

**PROPOSAL 107 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.**

Close the Yukon River summer chum salmon commercial fishery to protect king salmon, as follows:

5 AAC 05.362 is amended to read:

**No commercial openings on summer chum run in Yukon River as a means of protecting king run.**

**What is the issue you would like the board to address and why?** At issue here the Tanana Rampart Manley Fish and Game Advisory Committee felt that while they support reasonable and sustainable commercial harvests they felt that management was unable to say no to the extreme pressures by commercial interests to have summer chum commercial openings and protect king salmon at the same time. Corruption of the pulse protection principle to not protect the last main

pulses of king salmon in order to allow commercial chum fishing sooner is an example. Members also pointed out regulations passed (fish wheel live box use) and management bowing to pressure to consider things such as drift seining and Board of Fisheries passing of beach seining and live box fishing for summer chum while releasing kings caught in same gear.

Basically members felt that until time can be found to deal properly with these issues the best move would be to stop all commercial summer chum fishing.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee

(EF-C15-023)

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**PROPOSAL 108 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.**

Reduce management triggers in the Yukon River Summer Chum Salmon Management Plan based on the run size of summer chum salmon, as follows:

We suggest that:

1. Subsistence fisheries should be managed below the low end of the BEG range, 600,000 salmon, so that no less than 400,000 salmon are allowed to spawn;
2. The commercial exploitation rate shall be 50% of the commercially available harvestable surplus of runs between 700,000 and 800,000; and
3. The commercial exploitation rate shall be up to 100% of the commercially available harvestable surplus of runs in excess of 800,000.

Suggested changes to the Yukon River Summer Chum Salmon Management Plan follows:

**5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan**

(b) When the projected run size of summer chum salmon is **400,000** [600,000] fish or less, the commissioner shall, by emergency order, close the...

(c) When the projected run size of summer chum salmon is more than **400,000** [600,000] fish, but not more than **600,000** [700,000] fish,

(1) the commissioner shall close, by emergency order, the commercial, sport, and personal use directed summer chum salmon fisheries;

(2) the department shall manage the subsistence directed summer chum salmon fishery to achieve drainage-wide escapement of no less than **400,000** [600,000] summer chum salmon, except that, if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a less restrictive directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict.

(d) When the projected run size of summer chum salmon is more than **600,000** [700,000] fish, but not more than **700,000** [1,000,000] fish,...

(e) Notwithstanding (d) of this section, when the projected run size of chum salmon is more than **700,000** [900,000] fish, but not more than **800,000** [1,000,000] fish, the commissioner may, by emergency order, open a drainagewide commercial fishery to harvest up to 50,000 fish above

the run size of **700,000** [900,000] chum salmon distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.

(f) When the projected run size of summer chum salmon is more than **800,000** [1,000,000] fish, the commissioner may open, by emergency order, a drainagewide commercial fishery with the harvestable surplus distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.

**What is the issue you would like the board to address and why?** The Alaska Department of Fish and Game (ADF&G) recently completed a Biological Escapement Goal (BEG) analysis for Yukon River summer chum salmon. Based on that analysis, ADF&G may establish a BEG range for the entire Yukon River drainage of 600,000 to 1,000,000 salmon. The current Yukon River Summer Chum Salmon Management Plan was based on an implied drainage-wide escapement above Yukon Sonar project of at least 1,000,000 salmon. At that time, this implied escapement goal was based on the fact that half of the summer chum salmon passing the Yukon Sonar project site were destined to the Anvik River and that the established BEG for the Anvik River was point estimate of 500,000. At that time also, ADF&G assumed that productivity for the non-Anvik River stocks within the Yukon River drainage was probably similar to the Anvik River, so escapement to that portion of the drainage above the Yukon Sonar site should be similar.

Therefore, we ask the BOF to critically examine the current summer chum management plan and alter the trigger points in relation to the newly established drainage-wide summer chum salmon BEG, with consideration not to burden the subsistence fishery with Maximum Sustained Yield (MSY) management in years of low runs. Note that the strategy that allows the subsistence fishery to harvest summer chum salmon below the established BEG does not alter the trigger points that are associated with the commercial fishery.

Since there will likely be a new drainage-wide escapement goal for summer chum salmon, the management plan needs to be modified accordingly. We suggest that because Yukon River summer chum salmon have good production at low levels of escapement, subsistence harvests should be allowed to occur when runs are projected to provide for the escapements less than the lower end of the BEG. Note that there hasn't been an escapement below 400,000 salmon in recorded history, but escapements within the 400,000 to 500,000 range have produced well. For example, the estimated escapement of 486,000 salmon in 2000 produced an estimated 750,000 salmon, while the estimated escapement of 423,000 salmon in 2001, the lowest escapement recorded, produced a record 5.1M salmon, with an associated return per spawner (R/S) of 11.8, which is the also the highest on record. The only other escapement near the 600,000 lower end of the BEG range occurred in 1990 with an escapement of 622,000 salmon that produced the third highest return on record at 3.2M salmon, with a R/S of 4.9, which ranks second.

BEG-based management, on the average, is expected to produce MSY 90% of the time. We believe that when low runs occur (<600,000 salmon), management of the subsistence fishery to the attainment of escapements within the BEG is not in the best interest of the state. We believe that closing subsistence fisheries when runs are projected to be between 400,000 and 600,000 manages the stock for an expected MSY 4 or 5 years in the future on the backs of the subsistence fishers, which is unnecessary. The people of the Yukon River, particularly the people of the Lower Yukon Area, are extremely dependent on the summer chum salmon to sustain them

through the winter. It is, and always has been, the major and most important salmon species to for food. In our opinion, denying people the food they need because of MSY management is totally and absolutely wrong. Summer chum salmon subsistence fisheries of the Lower Yukon Area are necessary for the people's food security. The state should not be managing for future MSY when runs are below the low end of the BEG. I also note that in 2000 and 2001, ADF&G was reluctant to close the subsistence fisheries even though it was obvious inseason that the escapement target in the summer chum salmon management plan was not going to be achieved.

