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ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON
COMMERCIAL, SPORT, AND SUBSISTENCE
REGULATORY PROPOSALS
COMMITTEE OF THE WHOLE–GROUPS 1 AND 2

FOR THE BRISTOL BAY MANAGEMENT AREA

ALASKA BOARD OF FISHERIES MEETING
DILLINGHAM, ALASKA

November 28–December 3, 2018

Regional Information Report No. 2A18-01

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) meeting, November 28–December 3, 2018. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Acronyms and Abbreviations

The following acronyms and abbreviations, and others approved for the Système International d'Unités (SI), are used without definition in the following reports by the Divisions of Commercial Fisheries, Sport Fish, and Subsistence: All others, including deviations from definitions listed below, are noted in the text at first mention, as well as in the titles or footnotes of tables, and in figure or figure captions.

Weights and measures (metric)

centimeter	cm
deciliter	dL
gram	g
hectare	ha
kilogram	kg
kilometer	km
liter	L
meter	m
milliliter	mL
millimeter	mm

Weights and measures (English)

cubic feet per second	ft^3/s
foot	ft
gallon	gal
inch	in
mile	mi
nautical mile	nmi
ounce	oz
pound	lb
quart	qt
yard	yd

Time and temperature

day	d
degrees Celsius	°C
degrees Fahrenheit	°F
degrees kelvin	K
hour	h
minute	min
second	s

Physics and chemistry

all atomic symbols	
alternating current	AC
ampere	A
calorie	cal
direct current	DC
hertz	Hz
horsepower	hp
hydrogen ion activity (negative log of)	pH
parts per million	ppm
parts per thousand	ppt, ‰
volts	V
watts	W

General

Alaska Administrative Code	AAC
all commonly accepted abbreviations	e.g., Mr., Mrs., AM, PM, etc.
all commonly accepted professional titles	e.g., Dr., Ph.D., R.N., etc.
at	@
compass directions:	
east	E
north	N
south	S
west	W
copyright	©
corporate suffixes:	
Company	Co.
Corporation	Corp.
Incorporated	Inc.
Limited	Ltd.
District of Columbia	D.C.
et alii (and others)	et al.
et cetera (and so forth)	etc.
exempli gratia (for example)	e.g.
Federal Information Code	FIC
id est (that is)	i.e.
latitude or longitude	lat or long
monetary symbols (U.S.)	$, ¢
months (tables and figures): first three letters	Jan,...,Dec
registered trademark	®
trademark	™
United States (adjective)	U.S.
United States of America (noun)	USA
U.S.C.	United States Code
U.S. state	use two-letter abbreviations (e.g., AK, WA)

Acronyms

Acceptable Biological Catch	ABC
Alaska Board of Fisheries	board
Alaska Department of Fish and Game	department /ADF&G
Amount Necessary for Subsistence	ANS
Alaska Wildlife Troopers	AWT
Biological Escapement Goal	BEG
Central Gulf of Alaska	CGOA
Coded Wire Tag	CWT
Commercial Fisheries Entry Commission	CFEC
Cook Inlet Aquaculture Association	CIAA
Customary and Traditional	C&T
Department of Natural Resources	DNR
Demersal Shelf Rockfish	DSR
Emergency Order	EO
Guideline Harvest Level	GHL
Gulf of Alaska	GOA
Global Positioning System	GPS
Individual Fishing Quota	IFQ
Local Area Management Plan	LAMP
Lower Cook Inlet	LCI
Mean Low Water	MLW
Mean Lower Low Water	MLLW
No Data	ND
National Marine Fisheries Service	NMFS
National Oceanic and Atmospheric Administration	NOAA
Nick Dudiak Fishing Lagoon	NDFL
North Pacific Fishery Management Council	NPFMC
Optimum Escapement Goal	OEG
Pelagic Shelf Rockfish	PSR
Prince William Sound	PWS
Prior Notice of Landing	PNOL
Private Nonprofit Salmon Hatchery	PNP
River Mile	RM
Special Harvest Area	SHA
Sustainable Escapement Goal	SEG
Trail Lakes Hatchery	TLH
Upper Cook Inlet	UCI
Western Gulf of Alaska	WGOA

REGIONAL INFORMATION REPORT 2A18-01

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON COMMERICAL, SPORT, AND SUBSISTENCE REGULATORY PROPOSALS COMMITTEE OF THE WHOLE–GROUPS 1 AND 2 FOR

BRISTOL BAY FINFISH

ALASKA BOARD OF FISHERIES MEETING DILLINGHAM, ALASKA

NOVEMBER 28–DECEMBER 3, 2018

by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Sport Fish, Research and Technical Services
333 Raspberry Road, Anchorage, AK 99518–1565

November 2018

ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on commercial, sport, and subsistence finfish regulatory proposals for the Bristol Bay Management Area. These comments were prepared by the department for use at the Alaska Board of Fisheries (board) meeting, November 28–December 3 in Dillingham, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Key words: Alaska Board of Fisheries (board), Alaska Department of Fish and Game (department), staff comments, Bristol Bay, finfish, management, management plan, regulatory proposals, commercial fisheries, sport, guided sport, subsistence, salmon, rainbow trout, herring.

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Proposal No.	Department Position	Issue
18	**N**	Repeal limits to subsistence fishing periods in the Nushagak District.
19	**N**	Allow subsistence fishing for salmon with dipnets near Dillingham.
20	**N**	Allow the use of drift gillnets not more than 10 fathoms in length for subsistence salmon fishing in the Wood and Nushagak Rivers near Dillingham.
21	**NA**	Allow subsistence fishing with hook and line attached to a rod or pole in Six Mile Lake.
22	**N**	Allow subsistence fishing for salmon in the Egegik District at any time from May 1 through September 30.
47	**N**	Adopt the Southwest Alaska Rainbow Trout Management Plan.
48	**O**	Modify the sport fishing season in the Naknek River drainage.
49	**O/N**	Prohibit retention of rainbow trout by nonresident sport anglers in a portion of the Naknek River drainage.
50	**O/N**	Prohibit guiding on the Naknek River drainage during spring from the marker at Lake Camp downstream to the maker at Rapids Camp.
51	**NA/N**	Establish a limited guide permit system between September 10 and October 20 in a portion of the Naknek River.
52	**O/N**	Limit the number of clients a sport fishing guide or sport fishing guide business may have while targeting rainbow trout in a portion of the Naknek River.
53	**O/N**	Establish guide permits in a section of the Naknek River drainage.
54	**N**	Limit the hours a guided or clients can fish on a section of the Naknek River.
55	**N**	Limit the days a guide or clients can fish on a section of the Naknek River
56	**O**	Prohibit chumming by guides and other commercial users in a portion of the Naknek River drainage.
57	**O**	Prohibit the use of certain sport fishing tackle in a section of the Naknek River drainage.
58	**O**	Close sport fishing for king salmon in a portion of the Naknek River drainage.
59	**O**	Close waters to king salmon fishing in a section of the Naknek River drainage.
60	**O/N**	Create a rod limit for nonresident anglers sport fishing for salmon on a portion of the Naknek River.
61	**O**	Prohibit blocking access to sport fishing locations in the Naknek River.
62	**O**	All sport-caught fish removed from the water in all freshwater drainages of the Bristol Bay Area must be retained.
175	**S**	Align regulations for sport fishing services and sport fishing guide services in fresh and salt waters and update guide registration and reporting regulations.

N = Neutral; S = Support; O = Oppose; NA = No Action, WS = Withdrawn Support

Summary of department positions on regulatory proposals for Bristol Bay Finfish – Dillingham, November 28–December 3, 2018.

Proposal No.	Department Position	Issue
23	**N**	Clarify that the holder of two drift gillnet limited entry permits may operate up to 150 fathoms of drift gillnet gear.
24	**N**	Allow the holder of either two set gillnet or two drift gillnet limited entry permits to operate more gear than the holder of a single limited entry permit.
25	**N**	Allow and individual holding two drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear.
26	**N**	Allow the owner of two drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear from a single vessel.
27	**N**	Allow the owner of two set gillnet limited entry permits in the Naknek-Kvichak, Egegik, and Ugashik districts to operate 100 fathoms of set gillnet gear.
28	**O/N**	Allow commercial fishing for salmon, with set net gear only, within the section of the Kvichak River that borders Levelock Village land
29	**S**	Establish mesh size restrictions for the conservation of king salmon in the Naknek-Kvichak and Ugashik Districts
174	**S**	Clarify fishing areas, districts, sections, and gear specifications and operations for Sockeye Special Harvest Areas in Bristol Bay.
30	**N**	Increase the maximum length for drift gillnet vessels from 32 feet in overall length to 42 feet in overall length.
31	**O/N**	Delay implementation of the 48-hour district transfer notification period until the third Saturday in June.
32	**S**	Extend Duration of the late-season fishing periods in the Naknek-Kvichak, Egegik, and Ugashik Districts.
33	**N**	Allow the use of beach weirs in commercial salmon fishing in Bristol Bay.
34	**N**	Reduce closed waters in the Naknek-Kvichak District.
35	**S**	Reduce closed waters in the Naknek-Kvichak District near Graveyard Creek.
36	**S**	Repeal conditions that must be met prior to allowing commercial fishing for salmon in the *Alagnak River Special Harvest Area.*
37	**O/N**	Manage the Naknek and Kvichak sections independently of each other based on the harvestable surplus within each section and establish section-specific harvest allocation criteria so that 84% of each section's harvest is allocated to the drift gillnet fleet and 16% of the section's harvest is allocated to the set gillnet fleet.
38	**O/N**	Repeal provisions to the *Wood River Special Harvest Area* when the escapement of sockeye salmon into the Wood River exceeds 1,100,000 fish and the escapement is projected to exceed 1,400,000 fish
39	**N**	Open the *Wood River Special Harvest Area* to both set and drift gillnet gear after July 17.
40	**O**	Establish a drawing system for the use of the four furthest downstream set gillnet sites in the *Wood River Special Harvest Area.*
41	**N/O**	Reduce fishing time in the Nushagak District commercial salmon fishery when the Nushagak River sport fishery is restricted for king salmon conservation.

N = Neutral; S = Support; O = Oppose; NA = No Action, WS = Withdrawn Support

Summary of department positions on regulatory proposals for Britol Bay Finfish – Dillingham, November 28–December 3, 2018.

Proposal No.	Department Position	Issue
42	**N/O**	Reduce fishing time in the Nushagak District commercial salmon fishery when the Nushagak River sport fishery is restricted for king salmon conservation.
43	**O**	Establish subdistricts in the Nushagak District.
44	**N**	Allow any remaining unharvested Togiak District herring spawn-on-kelp allocation to be reallocated to the Togiak District sac roe herring fishery.
45	**N**	Allow unharvested Togiak District sac roe gillnet allocation to be reallocated to the Dutch Harbor food and bait herring fishery.
46	**N**	Increase the amount of harvestable surplus Togiak herring allocated to the purse seine fleet from 70 to 88 percent.

N = Neutral; S = Support; O = Oppose; NA = No Action, WS = Withdrawn Support

COMMITTEE OF THE WHOLE–GROUP 1: SUBSISTENCE SALMON, SPORT FISHING (22 PROPOSALS)

Subsistence Salmon (5 Proposals)

PROPOSAL 18 – Repeal limits to subsistence fishing periods in the Nuchagak District

5 AAC 01.310. Fishing Seasons and Periods

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This would repeal language that limits the subsistence salmon fishery to three days per week on the Dillingham beaches between July 2 and July 17.

WHAT ARE THE CURRENT REGULATIONS? Currently, subsistence salmon fishing is allowed continuously in Nushagak Bay watersheds, except in the area commonly referred to as Dillingham beaches, which is restricted to three days per week from July 2 through July 17. According to 5 AAC 01.310(d), the Dillingham beaches area is defined as all waters of the Nushagak District upstream of a line from a point approximately two miles south of Bradford Point at lat 58°58.63′N, long 158°33.62′W to Nushagak Point at lat 58°56.79'N, long 158°29.53′W, to a point at Red Bluff on the west shore of the Wood River at lat 59°09.58′N, long 158°32.36′W, and to Lewis Point on the north shore on the Nushagak River at lat 58°59.46′N, long 158°05.57′W. In this area, from July 2 through July 17, salmon may be taken only from (1) 9:00 a.m. Monday to 9:00 a.m. Tuesday; (2) 9:00 a.m. Wednesday to 9:00 a.m. Thursday; and (3) 9:00 a.m. Saturday to 9:00 a.m. Sunday.

A permit is required. Allowable gear in all waters of Nushagak Bay upstream of a line from a point approximately two miles south of Bradford Point at lat 58°58.63′N, long 158°33.62′W to Snag Point at lat 59°03.18′N, long 158°25.59′W, which includes the Dillingham beaches area, is 10-fathom set gillnets. Outside of the Dillingham beaches area, no set gillnet may be operated within 300 feet of another set gillnet. Each set gillnet must be staked and buoyed, and the fisherman's information inscribed either on the buoy or on a sign at or near the gillnet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Subsistence users in all areas of the Nushagak Bay watersheds, other than the portion of Nushagak Bay open to commercial fishing, would be able to subsistence fish on the same schedule. Subsistence fishing for salmon along the Dillingham beaches would no longer be limited to three 24-hour periods per week between July 2 through July 17.

BACKGROUND: Institutional knowledge and information gathered via informal interviews with local residents by Division of Subsistence staff indicate that the restriction of subsistence fishing to three, 24-hour periods from July 2 through July 17 for the Dillingham beaches was implemented in 1974. This was at the request of local residents to reduce perceived waste during the peak of the salmon run and to limit what some local residents deemed a population influx of many newcomers to the subsistence set gillnet fishery.

Department staff receive numerous calls each year asking what the restriction is and to what locations it applies.

The regulations that refer to allowable net length changed in 2009 and there remains confusion among users because the area where 10 fathoms of gear is allowed is no longer the same area as that which is restricted to three days per week.

Subsistence fishing, especially with the use of a skiff, is tidally dependent in the Dillingham beaches area and can limit user access when suitable tides are in the middle of the night and the middle of the day. Run timing for sockeye salmon varies annually and there are years when the July 2–July 17 dates do not encompass large volumes of salmon. When large volumes of salmon are moving past the Dillingham beaches it is possible for a set gillnet to harvest hundreds of fish in minutes, so the restriction is not necessarily effective.

Subsistence harvests in the Dillingham beaches portion of the Nushagak District since 1997 have ranged from about 17,000 salmon (in 1998 and 2001) to about 27,000 salmon in 2009 (Figure 18-1). The average annual harvest over this 21-year period is 20,541 salmon; the recent 10-year average is 21,618 salmon and the recent 5-year average is 20,526. Most of the harvest is taken by residents of the Bristol Bay Area, primarily Dillingham. Over the last 10 years, the average harvest per permit has been 71 salmon; the recent 5-year average is 72 salmon (Figure 18-2).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The restrictions in place now cause confusion and anxiety without necessarily preventing the possibility for waste. There is no resource conservation reason for maintaining the current fishing schedule.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.
4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, as well as 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

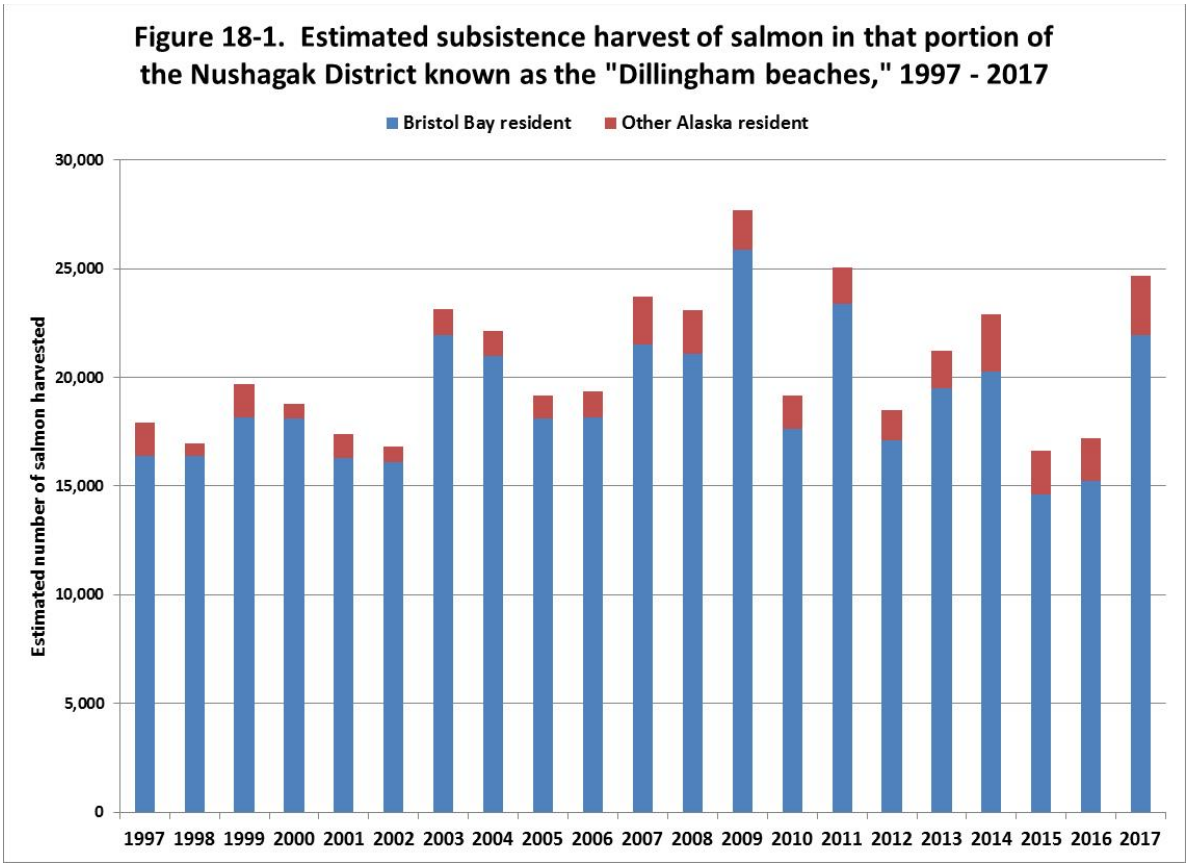


Figure 18-1.–Estimated subsistence harvest of salmon in that portion of the Nushagak District known as the “Dillingham beaches,” 1997-2017.

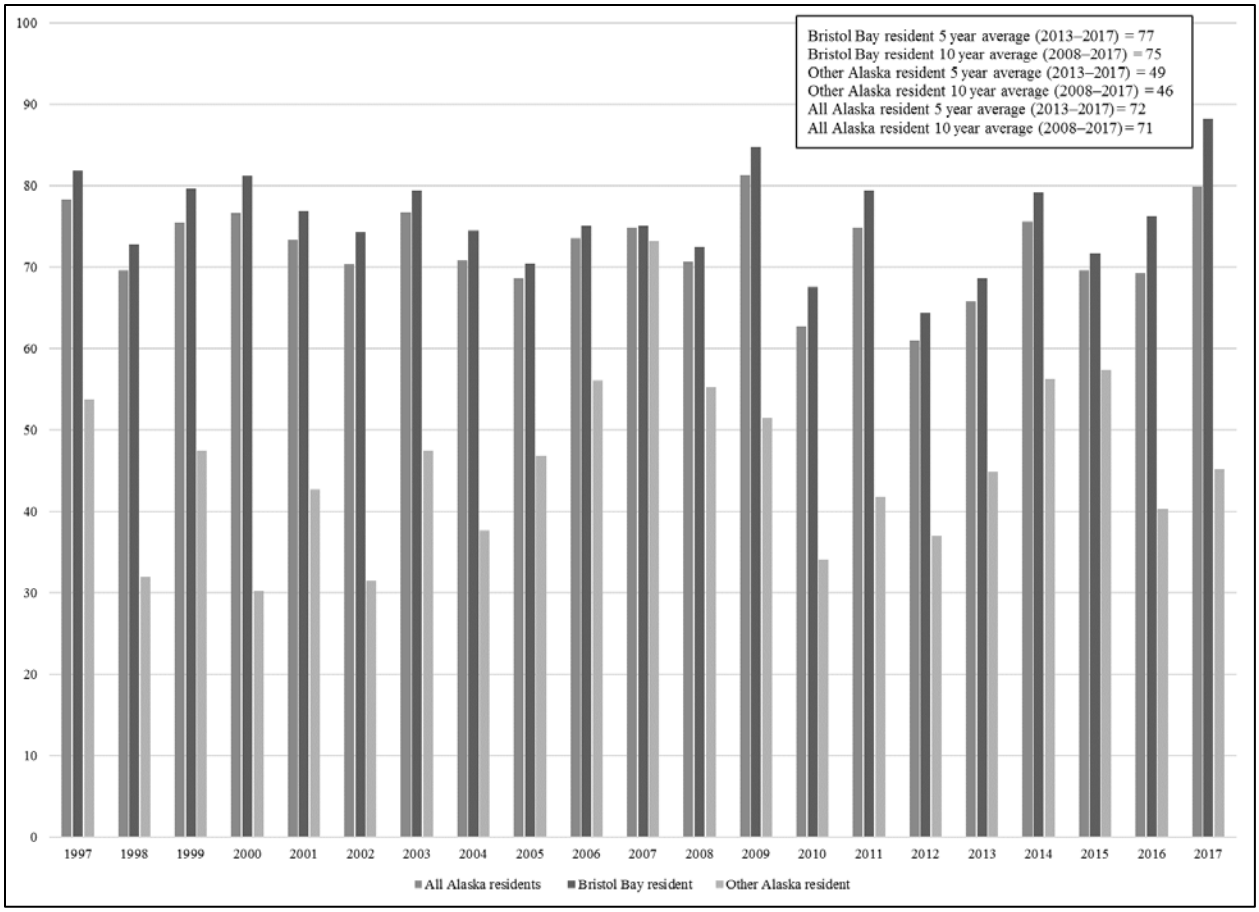


Figure 18-2.–Average harvest per permit, lower Wood River and Nushagak Bay noncommercial subsistence fisheries, Alaska, 1997–2017.

PROPOSAL 19 – Allow subsistence fishing for salmon with dipnets near Dillingham

5 AAC 01.320. Lawful Gear and Gear Specifications

PROPOSED BY: Dan Dunaway

WHAT WOULD THE PROPOSAL DO? This would allow dipnets to be used as subsistence salmon gear in the Dillingham beaches area.

WHAT ARE THE CURRENT REGULATIONS? Subsistence fishing for salmon is allowed with set gillnets and beach seines in the Dillingham beaches area. A permit is required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Subsistence users would be able to moderate their catch in times of high salmon abundance and sort the catch allowing for the release of non-target species.

BACKGROUND: Dip nets are legal subsistence fishing gear in Bristol Bay, however, they may not be used for salmon, herring, and capelin in the Nushagak District. In recent years dip nets have been included as legal subsistence fishing gear for salmon in times of conservation in other areas of the state, which has provided additional subsistence fishing opportunity while allowing for the conservation of certain species. Live release gear types, like dip nets, allow subsistence users to be selective in the number and species of fish they harvest (compared to a gillnet) and allow for the release of non-target species.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Adoption of this proposal would require a minor modification to the current subsistence salmon permit to acknowledge the legal use of dip nets.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.
4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, as well as 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

PROPOSAL 20 – Allow use of drift gillnets not more than 10 fathoms in length for subsistence salmon fishing in the Wood and Nushagak Rivers near Dillingham

5 AAC 01.320. Lawful Gear and Gear Specifications

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This would make 10 fathom drift gillnets a legal gear type for subsistence salmon fishing in the Dillingham beaches area.

WHAT ARE THE CURRENT REGULATIONS? Subsistence fishing for salmon in the Dillingham beaches area is allowed only with set gillnets and beach seines. A permit is required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Allowing subsistence fishing with drift gillnets may increase harvest of king salmon that are not otherwise susceptible to harvest by set gillnet gear. Adoption of drift nets is unlikely to alleviate congestion of subsistence set gillnets in the Dillingham beaches area and may lead to increased user conflicts.

BACKGROUND: The department periodically receives reports of people using drift gillnets to harvest salmon for subsistence purposes; however this activity mostly occurs outside of the Dillingham beaches area. Institutional and local knowledge has informed department staff on the congestion and competition for space on the beaches in Dillingham that are accessed by vehicle. In the areas accessed by skiff, there is little congestion, and large areas of shoreline are available where subsistence set gillnets can be operated. Although king salmon are present in the set gillnet subsistence harvest area, their numbers tend to increase during storm/wind events when they are pushed closer to shore. The subsistence harvest of king salmon has remained stable historically, with the 43-year (1983–2017) average of 12,626 estimated fish, the 10-year (2008–2017) average at 12,384 estimated fish, and with a slight increase in the 5-year (2013–2017) average at estimated 13,237 fish. There may be an increase in king salmon harvested in the subsistence fishery by allowing drift gillnets.

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.
4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, as well as 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

PROPOSAL 21 – Allow subsistence fishing with hook and line attached to rod or pole in Six Mile Lake

5 AAC 01.320. Lawful gear and gear specifications.

PROPOSED BY: Nondalton Tribal Council.

