restrictive.

Of particular concern to me are 4aii that requires "the proposal identifies the historical use of the site." And 4vii "the proposal results in a historical fairness."

Currently DNR uses historical use of a site as a tiebreaker when more than one fisherman wants to lease the same site as well as the length of time an applicant has engaged in fishing. After the sites have been leased its use is questionable.

I come from a family with a long history of involvement in Bristol Bay, however I believe the State of Alaska should ensure all laws; regulations and remedies are applied and/or available to all fishermen on an equal basis regardless of historical use. Someone who is or has fished 40 years, 30 years, 20 years, 10 years, 5 years or 1 year should have the same set of rules apply in order to maintain an equal opportunity.

I agree with the other starting points.

Thank you for your consideration,

Kristina Kurtz
P.O. Box 92895
Anchorage, Alaska 99509
(907) 360-0734

Haight, Glenn E (DFG)

From: Alannah Hurley <girlasue@gmail.com>
Sent: Friday, January 08, 2016 4:15 PM
To: Haight, Glenn E (DFG)
Subject: Additional Comments on Committee on Climate Change/Coastal Erosion Proposals
DRAFT Criteria

Afternoon,

Thanks for forwarding my comments Glenn! Quiana to you all for moving so quickly on this and I really look forward to the progress to come on these issues :)

I'm writing to provide further comment on the draft criteria since I've had a little more time to digest it. The only recommendation I have now is in regards to the "Are the adjacent lease sites negatively impacted and to what extent?" I think broadening the language would be helpful to the board and fishermen to look at "impacts" (whether they be positive or negative) to other fishermen and the fishermen affected by the proposal- giving a much better picture and frame for the board to understand and contemplate proposals holistically. My concern with the current language is that it's very limiting to just contemplating potentially negative impacts. While I know the discretion to decide whether or not claims of negative impacts is going to be left up to the board I think it's safe to assume someone is always going to be able to claim they're going to be negatively impacted by a change in regulation so it's probably not the most effective question to ask. Using broader language to look at what all of the impacts are (positive and negative) frames the criteria to look at the bigger picture and more towards progress and solutions to problems fishermen are facing. While I realize this may be considered semantics to some, I really think the way you ask a question is very important- especially when considering looking at impacts overall of these types of proposals.

Thanks again and look forward to the report/discussion at the upcoming AYK meeting.

Have a great weekend,

Alannah Hurley
(907) 843-1633

January 15, 2016.

Note: **bold underline language is new suggested language.** [BRACKETED, CAPITALIZED, AND UNDERLINED LANGUAGE IS DELETED]

a. **Criteria for Board consideration of proposals that seeks relief from coastal erosion, deposition, or land accretion of set net sites.** [THE PROPOSAL] –

i. *is related to coastal erosion*

COMMENT: Although deposition and land accretion is related to coastal erosion, BBEDC believes that these changes to the set net site should be specifically included in this set of criteria. This criterion should also be modified to include "...land that accretes through natural or artificial causes contiguous to the leasehold...". BBEDC also believes that any changes to the set net site through artificial causes should be scrutinized as to the cause of the artificial change and the intent of the perpetrator.

ii. [IDENTIFIEDS THE] **contains a description of the** historical use of the site.

[iii. INDICATES INVOLVEMENT OF OTHERS]

COMMENT: BBEDC believes that even if there is no impact to surrounding fishers or others, there could be a problem with erosion or deposition that affects only one site. That leaseholder should be able to seek relief under these criteria. However, the proposer should articulate how he/she will benefit from the adoption of the proposal and whom it would negatively affect.

This criterion is ambiguous. We really don't know what this means.

iv. *would not impact escapement.*

COMMENT: BBEDC believes that this is not needed. Escapement is the primary management objective and whether or not a set net site is fished, legally or illegally, does not affect the primary management objective. ADF&G will manage for escapement no matter what relief is or is not granted by the Board.

v. *will not increase the number of **historic legal set net** sites **in the immediate area*** [LEGALLY FISHED].

vi. *will not adversely affect those who have historically fished this area.*

COMMENT: BBEDC believes that this criterion would eliminate nearly all the proposals that seek relief because the requested relief will no doubt have some impact on either neighboring set net fishers or drift fishers. We suggest that the Board, under this criterion, considers the degree or the severity that the requested relief affects others who have historically fished in the area.

vii. *results in a historical fairness.*

BBEDC believes that this is the ultimate goal of the criteria but not a criterion in itself. This probably belongs in a preamble to the criterion or included in a purpose statement. Alternatively, the Board may want to consider historical harvests as a method to get to the "fairness" issue.