Strictly speaking, with an assumed subsistence harvest of 100,000 summer chum salmon, and in consideration of the established BEG, commercial fishing should be able to harvest the surplus over a run projected in excess of 700,000 salmon. However, we realize that the subsistence fishery may take more summer chum salmon because of the reduced king salmon subsistence harvest and that projections may not always be accurate. Therefore, we suggest that, similar to the present summer chum management plan, an exploitation rate of 50% be applied to the run between 700,000 and 800,000 salmon, with the possibility of full commercial exploitation on the commercially-available surplus for runs projected in excess of 800,000 salmon. This management strategy allows a commercial harvest to occur when runs are a full 200,000 fish less than the current management trigger point of 900,000 salmon. This change in the management plan will allow some income for commercial fishers when runs are lower than the current management plan triggers and will also foster maintaining commercial markets for the unique chum salmon of the Yukon River. Of course, we realize and expect that escapements should and will fall within the BEG, commensurate with run size. However, we also believe that ADF&G should do everything in their power to eliminate escapements in excess of 1.8M salmon. No escapements over 1.8M salmon have replaced themselves and usually have detrimental repercussions on the productivity of the stock.

Two other considerations should be discussed by the BOF regarding the summer chum salmon management plan: 1. Summer chum salmon subsistence harvests will probably fall below the assumed 100,000 salmon when more kings are taken for subsistence in the future, thereby eliminating that need for a buffer; and 2. The inability of the commercial fishery to efficiently harvest the commercial surplus available when king conservation strategies are in place, provides an additional buffer to escapement and subsistence needs. For example, in 2013 an estimated 1,487,000 summer chum salmon were available for harvest in Districts 1 and 2 of the Yukon Area. Actual commercial harvest was only 379,000 salmon, or about 25% of the allocation

**PROPOSED BY:** Kwik'pak Fisheries (EF-C15-123)  
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**PROPOSAL 109 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.**  
Modify Yukon River Summer Chum Salmon Management Plan triggers, as follows:

5 AAC 05.362(a)–(f) are amended as follows:

(a) The objective of this management plan is to provide the department with guidelines to manage for the sustained yield of Yukon River summer chum salmon. The department shall use the best available data, including preseason run projections, test fishing indices, age and sex composition, subsistence and commercial harvest reports, and passage estimates from

escapement monitoring projects to assess the run size for the purpose of implementing this plan. **Management of the summer chum salmon fisheries may be affected during times of king salmon conservation.**

(b) When the projected run size of summer chum salmon is 600,000 fish or less, [THE COMMISSIONER SHALL, BY EMERGENCY ORDER CLOSE THE]

(1) **the commissioner shall close, by emergency order, the** commercial, sport, and personal use directed summer chum salmon fisheries;

(2) **the department may restrict or close the** subsistence summer chum salmon fisheries, except that, if indicators show an individual escapement goal in a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict.

(c) When the projected run size of summer chum salmon is more than 600,000 fish, but not more than **750,000** [700,000] fish,

(1) the commissioner shall close, by emergency order, the commercial, sport, and personal use directed summer chum salmon fisheries;

(2) the department **may restrict** [SHALL MANAGE] the subsistence [DIRECTED] summer chum salmon fishery [TO ACHIEVE DRAINAGEWIDE ESCAPEMENT OF NO LESS THAN 600,000 SUMMER CHUM SALMON], except that, if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a less restrictive directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict;

**(3) if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a summer chum fishery for commercial, sport, or personal use fishing in that district, subdistrict or portion of a district or subdistrict.**

(d) **Repealed** / / [WHEN THE PROJECTED RUN SIZE OF SUMMER CHUM SALMON IS MORE THAN 700,000 FISH, BUT NOT MORE THAN 1,000,000 FISH,

(1) THE COMMISSIONER MAY OPEN, BY EMERGENCY ORDER, A SUBSISTENCE FISHERY WITH FISHING SEASONS AND PERIODS AS SPECIFIED IN 5 AAC 05.360(d);

(2) AND IF INDICATORS SHOW THAT INDIVIDUAL ESCAPEMENT GOALS WITHIN A DISTRICT, SUBDISTRICT, OR PORTION OF A DISTRICT OR SUBDISTRICT WILL BE MET, THE COMMISSIONER MAY OPEN, BY EMERGENCY ORDER, A SUMMER CHUM FISHERY FOR COMMERCIAL, SPORT, OR PERSONAL USE FISHING IN THAT DISTRICT, SUBDISTRICT OR PORTION OF A DISTRICT OR SUBDISTRICT].

(e) **Repealed** / / [NOTWITHSTANDING (d) OF THIS SECTION, WHEN THE PROJECTED RUN SIZE OF CHUM SALMON IS MORE THAN 900,000 FISH, BUT NOT MORE THAN 1,000,000 FISH, THE COMMISSIONER MAY, BY EMERGENCY ORDER, OPEN A DRAINAGEWIDE COMMERCIAL FISHERY TO HARVEST UP TO 50,000 FISH ABOVE THE RUN SIZE OF 900,000 CHUM SALMON DISTRIBUTED BY DISTRICT OR SUBDISTRICT IN PROPORTION TO THE GUIDELINE HARVEST LEVELS ESTABLISHED IN (g) OF THIS SECTION].