WHAT WOULD THE PROPOSALS DO? This would allow hook and line attached to a rod or pole (rod and reel) to be used under subsistence, in addition to sport, regulations in Six Mile Lake and within ¼ mile of the lake outlet, with the same bag and possession limits as specified in sport fishing regulations.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be harvested under subsistence regulations in Six Mile Lake by gillnet and beach seine. There are no bag, possession, or seasonal limits in the subsistence salmon fishery. A permit is required. Fish, other than salmon, herring, capelin, and halibut, may be taken by gear listed in 5 AAC 01.010(a) unless restricted under the terms of a subsistence fishing permit. Fishing with rod and reel is only allowed under subsistence regulations when fishing through the ice.

Six Mile Lake and tributaries are open to sport fishing (with rod and reel) June 8–April 9, the bag and possession limits are as follows: salmon, other than king salmon, is five fish, only two of which may be coho salmon; from June 8-October 31, one rainbow trout, from November 1-June 7, five rainbow trout, only one of which may be over 20 inches; Arctic char/Dolly Varden, from June 8-October 31, three fish, from November 1-June 7, 10 fish; Arctic grayling, two fish; lake trout, four fish; burbot, 15 fish; northern pike, five fish, only one of which may be 30 inches or longer; only unbaited, single-hook artificial lures may be used year round. In addition, the sockeye salmon bag and possession limits are linked to the *Kvichak River Drainage Sockeye Salmon Management Plan* and can be reduced inseason by emergency order depending on the projected inseason escapement.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? People fishing with rod and reel in the Six Mile Lake area would no longer be required to purchase a fishing license but would have the option to obtain a subsistence permit instead and abide by harvest reporting requirements and a bag and possession limit that are the same as the sport fishing limits. This may not increase subsistence harvest if subsistence users have been using rod and reel under sport fishing regulations to selectively target and harvest different species. Effects to subsistence fishing opportunity and conservation resulting from this proposal would likely be negligible because opportunity to harvest fish for personal use is currently provided under sport fishing regulations.

This would increase complexity of the regulations for salmon, other than king salmon, and rainbow trout as the proposer is asking for sport fish limits as specified in 5 AAC 67.020, but for those species the sport fish limits are specified in 5 AAC 67.022 and for sockeye salmon are linked to the *Kvichak River Drainage Sockeye Salmon Management Plan*. This would only allow rod and reel to be used in Six Mile Lake and a ½ mile downstream of the outlet. This would add complexity to the subsistence regulations because this gear would only be legal in a relatively small portion of the Bristol Bay Area.

BACKGROUND: Nondalton (population 144 in 2017), primarily a Denai'ina Athabascan community, is also the primary community engaged in subsistence fisheries in Six Mile Lake. Ethnographic studies have documented that the Dena'ina of the Iliamna Lake/Lake Clark area traditionally used a variety of gear to harvest salmon and other fish, including traps, setnets, dip nets, seines, and spears.

Sockeye salmon are the predominant species available to Nondalton residents: very few king or coho salmon are available, and no pink or chum salmon are available. The annual average subsistence harvest of sockeye salmon by Nondalton permit holders for the period 2008 to 2017 was 7,215 fish, with a range of 2,320 in 2016 to 10,550 in 2013 (Figure 21-1). Household surveys conducted by the Division of Subsistence for study years 2004, 2007, and 2008 found that most salmon harvests for home use by Nondalton residents were accomplished with set nets or seines; rod and reel accounted for a much smaller portion of the harvest (4.5% in 2004, 2.1% in 2007, and 1.7% in 2008; Figure 21-2).

In 2004, about 39% of Nondalton's harvest of nonsalmon fish (a total of about 5,562 usable pounds) was taken with rod and reel in open water, compared to 37% with hook and line through the ice, 8% with hand lines in open water, and 17% with subsistence nets or seines (Figure 21-3). Rod and reel accounted for notable portions of most nonsalmon fish harvests. Allowing rod and reel would provide Alaska residents with opportunity to harvest salmon for subsistence uses without being required to purchase a sport fishing license, and opportunity to selectively harvest certain species for subsistence purposes.

Fishing with rod and reel is one of few fundamental inherent characteristics of sport fishing and is a defining characteristic identified by the legislature in the statutory definition of "sport fishing". In many areas of the state, rod and reel is the only legal sport fishing gear allowed for finfish. However, the board has authorized rod and reel as a legal subsistence gear in many areas of the state, including this area when fishing through the ice.

The Federal Subsistence Board meets January 29–February 1, 2019, to consider subsistence fishing proposals. Proposal FP19-11 requests to add rod and reel use and Six Mile Lake to the subsistence salmon fishing opportunity that allows federally-qualified users to take salmon without a permit in Lake Clark and its tributaries by handline or rod and reel.

DEPARTMENT COMMENTS: The department recommends the board **TAKE NO ACTION** on this proposal. **The board will be addressing two proposals during this cycle requesting the use of rod and reel for subsistence fishing gear. Since 1997, the board has addressed five proposals requesting the use of rod and reel as legal subsistence gear: three of these proposals have carried, two have failed. There have been inconsistencies in the department's positions on these proposals in addition to the board's deliberation over this time.** The department suggests the board create a committee to discuss the use of rod and reel as sport and subsistence gear with the objective of creating a board finding or similar broad guidance for consideration on these types of proposals.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.
4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, as well as 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

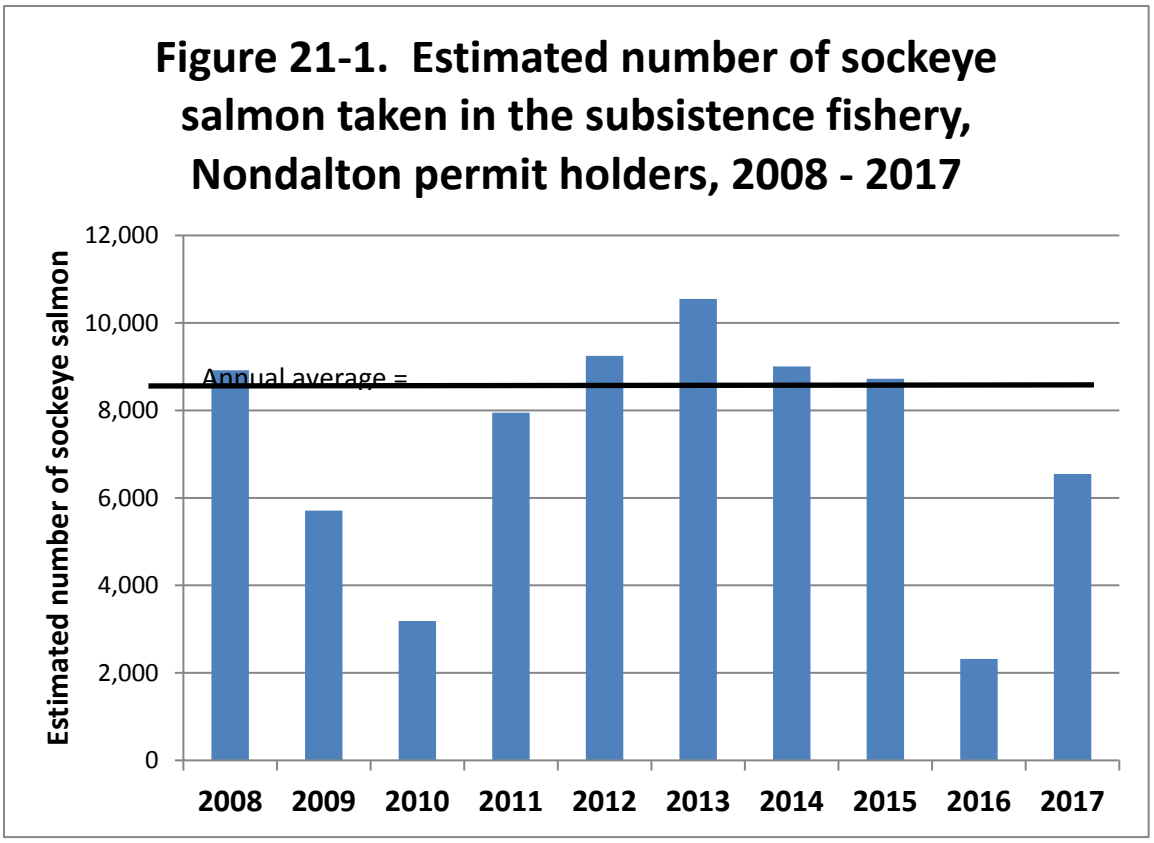


Figure 21-1.–Estimated number of sockeye salmon taken in the subsistence fishery, Nondalton permit holders, 2008–2017.

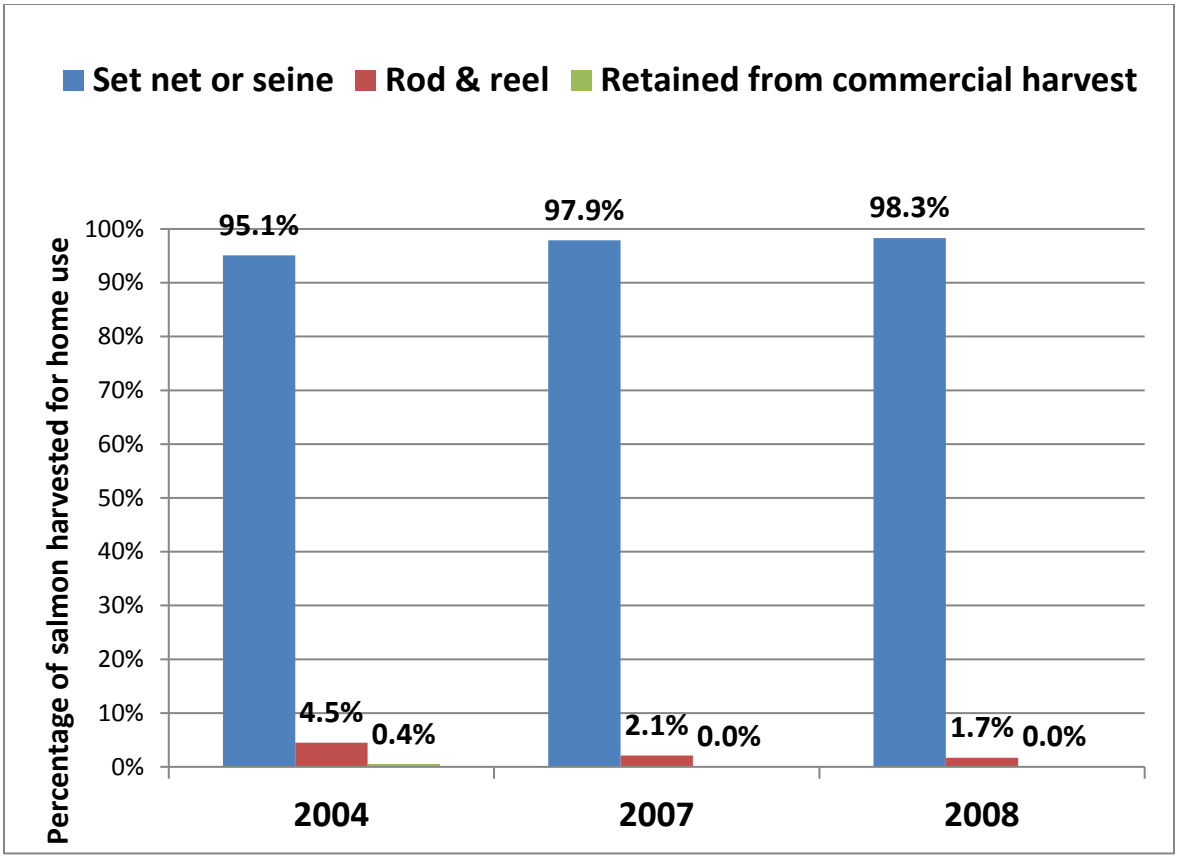


Figure 21-2.–Percentage of salmon harvest for home use by gear type, Nondalton.

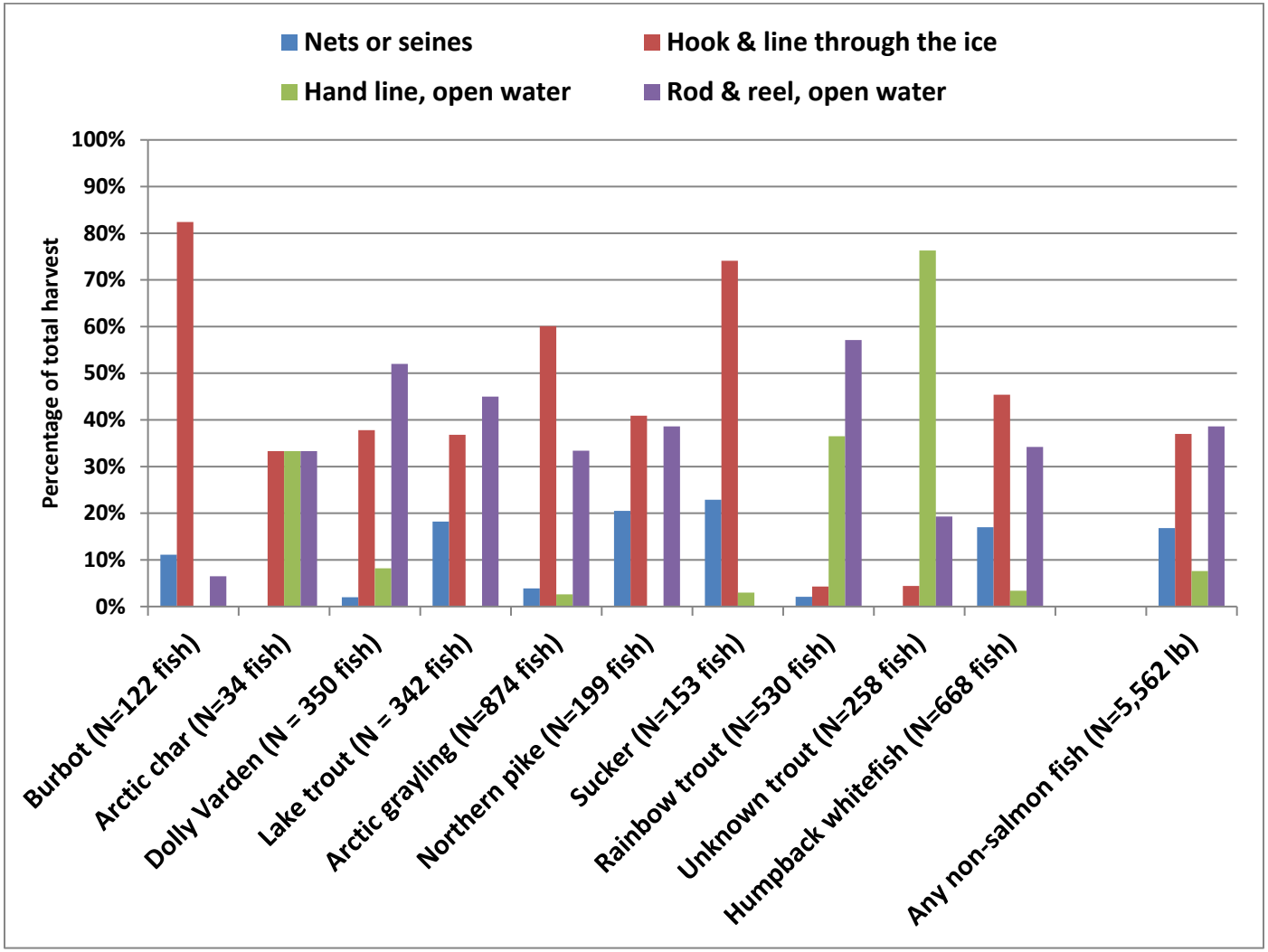


Figure 21-3.–Percentage of primary nonsalmon fish harvests by gear type, Nondalton, 2004.

PROPOSAL 22 – Allow subsistence fishing for salmon in the Egegik District at any time from May 1 through September 30.

5 AAC 01.310. Fishing seasons and periods

PROPOSED BY: Eddie Clark

WHAT WOULD THE PROPOSAL DO? This seeks to allow subsistence fishing in the Egegik District anytime between May 1 and September 30 unless closed or restricted by emergency order (EO). The proponent suggests marking subsistence-caught salmon to distinguish them from commercially-caught salmon.

WHAT ARE THE CURRENT REGULATIONS? Current regulations permit subsistence fishing for salmon in all commercial fishing districts from 9:00 a.m. Mondays to 9:00 a.m. Fridays, from May 1 to May 31 and from October 1 to October 31. From June 1 to September 30, subsistence fishing for salmon is permitted only during open commercial salmon fishing periods. A permit is required, and allowable gear is set gillnets no more than 25 fathoms in length and no closer than 300 feet from other set gillnet gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide more subsistence opportunity in the Egegik District.

BACKGROUND: Most of the productive fishing sites in the Egegik District are associated with commercial shore fishery leases, particularly on the north shore of Egegik Bay and around the village of Egegik. The department has been aware of the difficulties that some subsistence users encounter in finding a site to fish and has provided additional opportunity since 2000. Comments were provided to the department at the 2012 board meeting in Naknek regarding subsistence opportunity and priority. In response, since 2013, the department has provided 15–17 days of dedicated subsistence fishing time in the beginning of the season to address the concerns for limited opportunity (Table 22-1). Due to variable run timing and differing strategies of subsistence users, this may not provide enough additional subsistence fishing opportunity for all subsistence users. At the 2015 board meeting a proposal was adopted that allows fishing continuously in the Egegik River upstream from the commercial district; however, very few subsistence fishermen utilize this area because it requires traveling a fair distance by skiff.

Sockeye salmon escapements into the Egegik River have averaged near 1.4 million fish since 2000, and the 2015–2018 escapements have averaged over 2 million fish. The latest 10-year period (2008–2017) average reported Egegik subsistence harvest is 1,660 salmon of all species (Figure 22-1) including 1,282 sockeye salmon, with 34 subsistence permits issued on average annually, for an average of 49 salmon per permit. The most recent comprehensive survey for Egegik was in 2014, which reported that of all salmon harvested for home use, 68% was harvested with subsistence gear, 32% from commercial retention, and 0.1% with rod and reel.

DEPARTMENT COMMENTS: The department **NEUTRAL** on this proposal. The department has some concern over the potential for fish caught during directed subsistence periods to find their way into the commercial catch. Marking fish caught during commercial closures may simplify identification of subsistence catch from an enforcement perspective.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.
4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, as well as 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

Table 22-1.–Amount of emergency order additional subsistence time from 2012–2018.

	Start		End			
Year	Date	Time	Date	Time	Type	Time
201						
	8-Jun	12:00 PM	10-	6:00 PM	Subsistence only	55
	17-	12:00 PM	18-	6:00 PM	Subsistence only	30
	23-	6:00 AM	24-	6:00 PM	Subsistence only	36
					Commercial time [a,b,c]	227.5
					Total available time for subsistence	**348.5**
201						
	1-Jun	12:00	14-	11:59		336
	16-	12:00 PM	17-	12:00		24
	27-	12:00 PM	27-	11:59		12
	5-Jul	3:00 PM	until further notice			
					Commercial time [a,b,c]	303.5
					Total available time for subsistence	**675.5**
201						
	1-Jun	12:00	13-	11:59		312
	18-	12:01	18-	11:59		24
	19-	12:01	19-	11:59		24
	19-	11:59 PM	20-	11:59		24
	24-	12:01	24-	11:59		24
					Commercial time [a,b,c]	398.8
					Total available time for subsistence	**806.8**
201						
	1-Jun	12:00	17-	11:59		408
					Commercial time [a,b,c]	454.3
					Total available time for subsistence	**862.3**
201						
	1-Jun	12:01	17-	11:59		408
					Commercial time [a,b,c]	297.3
					Total available time for subsistence	**705.3**

-continued-

Year	Start Date	Start Time	End Date	End Time	Type	Time
201						
	1-Jun	12:01	16-	11:59		384
	27-	1:00 PM	27-	11:59		12
	28-	1:00 PM	28-	11:59		12
					Commercial time [a,b,c]	376.5
					Total available time for subsistence	**784.5**
201						
	1-Jun	12:01	15-	11:59		360
	19-	12:01	19-	11:59		24
	21-	12:01	21-	11:59		24
	23-	12:01	23-	11:59		24
					Commercial time [a,b,c]	250.5
					Total available time for subsistence	**682.5**

[a] Seasonal total, subsistence fishing is allowed during commercial periods.

[b] Set gillnet during allocation period.

[c] Fall schedule of 9:00 a.m. Monday to 9:00 a.m. Friday in effect after 9:00 a.m. July 17, that time is not included in the calculation of commercial time.

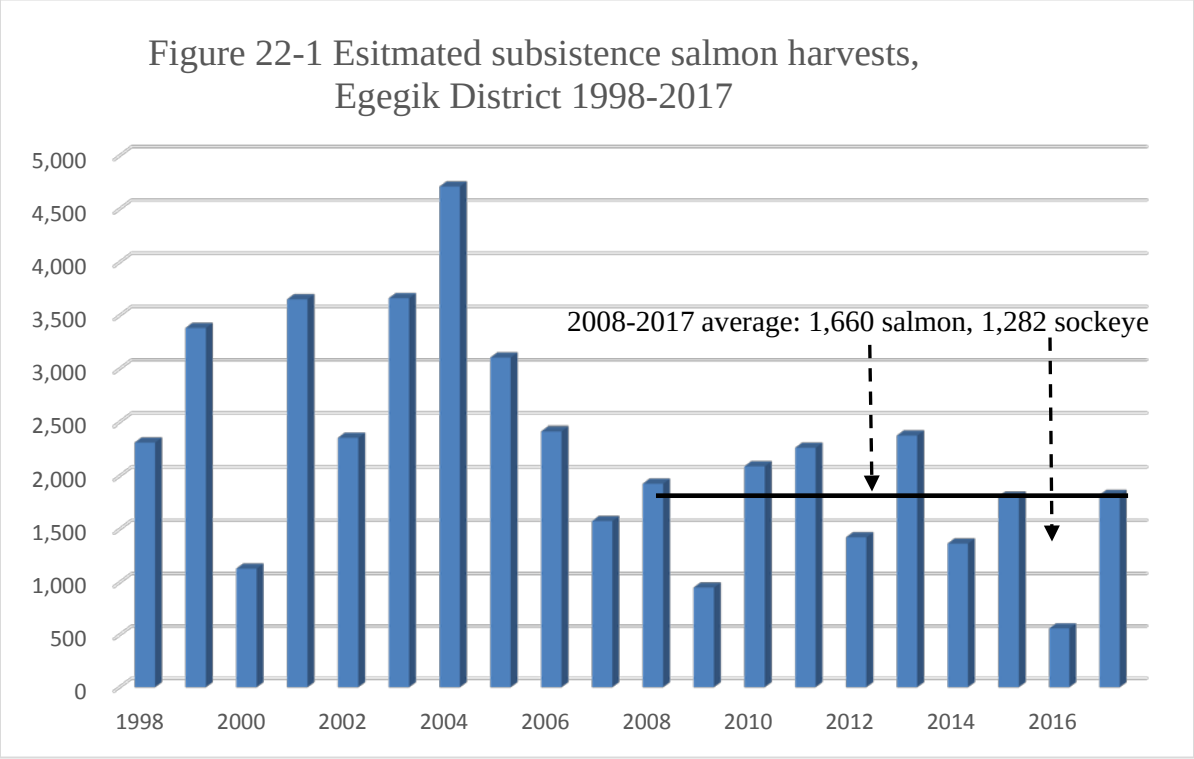


Figure 22-1.–Estimated subsistence salmon harvests, Egegik District, 1998–2017.

Rainbow Trout (3 Proposals)

PROPOSAL 47 – Adopt the Southwest Alaska Rainbow Trout management Plan

5 AAC XX.XXX. New section

PROPOSED BY: Nanci Morris Lyon

WHAT WOULD THE PROPOSAL DO? The *Southwest Alaska Rainbow Trout Management Plan* would be adopted into regulation.

WHAT ARE THE CURRENT REGULATIONS? The *Southwest Alaska Rainbow Trout Management Plan* has been used to guide management and regulatory development of Southwest Alaska rainbow trout stocks and associated sport fisheries, however, it is not in regulation. Currently the following statewide regulations and policies are used to guide management and regulatory development of Southwest Alaska rainbow trout stocks and associated sport fisheries: *Special Management Areas and Liberal Harvest Opportunities for Trout* (5 AAC 75.210), *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222).

The general regulations for rainbow trout in the Bristol Bay Area are as follows: From June 8 to October 31, the bag and possession limit is two fish, only one of which may be 20 inches or longer and from November 1 to June 7 the bag and possession limit is five fish, only one of which may be 20 inches or longer. Additionally, special regulations for seasons, gear, and bag limits for rainbow trout exist in numerous drainages throughout Bristol Bay

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would be required to use the *Southwest Alaska Rainbow Trout Management Plan* to guide management and regulatory development for rainbow trout stocks and associated sport fisheries in Southwest Alaska, including Bristol Bay and the lower Kuskokwim. Because nearly all the policies and criteria in this plan are already in statewide regulations that are currently used by managers, this would not change current management practices and would create some redundant regulations.

