

Hello Board of Fish,

My name is Jordan Larsen and I am the other author of proposal 256. I too, would like to express our support for Proposal 256.

I would like to very clearly state that we do not support the suggested modification that the department has submitted for proposal 256. In their comment they suggest that bait be prohibited on the Togiak from May 1<sup>st</sup> to August 1<sup>st</sup> or September 1<sup>st</sup> depending on location, to conserve King salmon.

Here are the issues with their suggested modification.

- Togiak King salmon are NOT a stock of concern, yet they are suggesting stricter regulations than the Nushagak which IS a stock of concern and still allows the use of ALL bait and allows Adult king retention.
- The Togiak does NOT have a King salmon closure. Anglers can still retain jacks and actively target adults for Catch and Release fishing.
- The whole purpose of us proposing a non “roe “bait fishery, was to promote bait methods that have lower mortality rates on King salmon in the event of by catch while targeting other species.
- Allowing bait to be used only after August 1<sup>st</sup>, in the 12 or so miles below Geciak Creek, and after September 1<sup>st</sup> in remainder of the Togiak Drainage, does not solve the unforeseen effect on our Sockeye, Chum, pink and coho fishery which was why we submitted the ACR in the first place.
- The department opposed proposal 29 last year at the Bristol Bay meeting because it would reduce sportfishing opportunity – Proposal 256 in its original format would increase angling opportunity & provides safety nets for King by catch.

We understand that likely the biggest concern of the board regarding our proposal is that bait could increase by-catch and possible mortality on King salmon. The department has conducted studies regarding mortality on catch and release King salmon fisheries. One of their recent ones being on the Nushagak in 2017 and 2018. Their study concluded that out of 318 adult Kings caught and released, there was only a 6.6 percent chance of mortality. Here is a direct quote from their study “Bait was used about 58% of the time, similar to the rate in 2017, and 81% of hooking locations were in noncritical areas. Fish were generally released with little bleeding (89%) and in good overall condition (80%), similar to rates seen in 2017.” In this study, they were specifically targeting Kings. These aren’t numbers on Kings caught while targeting other species.

We can’t be any more clear, we do not have any intentions to target Togiak Kings with bait. We are trying to get bait back on the table for other species that are abundant. I think that we can all agree, that the mortality rate on Togiak Kings caught in incidental by catch while targeting other species would likely have an even lower mortality rate than the one in the study that I just mentioned.

Thank you,

Jordan Larsen

#### References

Dye, J., & Borden, L. (2022, November). Mortality of Chinook Salmon Caught and Released Using Sport Tackle in the Nushagak River, 2017–2018.  
[https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/bb/Nushagak%20CR%20FDS\\_BOF.Draft.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/bb/Nushagak%20CR%20FDS_BOF.Draft.pdf)