(f) When the projected run size of summer chum salmon is more than **750,000** [1,000,000] fish, the commissioner may open, by emergency order, a drainagewide commercial fishery

**managed to achieve escapements within the established drainagewide escapement goal range of 600,000 – 1,000,000 summer chum salmon. The targeted harvest of the surplus will be [WITH THE HARVESTABLE SURPLUS] distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.**

**What is the issue you would like the board to address and why?** The Yukon River summer chum salmon management plan originated in 1990 with abundance and escapement triggers based upon historical estimates of abundance and potential escapement needs. The department is developing a Yukon River drainagewide escapement goal of 600,000 – 1,000,000 summer chum salmon. Therefore, some modifications of the summer chum salmon plan are appropriate at this time. The summer chum salmon escapement goal is based on a stock-recruit analysis aimed at maximizing sustainable yield in the fishery. However, escapements as low as 400,000 summer chum salmon have yielded a sustainable population. The amount necessary for subsistence (ANS) for summer chum salmon on the Yukon River is 83,500 – 142,192 fish. Recent subsistence harvests from 2010–2014 have ranged from 88,000 – 127,000 summer chum salmon. Given that escapements as low as 400,000 have yielded a sustainable population, there could be some flexibility for allowing subsistence opportunity at a run size at below 600,000. There is increasing demand for summer chum salmon to supplement declining king salmon subsistence harvests on the Yukon River. This proposal seeks to provide the department flexibility to provide a subsistence harvest when the summer chum salmon run size is at or near 600,000 fish. Other uses, primarily the commercial fishery, would be allowed commensurate with the new escapement goal and providing for the subsistence priority.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-028)  
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**PROPOSAL 110 – 5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan.** Increase the commercial fishery threshold trigger in the Yukon River Drainage Fall Chum Salmon Management Plan, as follows:

**5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan (3)(C)(5) is amended to read:**

(5) when the projected run size is more than **600,000** [500,000] chum salmon, the commissioner may, by emergency order, open and close, commercial fisheries drainage-wide and manage the fisheries to achieve escapements within the established drainage-wide escapement goal range of 300,000 - 600,000 chum salmon; the targeted harvest of the surplus will be distributed by district or subdistrict proportional to the guideline harvest range established in 5 AAC 05.365; the department shall distribute the harvest levels below the low end of the guideline harvest range by district or subdistrict proportional to the midpoint of the guideline harvest range;

**What is the issue you would like the board to address and why?** When projected run estimates for Yukon River fall chum salmon are 600,000 or less, second pulse protection of fall chum would be put in place with no commercial fishing allowed in Districts Y1 through Y5 so

that sufficient fall chum salmon will move upriver to meet subsistence needs and escapement goals.

Fall chum is the only salmon available to the upper Yukon River communities since Chinook salmon declines and closure of all directed Chinook harvest projected for the foreseeable future. Fall chum salmon is now needed to provide food for Yukon River communities more than ever before. Protections are needed to ensure commercial harvest of fall chum in the lower Yukon River does not prevent subsistence families from meeting their harvest needs in the upper river. This proposal is to increase the threshold at which the fall chum salmon commercial fishery can open from projected run size of 500,000 chum salmon to 600,000 chum salmon.

**What would happen if nothing is changed?** The current fall chum salmon commercial fishery threshold trigger of 500,000 is the lowest it has ever been in regulation. While currently the fall chum returns have been strong, this may not continue to be the case in the future and regulations take a long time to go into effect to be responsive and thus require proactive conservation management. If the regulation is not changed the uncertainty of projected run size could cause circumstances again in the future where a commercial fishery is prosecuted and runs do not return as expected, causing escapement goals to not be met and also place all the burden of limiting harvest on subsistence communities in the upper river (as well as commercial and sport fisheries in District 5) in order to meet escapement goals. Fall chum salmon is relied on more heavily now by subsistence communities in times of low Chinook returns and any restriction to subsistence fall chum salmon harvest caused by overharvest in the commercial fisheries causes great hardship to subsistence communities in the upper Yukon River that have no other salmon options.

This commercial fishery threshold increase will help build in protection for uncertain run size projections so that more fall chum can move upriver where they are necessary to meet increasing subsistence needs in the upper river prior to any accidental overharvest in the lower river by missed projections and still will allow for the commercial opportunity for the lower river. Increasing the projected run size commercial fishing threshold trigger will be a tool for managers to assure escapement goals are achieved and subsistence needs are met in the upper river Yukon River districts prior to removal of fall chum salmon from the system before fully knowing the run strength. The example is that if fall chum salmon don't actually return in the numbers that were projected, but a commercial fishery is already prosecuted in the lower Yukon districts then subsistence fishing in district Y5 has to be restricted in order to meet escapement goals.

**PROPOSED BY:** Eastern Interior Alaska Subsistence Regional Advisory Council  
(EF-C15-125)

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**PROPOSAL 111 – 5 AAC 05.360. Yukon River King Salmon Management Plan.** Eliminate the use of GHGs in the Yukon River King Salmon Management Plan, as follows:

We recommend the elimination of the GHG in numbers of fish and just use the associated percentages that are already in regulation.

**5 AAC 05.360. Yukon River King Salmon Management Plan**

(b) The department shall manage commercial fishing as follows:

(2) the department shall manage the Yukon River commercial king salmon fishery [FOR A GUIDELINE HARVEST RANGE OF 67,350 - 129,150 KING SALMON, DISTRIBUTED AS FOLLOWS:

(A) DISTRICTS 1 AND 2: 60,000 - 120,000 KING SALMON;

(B) DISTRICT 3: 1,800 - 2,200 KING SALMON;

(C) DISTRICT 4: 2,250 - 2,850 KING SALMON;

(D) DISTRICT 5:

(i) SUBDISTRICT 5-B AND 5-C: 2,400 - 2,800 KING SALMON;

(ii) SUBDISTRICT 5-D: 300 - 500 KING SALMON; AND

(E) DISTRICT 6: 600 - 800 KING SALMON ;

(3) WHEN THE PROJECTED KING SLAMON HARVEST RANGE FOR DISTRICT 1 - 6 COMBINED IS BELOW THE LOW END OF THE HARVEST LEVEL FROM ZERO TO 67,350 FISH, THE DEPARTMENT SHALL ALLOCATE] **by allocating** the commercial harvest available by percentage for each district as follows:

(A) Districts 1 and 2: 89.1 percent;

(B) District 3: 2.7 percent;

(C) District 4: 3.3 percent;

(D) Subdistricts 5-B and 5-C: 3.6 percent;

(E) Subdistrict 5-D: 0.4 percent; and

(F) District 6: 0.9 percent.