BACKGROUND: In February 1990, the board overhauled nearly all regulations for rainbow trout fisheries in the two management areas now known as the Bristol Bay Area and Kuskokwim–Goodnews Area (Figures 47-1, 47-2, and 47-3). The adopted regulations essentially implement the *Southwest Alaska Rainbow Trout Management Plan* without adopting the plan's language into regulation. However, the board recognized the plan as a guiding policy to achieve and maintain a more orderly and comprehensive mix of rainbow trout angling opportunities throughout the two areas. The overriding philosophy of the plan is one of conservative wild stock management. Nearly all of the policies and criteria set forth in the plan are included in the following statewide regulations: *Special Management Areas and Liberal Harvest Opportunities for Trout* (5 AAC 75.210), *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222). These regulations embody nearly all of the policies and criteria that originated and are still contained in the *Southwest Alaska Rainbow Trout Management Plan*. The only exception is a single criterion for selecting special management areas that considers habitat characteristics and appearances of a water (Policy II, #7).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department utilizes *Special Management Areas and Liberal Harvest Opportunities for Trout* (5 AAC 75.210), *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222) when making management decisions and regulatory proposals regarding rainbow trout stocks and associated fisheries in Southwest Alaska, including Bristol Bay, Kuskokwim Bay, and the lower Kuskokwim River drainage. Nearly all of the policies and criteria in the *Southwest Alaska Rainbow Trout Management Plan* are already included in these statewide regulations, therefore, current management practices would not change and adoption of this proposal would create redundant regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

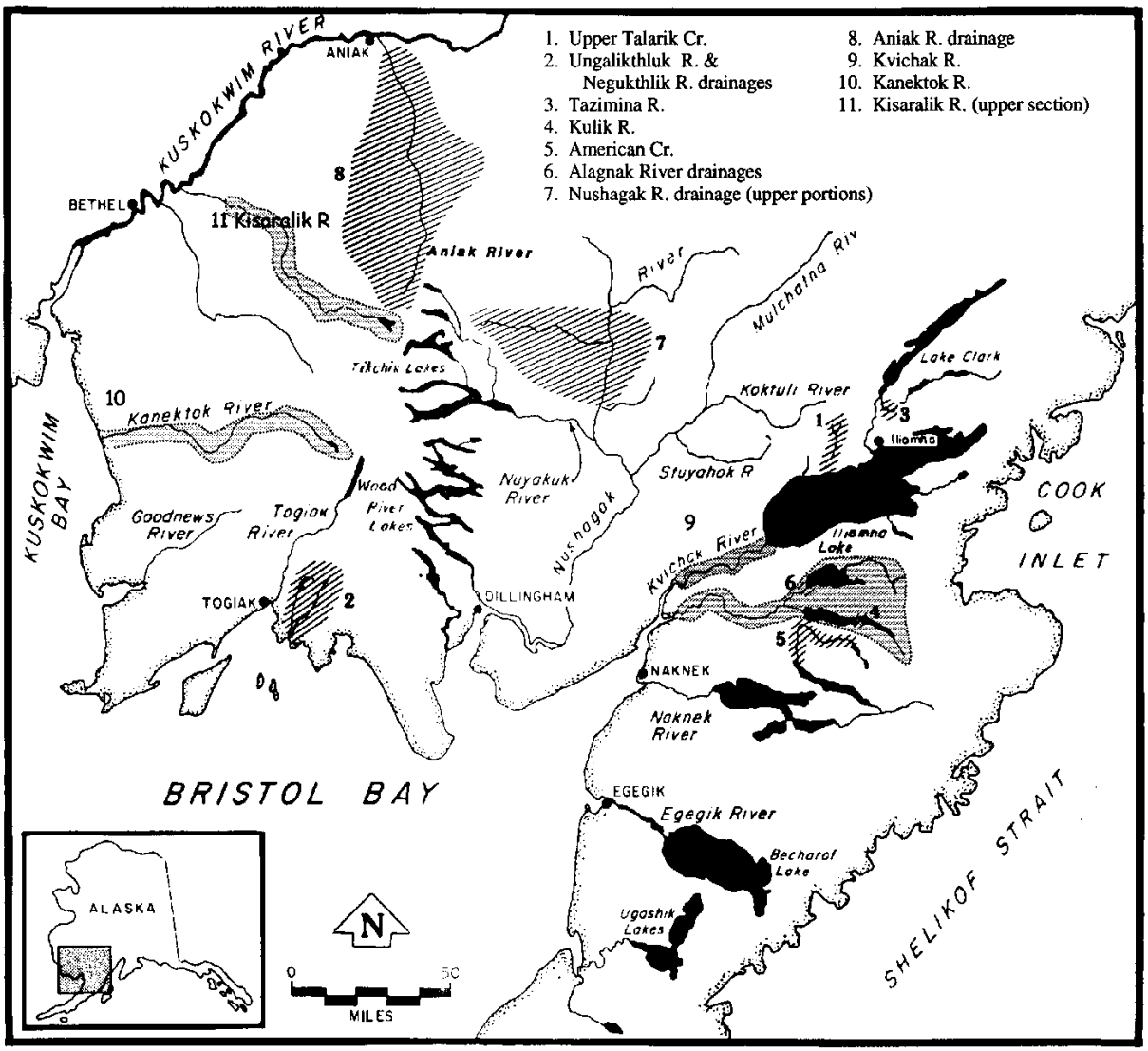


Figure 47-1.–Catch-and-release special management areas for rainbow trout in the Bristol Bay Area.

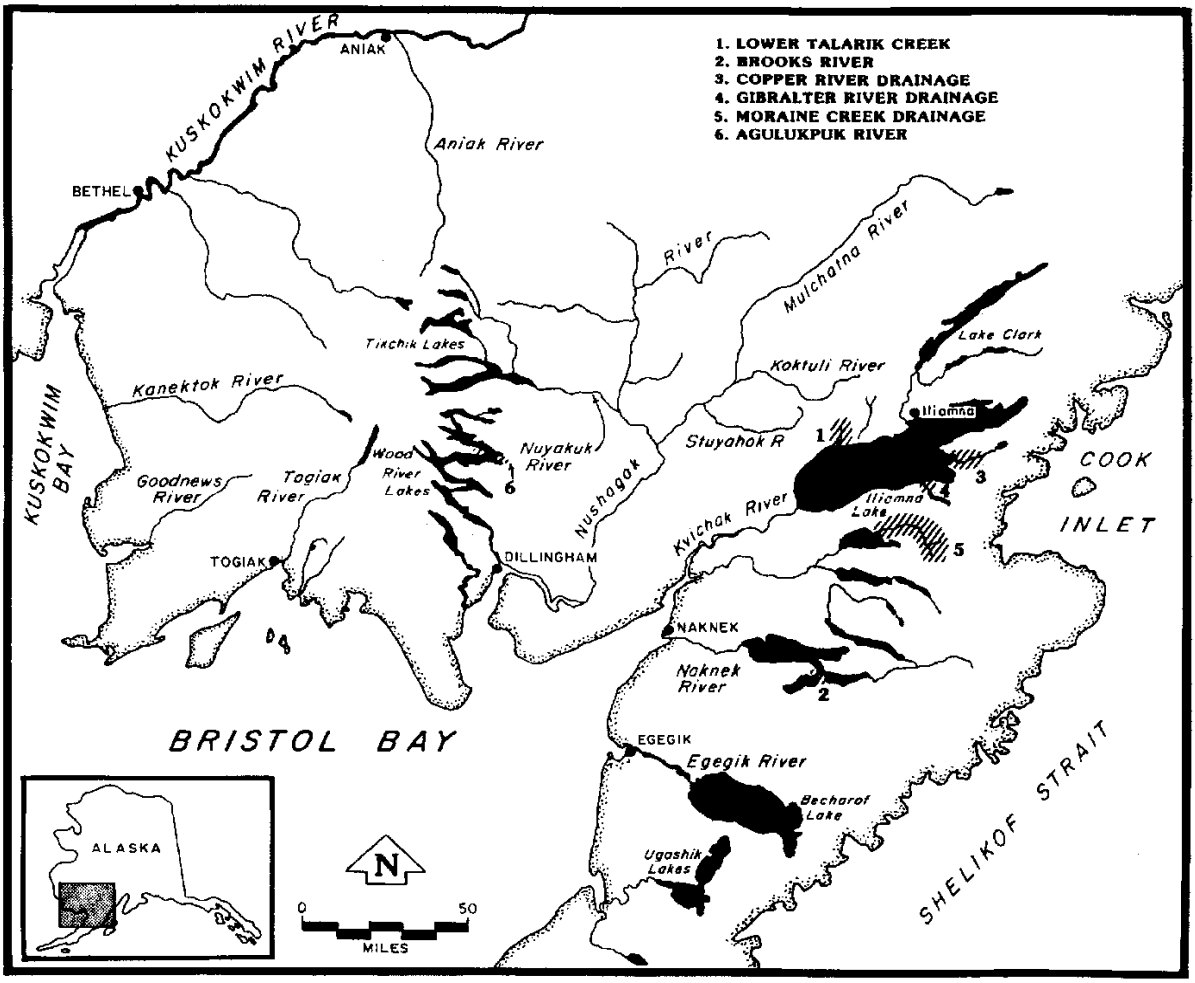


Figure 47-2.–Catch-and-release special management areas for rainbow trout in the Bristol Bay Area where gear is limited to unbaited, single-hook, artificial flies.

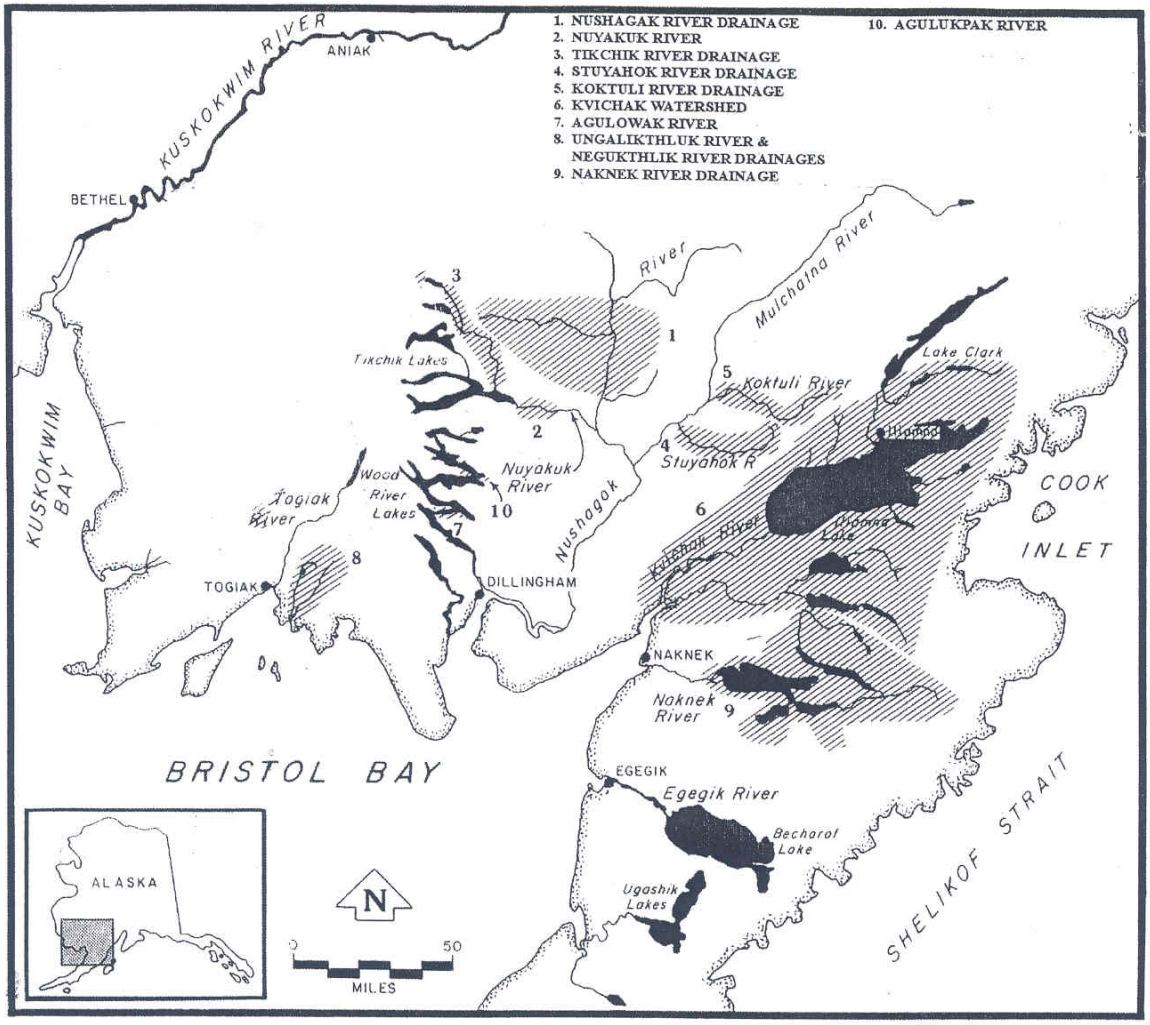


Figure 47-3.–Unbaited, single-hook artificial lure special management areas for rainbow trout in the Bristol Bay Area.

PROPOSAL 48 – Modify the sport fishing season in the Naknek River drainage

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

PROPOSED BY: Jason Lazore

WHAT WOULD THE PROPOSAL DO? The rainbow trout spawning season closure date would change from April 10 to April 1 in the Naknek River drainage.

WHAT ARE THE CURRENT REGULATIONS? In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams: only unbaited, single-hook, artificial lures or flies may be used year round. Additionally, all sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout (Figure 48-1). The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish, less than 18 inches, and from November 1 to June 7 is five fish, less than 18 inches.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Annual sport fishing opportunity in the Naknek River drainage would be reduced by nine days. Additionally, the earlier closure would eliminate angling for rainbow trout that begin spawning between April 1 and April 10. There would be a relatively small savings of rainbow trout due to the elimination of harvest and catch-and-release mortality of rainbow trout during this time period.

BACKGROUND: The current rainbow trout spawning season closure of April 10–June 7 has been in regulation since 1969. Prior to 1969, several adjustments based on annual spawning survey information were made to the closure dates to ensure that spawning rainbow trout are protected and sport fishing opportunity is not unnecessarily restricted. The peak of rainbow trout spawning in the Naknek River has historically been early May, however, weather and other factors (water temperature etc.) can affect annual timing, therefore, the current closure dates are based on numerous years of survey data and are intended to account for variations in spawning timing.

Guided angler rainbow trout catch and harvest in the upper Naknek River from April 1 to April 9 have averaged 177 fish and one fish from 2007 to 2016 respectively (Table 48-1). The catch-and-release mortality rate on Naknek River rainbow trout is unknown, however, because only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of one-half inch or less are allowed from March 1 to April 9, it is assumed to be low (≤5%; Schill, D. J. and R. L. Scarpella. 1997. Barbed hook restrictions in catch-and-release trout fisheries: a social issue. North American Journal of Fisheries Management 17(4): 873-881). This combined with the relatively small catch during this time period suggests that closing the fishery nine days earlier would have minimal biological benefit. Additionally, recent rainbow trout catches in the Naknek River drainage sport fishery suggest that the rainbow trout population is stable under current regulations (Table 48-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The proposed regulation unnecessarily restricts sport fishing opportunity for rainbow trout in the Naknek River drainage. Closing the fishery nine days earlier in the Naknek River drainage would likely have little measurable biological impact and current sport fishing regulations provide sufficient protection for spawning rainbow trout.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

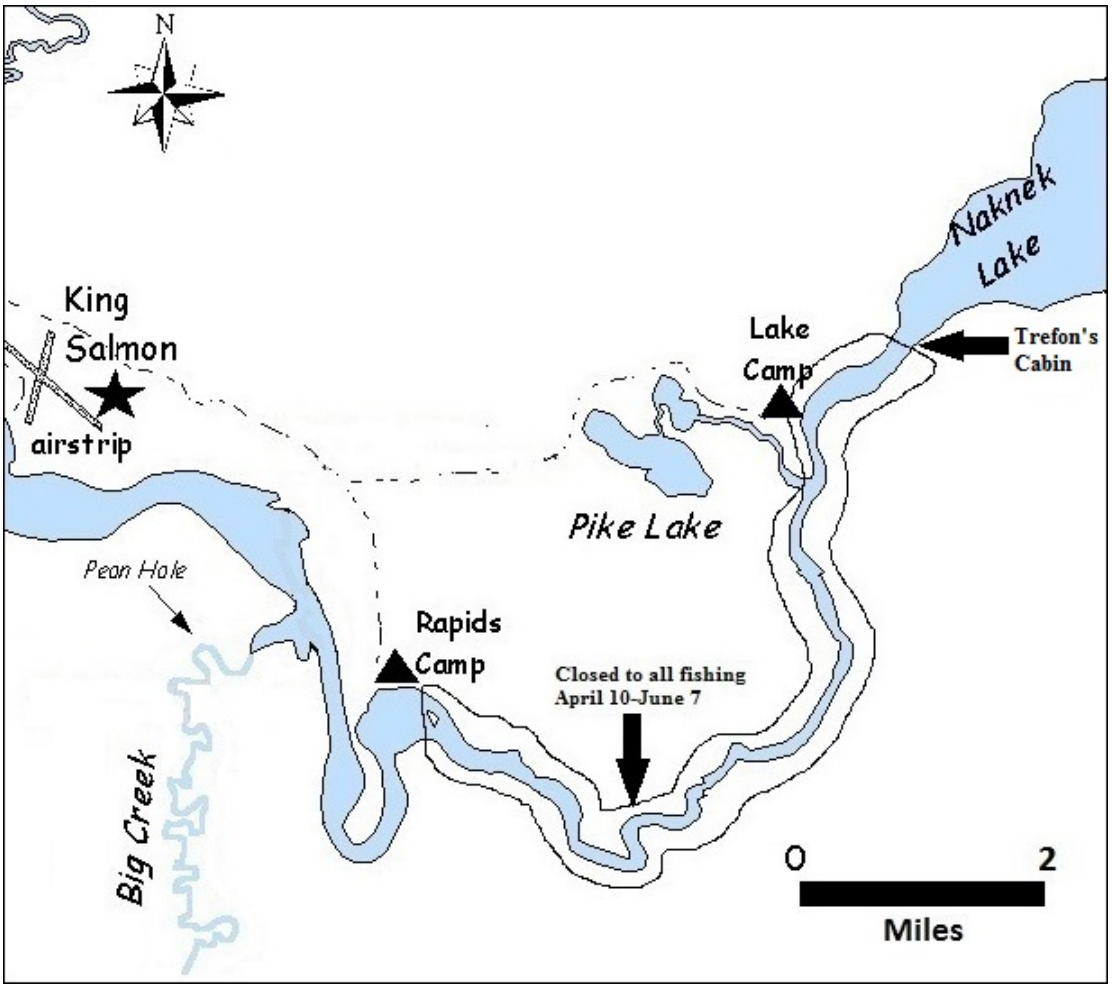


Figure 48-1.–Upper Naknek River drainage.

Table 48-1.–Upper Naknek River guided sport fishing effort and rainbow trout harvest and catch from April 1–9, 2007–2016 average, and 2012–2016 average.

Year	Guided effort (angler-days)	Guided harvest	Guided catch
Average			
2007–2016	42	1	177
2012–2016	42	0	165

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) and in Naknek River and Tributaries (site code R0007) from April 1 to 9.

Table 48-2.–Naknek River sport fishing effort, anglers, and rainbow trout harvest and catch, 1996–2017.

Year	Effort (angler-days)	Anglers	Harvest	Catch
1996	11,971	3,710	603	16,888
1997	13,673	4,059	246	13,737
1998	13,988	4,508	388	12,795
1999	21,189	4,573	343	17,946
2000	22,529	4,434	450	30,738
2001	12,401	4,386	160	16,198
2002	21,020	4,588	760	30,635
2003	13,398	4,281	171	26,183
2004	16,956	4,259	272	20,497
2005	12,699	3,477	175	16,431
2006	14,928	4,252	196	15,555
2007	17,744	3,664	307	25,692
2008	14,444	4,392	175	19,886
2009	16,850	3,968	60	31,097
2010	16,828	4,150	226	22,555
2011	14,465	4,321	589	21,869
2012	12,704	3,117	48	15,794
2013	12,723	3,537	47	15,779
2014	16,202	4,346	94	21,650
2015	14,621	3,632	416	21,311
2016	15,813	3,968	101	36,277
Average				
1991–2016	15,578	4,077	277	21,405
2012–2016	14,413	3,720	141	22,162
2017	14,854	4,593	151	21,362

PROPOSAL 49 – Prohibit retention of rainbow trout by nonresident sport anglers in a portion of the Naknek River drainage

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This would prohibit harvest of rainbow trout by nonresident anglers and continue to allow harvest of rainbow trout by resident anglers under current regulations in the Naknek River drainage.

WHAT ARE THE CURRENT REGULATIONS? In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams: only unbaited, single-hook, artificial lures or flies may be used year round. Additionally, all sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout (Figure 48-1). The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish, less than 18 inches, and from November 1 to June 7 is five fish, less than 18 inches.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate harvest opportunity and harvest of rainbow trout by nonresident anglers in the Naknek River drainage sport fishery. Eliminating nonresident harvest will likely result in minimal biological benefit.

BACKGROUND:. Based on freshwater guide logbook data, guided nonresident rainbow trout harvest has averaged 19 fish from 2007 to 2016 (Table 49-1). Recent total (guided and unguided) rainbow trout catch and harvest in the Naknek River drainage sport fishery suggest that the rainbow trout population is stable under current regulations (Table 48-2).

Throughout Bristol Bay, the board has provided seasonal opportunities for harvesting rainbow trout under sport regulations by liberalizing bag limits during the off-season months (typically fall to late spring), when most local residents pursue rainbow trout for food. For example, in the Naknek River, the summer bag limit is one rainbow trout under 18 inches in length per day, but in the winter months the bag limit increases to five rainbow trout under 18 inches in length per day. Seasonal changes in the bag limits accommodate the winter harvest needs of the few local residents but do little to jeopardize the health of local rainbow trout stocks.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity and reduce sport fishing opportunity with minimal biological benefit. Catch and harvest of rainbow trout in the Naknek River drainage sport fishery suggest that the rainbow trout population is stable under current regulations. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 49-1.–Naknek River guided nonresident angler rainbow trout harvest, 2007–2017.

Year	Guided nonresident rainbow trout harvest
2007	49
2008	[a]
2009	10
2010	11
2011	[a]
2012	21
2013	27
2014	[a]
2015	21
2016	[a]
Average	
2007–2016	19
2012–2016	21
2017 [b]	[a]

[a] Less than 4 businesses reporting.

[b] 2017 data are preliminary.

Sport Fishing Guides (6 Proposals)

PROPOSAL 50 – Prohibit guiding on the Naknek River drainage during spring from the marker at Lake Camp downstream to the marker at Rapids Camp

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

PROPOSED BY: Jason Lazore

WHAT WOULD THE PROPOSAL DO? This would prohibit people from providing sport fishing guide services on the Naknek River drainage from the marker at Lake Camp to the marker at Rapids Camp from January 1 through June 7.

WHAT ARE THE CURRENT REGULATIONS Currently there are no regulations prohibiting guided fishing activity in the Naknek River drainage. In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams: only unbaited, single-hook, artificial lures or flies may be used year round. Additionally, all sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout (Figure 48-1). The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish, less than 18 inches, and from November 1 to June 7 is five fish, less than 18 inches.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate guided sport fishing effort, catch, and harvest for guided anglers in the Naknek River drainage from January 1 to June 7. Overall effort, catch, and harvest would be reduced by an unknown amount as some of the reductions would likely be offset by an increase in effort, catch, and harvest by unguided anglers during this time. Guides and guide-related businesses may experience an economic loss.

BACKGROUND: Based on freshwater guide logbook data, guided sport fishing effort in the upper Naknek River from January 1 to June 7, 2007–2016 has averaged 61 angler-days. For comparison the total annual guided sport fishing effort in the upper Naknek River has averaged 2,406 angler-days and 3,878 angler-days in the entire Naknek River from 2007 to 2016 (Tables 50-2 and 50-3). The total number of guide businesses operating annually on the upper Naknek River has averaged 13 from 2007 to 2016 (Table 50-2). Guided rainbow trout catch in the upper Naknek River from January 1 to June 7, 2007–2016 has averaged 240 fish. Guided angler harvest during this time period has averaged one fish from 2007 to 2016 (Table 50-1). Catch per unit effort (CPUE) from 2007 to 2016 has averaged 3.9 fish per angler-day (Table 50-1). Effort, catch, and harvest during this time period can be significantly influenced from year to year by weather and water conditions.

Based on the SWHS, the estimated rainbow trout sport catch from 2012 to 2016 has ranged from a high of 36,277 in 2016 to a low of 15,779 in 2013 with an average of 22,162 fish from the Naknek River drainage (Table 48-2). The sport harvest of rainbow trout from 2007 to 2016 has ranged from a high of 589 in 2011 to a low of 47 in 2013 with an average of 206 (Table 48-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 14,843 (Table 48-2).