**What is the issue you would like the board to address and why?** Yukon River commercial king salmon Guideline Harvest Ranges (GHR), in numbers of fish, are meaningless. They should be deleted because they do not represent expected commercial harvest of Yukon king salmon. Originally, they were established so that fishers could have some expectation of the harvest within a district or subdistrict. Commercial harvests of king salmon have not been within the guideline harvest level since 1999. The last directed king salmon commercial fishery occurred in 2007. The state prohibited the sale of incidentally caught king salmon from the directed summer chum salmon fishery in 2009, and from 2010 through 2014. Sale of incidentally caught king salmon caught in the fall season fisheries was prohibited since 2012. Drainage-wide commercial harvests of equal to or more than 67,350 king salmon are highly unlikely for the foreseeable future. Therefore it does not make any sense to have this GHR, expressed in numbers of fish, as an expectation in regulation.

We suggest using the percentages in regulation to distribute any commercially-harvestable surplus by district and or subdistrict.

**PROPOSED BY:** Kwik'pak Fisheries

(EF-C15-124)

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**PROPOSAL 112 – 5 AAC 01.220. Lawful gear and gear specifications.** Allow all gear used in Yukon Area commercial fisheries to be allowed in Yukon Area subsistence fisheries, as follows:

5 AAC 01.220 is amended to read:

**Fishing gear allowed in one section of the Yukon River for a commercial and/or subsistence fishery should be allowed for subsistence in the whole river unless a run sustainability issue is apparent. In the case of run sustainability being an issue, commercial restrictions shall be addressed first.**

Tanana Rampart Manley Fish and Game Advisory Committee supported this unanimously.

**What is the issue you would like the board to address and why?** At issue here is that over the years, commercial fishing interests often get heard best because of more money and manpower to promote itself. This was seen long ago during the creation of unfair limited entry quotas and allowing commercial fishers in areas with the best fishing and biggest quotas to harvest fish with the highly efficient method of drift netting while some areas of very poor fishing are only allowed to setnet for their subsistence needs.

This issue continues today with commercial interests recently obtaining the right to beach seine and drift dipnet for commercial chum salmon in some areas not traditional, yet in our area which had pre-limited entry historical dip net fisheries, dipnet fishing for even subsistence is currently illegal.

Fairness aside, subsistence is supposed to have priority over commercial and we feel this has not been happening.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-024)

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**PROPOSAL 113 – 5 AAC 01.220. Lawful gear and gear specifications; and 5 AAC 05.330. Gear.** Prohibit the use of drift gillnets in the Yukon Area subsistence fishery and in the Yukon Area commercial fishery, as follows:

Suggested language: **There will be no subsistence or commercial drift net fishing allowed on the Yukon River for Chinook salmon**

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supports the similar king salmon part of the Fairbanks AC’s anti-drift net proposal that they plan to be sending in to the board.

**What is the issue you would like the board to address and why?** At issue here we feel (unanimous TRM AC vote) is a non-sustainable, very unfair and extremely difficult to manage otherwise, drift net fishery in the Yukon River.

Our basic premise is that if the king runs ever recover to fishable numbers, a sustainable, fair fishery cannot exist with the current situation of allowing drifting in the areas easiest to catch kings and banning it in many of the hardest to catch king areas as is now the case. Drift net fishing also goes against the elders' principle of not targeting other peoples' fish. We believe that drift netting gives fishers way too much access to those kings going the farthest upriver (mid-river Canadian bound— the kings in most trouble) that would not otherwise be caught as frequently. Drift net use prior to the early 1970's was very minimal compared to today's vastly increased numbers we see during present day limited entry fish openings. There will never be a better, less painful time to remedy the unfairness and overfishing capabilities of the drift net fishery on the Yukon than now, while everyone grapples with how best to bring back and manage the fishery in the future.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-016)  
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**PROPOSAL 114 – 5 AAC 01.230. Subsistence fishing permits.** Require subsistence salmon fishing permits in Yukon Area District 5 and set permit limits for king salmon during times of king salmon conservation, as follows:

The board will need to determine permit stipulations during times of king salmon conservation.  
**5 AAC 01.230. Subsistence fishing permits. (b)**

(1) for the **taking of salmon in District 5** [YUKON RIVER DRAINAGE UPSTREAM FROM THE WESTERNMOST TIP OF GARNET ISLAND TO THE MOUTH OF THE DALL RIVER];

...

**(3) Repealed**

**(f) In District 5, only during times of king salmon conservation, the department may set permit limits for king salmon by household or communities based upon the estimated surplus of king salmon.**

**What is the issue you would like the board to address and why?** Allow opportunity for subsistence king salmon harvest in District 5 during low king salmon runs through use of household or community subsistence fishing permits. In Districts 1–4 and 6, the department may allow 6-inch mesh gillnets to direct harvest at summer chum salmon with some incidental harvest of king salmon during times of king salmon conservation. Fish wheels may also be allowed to harvest summer chum and other species with king salmon required to be released unharmed. In District 5 there are few summer chum salmon available and the majority of king salmon in this district are Canadian bound. While many Yukon River fishermen can harvest summer chum salmon for food, District 5 fishermen may have less opportunity for obtaining fish for subsistence uses. A permit system would allow for a controlled harvest of king salmon in District 5 to allow for a more equitable distribution of king salmon harvest in this portion of the drainage during low runs. A permit system could allow fishermen to fish earlier in the run rather than fishing late in the run when fish quality is not as good and female king salmon may be more prevalent. A community permit might allow more involvement by local fishermen in

determining when they can fish and how to distribute a limited harvest while still meeting escapement needs to Canada. Since subsistence fishing permits are already required in portions of District 5, it might be reasonable to extend this regulation to the remainder of the district. The permit system would provide subsistence salmon harvest reporting for this portion of the river.

**PROPOSED BY:** Gene J. Sandone (EF-C15-121)  
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**PROPOSAL 115 – 5 AAC 01.220. Lawful gear and gear specifications.** Allow for the retention of king salmon less than 25 inches in length in Yukon Area fish wheel subsistence fisheries, as follows:

- Yukon River subsistence fish wheels
- Subsistence fish wheels that qualify for fish friendly operations would be allowed to retain chinook salmon less than 25 inches in length.

**What is the issue you would like the board to address and why?** Retention of king salmon in the Yukon River.

There are age classifications of kings within those returning each year that are not needed for sustained yield. Studies in recent years have shown that over 90% of the four year old returning fish are males. The FAC proposal is for a gear restriction within the definition of fish friendly fish wheels that would allow subsistence fishermen to retain a select size of king salmon.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (HQ-F15-069)  
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**PROPOSAL 116 – 5 AAC 01.220. Lawful gear and gear specifications; and 5 AAC 05.368. Anvik River Chum Salmon Fishery Management Plan.** During times of salmon conservation in the Yukon Area, require fish wheels with live boxes to be manned and require immediate release of the specified salmon, as follows:

Suggested language:

**Fish wheels must be manned at all times when any catch and release of king salmon or other species is required in an executed fishery. There is to be no livebox holding and release of species required to be not kept, river wide.** (Note: This was written as to not interfere with more sound fish wheel release practices being considered at present by management such as live chute releasing of king salmon which does not use any live box holding methods.)

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supported this proposal submission unanimously.

**What is the issue you would like the board to address and why?** TRM AC is concerned about present regulations allowing and further attempts to increase fish wheels as a legal means

of targeting one species (such as chum salmon) while releasing another species (such as king salmon). Many of the methods of holding, release and equipment used are being portrayed as non-harmful ways of dealing with bycatch. TRM members come from an area of high fish wheel use and many are very familiar with the number of studies (mostly U.S. Fish and Wildlife Service in this area) done on fish wheel live box holding and general fish wheel operation and how it affects caught and released fish. We feel these issues have been sufficiently neglected in management and Board of Fish (BOF) actions in the past, despite the literature presented to them and concerns voiced to management, and at Yukon River Drainage Fisheries Association and BOF meetings, that a regulation against it needs to be clearly on the books.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-022)

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**PROPOSAL 117 – 5 AAC 01.220. Lawful gear and gear specifications; 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan; and 5 AAC 05.368. Anvik River Chum Salmon Fishery Management Plan.** Prohibit the use of beach seines in the Yukon Area subsistence salmon fishery and in the Yukon River and Anvik River summer chum salmon commercial fisheries, as follows:

Suggested language:

**There will be no subsistence or commercial beach seine fishing allowed on the Yukon River for Chinook salmon**

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supported this proposal unanimously.

**What is the issue you would like the board to address and why?** The TRM AC feels that beach seines should not be allowed to target certain species (such as chum salmon) and release bycatch (such as king salmon) due to the lack of studies showing insignificant harm and multitude of studies showing significant harm to seined king and/or other species. Many of these studies showing harm are in situations where the migration after seining are extremely shorter than Yukon salmon and holding conditions are less severe.

Currently this condition exist under the guise of being not harmful to king salmon yet providing needed opportunity to commercial fishers of chum salmon. Because of the relentless efforts of some commercial interests to get different types of seining passed by the Board of Fisheries (some have passed) through numerous avenues we feel a regulation specifically banning seining in the Yukon is necessary and should be part of a larger effort to create and secure a healthy future for Yukon king salmon.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-017)

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**PROPOSAL 118 – 5 AAC 01.220. Lawful gear and gear specifications.** Establish specifications for a beach seine used for subsistence fishing in the Yukon Area, as follows:

5 AAC 01.220(f) is amended by adding a new paragraph to read:

**(10) a beach seine may not exceed 150 fathoms in length or 100 meshes in depth with mesh size that does not exceed three and one-half inches stretched measure.**

**What is the issue you would like the board to address and why?** Beach seines are legal gear under current subsistence fishing regulations, though there are no specifications. Therefore, any combination of net length, depth, and mesh size could be operated within the Yukon Area as a beach seine. Under current regulations, a very large or very long beach seine could potentially capture king salmon. Because of king salmon conservation concerns, it is prudent to ensure beach seine gear will not cause king salmon mortality. The beach seine gear specifications proposed here would also align with proposed commercial beach seine specifications.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-016)

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**PROPOSAL 119 – 5 AAC 01.220. Lawful gear and gear specifications.** Require live release of king salmon from subsistence beach seines during times of king salmon conservation in the Yukon Area, as follows:

5 AAC 01.220(n) is amended by adding a new paragraph to read:

**(4) a beach seine may be used, however, all king salmon caught with a beach seine must be released to the water alive.**

**What is the issue you would like the board to address and why?** Beach seines are permitted under current regulations as subsistence gear. In 2014, subsistence fishing in Yukon River Districts 1–2 was restricted to dip nets and beach seines to target summer chum salmon while minimizing the impact to a low king salmon run. During times of king salmon conservation, current regulations require live release of king salmon caught in dip nets but do not specify that king salmon caught in beach seine gear must be released alive to the water. Fishermen could retain any king salmon caught using beach seine gear for subsistence fishing. Requiring live release of king salmon from beach seine gear aligns with regulations for other selective gear types, such as dip nets, and also aligns with commercial beach seine regulations during times of king salmon conservation.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-024)

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**PROPOSAL 120 – 5 AAC 01.210. Fishing seasons and periods.** Allow subsistence fall chum salmon fishing seven days per week in District 5 of the Yukon Area once a fall chum salmon commercial fishery is opened, as follows:

Suggested language:

**In District 5 once a fall chum fishery is determined healthy enough to have commercial openings on it then no subsistence restrictions on days open should be placed on that fishery. It is to be open 7 days a week.**

Tanana Rampart Manley Fish and Game Advisory Committee (TRM) supported this proposal submission unanimously.