The catch-and-release mortality rate on Naknek River rainbow trout is unknown, however, because only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of one-half inch or less are allowed from March 1 to April 9, it is assumed to be low (≤5%; Schill, D. J. and R. L. Scarpella. 1997. Barbed hook restrictions in catch-and-release trout fisheries: a social issue. North American Journal of Fisheries Management 17(4): 873-881). This combined with the guided angler catch and harvest during this time period suggests that prohibiting guides and guided fishing from January 1 to June 7 would likely have little measurable biological benefit. Additionally, recent rainbow trout catches and catch rates in the Naknek River drainage sport fishery suggest that the rainbow trout population is stable under current regulations (Tables 48-2 and 50-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would reduce sport fishing opportunity and increase regulatory complexity in the absence of a measurable biological benefit. Catch and harvest of rainbow trout in the Naknek River drainage sport fishery suggest that the rainbow trout population is stable under current regulations. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 50-1.–Upper Naknek River guided sport fishing effort, rainbow trout harvest and catch, and catch per angler-day from January 1 to June 7, 2007–2016 average and 2012–2016 average.

Year	Guided effort (angler-days)	Guided harvest	Guided catch	Catch per angler-day
Average				
2007–2016	61	1	240	3.9
2012–2016	62	0	222	3.6

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) and in Naknek River and Tributaries (site code R0007) from January 1 to June 7.

Table 50-2.–Upper Naknek River guided sport fishing effort, guided trips, guide businesses, and rainbow trout harvest and catch, 2007–2017.

Year	Guided effort (angler-days)	Guided trips	Guide businesses	Guides operating	Guided harvest	Guided catch	Catch per angler-day
2007	2,387	823	14	35	41	4,921	2.1
2008	2,507	880	18	48	12	5,037	2.0
2009	2,114	748	13	43	23	5,471	2.6
2010	1,809	683	12	42	11	5,184	2.9
2011	2,308	925	12	60	8	6,633	2.9
2012	2,284	908	13	56	19	6,953	3.0
2013	2,426	1,020	14	54	22	7,926	3.3
2014	2,612	1,076	14	54	16	8,685	3.3
2015	2,827	1,186	11	47	13	11,506	4.1
2016	2,787	1,239	11	53	2	11,634	4.2
Average							
2007–2016	2,406	949	13	49	17	7,395	3.1
2012–2016	2,587	1,086	13	53	14	9,341	3.6
2017 [a]	2,325	1,150	10	74	14	9,414	4.0

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) plus 66%, 50%, 81%, and 90% (based on average annual percentage of Naknek River total reported upstream of Rapids Camp) of the effort, trips, harvest, and catch respectively reported in Naknek River and Tributaries (site code R0007). Guides operating is the total number from site code R0275.

[a] 2017 data are preliminary.

Table 50-3.–Naknek River total annual guided sport fishing effort and rainbow trout harvest and catch, 2007–2016.

Year	Guided effort (angler-days)	Guided harvest	Guided catch
2007	3,993	51	5,802
2008	4,273	12	6,656
2009	3,923	24	7,335
2010	3,160	13	5,468
2011	4,162	9	7,500
2012	3,444	21	7,696
2013	3,784	32	8,883
2014	3,814	31	9,876
2015	4,039	21	12,513
2016	4,188	3	12,486
Average			
2007–2016	3,878	22	8,422
2012–2016	3,854	22	10,291

PROPOSAL 51 – Establish a limited guide permit system between September 10 and October 20 in a portion of the Naknek River

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

WHAT WOULD THE PROPOSAL DO? This would create a limited entry sport fishery by using a permit system in the Naknek River drainage from Rapids Camp upstream to Trefon's Cabin from September 10 through October 20 (Figure 48-1).

WHAT ARE THE CURRENT REGULATIONS? There are no regulations limiting use by any commercial, business or private entities that use the river to host trips in the Naknek River drainage. Guide businesses and guides are currently required to be registered with the department and complete logbooks after each trip to report the number of clients, where they fished, and number of fish species harvested and fish species released.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Sport fishing effort, catch, and harvest in the Naknek River drainage may be reduced by an unknown amount if the proposed permit limits are less than current guided angler activity.

BACKGROUND: Although no limited entry sport fisheries currently exist in Alaska, in 1991, the Alaska Department of Natural Resources (DNR) proposed to limit the number of guides on the Kenai River. Under their proposal the long-term number of guides allowed to operate on the Kenai River was set at 250. The proposal was determined to be unconstitutional by the Attorney General of the State of Alaska and therefore was rescinded.

DEPARTMENT COMMENTS: The department recommends the board take **NO ACTION**. This would create a limited entry sport fishery and would require legislative action to implement. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 52 – Limit the number of clients a sport fishing guide or sport fishing guide business may have while targeting trout in a portion of the Naknek River drainage.

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Commercial entities, including rental boat operators, would be limited to four anglers targeting rainbow trout at a given time in the Naknek River drainage from ADF&G regulatory markers located one-half mile upstream of Rapids Camp upstream to ADF&G markers near Trefon's Cabin from June 8 through October 31 (Figure 48-1). The anglers would be identified by badges worn by each person fishing for trout.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations limiting the number of guided anglers or unguided anglers using rental boats in the Naknek River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Guided angler effort would likely decrease in the Naknek River drainage by an unknown amount with little effect on catch and harvest of rainbow trout, Dolly Varden/Arctic char, or Arctic grayling. The impact on overall angler effort is unknown as some of the reduction in guided anglers would likely be offset by an increase in unguided anglers. It would also increase regulatory and enforcement complexity.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River from June 8 to October 31, 2007–2016 has ranged from a high of 2,768 in 2015 to a low of 1,749 in 2010 with an average of 2,358 angler-days (Table 52-1). Similarly, during the same time period the number of guided trips has ranged from a high of 1,040 in 2016 to a low of 527 in 2010 with an average of 733 guided trips and the number of guide businesses has ranged from a high of 18 in 2008 to a low of 11 in 2016 averaging 13 (Table 52-2). Guided rainbow trout catch in the upper Naknek River from June 8 to October 31, 2007–2016 has ranged from a high of 11,363 in 2016 to a low of 4,482 in 2007 with an average of 7,173 fish (Table 52-1). Guided angler harvest during this time period has ranged from a high of 41 in 2007 to a low of 2 in 2016 with an average of 16 fish (Table 52-1). The increased catch and harvest coincide with the increase in guided angler effort. Catch per unit effort (CPUE) has been increasing from 2007 to 2016, averaging 3.0 fish per angler-day (Table 52-1).

Based on the SWHS, the estimated rainbow trout sport catch from 2012 to 2016 has ranged from a high of 36,277 in 2016 to a low of 15,779 in 2013 with an average of 22,162 fish from the Naknek River drainage (Table 48-2). The sport harvest of rainbow trout from 2012 to 2016 has ranged from a high of 416 in 2015 to a low of 47 in 2013 with an average of 141 (Table 48-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 14,843 (Table 48-2). Estimated sport catch of Dolly Varden/Arctic char, and Arctic grayling has been stable in recent years (Table 52-3).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal without more information on the multiple elements of the proposed regulation. This would increase regulatory complexity and may be difficult to enforce. The department is **NEUTRAL** on the allocative

aspects of this proposal. Catch and harvest of rainbow trout, Dolly Varden/Arctic char, and Arctic grayling in the Naknek River drainage sport fishery suggest that these populations are stable under existing regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 52-1.–Upper Naknek River guided sport fishing effort and rainbow trout harvest, catch, and catch per angler-day from June 8 to October 31, 2007–2017.

Year	Guided effort (angler-days)	Guided harvest	Guided catch	Catch per angler-day
2007	2,330	41	4,482	1.9
2008	2,466	7	4,872	2.0
2009	2,092	20	5,376	2.6
2010	1,749	9	5,040	2.9
2011	2,250	8	6,279	2.8
2012	2,232	19	6,738	3.0
2013	2,384	22	7,763	3.3
2014	2,574	16	8,523	3.3
2015	2,768	13	11,291	4.1
2016	2,739	2	11,363	4.1
Average				
2007–2016	2,358	16	7,173	3.0
2012–2016	2,540	14	9,135	3.6
2017 [a]	2,284	14	8,915	3.9

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) from June 8 to October 31 plus 66%, 81%, and 90% (based on average annual percentage of Naknek River total reported upstream of Rapids Camp) of the effort, trips, harvest, and catch respectively reported in Naknek River and Tributaries (site code R0007) from June 8 to October 31..

[a] 2017 data are preliminary.

Table 52-2.–Upper Naknek River guide businesses and guided sport fishing trips from June 8 to October 31, 2007–2017.

Year	Guide businesses	Guided trips
2007	14	539
2008	18	633
2009	12	570
2010	12	527
2011	12	698
2012	13	670
2013	14	836
2014	14	859
2015	11	962
2016	11	1,040
Average		
2007–2016	13	733
2012–2016	13	873
2017	10	940

Note: Includes all businesses and trips operating upstream of Rapids Camp (site code R0275) from June 8 to October 31.

[a] 2017 data are preliminary.

Table 52-3.–Naknek River Dolly Varden/Arctic char and Arctic grayling catch, 2004–2017.

	Catch	
Year	Dolly Varden/Arctic char	Arctic grayling
2004	8,661	1,054
2005	6,361	1,803
2006	4,439	419
2007	4,640	2,345
2008	3,817	1,261
2009	10,259	3,985
2010	7,729	2,171
2011	5,665	1,369
2012	5,465	1,886
2013	5,837	2,100
2014	5,673	1,811
2015	7,034	3,606
2016	6,815	2,054
Average		
2004–2016	6,338	1,990
2012–2016	6,165	2,291
2017	3,468	1,137

PROPOSAL 53 – Establish guide permits in a section of the Naknek River drainage

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

PROPOSED BY: Dan Kirsch

WHAT WOULD THE PROPOSAL DO? A guide permit system would be created for the Naknek River drainage from ADF&G regulatory markers located one-half mile upstream of Rapids Camp upstream to ADF&G markers near Trefon's Cabin from January 1 to April 8 and June 8 to December 31 (Figure 48-1). Additionally, commercial operators that guide or provide rental boats to anglers targeting trout would be required to register with ADF&G and would be required to prove their support for conserving the resource and must train their clients in the proper handling of trout, respect of river habitat, and river etiquette. Finally, boat rental businesses would be required to issue certificates to individual clients verifying their boating skills and abilities. The department would need to develop a program to establish guide qualifications to meet these standards.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations limiting use by guides, guided anglers, or unguided anglers using rental boats in the Naknek River drainage. Guide businesses and guides are currently required to be registered with the department and complete logbooks after each trip to report the number of clients, where they fished, and number of fish species harvested and fish species released.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It would increase regulatory and enforcement complexity. Guides, guide-related businesses, and boat rental businesses may experience an increased economic cost in order to meet specific qualifications. Unguided anglers renting boats would be required to meet standards for operating the rental boats. This would also have a substantial budgetary impact on the department due to the cost of developing, administrating, tracking, and enforcing a qualification program to certify guide businesses, rental boat operators, and anglers renting boats. The board would need to define "qualified entities," "proper techniques for catching and handling of trout," and "boatmanship." Guided angler effort in the Naknek River drainage may be reduced. There would be little effect on catch and harvest of rainbow trout, Dolly Varden/Arctic char, or Arctic grayling. The impact on overall angler effort is unknown as some of the reduction in guided anglers would likely be offset by an increase in unguided anglers.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River from 2007 to 2016 has ranged from a high of 2,827 in 2015 to a low of 1,809 in 2010 with an average of 2,406 angler-days (Table 50-2). Similarly, from 2007 to 2016, the total number of guided trips in the Naknek River has been increasing, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). The number of businesses guiding anglers in the upper Naknek River from 2007 to 2016 has ranged from a high of 18 in 2008 to a low of 11 in 2015 and 2016 with an average of 13 businesses (Table 50-2). Guided angler rainbow trout catch in the upper Naknek River from 2007 to 2016 has ranged from a high of 11,634 in 2016 to a low of 4,921 in 2007 with an average of 7,395 fish (Table 50-2). Guided angler harvest during this time period has ranged from a high of 41 in 2007 to a low of two in 2016 with an average of 17 fish. The increased catch and harvest coincide with the increase in guided angler effort. Catch

per unit effort (CPUE) has been increasing from 2007 to 2016, averaging 3.1 fish per angler-day (Table 50-2).

Based on the SWHS, the estimated rainbow trout sport catch from 2012 to 2016 has ranged from a high of 36,277 in 2016 to a low of 15,779 in 2013 with an average of 22,162 fish from the Naknek River drainage (Table 48-2). The sport harvest of rainbow trout from 2012 to 2016 has ranged from a high of 416 in 2015 to a low of 47 in 2013 with an average of 141 (Table 48-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 14,843 (Table 48-2). Estimated sport catch of Dolly Varden/Arctic char, and Arctic grayling has been stable in recent years (Table 52-3).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal without knowing to what extent the level of qualification and who would be impacted by the proposed regulations on rental boats. This would increase regulatory complexity and would be difficult to enforce. It would create a burden on guide businesses, guides, boat rental businesses, and anglers to comply with an additional registration program. It would also generate a cost to the department to develop and implement the proposed program. The department is **NEUTRAL** on the allocative aspects of this proposal. Catch and harvest of rainbow trout, Dolly Varden/Arctic char, and Arctic grayling in the Naknek River drainage sport fishery suggest that these populations are relatively stable under existing regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 54 – Limit the hours guides or clients can fish on a section of the Naknek River

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

PROPOSED BY: Jason Lazore

WHAT WOULD THE PROPOSAL DO? Guides and guided anglers would be prohibited from fishing the Naknek River from Lake Camp downstream to Rapids Camp from 6:00 p.m. until 8:00 a.m. (Figure 48-1).

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations limiting use by guides or guided anglers in the Naknek River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide 14 hours of opportunity for unguided anglers to fish without the presence of guided fishing activity. There would be an unknown, but likely minimal effect on catch and harvest of rainbow trout. It is possible that guided angler effort could shift to areas outside of the proposed waters. Guides and guide related businesses may experience an economic loss. Although some guided effort occurs between 6:00 p.m. and 8:00 a.m., the amount is unknown and the largest proportion of guided effort likely occurs between 8:00 a.m. and 6:00 p.m.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River from 2007 to 2016 has ranged from a high of 2,827 in 2015 to a low of 1,809 in 2010 with an average of 2,406 angler-days (Table 50-2). Similarly, the total number of guided trips in the Naknek River has been increasing from 2007 to 2016, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). The number of businesses guiding anglers in the upper Naknek River from 2007 to 2016 has ranged from a high of 18 in 2008 to a low of 11 in 2015 and 2016 with an average of 13 businesses. The number of guides operating in the upper Naknek River from 2007 to 2016 has ranged from a high of 60 in 2011 to a low of 35 in 2007 with an average of 49 guides (Table 50-2). Guided angler rainbow trout catch in the upper Naknek River from 2007 to 2016 has ranged from a high of 11,634 in 2016 to a low of 4,921 in 2007 with an average of 7,395 fish (Table 50-2). Guided angler harvest during this time period has ranged from a high of 41 in 2007 to a low of two in 2016 with an average of 17 fish. The increased catch and harvest coincide with the increase in guided angler effort. Catch per unit effort (CPUE) has been increasing from 2007 to 2016, averaging 3.1 fish per angler-day (Table 50-2).

Based on the SWHS, the estimated rainbow trout sport catch from 2012 to 2016 has ranged from a high of 36,277 in 2016 to a low of 15,779 in 2013 with an average of 22,162 fish from the Naknek River drainage (Table 48-2). The sport harvest of rainbow trout from 2012 to 2016 has ranged from a high of 416 in 2015 to a low of 47 in 2013 with an average of 141 (Table 48-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 14,843 (Table 48-2).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department does not have data on guided angler effort specific to the daily time period of 6:00 p.m. to 8:00 a.m. Catch and harvest of rainbow trout in the Naknek River drainage sport fishery suggest that the rainbow trout population is relatively stable under existing regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 55 – Limit the days guides or clients can fish on a section of the Naknek River

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

PROPOSED BY: Jason Lazore

WHAT WOULD THE PROPOSAL DO? Guides and guided anglers would be prohibited from fishing the Naknek River from the marker near Trefon's Cabin downstream to the marker at Rapids Camp on Sundays and Thursdays (Figure 48-1).

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations limiting use by guides or guided anglers in the Naknek River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Guided angler fishing opportunity would be reduced by 29%. There would likely be little impact on overall angler effort as the reduction in guided anglers may likely be offset by an increase in unguided anglers during those days. This would provide two days per week of opportunity for unguided anglers to fish without the presence of guided fishing activity. It is likely that there would be little measurable effect on catch and harvest of rainbow trout. It is possible that guided angler effort could shift to areas outside of the proposed waters or increase on the days guide activities was allowed in this area. Guides and guide-related businesses may experience an economic loss.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River from 2007 to 2016 has ranged from a high of 2,827 in 2015 to a low of 1,809 in 2010 with an average of 2,406 angler-days (Table 50-2). Similarly, the total number of guided trips in the Naknek River has been increasing from 2007 to 2016, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). Guided angler rainbow trout catch in the upper Naknek River from 2007 to 2016 has ranged from a high of 11,634 in 2016 to a low of 4,921 in 2007 with an average of 7,395 fish (Table 50-2). Guided angler harvest during this time period has ranged from a high of 41 in 2007 to a low of two in 2016 with an average of 17 fish. The increased catch and harvest coincide with the increase in guided angler effort. Catch per unit effort (CPUE) has been increasing from 2007 to 2016, averaging 3.1 fish per angler-day (Table 50-2).

Based on the SWHS, the estimated rainbow trout sport catch from 2012–2016 has ranged from a high of 36,277 in 2016 to a low of 15,779 in 2013 with an average of 22,162 fish from the Naknek River drainage (Table 48-2). The sport harvest of rainbow trout from 2012–2016 has ranged from a high of 416 in 2015 to a low of 47 in 2013 with an average of 141 (Table 48-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 14,843 (Table 48-2).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. This proposal would likely have little impact on overall sport fishing effort in the Naknek River. Catch and harvest of rainbow trout in the Naknek River drainage sport fishery suggest that the rainbow trout population is relatively stable under existing regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Methods and Means (2 Proposals)

PROPOSAL 56 – Prohibit chumming by guides and other commercial users in portions of the Naknek River drainage sport fishery

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Chumming would be prohibited in all waters of the Naknek River drainage and its tributaries including Naknek Lake and all of its tributaries (Figure 56-1).

WHAT ARE THE CURRENT REGULATIONS? In waters closed to the use of bait, sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would prohibit chumming by anglers fishing from rented boats and those transported by commercial entities, not just guides and guided anglers, in the Naknek River drainage and all its tributaries. The term "self-guided" is not defined and it is unclear what users it would include.

BACKGROUND: In 2012, the board adopted a regulation that modified the definition of bait in fresh waters of Bristol Bay to include any substance placed in fresh water by a person for the purpose of attracting fish by scent. The intent of this regulation was to prohibit anglers and sport fishing guides from placing fish parts in the water for the purpose of attracting fish in fresh waters where bait is prohibited.

After this regulation became effective in 2013, subsistence users in the Nondalton and Newhalen areas became concerned that it could result in citations for local residents who harvest nonsalmon species under sport fishing regulations near traditional fish camps where salmon are harvested and processed under subsistence regulations. It is a common and customary practice for subsistence users at traditional fish camps in the area to catch and harvest nonsalmon species downstream of where subsistence caught salmon are being processed. If adopted as written, this proposal would revive the concerns regarding subsistence users potentially being cited in the Naknek River drainage.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal given little apparent biological benefit and increased regulatory complexity. Terms including "rental boat," "commercial entities," and "self-guided" would need to be defined. Current regulations prohibit the use of bait for guides and guided anglers in all fresh waters of Bristol Bay closed to the use of bait and regulations would become more complex if this proposal is adopted since it would apply only to the Naknek River.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

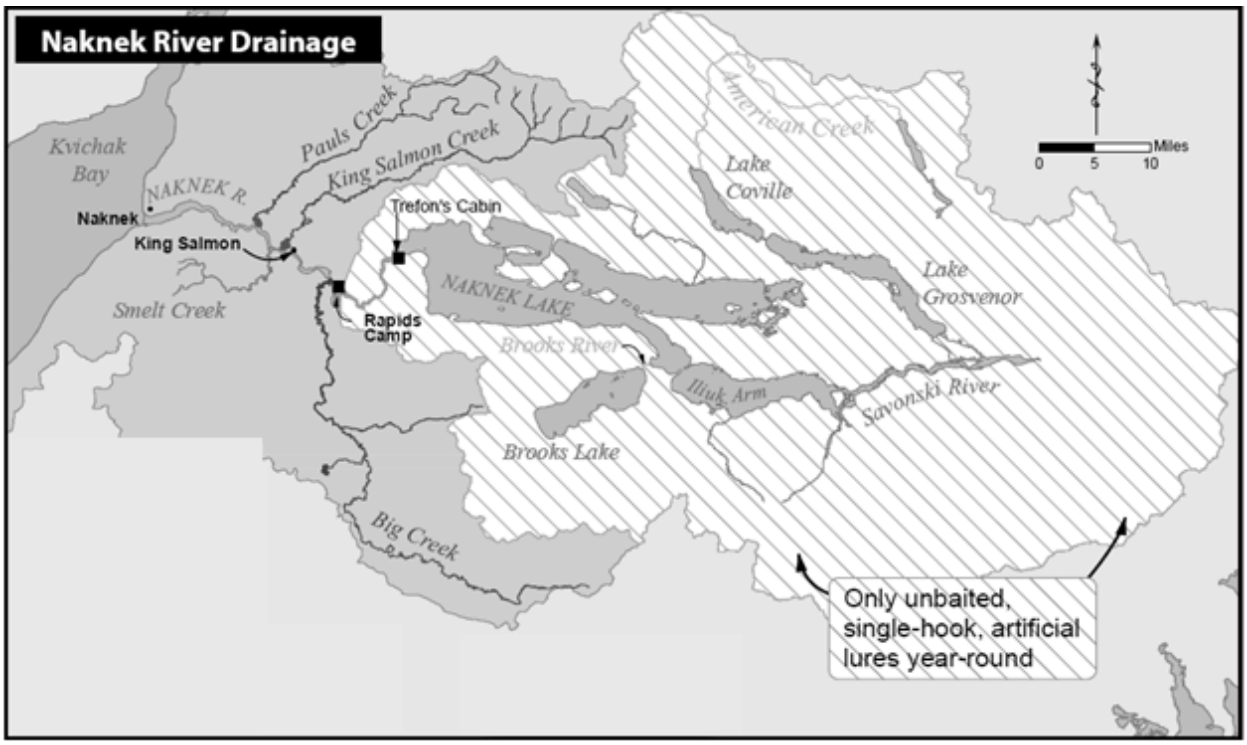


Figure 56-1.–Naknek River drainage.

PROPOSAL 57 – Prohibit the use of certain sport fishing tackle in a section of the Naknek River drainage

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The use of egg imitation patterns would be prohibited unless the egg imitation is a fixed part of a fly or lure longer than 1 inch in length in waters upstream from the ADF&G markers located one-half mile above Rapids Camp to ADF&G markers located at Trefon's Cabin at the outlet of Naknek Lake (Figure 48-1).

WHAT ARE THE CURRENT REGULATIONS? In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams, only unbaited, single-hook, artificial lures or flies may be used year-round. Additionally, all sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout. The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish, less than 18 inches, and from November 1 to June 7 is five fish, less than 18 inches.

Under statewide regulations, an attractor, including a bead, when used with an artificial fly, artificial lure, or bare hook, must be either fixed within two inches of the bare hook, fly, or lure, or be free sliding on the line or leader.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in decreased catch rates for anglers, increased regulatory complexity, and prohibition of a vast range of tackle under 1 inch in length commonly used by anglers targeting rainbow trout, Arctic grayling, Dolly Varden, and Arctic char. The board would need to define an egg imitation pattern.

BACKGROUND: In 1990, the board adopted regulations for conservative management of wild rainbow trout in the Bristol Bay area. Conservative wild stock management does not necessarily preclude limited harvest of rainbow trout. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is inevitable, but by managing the area's wild rainbow trout stocks conservatively, the potential for serious long-term resource problems is minimized. From a social perspective, conservative wild stock management is consistent with the wishes and desires of most of the public presently using the resource. The *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222), and the region's regulations contain policies and regulations that protect the biological integrity of wild trout stocks and maximize their recreational benefit and economic potential. Little data exist on the effects of egg-simulating lures on rainbow trout stocks, however, the Naknek River drainage rainbow trout fishery is conservatively managed with no bait and single-hook regulations, conservative bag limits, and a spawning season closure to maintain wild stocks. The rainbow trout catch by guided anglers in the Upper Naknek River sport fishery has been increasing relative to effort over the most recent 10 years with angler-days increasing from 2,387 in 2007 to 2,787 in 2016 and catch increasing from 4,921 in 2007 to 11,634 in 2016 (Table 50-2). For comparison,

based on previous studies in the Kenai River where rainbow trout abundance appears to be similar, the recent average annual sport catch of rainbow trout by guided anglers has been approximately 50,000 fish. Many of these fish are caught on egg simulating lures and there are no biological concerns with this population of rainbow trout.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Adoption of this proposal would deviate from statewide regulations, increase regulatory complexity, and negatively impact fishing opportunity with little apparent conservation benefit. There is currently no biological or conservation concern related to the use of egg simulating lures in this rainbow trout sport fishery. Many lures under 1 inch in length are designed to imitate eggs, or a portion of the lure contains an egg imitation, therefore, a variety of commonly used spoons, spinners, plugs, and flies would become illegal to use in this drainage.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Sport Salmon (4 Proposals)

PROPOSAL 58 – Close sport fishing for king salmon in a portion of the Naknek River drainage

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? The following sections of the Naknek River drainage would be closed to fishing for king salmon year round: the waters of the Naknek River from "Painter Bob's Cabin" upstream to the ADF&G marker at Trefon's Cabin near the mouth of Naknek Lake; all waters of Big Creek upstream of its confluence with the Naknek River; all waters of King Salmon Creek upstream from the ADF&G markers at the confluence of the Naknek River; and all waters of Paul's Creek upstream of its confluence with the Naknek River (Figure 58-1).