**What is the issue you would like the board to address and why?** Fall chum salmon fishing in this area comes late in summer. The weather is cooling and often the rains start making drying of fish difficult if not impossible on many days. Over the years we have tried to point out to management that the current reduced subsistence schedules of 4 days or 5 days a week that we find ourselves in, often do not coincide with days able to put up fish. This is especially true at the beginning of the run where the best quality fish for human consumption are found. For example in the last two years we have documented times where fishers have waited almost an entire open period of fishing only to have the sun come out on the closed days. Fall season is too short and lately, because of the king crisis, it has become too important to lose this opportunity. Admittedly, it is the king crisis that has pushed this issue to the forefront.

Issues of subsistence and commercial opening conflicts have never been a problem in this area but sometimes are a problem for others, so for that reason we ask for this in District 5 only and will let others propose as they choose. Also we are only trying to increase opportunity in situations where it would not be detrimental to any species, so any concerns that the Board of Fisheries or management would have over this proposal, TRM would be happy to adjust the proposal to meet those concerns. TRM has contacted the ADF&G Yukon fall chum manager on this proposal's acceptability and the language reflects those initial and preliminary talks.

TRM would like to thank the present fall manager for being very helpful in this matter, but we would like to see this in regulation so it would be easier to institute each year and future managers would not have to be educated and convinced of the need in order to execute as proposed. It would happen automatically.

**PROPOSED BY:** Tanana Rampart Manley Fish and Game Advisory Committee  
(EF-C15-021)

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**PROPOSAL 121 – 5 AAC 01.220. Lawful gear and gear specifications.** Expand the area of allowable subsistence drift gillnet fishing for chum salmon in Subdistrict 4-A of the Yukon Area, as follows:

5 AAC 01.220(e)(2) is amended to read:

(e) In Districts 4, 5, and 6, salmon may not be taken for subsistence purposes by drift gillnets, except as follows:

...

(2) in Subdistrict 4-A downstream from the mouth of Stink Creek,

**(A) king salmon may be taken by drift gillnets from June 10 through July 14, unless closed by emergency order;**

**(B) from June 10 through August 2, the commissioner may open, by emergency order, fishing periods during which chum salmon may be taken by drift gillnets;**

**What is the issue you would like the board to address and why?** In March 2015, the Alaska Board of Fisheries adopted regulations allowing subsistence drift gillnet fishing, by emergency order, for chum salmon in the upper portion of the Yukon Area Subdistrict 4-A from June 10 through August 2. The intent was to allow subsistence opportunity to target abundant summer chum salmon with drift gillnets during times of king salmon conservation, as there are few set net sites in the area and river conditions can be dangerous for set net fishing during high water events. Fishermen had noted that there was missed opportunity to catch summer chum salmon for subsistence purposes. In 2014, fishermen in the lower portion of Subdistrict 4-A stated that they also experienced difficulty in meeting their subsistence needs for summer chum salmon using set nets. This proposal would extend the drift gillnet opportunity to harvest summer chum salmon for subsistence purposes from the upper portion of Subdistrict 4-A to all of Subdistrict 4-A. It would provide fishery managers emergency order authority to open and close drift gillnet subsistence fishing targeting summer chum salmon during times of king salmon conservation in all of Subdistrict 4-A, not just in the upper portion of the subdistrict.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-017)  
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**PROPOSAL 122 – 5 AAC 05.331. Gillnet specifications and operations.** Modify Yukon Area commercial set gillnet length specification to an aggregate length standard, as follows:

5 AAC 05.331(a) is amended to read:

- (a) A [NO] person may **not** operate
  - (1)** set gillnet gear that exceeds 150 fathoms in **aggregate** length;
  - (2)** [NO PERSON MAY OPERATE] drift gillnet gear that exceeds 50 fathoms in length.

**What is the issue you would like the board to address and why?** Set gillnet gear is currently permitted with gear specifications on length for subsistence and commercial fishing. Subsistence regulations specify set gillnet gear as an aggregate length to allow for multiple nets to be fished, with the combined total length of nets limited to 150 fathoms. This proposal would provide clarification and align commercial regulations of set gillnet length to subsistence regulations.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-027)  
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**PROPOSAL 123 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.** Further define commercial beach seine specifications for summer chum salmon in the Yukon Area, as follows:

5 AAC 05.362(k)(1)(B) is amended to read:

(1) a permit holder may fish with

...

(B) beach seine gear; **a beach seine may not exceed 150 fathoms in length or 100 meshes in depth** [,] with mesh size that does not exceed **three and one-half** [FOUR] inches stretched measure; and

**What is the issue you would like the board to address and why?** Beach seines are allowable gear under current commercial fishing regulations during times necessary for king salmon conservation. However, there are no specifications on length and depth for beach seines. Currently, any combination of net length and depth could be operated within the Yukon Area as a beach seine. Reducing the mesh size aligns with existing gear used in the fishery and may assist in conserving king salmon. The beach seine gear specifications proposed here would complement the proposed subsistence beach seine specifications.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-025)  
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**PROPOSAL 124 – 5 AAC 05.331. Gillnet specifications and operations.** Allow for six-inch or smaller mesh gillnets in the commercial salmon fishery in Yukon River District 6 by emergency order, as follows:

5 AAC 05.331(d) is amended to read:

(d) In **Districts 4 and 6** [DISTRICT 4], salmon may be taken only with gillnets of six-inch or smaller mesh **during periods established** [AFTER A DATE SPECIFIED] by emergency order.

**What is the issue you would like the board to address and why?** Current regulations allow commercial set gillnets and fish wheels to be operated in Yukon River Districts 4–6. In 2014, gillnets restricted to six-inch or smaller mesh were allowed in Districts 1–2 for the directed harvest of summer chum salmon while reducing incidental king salmon harvest. However, the department does not have authority to specify six-inch or smaller mesh size for commercial set gillnet gear in District 6. Allowing for six-inch or smaller mesh size gillnets in the salmon fishery in Yukon River District 6 by emergency order gives fishery managers the flexibility to open and close set gillnet fishing targeting summer chum salmon in District 6, while minimizing king salmon mortality. It is common management practice to establish gear specifications by periods rather than after a date specified by emergency order.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-026)  
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**PROPOSAL 125 – 5 AAC 05.331. Gillnet specifications and operations.** Establish gillnet gear provisions to allow a directed pink salmon commercial fishery in districts 1–3 of the Yukon Area, as follows:

Establish a directed pink salmon fishery in the Yukon River with the use of gillnets four inches or less and no deeper than 50 mesh. Draft language adds a new section (k) to 5 AAC 05.331

**5 AAC 05.331. Gillnet specifications and operations**

**(k) Notwithstanding the other provisions of this section, in Districts 1 - 3, the commissioner may, by emergency order, close the fishing season and immediately reopen the season during which a person may take salmon only with a gillnet that has a mesh size of four inches or less and that is not more than 50 meshes in depth.**

**What is the issue you would like the board to address and why?** Pink salmon runs are strong and a harvestable surplus is available, particularly in even numbered years. Accordingly, we seek to establish a directed pink salmon fishery within the open waters of the Yukon Area using gillnets of four inch or less mesh size and no greater than 50 meshes deep. We believe that favorable market conditions exist. Although small numbers of pink salmon have been sold in the past, these fish were incidentally caught in the directed summer chum salmon fishery. We now seek to establish a directed fishery for pink salmon in the Yukon River. Although there has not been assessment of the pink salmon stock, we believe that it is relatively strong and there are no concerns with escapement and subsistence, particularly during the large runs in even numbered years.

**PROPOSED BY:** Kwik’pak Fisheries (EF-C15-066)

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**PROPOSAL 126 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.**

Add purse seine gear as an allowable commercial salmon fishing gear to target summer chum salmon in districts 1–3 of the Yukon River during times of king salmon conservation, as follows:

Specifically, we would like the BOF to approve the use of purse seines to harvest the abundant summer chum salmon during times of king salmon conservation 5 AAC 05.362 (k). We also seek that the BOF stipulate that all king salmon caught in a purse seine set must be released immediately and returned to the water unharmed.

**5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan**

Add a new section (C)

(k)

...

(B) beach seine gear, with mesh size that does not exceed four inches stretched measure; [AND]

(C) **purse seine gear, with a mesh size that does not exceed three and one-half inches stretched measure and a total length not more than 150 fathoms; and**

...

(2) all king salmon caught in dip net, [AND] beach seine gear **and purse seine gear** must be released immediately and returned to the water unharmed.

**What is the issue you would like the board to address and why?** A huge commercially available harvestable surplus of summer chum salmon in the Yukon River cannot be harvested with the few gill net opening allowed during the extreme end of the summer chum salmon run (non-selective gear) because of the concern for the very low king salmon runs. Note that the kings and summer chum salmon runs tend to enter the mouth of the river together and migrate upriver concurrently. Previous regulations allowing dipnet and beach seine gear (selective gear) to be used in the Yukon River has allowed only a portion of the huge surplus to be harvested.

Declines in Yukon River king salmon runs have been noted in the Yukon River since 1998. However, the Yukon River king salmon runs have declined to a point that during 2014, ADF&G requested that subsistence fishers reduce their normal king salmon subsistence harvest dramatically and also took action to effectively eliminate the king salmon subsistence harvests within the Alaskan portion of the drainage. During the 2014 season, extremely severe subsistence restrictions were employed throughout the drainage to bolster king salmon escapements and to attempt to meet the agreed upon the minimum escapement of 42,500 king salmon in Canada plus the Canadian share of the TAC. The king salmon subsistence harvest in 2014 was approximately only 4,000 fish in the Alaskan portion of the drainage. The historic average subsistence harvest before the decline in Yukon River king salmon was approximately 45,000 fish.

In contrast, recent Yukon River summer chum salmon runs have been above average in run size. During the past few years, millions of commercially-harvestable summer chum salmon have passed through the Lower Yukon Area with very few being harvested because of the concern for the king salmon escapement. This foregone summer chum salmon harvest has been substantial in recent years, more than 1.0M fish in both 2011 and 2012. Despite new selective commercial fishing gear allowed in the lower Yukon River in 2013 and 2014 by the BOF, which included the use of dipnets, beach seines and shallower and smaller mesh size gillnets (5.5 stretch measure, 30 meshes deep), preliminary estimates indicate that more than 1.8M and 800,000 commercially-available summer chum were passed onto the spawning grounds in 2013 and 2014, respectively. Foregone harvest have translated into a possible loss to the fishermen of over \$22M during the past four years. The actual value of the Yukon Area summer chum salmon harvest was approximately \$6M for the same 4-year period. In contrast, the value of the commercial harvests in the mid-1990s, when king salmon were commercially harvested, was approximately \$15M annually.

The Lower Yukon Area is one of the most impoverished areas in the state of Alaska and the country. Off the road system and located in remote Alaska, fuel can often cost over \$6 a gallon. With little economic opportunity available in the region, fishermen's income has been severely reduced with the closure of the Chinook salmon commercial fishery and we are now struggling against restrictions and conservation concerns to make the commercial summer chum salmon fishery viable. There is an urgent need to find new and innovative ways to commercially harvest the surplus of summer chum salmon in the river while minimizing the impact to king salmon. We believe that the use of purse seines in the Lower Yukon Area would serve that dual purpose.