WHAT ARE THE CURRENT REGULATIONS? Sport fishing for king salmon in the Naknek River mainstem is open from May 1 to July 31. King Salmon Creek and Paul's Creek from an ADF&G regulatory marker located at each creek's confluence with the Naknek River upstream to the upstream side of the Alaska Peninsula Highway bridges are closed to sport fishing from June 1 to July 31; upstream of the Alaska Peninsula Highway bridges, sport fishing for king salmon is closed year round. There is no retention of king salmon in all waters of Big Creek upstream of its confluence with the Naknek River from May 1 to July 31. The bag and possession limit for king salmon 20 inches or longer is three fish, of which only one may be 28 inches or longer, with an annual limit of five. For king salmon less than 20 inches in length, the bag and possession limit is 10 with no annual limit. Sport fishing for salmon other than king salmon in the Naknek River (including Big Creek) is open the entire year with a bag and possession limit of five fish. Downstream of an ADF&G marker located at Rapids Camp (including Big Creek), gear is limited to unbaited, artificial lures only and upstream of an ADF&G marker located at Rapids Camp gear is limited to unbaited, single-hook, artificial lures only.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All sport fishing opportunity for king salmon in portions of the Naknek River drainage would be eliminated and king salmon sport fishing regulations and enforcement would be complicated by adding additional closed sections to the waters of the Naknek River drainage. This may also decrease the harvest and catch-and-release mortalities of king salmon by an unknown number.

BACKGROUND: Beginning in the early 1990s, increasing portions of Paul's and King Salmon creeks were closed to king salmon fishing to protect spawning stocks in these waters. In 1995, the outlets of Paul's and King Salmon creeks into the Naknek River were closed to angling to protect important holding areas for king salmon. In 1997, closures to king salmon angling in Paul's and King Salmon Creek were clarified, and an annual limit of five king salmon per angler was adopted for this fishery.

The Big Creek drainage was closed to sport fishing for king salmon beginning in 2013 and re-opened to catch-and-release sport fishing in 2015. The Naknek River within a one-quarter mile of the confluence with Big Creek was included in the 2013 closure to protect king salmon staging to ascend Big Creek. However, based on a lack of suitable holding water, fish do not appear to hold

in this section of the Naknek River. Additionally, the closure included the entire width of the Naknek River, requiring anglers to remove their lines from the water while drift fishing through this section of river. From 2001 to 2012, Big Creek supported a catch-and-release king salmon sport fishery and prior to 2001 harvest was allowed.

From 2007 through 2012, the annual guided sport catch of king salmon in Big Creek averaged 82 fish (Table 58-1). Using the preliminary estimated catch-and-release mortality for king salmon in the Nushagak River (6.7%), the average annual mortality in the guided sport fishery would be approximately five king salmon. The Big Creek drainage was reopened to catch-and-release sport fishing for king salmon after the December 2015 board meeting and the preliminary annual guided sport catch of king salmon from 2016 to 2017 averaged 252 fish (Table 58-1). Using the preliminary estimated catch-and-release mortality for king salmon in the Nushagak River (6.7%), the average annual mortality in the guided sport fishery would be approximately 17 king salmon.

Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River has been increasing slightly since 2007 ranging from a low of 1,809 angler-days in 2010 to a high of 2,827 angler-days in 2015 and averaging 2,587 angler-days from 2012 to 2016 (Table 58-2). Based on SWHS data, total sport fishing effort in the Naknek River drainage has been relatively steady since peaks in the late 1990s and early 2000s, ranging from a low of 11,971 angler-days in 1996 to a high of 22,529 angler-days in 2000 and averaging 14,413 angler-days from 2012–2016 (Table 48-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity and reduce sport fishing opportunity for king salmon with little apparent conservation benefit.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

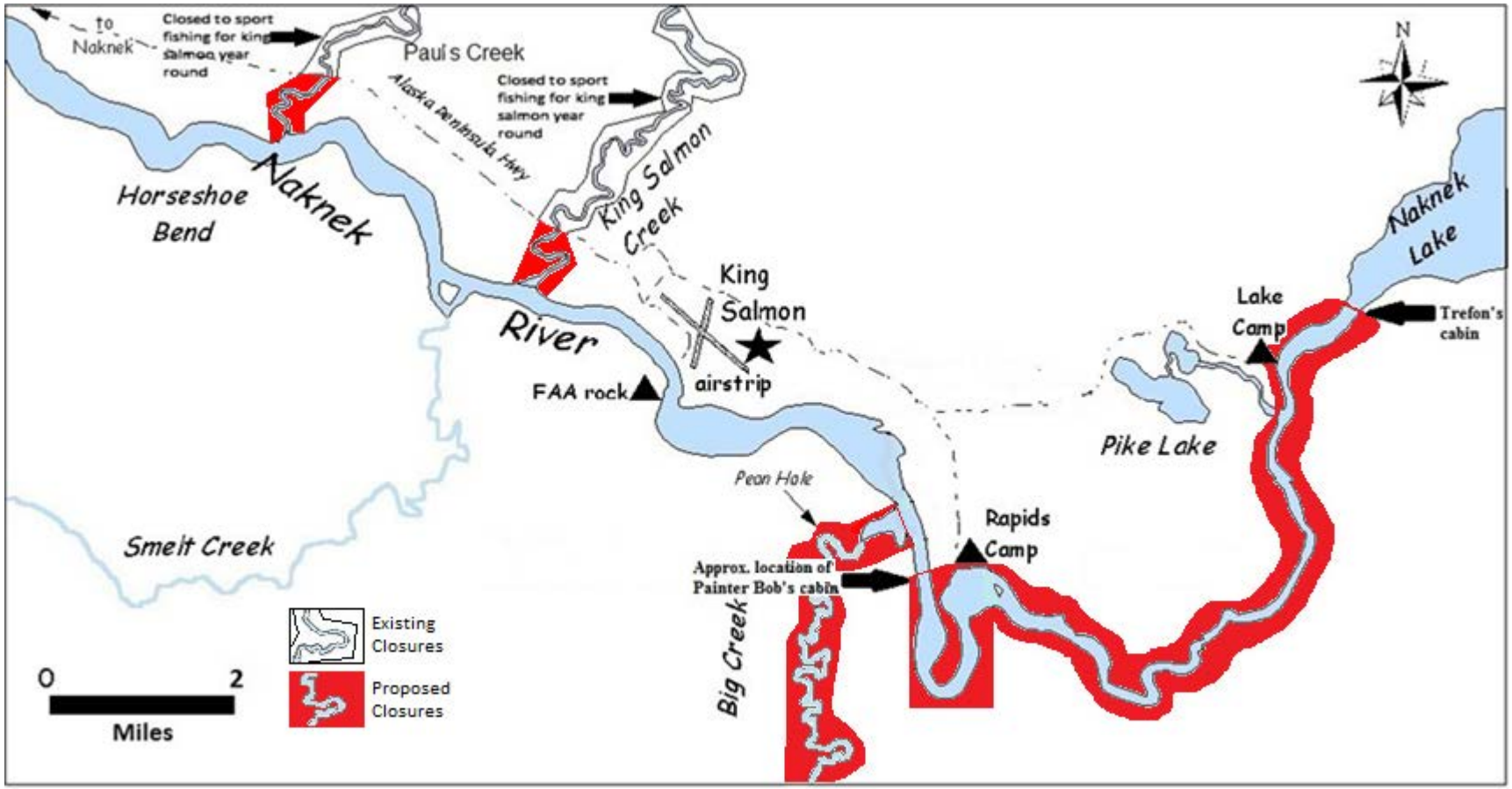


Figure 58-1.–Upper Naknek River drainage with existing and proposed closure areas.

Table 58-1.–Guided sport fishing effort (trips) and guided sport catch of king salmon from Big Creek, 2007–2017.

Year	Trips	Clients	Catch
2007	45	95	68
2008	49	133	129
2009	20	50	30
2010	25	77	95
2011	[a]	[a]	[a]
2012	47	108	26
2013 [b]	53	120	0
2014 [b]	73	157	7
2015 [b]	76	163	0
2016	84	214	101
Average 2007–2012	42	110	82
2017 [c]	101	207	403

[a] Less than four but more than one business reporting.

[b] Sport fishing for king salmon in Big Creek was closed 2013–2015.

[c] 2017 data are preliminary.

Table 58-2.–Guided effort in angler-days, and king salmon harvest and catch in the Naknek River drainage from the ADF&G marker at Rapids Camp to the ADF&G marker at Trefon's Cabin at the mouth of Naknek Lake, 2007–2017.

Year	Angler-days	Harvest	Catch
2007	2,387	202	638
2008	2,507	159	652
2009	2,114	90	355
2010	1,809	100	497
2011	2,308	127	489
2012	2,284	147	471
2013	2,426	160	425
2014	2,612	193	706
2015	2,827	154	1,132
2016	2,787	215	693
Average 2012–2016	2,587	173	685
2017 [a]	2,325	172	785

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) from June 8 to October 31 plus 66%, 22%, and 39% (based on average annual percentage of total reported upstream of Rapids Camp) of the effort, harvest, and catch respectively reported in Naknek River and Tributaries (site code R0007) from 2007 to 2017.

[a] 2017 data are preliminary.

PROPOSAL 59 – Close waters to king salmon sport fishing in a section of the Naknek River drainage

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

PROPOSED BY: Dan Kirsch

WHAT WOULD THE PROPOSAL DO? This would introduce additional season, area, and annual limit restrictions for the Naknek River drainage. This would include closure of the Naknek River mainstem from Painter Bob's Cabin upstream to the ADF&G markers at Trefon's Cabin near the mouth of Naknek Lake to king salmon fishing year-round. This would also close the Naknek River mainstem within one-quarter mile of the mouth of Big Creek after July 15 and all tributaries to the Naknek River year-round (Figure 59-1). In addition, the annual bag limit would be reduced, at least for nonresidents but possibly for all anglers, from five fish to two fish in all waters of the Naknek River drainage as well as introduce a limit to the number of rods in the water per day per lodge.

WHAT ARE THE CURRENT REGULATIONS? Sport fishing for king salmon in the Naknek River mainstem is open from May 1 to July 31. King Salmon Creek and Paul's Creek from an ADF&G regulatory marker located at each creek's confluence with the Naknek River upstream to the upstream side of the Alaska Peninsula Highway bridges are closed to sport fishing from June 1 to July 31; upstream of the Alaska Peninsula Highway bridges, sport fishing for king salmon is closed year round. There is no retention of king salmon in all waters of Big Creek upstream of its confluence with the Naknek River from May 1 to July 31. The bag and possession limit for king salmon 20 inches or longer is three fish, of which only one may be 28 inches or longer, with an annual limit of five. For king salmon less than 20 inches in length, the bag and possession limit is ten fish with no annual limit. Sport fishing for salmon other than king salmon in the Naknek River (including Big Creek) is open the entire year with a bag and possession limit of five fish. Downstream of an ADF&G marker located at Rapids Camp (including Big Creek), gear is limited to unbaited, artificial lures only and upstream of an ADF&G marker located at Rapids Camp, gear is limited to unbaited, single-hook, artificial lures only. King salmon removed from the water must be retained in all fresh water drainages of Bristol Bay and becomes part of the bag limit of the person originally hooking it.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All sport fishing opportunity for king salmon would be eliminated in portions of the Naknek River drainage and complicate king salmon sport fishing regulations and enforcement by adding additional closed sections to the waters of the Naknek River drainage. Further regulatory complexity would be added in the form of additional marker buoy deployments, a lower annual bag limit for king salmon and a rod limit for lodges in the Naknek River drainage. Guides and guide-related businesses may experience an economic loss. This proposal may decrease the harvest and catch-and-release mortalities of king salmon by an unknown number.

BACKGROUND: Concern over low escapements and increasing sport harvest prompted the Alaska Board of Fisheries in 1987 to adopt a regulation package addressing Naknek River king salmon. The key elements of that package include the following:

1. Establishing a season for king salmon (May 1 to July 31)

2. Artificial-lure-only designation
3. Reduction in bag and possession limits to three fish, one of which may be over 28 inches

Beginning in the early 1990s, increasing portions of Paul's Creek and King Salmon Creek were closed to king salmon fishing to protect spawning stocks in these waters. In 1995, the outlets of Paul's Creek and King Salmon Creek into the Naknek River were closed to sport fishing for king salmon to protect important holding areas for king salmon. In 1997, closures to sport fishing for king salmon in Paul's Creek and King Salmon Creek were clarified, and an annual limit of five king salmon per angler was adopted for this fishery. The annual harvest limit was Bristol Bay-wide and required anglers to record the date and location of each king salmon taken.

The Big Creek drainage was closed to sport fishing for king salmon beginning in 2013 and re-opened to catch-and-release sport fishing after the 2015 board meeting. The Naknek River within a one-quarter mile of the confluence with Big Creek was included in the 2013 closure to protect king salmon staging to ascend Big Creek. However, based on a lack of suitable holding water, fish do not appear to hold in this section of the Naknek River. Additionally, the closure included the entire width of the Naknek River, requiring anglers to remove their lines from the water while drift fishing through this section of river. From 2001 to 2012, Big Creek supported a catch-and-release king salmon sport fishery and prior to 2001, harvest was allowed.

Based on freshwater logbook data from 2007 to 2012, the annual guided sport catch of king salmon averaged 82 fish (Table 58-1). Using the preliminary estimated catch-and-release mortality for king salmon in the Nushagak River (6.7%), the average annual mortality in the guided sport fishery would be approximately five king salmon. The Big Creek drainage was reopened to catch-and-release sport fishing for king salmon after the December 2015 board meeting and the preliminary annual guided sport catch of king salmon from 2016 to 2017 averaged 252 fish (Table 58-1). Using the preliminary estimated catch-and-release mortality for king salmon in the Nushagak River (6.7%), the average annual mortality in the guided sport fishery would be approximately 17 king salmon.

Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River has been increasing slightly since 2007 ranging from a low of 1,809 angler-days in 2010 to a high of 2,827 angler-days in 2015 and averaging 2,587 angler-days from 2012 to 2016 (Table 58-2). Similarly, the total number of guided trips in the Naknek River has been increasing from 2007 to 2016, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). Based on SWHS data, total sport fishing effort in the Naknek River drainage has been relatively steady since peaks in the late 1990s and early 2000s, ranging from a low of 11,971 angler-days in 1996 to a high of 22,529 angler-days in 2000 and averaging 14,413 angler-days from 2012 to 2016 (Table 48-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity and reduce sport fishing opportunity for king salmon in the Naknek River drainage with little apparent conservation benefit. The department is **NEUTRAL** on the allocative aspects of this proposal if the annual limit only applied to nonresidents.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

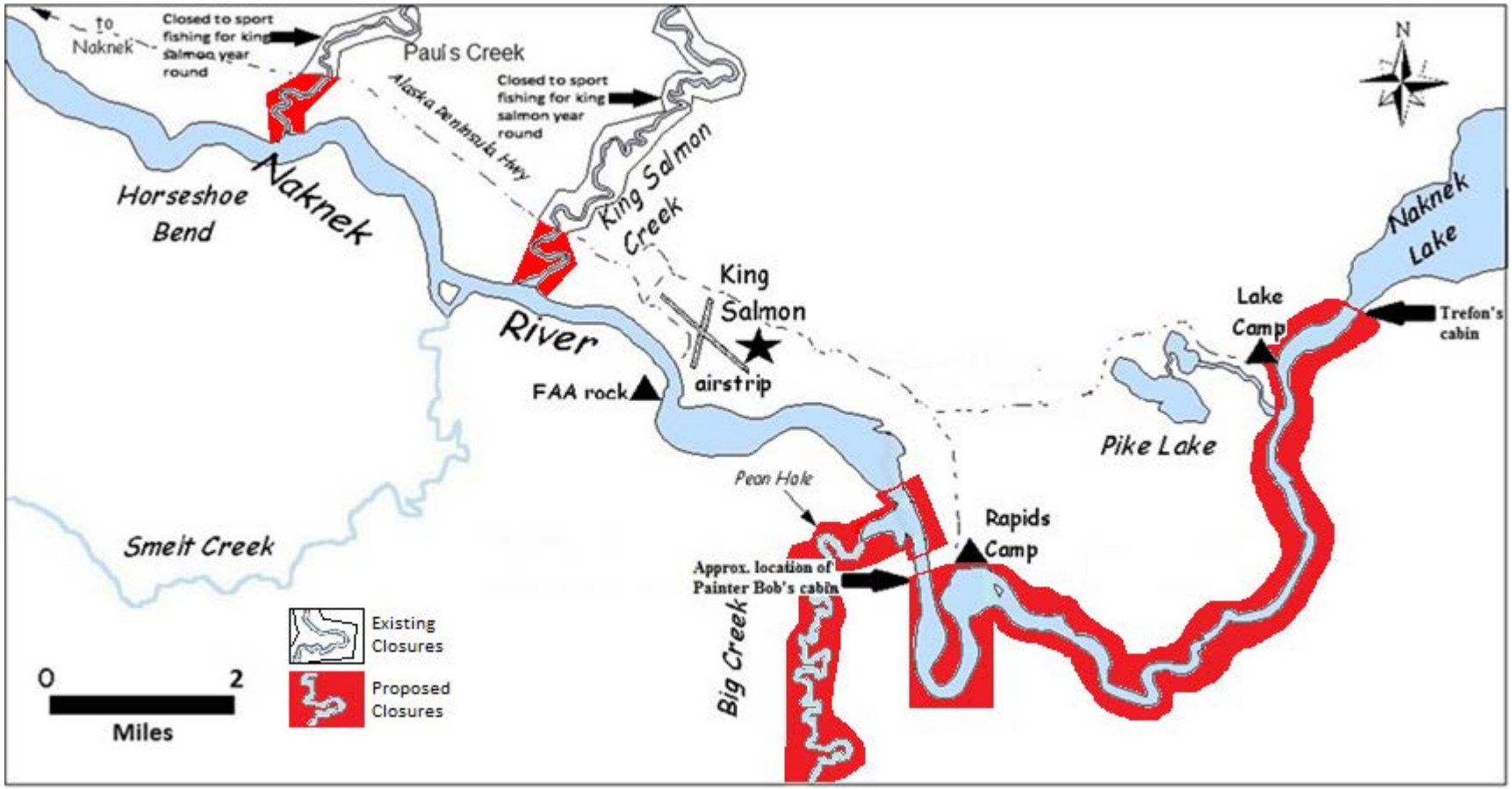


Figure 59-1.–Upper Naknek River drainage with existing and proposed closure areas.

PROPOSAL 60 – Create a rod limit for nonresident anglers sport fishing for salmon on a portion of the Naknek River

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This would introduce a rod limit for sockeye and coho salmon of eight nonresident anglers per day per commercial business entity including lodges, transporters, boat rentals, and fishing clubs upstream from the ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's Cabin at the outlet of Naknek Lake including all waters within one-quarter mile of all lake inlet and outlet streams (Figure 48-1).

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations limiting use by commercial entities including lodges, transporters, boat rentals, and fishing clubs in the Naknek River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce sport fishing opportunity for nonresident anglers that choose to use the services of a guide, transporter, boat rental, etc. This may result in an increase of unguided anglers in the upper Naknek River. Guide businesses may try to increase the number of resident angler clients to make up for the loss of nonresident anglers. Additionally, this may increase effort in other areas that would not be restricted to nonresident guided anglers. In addition, this would increase regulatory and enforcement complexity. This proposal may also reduce effort, catch, and harvest on the river by an unknown amount.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River has been increasing slightly since 2007, ranging from a low of 1,809 angler-days in 2010 to a high of 2,827 angler-days in 2015 and averaging 2,587 angler-days from 2012 to 2016 (Tables 60-1 and 60-2). Similarly, the total number of guided trips in the Naknek River has been increasing from 2007 to 2016, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). Based on SWHS data, total sport fishing effort in the Naknek River drainage has been relatively steady since peaks in the late 1990s and early 2000s, ranging from a low of 11,971 angler-days in 1996 to a high of 22,529 angler-days in 2000 and averaging 14,413 angler-days from 2012 to 2016 (Table 48-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal in the absence of more information specific to what constitutes transporters, boat rentals, and fishing clubs. This would increase regulatory complexity and reduce sport fishing opportunity in the absence of a measurable biological benefit. The department is **NEUTRAL** on the allocative aspects of this proposal and the rod limit if applied on guide and guide businesses only.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 60-1.–Annual guided sport fishing effort in angler-days, coho salmon harvest and catch in the Naknek River drainage from the ADF&G marker at Rapids Camp to the ADF&G marker at Trefon's Cabin at the mouth of Naknek Lake, 2007–2017.

Year	Angler-days	Harvest	Catch
2007	2,387	1,334	1,743
2008	2,507	2,183	3,102
2009	2,114	1,332	1,751
2010	1,809	594	1,042
2011	2,308	1,009	1,448
2012	2,284	957	1,233
2013	2,426	1,013	1,183
2014	2,612	1,424	1,850
2015	2,827	1,093	1,321
2016	2,787	1,050	1,229
Average 2012–2016	2,587	1,107	1,363
2017 [a]	2,325	960	1,336

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) plus 66%, 61%, and 62% (based on average annual percentage of total reported upstream of Rapids Camp) of the effort, harvest, and catch respectively reported in Naknek River and Tributaries (site code R0007) from 2007 to 2017.

[a] 2017 data are preliminary.

Table 60-2.–Annual guided sport fishing effort in angler-days, sockeye salmon harvest and catch in the Naknek River drainage from the ADF&G marker at Rapids Camp to the ADF&G marker at Trefon's Cabin at the mouth of Naknek Lake, 2007–2017.

Year	Angler-days	Harvest	Catch
2007	2,387	2,250	4,598
2008	2,507	2,259	3,672
2009	2,114	1,875	3,069
2010	1,809	1,968	3,581
2011	2,308	1,952	2,889
2012	2,284	1,925	2,617
2013	2,426	2,428	3,261
2014	2,612	2,260	2,946
2015	2,827	3,518	5,114
2016	2,787	2,550	4,110
Average 2012–2016	2,587	2,536	3,610
2017 [a]	2,325	2,310	4,343

Note: Includes all effort, harvest, and catch reported upstream of Rapids Camp (site code R0275) plus 66%, 93%, and 94% (based on average annual percentage of total reported upstream of Rapids Camp) of the effort, harvest, and catch respectively reported in Naknek River and Tributaries (site code R0007) from 2007 to 2017.

[a] 2017 data are preliminary.

PROPOSAL 61 – Prohibit blocking access to sport fishing locations in the Naknek River

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

PROPOSED BY: Naknek/Kvichak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This would prohibit staking out or marking of areas along the Naknek River for the purpose of holding a fishing hole for fishermen not yet present.

WHAT ARE THE CURRENT REGULATIONS? A person may not intentionally obstruct or hinder another person's lawful hunting, fishing, trapping, or viewing of fish or game (AS 16.05.790).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would prohibit any person from holding a fishing spot for another and would likely alter the behavior of some operators using this practice to reserve sections of the river for their clients. There may be an effect on other user groups such as hunters, nature viewers, and local residents that use the river's edge for activities other than fishing. This would increase regulatory and enforcement complexity.

BACKGROUND: Freshwater logbook data suggests that guided fishing effort on the Naknek River drainage has been relatively stable since 2007 ranging from a low of 2,517 angler-days in 2010 to a high of 3,944 angler-days in 2016 and averaging 3,493 angler-days (Table 61-1). From 2007 to 2016, the total number of guided trips in the Naknek River has been increasing, ranging from a low of 683 in 2010 to a high of 1,239 in 2016 and averaging 949 (Table 50-2). The number of businesses guiding anglers in the upper Naknek River from 2007 to 2016 has ranged from a high of 18 in 2008 to a low of 11 in 2015 and 2016 with an average of 13 businesses. The number of guides operating in the upper Naknek River from 2007 to 2016 has ranged from a high of 60 in 2011 to a low of 35 in 2007 with an average of 49 guides (Table 50-2). Statewide Harvest Survey data suggests that total sport fishing effort in the Naknek River has strongly declined since a peak of 22,529 angler-days in 2000 and has remained relatively stable between 2003 and 2016, averaging 15,027 angler-days (Table 48-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Current regulations provide protection for anglers against obstruction or hindrance of lawful fishing. By prohibiting "staking" along the banks of the river, the proposal may regulate nonfishing activities, which may be outside of the board's authority.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 61-1.–Annual guided angler effort in angler-days in the Naknek River, 2007–2017.

Year	Guided angler-days
2007	3,582
2008	3,644
2009	3,315
2010	2,517
2011	3,299
2012	3,422
2013	3,748
2014	3,639
2015	3,823
2016	3,944
Average 2007–2016	3,493
2017 [a]	3,738

[a] 2017 data are preliminary.

Miscellaneous Sport (2 Proposals)

PROPOSAL 62 – All sport-caught fish removed from the water in all freshwater drainages of the Bristol Bay Area must be retained

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

PROPOSED BY: Daniel Herrig

WHAT WOULD THE PROPOSAL DO? This would prohibit removing any species of sport caught fish from the water in all waters of Southwest Alaska unless the fish is harvested.

WHAT ARE THE CURRENT REGULATIONS? Any king salmon removed from freshwater drainages of Bristol Bay from Cape Menshikof to Cape Newenham (Figure 62-1) must be retained and becomes part of the bag limit of the person originally hooking it. A person who intends to release a king salmon may not remove it from the water before releasing it.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would change angling habits in ways that are difficult to anticipate. Anglers may choose to harvest fish that would have otherwise been photographed and released for the sake of obtaining a photo. For many anglers, the trophy is the photo, and this may increase retention in situations that would have otherwise resulted in a catch-and-release event. This may also reduce catch-and-release mortality by an unknown, but likely minimal, amount and may increase harvest by an unknown amount. This would increase regulatory complexity.

BACKGROUND: During the 2000 Bristol Bay board meeting, the board adopted a regulation requiring any king salmon removed from freshwater drainages from Cape Menshikof to Cape Constantine to be retained and become part of the bag limit of the person originally hooking it. The concept was initiated in a discussion on how to reduce mortality on king salmon being released in the sport fishery. During the 2003 Bristol Bay board meeting the scope of this regulation was expanded to include all freshwater drainages from Cape Menshikof to Cape Newenham in order to extend this protection to the Togiak River drainage and align regulations in the western section of the Bristol Bay Area with the remainder of the area.

In recent years, concerns have been expressed over exposing fish to air before release. Mortality of fish released without being removed from the water is conventionally thought to be lower than that of fish removed from the water prior to release; however a recent study (Roth, C. J., D. J. Schill, M. C. Quist, B. High. 2018. Effects of air exposure in summer on the survival of caught-and-released salmonids. North American Journal of Fisheries Management 38(4): 886-895) was unable to find a statistically significant difference in survival between three separate salmonid species exposed to air from those that were not exposed after catch-and-release angling. Results of this study suggest that anglers expose fish to air for periods that are much less than those reported to cause mortality. Results from this study paired with those from prior field studies of air exposure times during angling (Lamansky Jr., J. A. and K. A. Meyer. 2016. Air exposure time of trout released by anglers during catch and release. North American Journal of Fisheries Management 36(5): 1018-1023) suggest that mortality from briefly exposing fish to air is not likely a population-level concern in catch-and-release fisheries.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity and unnecessarily impact sport fishing opportunity in the absence of a measurable biological benefit. The department encourages anglers to use best practices when handling and releasing all sport caught fish.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

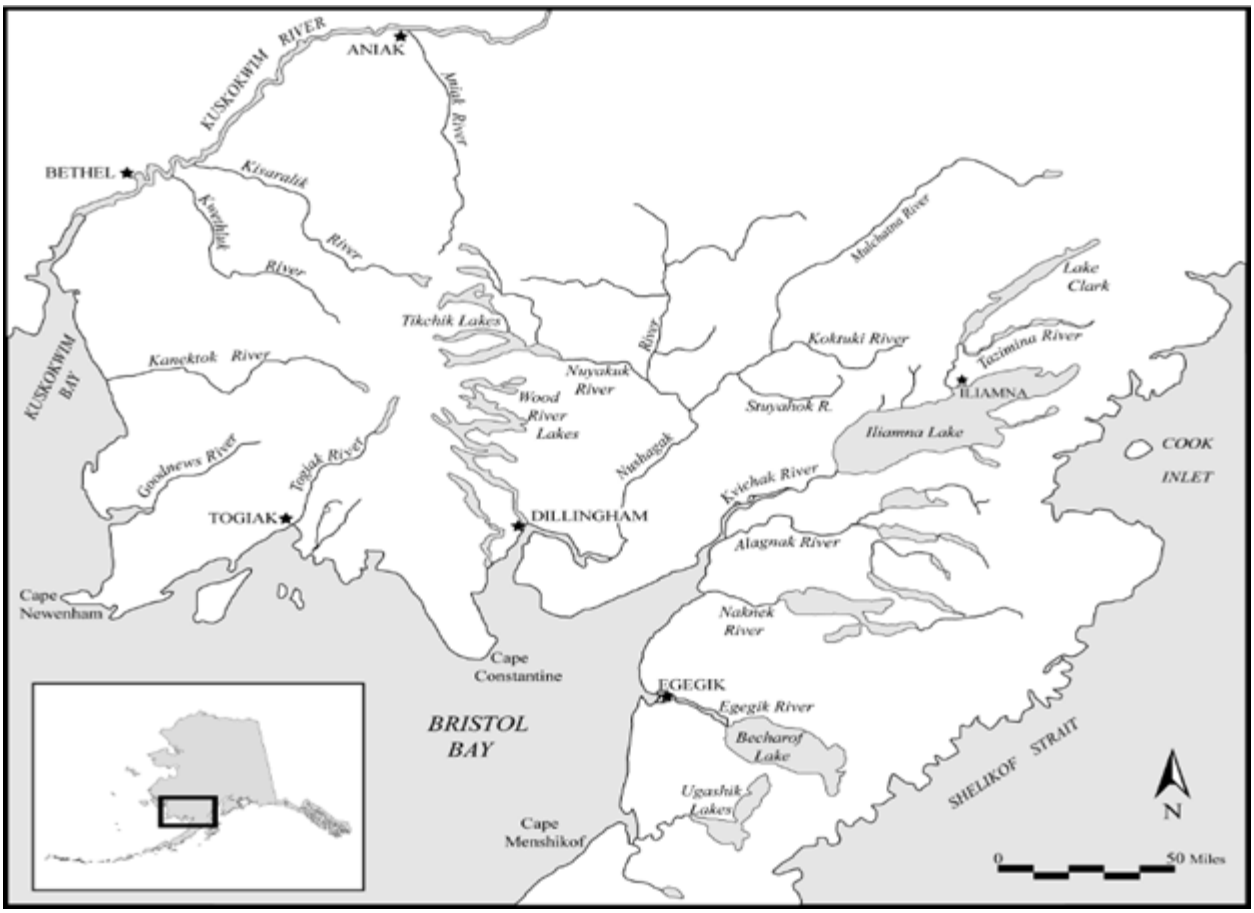


Figure 62-1.–Map of Bristol Bay Area.

PROPOSAL 175 – Align regulations for sport fishing services and sport fishing guide services in fresh and salt waters and update guide registration and reporting regulations

5 AAC 47.090. George Inlet superexclusive guided sport ecotourism Dungeness crab fishery.; 5 AAC 47.091. Nakwasina Sound superexclusive guided sport ecotourism Dungeness crab fishery.; 5 AAC 75.075. Sport fishing services and sport fishing guide services; salt water license and fresh water registration requirements; regulation of activities.; 5 AAC 75.076. Sport fishing guide and operator reporting requirements.; 5 AAC 75.085. Guided sport ecotourism requirements.; and 5 AAC 75.995. Definitions.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Amend saltwater sport fishing guide and operator licensing requirements and references in other sections of the Fishing Services and Sport Fishing Guides regulations to align regulations for sport fishing services and sport fishing guide services in fresh and salt waters and update sport fishing guide and operator reporting requirements consistent with Alaska Statutes.

WHAT ARE THE CURRENT REGULATIONS? Current regulations require sport fishing businesses and guides operating in fresh water to be registered with the department, while sport fishing businesses and guides operating in salt water are required to obtain a salt water operator license or a salt water guide license. Before a vessel is used to provide sport fishing guide services in fresh or salt waters, a vessel must be registered with the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Regulations for salt water sport fishing guides and operators would no longer be in conflict with statute. It would continue vessel registration and logbook programs for all sport fishing guides and operators with no gap in data collection. These data will continue to provide the department, board, and other entities with detailed information on harvest and effort of guided anglers in fresh- and saltwater fisheries.

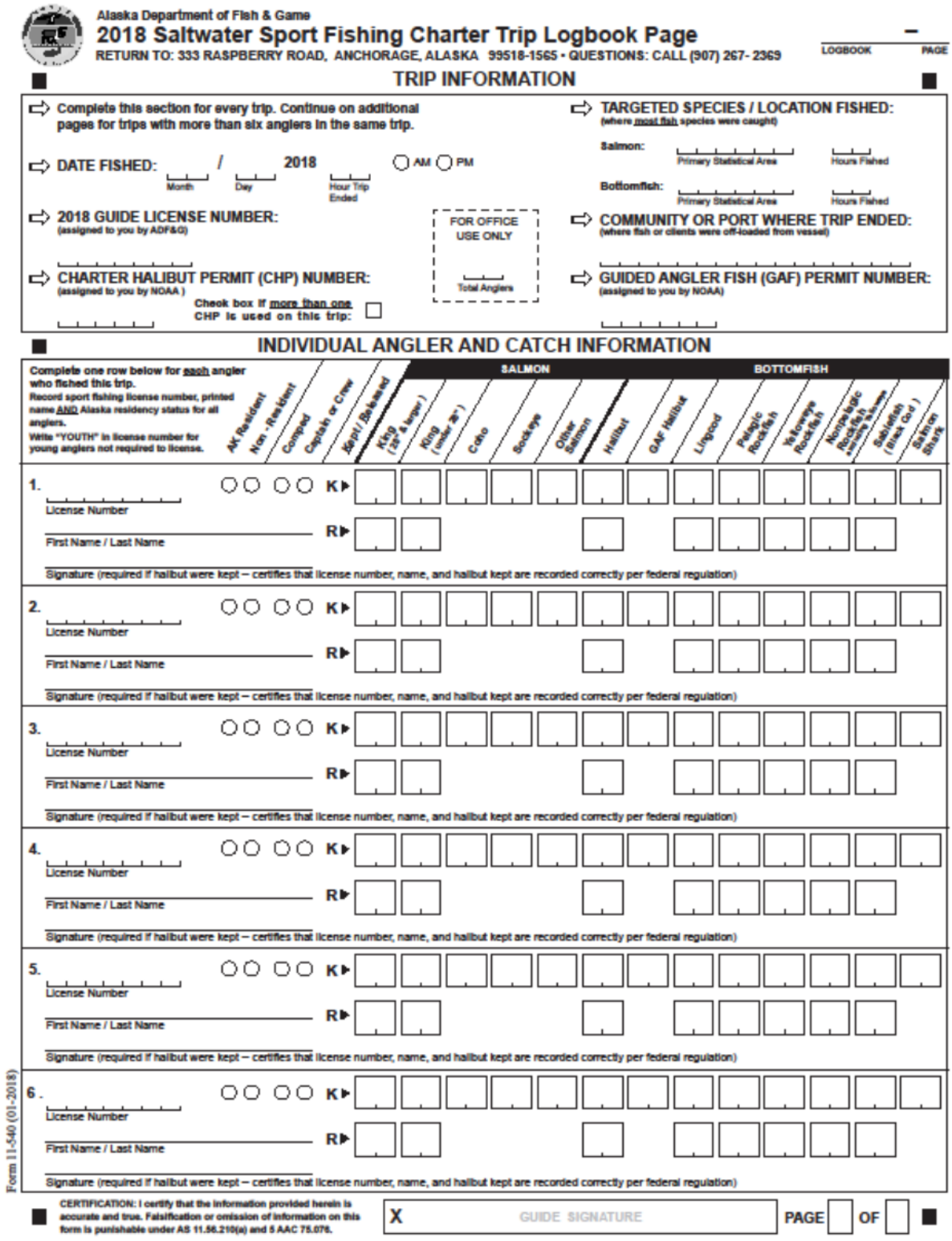
BACKGROUND: In February 1998, the board established statewide *registration* requirements for sport fishing businesses and guides and required sport fishing business owners to complete logbooks for saltwater charter vessels. In May 2004, the Alaska Legislature adopted HB 452 that established statewide *licensing* requirements for sport fishing guide business owners and sport fishing guides. Licensing requirements include license fee and minimum insurance provisions—requirements authorized by the Alaska Legislature but not the board—where registration requirements do not. The bill also established reporting requirements for all guided fishing trips, in both salt and fresh waters, and required that all vessels used in these guided fishing trips be registered with the department. In November 2004, the board amended the state regulations for sport fishing guide businesses and guides to implement the new statutes created by the Alaska Legislature. The statutes (AS 16.05.260–16.05.299) established by adoption of HB 452 sunsetted effective January 1, 2015.

House Bill 41 (HB41) was submitted during the 29th Legislature to reimplement the provisions that sunsetted in January 2015. During the 2016 legislative session, HB 41 was adopted as amended by the Alaska Legislature to require licensing of sport fishing guides and businesses operating in salt water and not freshwater. This most recent legislation will sunset January 1, 2019. The department has operated a program to register (1998–2004, 2015–2016, 2017–2018 [for fresh water]) and/or license (2005–2014, 2017–2018 [for salt water]) both sport fishing guides and

businesses, administer sport fishing salt (since 1998) and fresh (since 2005) water guide logbooks, and register sport fishing guide vessels (since 2005) (Figures 175-1 and 175-2).

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.



Alaska Department of Fish & Game

2018 Saltwater Sport Fishing Charter Trip Logbook Page

RETURN TO: 333 RASPBERRY ROAD, ANCHORAGE, ALASKA 99518-1565 • QUESTIONS: CALL (907) 267-2369

LOGBOOK – PAGE

TRIP INFORMATION

Complete this section for every trip. Continue on additional pages for trips with more than six anglers in the same trip.

DATE FISHED: ___ / ___ 2018 (Month / Day) ___ (Hour Trip Ended) ○ AM ○ PM

2018 GUIDE LICENSE NUMBER: (assigned to you by ADF&G)

CHARTER HALIBUT PERMIT (CHP) NUMBER: (assigned to you by NOAA) Check box if more than one CHP is used on this trip: ☐

FOR OFFICE USE ONLY — Total Anglers

TARGETED SPECIES / LOCATION FISHED: (where most fish species were caught)

Salmon: ___ (Primary Statistical Area) ___ (Hours Fished)

Bottomfish: ___ (Primary Statistical Area) ___ (Hours Fished)

COMMUNITY OR PORT WHERE TRIP ENDED: (where fish or clients were off-loaded from vessel)

GUIDED ANGLER FISH (GAF) PERMIT NUMBER: (assigned to you by NOAA)

INDIVIDUAL ANGLER AND CATCH INFORMATION

Complete one row below for each angler who fished this trip.
Record sport fishing license number, printed name AND Alaska residency status for all anglers.
Write "YOUTH" in license number for young anglers not required to license.

					SALMON					BOTTOMFISH								
	AK Resident	Non-Resident	Comped	Captain or Crew	Kept / Released	King (28" & larger)	King (under 28")	Coho	Sockeye	Other Salmon	Halibut	GAF Halibut	Lingcod	Pelagic Rockfish	Yelloweye Rockfish	Nonpelagic Rockfish (excluding Yelloweye)	Sablefish (Black Cod)	Salmon Shark
1. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		
2. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		
3. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		
4. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		
5. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		
6. License Number ___ First Name / Last Name ___	○	○	○	○	K ▸													
					R ▸													
Signature (required if halibut were kept – certifies that license number, name, and halibut kept are recorded correctly per federal regulation)																		

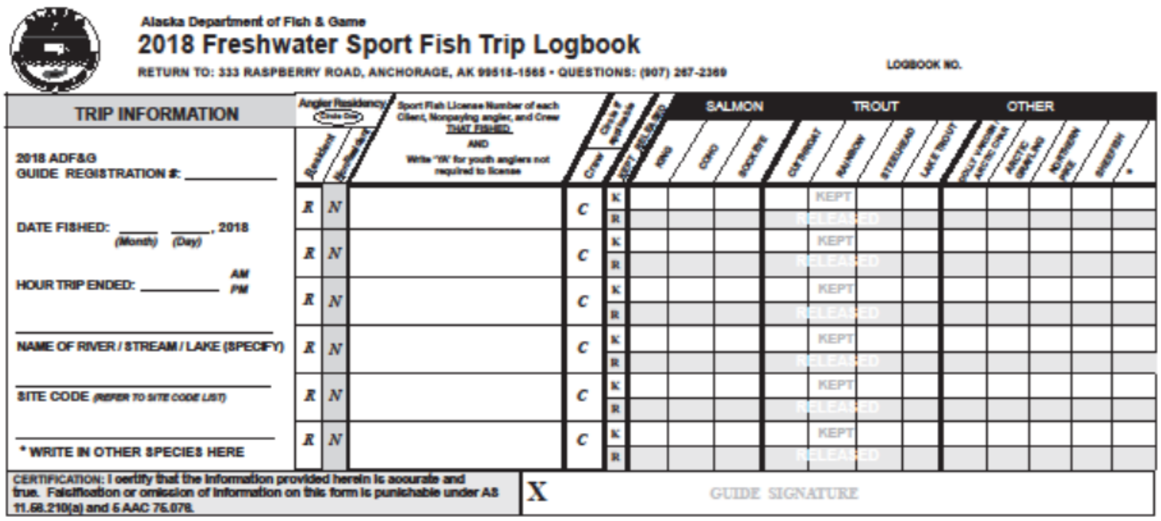
Form 11-540 (01-2018)

CERTIFICATION: I certify that the information provided herein is accurate and true. Falsification or omission of information on this form is punishable under AS 11.56.210(a) and 5 AAC 75.076.

X GUIDE SIGNATURE

PAGE ___ OF ___

Figure 175-1.–Copy of 2018 Saltwater Logbook data page.



Alaska Department of Fish & Game

2018 Freshwater Sport Fish Trip Logbook

RETURN TO: 333 RASPBERRY ROAD, ANCHORAGE, AK 99518-1565 • QUESTIONS: (907) 267-2369

LOGBOOK NO.

TRIP INFORMATION

2018 ADF&G GUIDE REGISTRATION #: ____________

DATE FISHED: ____ ____, 2018 (Month) (Day)

HOUR TRIP ENDED: __________ AM PM

NAME OF RIVER / STREAM / LAKE (SPECIFY)

SITE CODE (REFER TO SITE CODE LIST)

* WRITE IN OTHER SPECIES HERE

Angler Residency (Circle One)

Sport Fish License Number of each Client, Nonpaying angler, and Crew THAT FISHED AND Write "W" for youth anglers not required to license

SALMON TROUT OTHER

KEPT RELEASED

CERTIFICATION: I certify that the information provided herein is accurate and true. Falsification or omission of information on this form is punishable under AS 11.56.210(a) and 5 AAC 75.076.

X GUIDE SIGNATURE

Figure 175-2–Copy of 2018 Freshwater Logbook data page.

COMMITTEE OF THE WHOLE–GROUP 2: COMMERCIAL SALMON, COMMERCIAL HERRING (25 PROPOSALS)

Gear Specifications and Operations, and Description of Area/Fishing districts (8 Proposals)

PROPOSAL 23 – Clarify that the holder of two drift gillnet limited entry permits may operate up to 150 fathoms of drift gillnet gear

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

PROPOSED BY: Katherine Carscallen, Susie Jenkins-Brito, Bronson Brito, Mark Schwantes, Robert Heyano, Patricia Treydte, Reba Temple

WHAT WOULD THE PROPOSAL DO? This would add additional language to existing regulation to emphasize that an individual owning two CFEC limited entry drift gillnet permits would not be permitted to operate 200 fathoms of drift gillnet gear as a dual permit operation.

WHAT ARE THE CURRENT REGULATIONS? Dual permit regulations require two separate permit holders to be present on a vessel in order to operate as a dual vessel with 200 fathoms of gear. Current regulations limit the length of a drift gillnet to no more than 150 fathoms per vessel unless two drift gillnet permit holders are on board a vessel at the same time, the vessel and permit holders have registered as a dual operation, and the vessel is marked accordingly. In this instance, 200 fathoms of drift gillnet gear may be fished.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would have no effect because it does not change how the drift gillnet fishery is conducted or change the amount of gear deployed from a drift gillnet vessel.

BACKGROUND: When the limited entry permit system was implemented for salmon in 1974, an individual was allowed to own only one permit. House Bill 286 was passed into law in 2002, allowing an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 was passed allowing the board to authorize additional gear with ownership of a second permit.

The legal gear limit for drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted that allowed use of 200 fathoms of gear when two permit holders are on the same vessel and the vessel is marked accordingly. Prior to 2016 dual permit harvest data is inferred on registration information which may be inaccurate due to the mobility of the drift gillnet fleet and because a dual combination may have chosen to deliver on only one permit. Beginning in 2016, dual permit operations were required to imprint both CFEC drift gillnet permits on a fish ticket when delivering under a dual permit operation (Table 23-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department supports maintaining access to CFEC limited entry permits for new fishery participants.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 23-1.–Dual drift gillnet participation and percent of drift gillnet harvest, Bristol Bay, 2010–2018.

Year	Total permits	Permits fished	% Fished	Dual [a]		
				Number of permits [b]	% of permits [b]	% of harvest
2010	1,863	1,731	93%	720	42%	35%
2011	1,862	1,747	94%	448	26%	31%
2012	1,862	1,740	93%	652	37%	32%
2013	1,862	1,709	92%	626	37%	28%
2014	1,863	1,751	93%	624	36%	32%
2015	1,863	1,744	94%	618	35%	32%
2016	1,863	1,714	93%	706	41%	38%
2017	1,863	1,728	95%	714	41%	37%
2018 [c]	1,863	1,733	92%	744	43%	39%
Average 2010–2018	1,869	1,651	88%	650	39%	34%

Note: Drift gillnet catch only; excludes set gillnet catch. Also excludes Togiak District because dual permits not allowed.

[a] Tracking dual permits did not begin until 2010.

[b] 2010–2015 dual permit participation is inferred from permit registration information (source: CFEC); 2016–2018 dual participation based on fish ticket information.

[c] Preliminary data..

PROPOSAL 24 – Allow the holder of either two set gillnet or two drift gillnet limited entry permits to operate more gear than the holder of a single limited entry permit

5 AAC 06.331. Gillnet specifications and operations, and 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay

PROPOSED BY: Bruce Skolnick.

WHAT WOULD THE PROPOSAL DO? This would permit an individual owning two CFEC limited entry drift or set gillnet permits to operate both permits as a dual permit operation. Dual drift gillnet operations would be allowed 200 fathoms of gear as per 5 AAC 06.333 but set gillnet specifications and gear allowances are not defined other than to "operate more gear than the holder of a single limited entry permit".

WHAT ARE THE CURRENT REGULATIONS? Current regulations limit the length of a drift gillnet to no more than 150 fathoms per vessel unless two drift gillnet permit holders are on board a vessel at the same time, the vessel and permit holders have registered as a dual operation, and the vessel is marked accordingly. In this instance, 200 fathoms of drift gillnet gear may be fished. Dual permit regulations require two separate permit holders to be present on a vessel in order to operate as a dual vessel with 200 fathoms of gear.

Regulations allow the ownership of more than one set gillnet permit, but they cannot be fished concurrently. A set gillnet permit holder may operate no more than 50 fathoms of gear and two nets. In special harvest areas however, different regulations may apply for the allowable length and total number of nets. In addition, minimum distances between nets and a maximum distance offshore are stipulated and vary by district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? For drift gillnets there would be no effect on management for escapement goals. When originally adopted it was thought that each dual permit combination would have the potential result of one less vessel and 100 fathoms less gear in the fishery. It is not possible to determine if there would be a decrease in vessels or a change to the total amount of gear fished. This would likely increase permit value and reduce permit availability by an unknown amount.

Unlike the potential for fleet and gear reduction of stacking drift gillnets, for set gillnets this proposal may result in consolidation of set gillnet permit ownership without the same potential for reducing the amount of gear in the fishery. Depending on district, sites and support facilities (tenders, cabins, storage) may be limited and provide impediments for some set gillnet fishermen. Stacking of permits would have no effect on how fisheries are managed pertaining to escapements, harvests, and allocations.

BACKGROUND: When the limited entry permit system was implemented for salmon in 1974, an individual was allowed to own only one permit. House Bill 286 was passed into law in 2002, allowing an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 was passed allowing the board to authorize additional gear with ownership of a second permit.

The legal gear limit for drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted that allowed use of 200 fathoms of gear when two permit holders are on the same vessel and the vessel is marked accordingly.

For set gillnet gear, the board adopted a regulation in 2009, with a sunset clause of December 31, 2012, to allow an individual with two set gillnet permits to operate up to 100 fathoms of gear with no more than four nets and no single net longer than 50 fathoms.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department supports maintaining access to CFEC limited entry permits for new fishery participants. If an individual is allowed to own and operate two permits and compliments of set gillnet gear, they would need to attend gear in operation consistent with 5 AAC 39.107(d) and (e).