We believe that the lower Yukon River commercial fishers will benefit because they will be able to harvest more of the available summer chum salmon without any harm to any king salmon caught and released.

We also believe that all Yukon River summer chum salmon subsistence and commercial users will benefit because the summer chum salmon escapements will be reduced below the level that may be detrimental to the stock. Drainage-wide summer chum salmon escapements above 2.0M have reduced productivity and may result in smaller runs.

We foresee no harm to any fishers upriver. This is not an allocative issue.

**PROPOSED BY:** Kwik'pak Fisheries (EF-C15-053)

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**PROPOSAL 127 – 5 AAC 05.200. Fishing districts and subdistricts; and 5 AAC 05.350. Closed waters.** Expand the commercial fishing area of Yukon Area District 1, as follows:

We recommend that the area open to commercial fishing be expanded to include the area between latitudes of Point Romanof and Apoon Pass. Draft regulatory language follows:

**5 AAC 05.200. Fishing districts and subdistricts.** (a) District 1 consists of that portion of the Yukon River drainage from **Point Romanof [ITS TERMINUS AT APOON PASS]** extending **south and** west [AND SOUTH] along the coast of the delta to the terminus of Black River upstream to the northern edge of the mouth of the Anuk River and all waters of the Black River.

**5 AAC 05.350. Closed waters.** Salmon may not be taken in the following waters:

(2) waters farther than one nautical mile seaward from any grassland bank in District 1 from **Point Romanof** [APOON PASS] extending **south and** west [AND SOUTH] to a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical miles south from the mouth of Black River, except that in Acharon Channel of the south mouth of the Yukon River the closed waters are those waters farther than two and one-half nautical miles from a line bearing 285\_ extending from an ADF&G regulatory marker located below Chris Point to the opposite side of the channel;

**(new number) Pastolik River.**

**What is the issue you would like the board to address and why?** We seek the Alaska Board of Fisheries to expand the area open to commercial fishing at the mouth of the Yukon River to include that portion from Apoon Pass to Point Romanof. Opening this area to fishing will alleviate crowding in the traditional set net area near the North Mouth of the Yukon River, caused by changes in the river mouth environment.

Because of a buildup of silted in areas of the coast, set net fishermen have less opportunity than they have had in the past. This has been an ongoing problem due to shifting channels. Extending the area open to commercial fishery will help to alleviate this problem.

In addition, we ask that the Pastolik River be closed to commercial salmon fishing because it is a small stock and the quality of those fish would be poor for commercial sale.

**PROPOSED BY:** Kwik'pak Fisheries (EF-C15-074)  
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**PROPOSAL 128 – 5 AAC 05.200. Fishing districts and subdistricts; and 5 AAC 05.350. Closed waters.** Extend commercial fishing three miles offshore and north to Point Romanof in District 1 of the Yukon Area, as follows:

We recommend that the area open to commercial fishing be expanded to the 3 mile limit around the delta. Draft regulatory language follows:

**5 AAC 05.200(a) Fishing districts and subdistricts is amended to read:**

(a) District 1 consists of that portion of the Yukon River drainage from **the latitude of Point Romanof [ITS TERMINUS AT APOON PASS]** extending **south and** west [AND SOUTH] along the coast of the delta to the terminus of Black River upstream to the northern edge of the mouth of the Anuk River and all waters of the Black River.

5 AAC 05.350. Closed waters is amended to read:

Salmon may not be taken in the following waters:

(1) repealed 4/13/2013;

(2) waters farther than **three** [ONE] nautical mile seaward from any grassland bank in District 1 from Apoon Pass extending west and south to a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical miles south from the mouth of Black River[, EXCEPT THAT IN ACHARON CHANNEL OF THE SOUTH MOUTH OF THE YUKON RIVER THE CLOSED WATERS ARE THOSE WATERS FARTHER THAN TWO AND ONE-HALF NAUTICAL MILES FROM A LINE BEARING 285\_ EXTENDING FROM AN ADF&G REGULATORY MARKER LOCATED BELOW CHRIS POINT TO THE OPPOSITE SIDE OF THE CHANNEL];

(3) all waters south and west of a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical mile south of the mouth of Black River, in a northwestern direction to an ADF&G regulatory marker located **three** [ONE] nautical mile offshore;

**What is the issue you would like the board to address and why?** We seek the Alaska Board of Fisheries to expand the area open to commercial fishing at the mouth of the Yukon River to include all State of Alaska waters, extending three nautical miles seaward, around the delta. Opening this area to fishing will provide better quality salmon for harvest, it will alleviate crowding in the traditional set net area caused by changes in the river mouth environment, and it

will provide state managers options when/if the federal government prohibits commercial fisheries on abundant salmon species.

Please note that Kwik'pak Fisheries is also submitting a proposal to establish a directed commercial pink salmon fishery using four inch mesh gillnets. Because Yukon River pink salmon mature rapidly once they enter into the river, harvesting them in the ocean will ensure much better quality than harvesting in the river.

Secondarily, we would like to be able to harvest chum salmon in the ocean, also for better quality.

Thirdly, because of a buildup of silted in areas of the coast, set net fishermen have less opportunity than they have had in the past. This has been an ongoing problem due to shifting channels. Extending the area open to commercial fishery will help to alleviate this problem.

Other reasons for allowing commercial fishing out to the 3-mile limit surrounding the Yukon Delta are:

- It was the traditional legal boundary in the past;
- It would provide more room for set net fishermen, which has always been a traditional fishery;
- It would allow drift fishermen to fish in less concentrated areas during the compressed gillnet fishery openings; and
- It would provide more opportunity to subsistence fish.

**PROPOSED BY:** Kwik'pak Fisheries

(EF-C15-073)

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