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSALS 25 and 26 – Allow an individual holding two drift gillnet limited entry permits to operate up to 200 fathoms of drift gillnet gear. Allow the owner of two drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear from a single vessel

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

PROPOSED BY: Abe Williams (Proposal 25) and Kurt Johnson (Proposal 26)

WHAT WOULD THE PROPOSAL DO? This would allow the owner of two drift gillnet permits to operate 200 fathoms of drift gillnet gear from a single vessel.

WHAT ARE THE CURRENT REGULATIONS? Current regulations limit the length of a drift gillnet to no more than 150 fathoms per vessel unless two drift gillnet permit holders are on board a vessel at the same time, the vessel and permit holders have registered as a dual operation, and the vessel is marked accordingly. Dual permit regulations require two separate permit holders to be present on a vessel in order to operate as a dual vessel which is allowed 200 fathoms of gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would have no effect on management for escapement goals. It is not possible to determine if there would be a decrease in vessels or a change to the total amount of gear fished. This would likely increase permit value and reduce permit availability by an unknown amount.

BACKGROUND: When the limited entry permit system was implemented for salmon in 1974, an individual was allowed to own only one permit. House Bill 286 was passed into law in 2002, allowing an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 was passed allowing the board to authorize additional gear with ownership of a second permit.

The legal gear limit for drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted that allowed use of 200 fathoms of gear when two permit holders are on the same vessel and the vessel is marked accordingly.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department supports maintaining access to CFEC limited entry permits for new fishery participants.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 27 – Allow the holder of two set gillnet limited entry permits in the Naknek–Kvichak, Egegik, and Ugashik districts to operate 100 fathoms of set gillnet gear

5 AAC 06.331. Gillnet specifications and operations

PROPOSED BY: Eddie Clark

WHAT WOULD THE PROPOSAL DO? This would allow an individual who owns two CFEC limited entry set gillnet permits to operate both concurrently as a dual permit operation with no more than four set gillnets, no more than 100 fathoms of set gillnet gear in the aggregate, in the Naknek-Kvichak, Egegik, and Ugashik districts. No single set gillnet may be more than 50 fathoms in length and no more than 50 fathoms of net may be fished on an individual set net site. Site and buoys must be marked with both CFEC permit numbers and with "S", and CFEC permit numbers must be on one in every 10 corks.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow the ownership of more than one set gillnet permit, but they cannot be fished concurrently. A set gillnet permit holder may operate no more than 50 fathoms of gear and two nets. However, in special harvest areas different regulations may apply for the allowable length and total number of nets. In addition, minimum distances between nets and a maximum distance offshore are defined and vary by district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Unlike the potential for fleet and gear reduction of stacking drift gillnets, for set gillnets this proposal may result in consolidation of set gillnet permit ownership without the same potential for reducing the amount of gear in the fishery. Depending on district, sites and support facilities (tenders, cabins, storage) may be limited and provide impediments for some set gillnet fishermen. Stacking of permits would have no effect on how fisheries are managed pertaining to escapements, harvests, and allocations.

BACKGROUND: When the limited entry permit system was implemented for salmon in 1974, an individual was allowed to own only one permit. House Bill 286 was passed into law in 2002, allowing an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 was passed allowing the board to authorize additional gear with ownership of a second permit. The board adopted a regulation in 2009, with a sunset clause of December 31, 2012, to allow an individual with two set gillnet permits to operate up to 100 fathoms of gear with no more than four nets and no single net longer than 50 fathoms.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department supports maintaining access to CFEC limited entry permits for new fishery participants. If an individual is allowed to own and operate two permits and compliments of set gillnet gear, they would also be required to attend gear in operation consistent with (5 AAC 39.107(d)(e)).

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 28 – Allow commercial fishing for salmon, with set net gear only, within the section of the Kvichak River that borders Levelock Village land

5 AAC 06.331. Gillnet specifications and operations

PROPOSED BY: Levelock Village Council

WHAT WOULD THE PROPOSAL DO? This would add a portion of the Kvichak River, adjacent to land of the village of Levelock, to the Kvichak Section for commercial fishing with set gillnet gear with gillnets restricted to 25 fathoms in length and other gillnet specifications and operations specific to this area. Salmon harvested in this area would be applied to the Kvichak Section set gillnet allocation as specified in 5 AAC 06.364 *Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.*

WHAT ARE THE CURRENT REGULATIONS? The Kvichak River is closed to commercial fishing upstream of the closed waters line near Graveyard Point. In the Bristol Bay Registration Area, a person may operate two set gillnets which may not exceed 50 fathoms in aggregate length. Set gillnets shall be operated in substantially a straight line. The Naknek-Kvichak District harvest allocation from June 1 to July 17 is 84% drift gillnet fishery, eight percent Kvichak Section set gillnet fishery, and eight percent Naknek Section set gillnet fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase the fishable area of the Kvichak Section with set gillnets in an area that is highly efficient for catching fish. This would likely increase the harvest capability of the Kvichak Section set gillnet fleet. Increased harvest capability may result in reduced fishing time for set gillnets in the Kvichak Section in order to achieve escapement goals and harvest allocations. Levelock is above the Kvichak Inriver Test Fishery and allowing harvest above the test fishery would complicate inriver run assessment. Management of the Kvichak River would be more complicated because fish near Levelock are two tides removed from the main commercial fishing district, therefore timing of fishing periods would likely be different from fishing periods in the main district.

BACKGROUND: The commercial fishing district has never been open near Levelock.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Creating a fishing area for set gillnet gear at Levelock would complicate management of Kvichak River sockeye salmon and reduce the department's ability to assess how many fish have moved beyond the commercial fishery and into the Kvichak River. Reduced assessment capacity may result in more conservative management. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 29 – Establish mesh size restrictions for the conservation of king salmon in the Naknek–Kvichak and Ugashik Districts

5 AAC 06.331. Gillnet specifications and operations

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Establish mesh size restrictions in regulation for the conservation of king salmon in the Naknek-Kvichak and Ugashik Districts.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow mesh size restrictions by emergency order for conservation purposes.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would establish gillnet mesh size restrictions of 5.5 inch or less for the conservation of king salmon in regulation for the Naknek-Kvichak and Ugashik districts and eliminate the need to issue a pre-season emergency order.

BACKGROUND: King salmon are harvested incidentally in all districts within Bristol Bay. Populations of king salmon in the Naknek-Kvichak, Egegik, and Ugashik river systems are not large enough to provide opportunity for directed commercial fisheries. Over the last decade, king salmon populations have been under stress statewide from unknown causes. The department has taken a precautionary approach to management of Bristol Bay eastside salmon fisheries by issuing preseason emergency orders in the Naknek-Kvichak and Ugashik commercial districts restricting mesh size to 5.5 inch or less to provide protection to king salmon in those systems. Additional measures for the conservation of king salmon include a three day per week fishing schedule early in the season in the Egegik District and scheduling fishing periods to start at the seven-foot tide mark in the Naknek-Kvichak District. Regulations are already in place to restrict gillnet mesh size for the conservation of king salmon in the Egegik District.

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 174 – Clarify fishing areas, districts, sections, and gear specifications and operations for Sockeye Special Harvest Areas in Bristol Bay

5 AAC 06.100. Description of area; 5 ACC 06.200. Fishing districts and sections; 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan; 5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan; and 5 AAC 06.373. Alagnak River Sockeye Salmon Special Harvest Area Management Plan

PROPOSED BY: Alaska Board of Fisheries

WHAT WOULD THE PROPOSAL DO? This will provide clarification that Sockeye Salmon Special Harvest Areas (SHA) in Bristol Bay are within the Bristol Bay Area as defined in 5AAC 06.100, and that SHAs are within fishing districts and sections defined in 5AAC 06.200. This will also clarify board intent regarding set gillnet specifications and operations within the SHA management plans.

WHAT ARE THE CURRENT REGULATIONS? Special harvest areas are present in all Bristol Bay districts, except the Togiak District, and are governed by specific management plans designed to conserve less abundant stocks by focusing effort on more abundant stocks (Wood River SHA, Naknek River SHA, Alagnak River SHA, and Egegik River SHA), or to provide additional opportunity to harvest fish in excess of escapement needs (Wood River SHA and Ugashik River SHA). During commercial fishing periods in the Wood River SHA subsistence is closed by regulation. In 2015, the board adopted a proposal to allow to subsistence fishing continuously in the Naknek River in an area that is overlapped by the Naknek River SHA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would specifically define the relationship between the Naknek and Wood River SHAs and the respective commercial fishing district. Subsistence fishing is permitted concurrently in commercial districts when commercial districts are open to commercial fishing. If the district definitions do not include SHAs, then subsistence fishing opportunity would be reduced in the commercial districts when the SHA is open.

BACKGROUND: The Wood River SHA is used frequently to either allow fishermen additional opportunity to harvest fish excess to escapement needs of the Wood River system, or conserve Nushagak River sockeye salmon stocks. In the Naknek-Kvichak District, the Naknek River and the Alagnak River SHAs are utilized to conserve Kvichak River sockeye salmon stocks. In 2018, the Naknek River SHA was used for the first time since 2007 and some confusion arose over whether the SHAs are part of the associated commercial fishing districts and how enforcement should approach any violations.

All five SHAs are governed by separate and distinct management plans, but each is considered as a subset of the management approach of the larger associated district. It is implied and but not specifically stated that each SHA is included within the district boundaries. Each SHA has statistical areas that are associated with the larger district, and SHA harvest is allocated per management plan developed by the board. How the districts are defined can impact subsistence opportunity.

DEPARTMENT COMMENTS: The department **SUPPORTS** clarifying existing regulation to clearly state that SHAs are part of their respective adjacent fishing districts and providing additional specificity regarding gear operation in SHAs.

COST ANALYSIS:. Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Registration and Reregistration, Vessel Specifications and Operations, Fishing Periods, and Closed Waters (6 Proposals)

PROPOSAL 30 – Increase the maximum length for drift gillnet vessels from 32 feet in overall length to 42 feet in overall length

5 AAC 06.341. Vessel specifications and operations

PROPOSED BY: Mark Smith

WHAT WOULD THE PROPOSAL DO? Adopt a maximum 42-foot overall length limit for drift gillnet vessels in Bristol Bay.

WHAT ARE THE CURRENT REGULATIONS? Commercial salmon fishing vessels are limited to an overall length of 32 feet with allowances for attachments not integral to the structure of the vessel to be no more than eight inches in width or height (e.g., anchor rollers, fish drop out baskets, motor guards).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow a maximum vessel length of 42 feet which would increase fleet harvest capacity and efficiency. This would likely result in a different amount of fishing time allowed relative to that allowed with a vessel size limit of 32 feet overall length to ensure escapement goals are met.

BACKGROUND: The 32-foot length limitation to commercial fishing vessels in Bristol Bay was established in 1949, though there have been some descriptive changes of that length throughout the years. The current regulation and description has been in effect since 1991. Common justifications found in proposals in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality with increased size allowing installation of refrigeration of fish or increased capacity for icing/cooling of fish. Proposals to increase boat length limit have been before the board in almost every cycle since 1991.

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 31 – Delay implementation of the 48-hour district transfer notification period until the third Saturday in June

5 AAC 06.370. Registration and reregistration

PROPOSED BY: Darryl Pope

WHAT WOULD THE PROPOSAL DO? Delay district registration until the third Saturday in June.

WHAT ARE THE CURRENT REGULATIONS? Current regulations require registration before commercial fishing for salmon with drift gillnets in any Bristol Bay district beginning June 1. Set gillnet permit holders are required to register if they are fishing in the Nushagak District beginning June 1. The Togiak District operates under regulations prohibiting a permit holder (drift and set gillnets) who has registered to fish in any other district in Bristol Bay from fishing in the Togiak District until July 27. Permit holders who have registered to fish in Togiak are prohibited from fishing in other districts in Bristol Bay until July 27.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Drift gillnet fishermen could fish any district (except Togiak) during any open commercial period without registering with the department, up to the third Saturday in June.

BACKGROUND: Prior to 2010, all commercial fishermen were required to register for a district before commercial fishing for salmon in any district in Bristol Bay regardless of date. In 2009, the regulation was modified to delay the drift gillnet registration requirement until June 25 in the Naknek-Kvichak, Egegik, and Ugashik districts. In 2015, the regulation was rescinded, and drift gillnet fishermen were again required to register before fishing in any district in Bristol Bay. Eight proposals were submitted at the 2015 Bristol Bay board meeting to change the registration date to June 1. Two more were submitted for a registration date similar to that in this proposal. Public comment was more supportive of an initial registration period beginning June 1. A transfer between districts is permitted after notifying the department and waiting a 48-hour period during which time the permit holder cannot fish. The 48-hour waiting period may be waived by emergency order if escapement surpasses the midpoint of the escapement goal range for a particular district.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The lack of a registration requirement combined with increased travel between districts makes it more difficult to anticipate how many boats will fish in a specific district. This uncertainty complicates early season management because the duration of fishing periods is partially dependent on the number of boats. In particular, it has proven difficult to manage Egegik and Ugashik districts early in the season because of the potential for a large number of drift gillnet vessels to show up. The elimination of an early registration requirement may favor fishermen who move freely between districts but may negatively impact fishermen who remain in a single district or are less mobile. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 32 – Extend duration of late-season fishing periods in the Naknek–Kvichak, Egegik, and Ugashik Districts

5 AAC 06.320. Fishing periods

PROPOSED BY: Bill Hill

WHAT WOULD THE PROPOSAL DO? This would increase duration of late season fishing periods in the Naknek-Kvichak, Egegik, and Ugashik districts by 60 hours. Beginning 9:00 a.m. July 17, fishing periods would be open from 9:00 a.m. Monday to 9:00 p.m. Sunday.

WHAT ARE THE CURRENT REGULATIONS? Beginning 9:00 a.m. July 17, salmon may be taken from 9:00 a.m. Monday to 9:00 a.m. Friday in the Naknek-Kvichak, Egegik, and Ugashik districts, except when special harvest area regulations are in effect. Registration and transfer notification are not required after July 17 except under some circumstances in the Ugashik District. In addition, the Ugashik District schedule changes on August 1 to 9:00 a.m. Thursday to 9:00 a.m. Monday.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase fishing opportunity during the late season fishing schedule while allowing for a 12-hour closed period to provide late season escapements each week. A predictable fishing schedule after July 17 may increase processor interest in harvesting salmon surplus to escapement needs.

BACKGROUND: The late season (fall) fishing schedule has been in place for many decades. In most years, when escapement goals have been met, the department has issued emergency orders to open continuous fishing periods through the first one or two weekend closures of the fall schedule. Since 2007, there have been only three years (2011, 2013, and 2017) that the department has not issued an EO to keep the fishery open. The practical result is that fishing is open continuously from mid-July to the end of the month. In late July to early August, fishermen and processors end operations as the sockeye salmon run tails off. Processors operate plants with the consideration of having fish available to process on a daily basis. If the fishery closes for the weekend, individual processors may not be able to economically justify a two day break and terminate operations for the season. Frequently, harvestable surpluses are available after such closures, but go unutilized because of lack of markets.

DEPARTMENT COMMENTS: The department **SUPPORTS** modifying the fall fishing schedule. Adoption of the proposed fishing schedule, or one similar to it, would simplify management of the commercial fishery after July 17 by putting all three eastside fishing districts on the same schedule. This would eliminate the need to use emergency orders to provide harvest opportunity on surplus fish and provide more predictable late season fishing opportunity for fishermen and processors. Management plans of Naknek-Kvichak, Egegik and Ugashik districts contain directions for the department to manage in the event of escapement shortfalls. .

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 33 – Allow the use of beach weirs in commercial salmon fishing in Bristol Bay 5 AAC 06.330. Gear, and 5 ACC XX.XXX. New section

PROPOSED BY: Russell Phelps and Reid Ten Kley.

WHAT WOULD THE PROPOSAL DO? This would create a new gear type called a beach weir with defined operations and specifications and apply the same regulations as set gillnets that pertain to allocations, open periods, and districts. A beach weir permit could be obtained by merging two set gillnet permits.

WHAT ARE THE CURRENT REGULATIONS? Beach weirs are not defined in regulation and are not listed under types of legal gear. DNR shore fishery leases are issued to holders of CFEC set gillnet limited entry or interim-use permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unknown how this gear type would affect harvest and allocation, but presumably beach weirs, being very similar to fish traps, would be considerably more efficient than set gillnets, thereby increasing overall set gillnet fishery harvest potential, depending on the number of fishermen who chose to operate beach weirs. This could potentially result in reduced fishing time for the set gillnet gear group in order to remain below allocation levels.

BACKGROUND: A beach weir as described in the proposal is very similar to either a fish trap or a fyke net. Alaska Statute 16.10.070 prohibits the operation of fish traps on state tideland and defines a fish trap as consisting principally of a fence or netting stretched across or partly across a stream to obstruct the upstream progress of the salmon and turn the fish into the "heart" or "pot" of the trap, where they are imprisoned until removed. Fyke nets, defined in 5 AAC 39.105(d)(17), are a type of legal commercial fishing gear, however they are not currently legal gear in commercial salmon fisheries.

DEPARTMENT COMMENTS: The department **NEUTRAL** on this proposal. Introduction of a fish trap-like beach weir gear type would complicate management of Bristol Bay salmon fisheries with unknown potential benefits. Provisions of this proposal requiring merging of two CFEC limited entry set gillnet permits to form a single beach weir permit would require action by CFEC.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 34 – Reduce closed waters in the Naknek–Kvichak District

5 AAC 06.350. Closed waters.

PROPOSED BY: Reid Ten Kley

WHAT WOULD THE PROPOSAL DO? This would move the closed waters line near Graveyard Point upstream to allow for compliance with minimum distance between set gillnets on leased sites.

WHAT ARE THE CURRENT REGULATIONS? The following locations in the Naknek-Kvichak District are closed to the taking of salmon: those waters northeast of a line from a point near Graveyard Point at lat 58°52.07′N, long 157°00.80′W to a point on the northwest shore of Kvichak Bay at lat 58°53.37′N, long 157°04.26′W.

In addition, in the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts, no part of a set gillnet may be set or operated within 300 feet of any part of another set gillnet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase the amount of fishing area available; however, it probably would not increase the number of available fishing sites.

BACKGROUND: Proposals to amend this closed waters line near Graveyard Point were deliberated by the board during the 2015 statewide meeting, during the 2015 Bristol Bay meeting, and during the 2016 statewide meeting. During the 2015 statewide meeting, coordinates for the west side of the boundary line were amended to correct an error in regulation. During the 2015 Bristol Bay meeting, a Committee on Coastal Erosion Impacts on Set Gillnet Operations was created in an attempt to address environmentally caused changes at set gillnet sites. The Committee developed the following criteria for proposals:

i. is related to coastal erosion
ii. identifies the historical use of the site
iii. indicates involvement of others
iv. would not impact escapement
v. would not increase the number of sites legally fished
vi. will not adversely affect those who have historically fished this area
vii. results in a historical fairness

During the 2016 statewide meeting the east side of the boundary line was amended to accommodate erosion issues and create more room for set gillnet sites.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there is not a management or conservation concern.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 35 – Reduce closed waters in the Naknek–Kvichak District near Graveyard Creek

5 AAC 06.350. Closed waters

PROPOSED BY: Agostino Grossi

WHAT WOULD THE PROPOSAL DO? This would replace the closed waters line that has been established by the department at the mouth of Graveyard Creek with a closed waters line that would be established by the board and defined in regulation.

WHAT ARE THE CURRENT REGULATIONS? The mouth of Graveyard Creek is not defined in 5 AAC 06.350. *Closed waters*. The department places closed waters signs at the mouth of Graveyard Creek. The Naknek-Kvichak District is defined as all waters of Kvichak Bay north and east of a line extending from near Johnson Hill to the west side of Kvichak Bay.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would clarify where the district boundary line is at Graveyard Creek and potentially change the amount of fishable area.

BACKGROUND: Several years ago, AWT observed multiple set gillnets fishing inside of Graveyard Creek that were operated in violation of several regulations, including fishing in closed waters, operating set gillnets seaward of other set gillnets, and nets that were not operated in a substantially straight line. AWT issued warnings to the fishermen. The department posted closed waters signs at the mouth of the creek to mark closed waters.

There are shore fishery leases at the mouth of Graveyard Creek (Figure 35-1). Although shore fishery leases have been established, conflicts remain among the set gillnet fishermen who operate near the creek. Issues that have been raised by fishermen include set gillnets that are fished outside of leased sites, set gillnets that obstruct navigation into the creek, and set gillnets that are not set in a substantially straight line.

DEPARTMENT COMMENTS: The department **SUPPORTS** creating a closed waters line at the mouth of Graveyard Creek with input from stakeholders, the department, and AWT.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

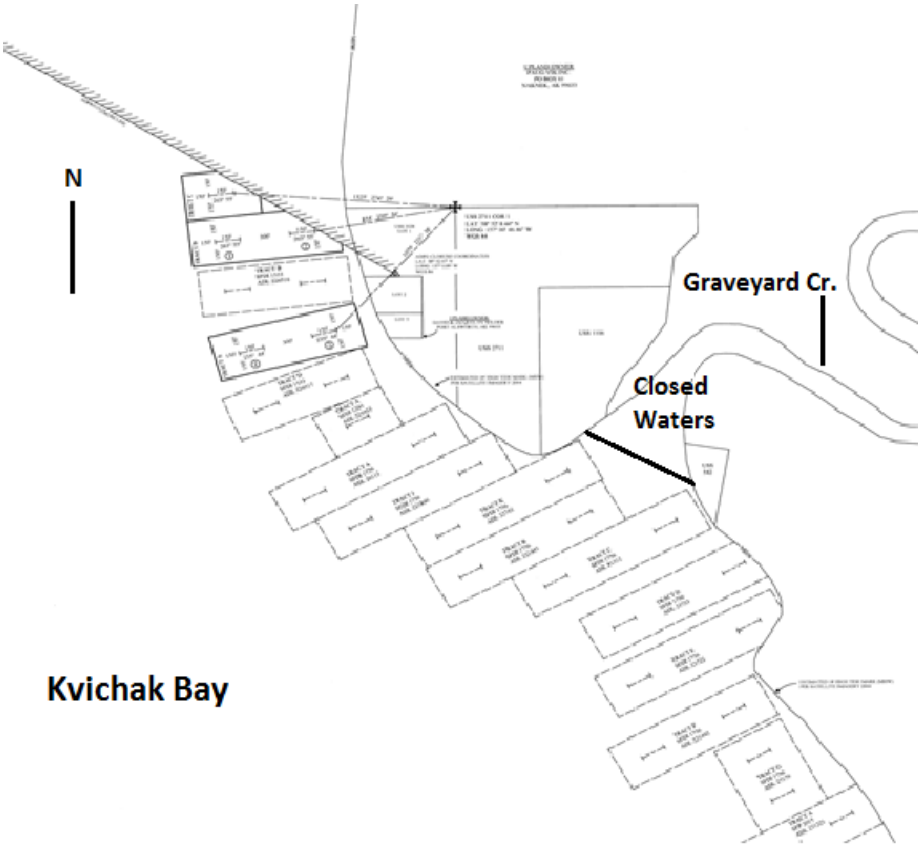


Figure 35-1.–Shore Fishery Plat No. 2029 with shore fishery leases near Graveyard Creek and approximate location of the department established closed waters line.

Figure 35-2.–Photo of Graveyard Creek at low tide with department closed waters markers in the background and set nets in the foreground.

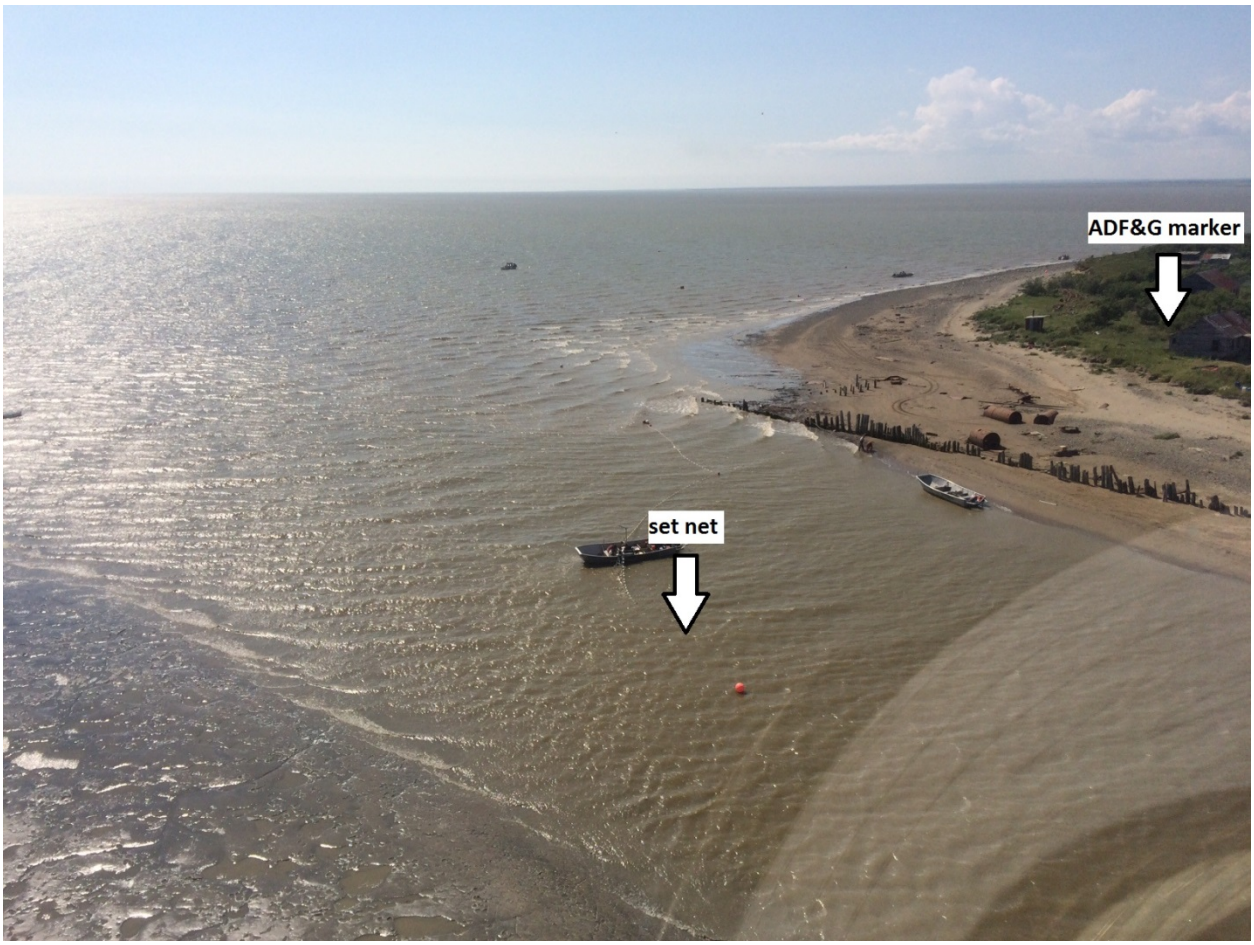


Figure 35-3.–Graveyard Creek during an ebbing high tide with set net in the foreground and location of department closed waters marker in the background.

Alagnak River Sockeye Salmon Special Harvest Area management Plan and Naknek–Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan (2 Proposals)

PROPOSAL 36 – Repeal conditions that must be met prior to allowing commercial fishing for salmon in the *Alagnak River Special Harvest Area*

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

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This would link commercial fishing periods in ARSHA to conservation of Kvichak River sockeye salmon and repeal conditions that must be met prior to allowing commercial fishing for salmon in the ARSHA.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be taken in the ARSHA during periods established by emergency order if the Alagnak River sockeye salmon escapement goal has been met and if the Alagnak River king salmon escapement goal was met in the previous year.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow the harvest of surplus Alagnak River sockeye salmon stocks in the ARSHA when sockeye salmon returns to the Kvichak River prevent the harvest of sockeye salmon within the Naknek-Kvichak District.

BACKGROUND: The *Alagnak River Sockeye Salmon Special Harvest Area Management Plan* (plan) was originally adopted in 2005 to provide opportunity to harvest surplus Alagnak River sockeye salmon when these fish could not be harvested in the Naknek-Kvichak District due to conservation of Kvichak River sockeye salmon. The plan was amended in 2015 to allow concurrent fishing periods in the ARSHA and the Naknek-Kvichak District and created additional conditions that must be met prior to allowing commercial fishing periods.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. The department has determined that the aerial survey method for king salmon escapement monitoring on this river since 2015 may not index escapement the same as, or similar to, previous surveys used to develop the escapement goal and is discontinuing this goal. The condition that requires meeting the king salmon escapement goal in the previous year resulted in no fishing opportunity in the ARSHA in 2018 when the Naknek-Kvichak District was closed for the conservation of Kvichak River sockeye salmon.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 37 – Manage the Naknek and Kvichak sections independent of each other based on the harvestable surplus within each section and establish section-specific harvest allocation criteria so that 84% of each section's harvest is allocated to the drift gillnet fleet and 16% of the section's harvest is allocated to the set gillnet fleet.

5 AAC 06.364. Naknek–Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan

PROPOSED BY: Mark Angasan

WHAT WOULD THE PROPOSAL DO? This would create separate allocations for each section of the Naknek-Kvichak District for drift gillnet and set gillnet gear with 84% distributed to drift gillnet gear in each section and 16% distributed to set gillnet gear in each section.

WHAT ARE THE CURRENT REGULATIONS? Distribute the harvestable surplus of sockeye salmon in the Naknek-Kvichak District to drift and set gillnet fisheries as follows:

1. drift gillnet – 84 percent; and
2. set gillnet – 16 percent as follows:
   a. Kvichak Section set gillnet fishery – 8 percent; and
   b. Naknek Section set gillnet fishery – 8 percent.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The drift gillnet fishery in the Kvichak Section would be managed separately from the drift gillnet fishery in the Naknek Section. The distribution of the Naknek-Kvichak District sockeye salmon harvest would not change.

BACKGROUND: The Naknek-Kvichak District is divided into two sections. Each section may be opened independently for each gear group, or each section may be opened concurrently for gear groups, or some other combination in order to achieve escapement goals in the Kvichak, Alagnak, and Naknek rivers and to distribute the harvestable surplus of sockeye salmon to the drift and set gillnet fisheries as specified in 5 AAC 06.364 (Table 37-1).

Harvest in the Naknek-Kvichak District is tracked by the statistical area that is reported on fish tickets. The Kvichak Section has three statistical areas for set gillnet gear, the Naknek Section has three statistical areas for set gillnet gear. There is one statistical area (324-00) used for all drift gillnet gear. in the Naknek-Kvichak District.

During fishing periods that are open to drift gillnet gear in the Naknek-Kvichak District, drift gillnet permit holders may fish in both the Naknek and Kvichak sections during the same fishing period.

Set gillnet fishermen may fish in either the Kvichak or Naknek section, however their mobility is somewhat limited by the limited number of fishable nonleased sites in the district and the inherent stationary nature of operating set gillnet gear.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it would substantially complicate management of these fisheries and would require a disproportionate amount of staff time to implement these changes. In order to manage for the allocations as specified in this proposal, separate statistical areas would need to be created for drift gillnet harvests in the Kvichak and Naknek sections; drift gillnet permit holders would be required to register for either the Kvichak

or Naknek section; and drift gillnet fishermen would not be able to fish in both the Kvichak and Naknek sections during the same fishing period. If these tools were implemented it would greatly complicate administration, management, and enforcement of the Naknek-Kvichak District salmon fishery. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 37-1.– Naknek-Kvichak District percentage of catch by gear type and section and permits fished by gear type 1998–2018.

		Drift net		Set net				Naknek River			
		Naknek–Kvichak		Naknek Section	Kvichak Section	Combined set net		Drift net		Set net	
Year		Catch %	Permits	Catch %	Catch %	Catch %	Permits	Catch %	Permits	Catch %	Permits
1998	[a]	85%	923	7%	8%	15%	290				
1999	[a]	84%	977	9%	7%	16%	308	100%	580	0%	
2000	[a]	82%	755	10%	4%	18%	327	79%	416	21%	234
2001	[a]	78%	547	7%	1%	23%	248	74%	482	26%	235
2002	[a,b]	65%	331	0%	0%	35%	236	65%	331	65%	226
2003	[a]	66%	468	1%	0%	34%	243	64%	457	36%	240
2004	[a]	80%	431	9%	8%	20%	280	88%	390	12%	213
2005	[a]	81%	555	2%	1%	19%	282	79%	318	21%	265
2006	[a]	83%	639	5%	3%	17%	298	79%	399	21%	286
2007	[c]	82%	604	12%	6%	18%	285	79%	380	21%	264
2008	[c]	81%	673	12%	7%	19%	282				
2009	[c]	80%	564	11%	9%	20%	269				
2010	[c]	80%	844	10%	10%	20%	276				
2011	[c]	83%	854	10%	7%	17%	264				
2012	[c]	85%	839	7%	8%	15%	268				
2013	[c]	84%	881	8%	8%	16%	255				
2014	[c]	83%	1,021	9%	8%	17%	270				
2015	[c]	84%	891	8%	8%	16%	275				
2016	[c]	82%	816	9%	9%	18%	256				
2017	[c]	70%	580	16%	14%	30%	264				
2018	[c,d]	71%	418	17%	12%	29%	263	84%	293	16%	202
Average											
1998–2018		79%	696	9%	7%	21%	273	79%	405	24%	241
2016–2018		74%	605	14%	12%	26%	261				
Allocation		84%		8%	8%	16%		NA		NA	

[a] Inriver catches included in total harvest percentage calculation.

[b] Entire season was fished in the NRSHA.

[c] Inriver catches excluded from total harvest percentage calculation.

[d] Preliminary data.

Wood River Sockeye Salmon Special Harvest Area Management Plan, Nushagak District Set and Drift Gillnet Sockeye Salmon Fisheries Management Plan, and Nushagak–Mulchatna King Salmon Management Plan (6 Proposals)

PROPOSAL 38 – Repeal provisions to open the *Wood River Special Harvest Area* when the escapement of sockeye salmon into the Wood River exceeds 1,100,000 fish and the escapement is projected to exceed 1,400,000 fish

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan

PROPOSED BY: Robert Heyano

WHAT WOULD THE PROPOSAL DO? Repeal 5 AAC 06.358(c)(3) which allows WRSHA to be opened to harvest salmon in surplus of the escapement goal and (d)(5) which addresses allocation.

WHAT ARE THE CURRENT REGULATIONS? Currently, WRSHA may be opened under (c)(3) when Wood River sockeye salmon escapement exceeds 1,100,000 and is projected to exceed 1,400,000. When opened under (c)(3), the WRSHA may only be opened for the gear group that is behind in the allocation specified by 5 AAC 06.367(b) for the Nushagak District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would remove one of the tools the department uses to control Wood River escapement in years of high abundance. It would also diminish economic opportunity for all Nushagak District fishermen and increase forgone harvest.

BACKGROUND: WRSHA was created in 1996 to allow the harvest of Wood River sockeye salmon surplus to escapement needs while protecting Nushagak River coho salmon. When first created, it allowed concurrent openings of both Nushagak District and WRSHA. In 2001 regulations were amended to prevent the WHRSA from opening concurrently with the Nushagak District. In 2006, despite almost continuous fishing by the drift and set gillnet fleet in the Nushagak District, Wood River sockeye salmon escapement exceeded 4 million fish. At the time, the upper end of the escapement goal range was 1.5 million fish. At the 2009 Bristol Bay board meeting, a proposal to open WRSHA to harvest surplus Wood River sockeye salmon was submitted and approved. This new regulation allowed for concurrent openings of the set and drift gillnet fleets. In 2012, the WRSHA plan was again changed such that the gear group behind in the allocation specified in 5 AAC 06.367(b) be given the opportunity to harvest surplus fish in the WRSHA. WRSHA has opened under this provision in 2014, 2017, and 2018. It is important to note, that under this regulation fishing in the WRSHA is optional and the regular district also remains open to both gear groups.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it removes an important tool that can be used to help control escapement to the Wood River and reduce forgone harvest in years of high abundance. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 39 – Open the *Wood River Special Harvest Area* to both set and drift gillnet gear after July 17

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan

PROPOSED BY: Nushagak Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would allow both set and drift gillnet gear to fish concurrently in WRSHA after 9:00 a.m. July 17 when the WRSHA was opened to harvest surplus sockeye salmon.

WHAT ARE THE CURRENT REGULATIONS? When opened under 5 AAC 06.358(c)(3) the WRSHA may only be opened for the gear group that is behind in the allocation specified by 5 AAC 06.367(b) for the Nushagak District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would not affect the department's ability to manage for sustainable yield. When multiple gear types are allowed in a relatively confined area, at the same time, there is a potential for gear conflict; however, this has not historically been the case in the WRSHA. After July 17, participation is typically decreasing and with the commercial district open, fishermen would have the option of fishing there as well. These factors should reduce gear conflicts.

BACKGROUND: WRSHA was created in 1996 to allow harvest of Wood River sockeye salmon surplus to escapement needs while protecting Nushagak River coho salmon. When first created, the WRSHA allowed for concurrent openings for both set and drift gillnets. In 2012, the WRSHA plan was changed to allow the gear group behind in allocation specified in 5 AAC 06.367(b) the opportunity to harvest surplus fish in the WRSHA. WRSHA has opened under this provision in 2014, 2017, and 2018. It is important to note that under this regulation, fishing in the WRSHA is optional and the Nushagak District also remains open to both gear groups. In 2014, the drift gillnet fleet was allowed to fish in the WRSHA for one day until their allocation percentage surpassed that specified in the allocation plan. The set gillnet fleet was then allowed to fish in WRSHA until July 15 when the drift fleet was again behind in allocation. WRSHA remained open to the drift fleet only until it closed as sockeye salmon numbers diminished. In 2017 and 2018, WRSHA was opened only for the set gillnet fleet since they were behind in allocation throughout the season. The department interprets the plan such that, regardless of the date, the gear type that is behind in allocation is afforded harvest opportunity provided by the *Wood River Sockeye Salmon Special Harvest Area Management Plan*. The WRSHA does not automatically revert to three drift gillnet openings to one set gillnet opening on July 17 if it was opened to harvest sockeye salmon surplus to escapement.

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 40 – Establish a drawing system for use of the four furthest downriver set gillnet sites in the *Wood River Special Harvest Area*

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan

PROPOSED BY: Paula Cullenberg and Peter Crimp

WHAT WOULD THE PROPOSAL DO? Develop a lottery system for distributing some set gillnet sites in WRSHA.

WHAT ARE THE CURRENT REGULATIONS? There are no shore fishery leases in the WRSHA. Set gillnet sites in the WRSHA are obtained by whomever sets a net first at that location. Set gillnets may not be operated within 150 feet of another set gillnet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A lottery system for determining who had the right to fish the furthest downstream set gillnet sites in the WRSHA would provide all fishermen an equal opportunity to access those sites and reduce competitive behavior in the fishery.

BACKGROUND: Shore leases are not available for the WRSHA through the Department of Natural Resources. Set gillnet sites are therefore obtained by the first legal net in the water standard. The furthest downstream sites are significantly more productive than the sites further upstream from the lower WRSHA boundary line. This results in competitive behavior as fishermen vie for the higher-producing sites. In 2017 and 2018, the WRSHA was opened for set gillnets to harvest sockeye salmon surplus to escapement needs. The total sockeye salmon harvest in the WRSHA for these two years was approximately 1.3 million.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This lottery would be conducted prior to each opening and would likely require dedicated department staff time and department funds to implement and monitor and therefore adoption of this proposal would likely lie outside the board's authority.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 41 – Reduce fishing time in the Nushagak District commercial salmon fishery when the Nushagak River sport fishery is restricted for king salmon conservation

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan

PROPOSED BY: Brian Kraft

WHAT WOULD THE PROPOSAL DO? This would restrict the maximum amount of commercial fishing time in the Nushagak District to no more than 12 hours for each gear group in any 24-hour period anytime the Nushagak River king salmon sport fishery is restricted by emergency order.

WHAT ARE THE CURRENT REGULATIONS? The Nushagak River king salmon escapement goal is 55,000–120,000 fish. An inriver goal of 95,000 king salmon was established to allow reasonable opportunity for subsistence and sport fishery guideline harvest of 5,000 fish. Various levels of restrictions are placed on the commercial, sport, and subsistence fisheries based on the department projection of king salmon returns relative to achieving the inriver and escapement goals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase probability of exceeding sockeye salmon escapement goals in the Nushagak and Wood rivers because of reduced commercial fishing opportunity. It would also reduce the department's ability to achieve allocation objectives specified in *Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.*

BACKGROUND: The Nushagak District is situated such that Nushagak and Wood River salmon must pass through the commercial district to enter their natal rivers, thus all species of salmon are subject to exploitation by the commercial fleet. The king salmon run overlaps significantly with the sockeye salmon run which results in incidental harvest of king salmon even with the 5.5-inch mesh restriction in place. In years of low king salmon and high sockeye salmon abundance, both sport and commercial fisheries have been restricted to meet the king salmon escapement goal. In 2017, the commercial fishery for sockeye salmon was delayed past the normal starting point due to poor king salmon escapement. This delay resulted in sockeye salmon escapements of approximately 700,000 in the Nushagak River and 500,000 in the Wood River prior to commercial fishing in the Nushagak District. It also resulted in a king salmon escapement of approximately 15,000 fish (27% of the lower end of the goal range) into the Nushagak River over a three day period. The king salmon sport fishery was restricted to a one fish per day limit however, the annual limit of four king salmon was not changed.

In 2018, Nushagak River king salmon returns were strong and there was no limitation to the sport fishery and the commercial fishery only implemented a 5.5 inch or smaller mesh restriction.

The Nushagak District experienced record sockeye salmon runs in 2017 and 2018 with sockeye salmon escapements exceeding the upper end of the escapement goal range by 217% and 39% respectively. The Wood River exceeded the upper end of the escapement goal range by 137% and 317% respectively.

DEPARTMENT COMMENTS: The department is **NEUTRAL** to the allocative aspects of this proposal. The department **OPPOSES** this proposal as a tool to conserve king salmon because it

lacks adaptability. Additionally, adaptive management tools are available that facilitate achieving both sockeye and king salmon escapement goals in the Nushagak District.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 42 – Reduce fishing time in the Nushagak District commercial salmon fishery when the Nushagak River sport fishery is restricted for king salmon conservation

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan

PROPOSED BY: Brian Kraft

WHAT WOULD THE PROPOSAL DO? This would require the commercial fishery to close for 8 hours around the high tide immediately following a high tide that was open to commercial fishing. This restriction would be in place anytime the Nushagak River king salmon sport fishery is restricted by emergency order in any way.

WHAT ARE THE CURRENT REGULATIONS? The Nushagak River king salmon escapement goal is 55,000–120,000 fish. An inriver goal of 95,000 king salmon was established to allow reasonable opportunity for subsistence and sport fishery guideline harvest of 5,000 fish. Various levels of restrictions are placed on the commercial, sport, and subsistence fisheries based on the department projection of king salmon returns relative to achieving the inriver and escapement goals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in reduced commercial fishing opportunity and harvest by an unknown amount. This would increase probability of exceeding Nushagak District sockeye and king salmon escapement goals.

BACKGROUND: The Nushagak District is situated such that fish bound for the Nushagak and Wood Rivers must pass through the commercial district to enter their natal rivers, thus all species of salmon are subject to exploitation by the commercial fleet. The king salmon run overlaps significantly with the sockeye salmon run which results in some harvest of king salmon even with the 5.5-inch mesh restriction in place. In years of low king salmon and high sockeye salmon abundance, both sport and commercial fisheries have been restricted to meet the king salmon escapement goal. In 2017, the commercial fishery for sockeye salmon was delayed past the normal starting point due to poor king salmon escapement. This delay resulted in sockeye salmon escapements of approximately 700,000 in the Nushagak River and 500,000 in the Wood River prior to commercial fishing in the Nushagak District. It also resulted in a king salmon escapement of approximately 15,000 fish (27% of the lower end of the goal range) into the Nushagak River over a three day period. The king salmon sport fishery was restricted to a one fish per day limit but the annual limit of four king salmon was not changed.

In 2018, Nushagak River king salmon returns were strong and there was no limitation to the sport fishery and the commercial fishery only implemented a 5.5 inch or smaller mesh restriction.

The Nushagak District experienced record sockeye salmon runs in 2017 and 2018 with sockeye salmon escapements exceeding the upper end of the escapement goal range by 217% and 39% respectively. The Wood River exceeded the upper end of the escapement goal range by 137% and 317% respectively.

DEPARTMENT COMMENTS: The department is **NEUTRAL** to the allocative aspects of this proposal. The department **OPPOSES** this proposal as a tool to conserve king salmon because it lacks adaptability. There are additional, adaptive management tools available that would allow for achieving both sockeye and king salmon escapement goals in the Nushagak District.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 43 – Establish subdistricts in the Nushagak District

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan

PROPOSED BY: Darryl Pope

WHAT WOULD THE PROPOSAL DO? Reduce the size of the Nushagak District to provide harvest opportunity on early sockeye salmon when Nushagak River king salmon escapement is below desired level.

WHAT ARE THE CURRENT REGULATIONS? The Nushagak River king salmon escapement goal is 55,000–120,000 fish. An inriver goal of 95,000 king salmon was established to allow reasonable opportunity for subsistence and sport fishery guideline harvest of 5,000 fish. Various levels of restrictions are placed on the commercial, sport, and subsistence fisheries based on the department projection of king salmon returns relative to achieving the inriver and escapement goals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would close a portion of the Nushagak District to commercial fishing for salmon. Reducing the area open to commercial fishing may reduce the time salmon traveling through the district are susceptible to exploitation by commercial fishing. It is unclear from the proposal language if the reduced area would apply only to the drift gillnet fleet or if it would also apply to the set gillnet fleet. A closure for the set gillnet fleet would displace fishermen from their traditional sites and may prevent them from fishing if no sites in the open area were available. Reducing the open area could result in crowding, more conflicts between gear types, and a disorderly fishery. It would also reduce the time sockeye salmon passing through the district are susceptible to harvest and make it more difficult to control sockeye salmon escapement.

BACKGROUND: The Nushagak District is shaped such that salmon destined for the Wood and Nushagak rivers must pass through the same waters open to commercial fishing. In 2017, as well as other years, Nushagak River king salmon sonar passage was not projected to meet the 95,000 fish inriver goal. When this occurs, the department does not allow commercial fishing in the Nushagak District until 100,000 sockeye salmon are projected to be past the escapement enumeration station on the Wood River. As a result of delaying commercial fishing to protect Nushagak River king salmon, up to 700,000 and 500,000 sockeye salmon were allowed to escape into the Nushagak River and Wood River, respectively. The department waited until the Wood River escapement reached 100,000 sockeye salmon as opposed to opening commercial fishing when 100,000 was projected. While this resulted in a larger than expected sockeye salmon escapement, it allowed for king salmon escapement crucial to achieving the lower end of the Nushagak River king salmon escapement goal range. It should also be noted that the 2017, the sockeye salmon run was the second largest run on record for the Nushagak District and far exceeded the preseason forecast.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Reducing the Nushagak District would limit the department's ability to harvest salmon surplus to escapement needs during large runs and create forgone harvest when managing for weak stocks. It would also remove set gillnet sites from the fishery thus reducing harvest power from the commercial fleet.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Bristol Bay Herring Management Plan (3 Proposals)

PROPOSAL 44 – Allow any remaining unharvested Togiak District herring spawn-on-kelp allocation to be reallocated to the Togiak District sac roe herring fishery

5 AAC 27.865. Bristol Bay Herring Management Plan

PROPOSED BY: Charles Treinen

WHAT WOULD THE PROPOSAL DO? Change the allocation for Togiak District herring such that all unharvested spawn-on-kelp quota be reallocated to the sac roe fishery.

WHAT ARE THE CURRENT REGULATIONS? The maximum exploitation rate for Bristol Bay herring stocks is 20%. Before opening the Togiak District herring fishery for sac roe and other herring products, approximately 1,500 short tons of herring are set aside for the Togiak District herring spawn-on-kelp fishery, and seven percent of the remaining available harvest for the Dutch Harbor food and bait fishery. If the actual spawn-on-kelp harvest is less than the herring spawn-on-kelp guideline harvest level, the department may reallocate 50% of the remainder to the Togiak District herring fishery.

After the herring spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the Togiak District herring fishery with 30% of the allocation available to the gillnet fleet and 70% of the allocation available to the purse seine fleet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would potentially increase the allowable harvest of herring in the Togiak District sac roe fishery by up to 750 short tons.

BACKGROUND: Although the department does occasionally receive enquiries about harvesting and purchasing spawn-on-kelp at a small-scale level, no buyer has registered to buy the product since 2003. Currently the department may reallocate 50% of the unharvested 1,500-ton spawn-on-kelp quota to the sac roe fishery. This has been done a few times but for various reasons it is not done consistently.

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

PROPOSAL 45 – Allow unharvested Togiak District sac roe gillnet allocation to be reallocated to the Dutch Harbor food and bait herring fishery

5 AAC 27.865. Bristol Bay Herring Management Plan

PROPOSED BY: Dan Veerhusen

WHAT WOULD THE PROPOSAL DO? Reallocate unharvested Togiak District sac roe herring gillnet quota to the Dutch Harbor Food and Bait herring fishery.

WHAT ARE THE CURRENT REGULATIONS? The maximum exploitation rate for Bristol Bay herring stocks is 20%. Before opening the Togiak District herring fishery for sac roe and other herring products, approximately 1,500 short tons of herring are set aside for the Togiak District herring spawn-on-kelp fishery, and seven percent of the remaining available harvest for the Dutch Harbor food and bait fishery. If the actual spawn-on-kelp harvest is less than the herring spawn-on-kelp guideline harvest level, the department may reallocate 50% of the remainder to the Togiak District herring fishery.

After the herring spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the Togiak District herring fishery with 30% of the allocation available to the gillnet fleet and 70% of the allocation available to the purse seine fleet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would change the allocation percentages for the Dutch Harbor food and bait herring fishery. This would reduce the amount available to the Togiak purse seine and gillnet fisheries. As written, in year one, this proposal would transfer 10% of unharvested quota to the Dutch Harbor fishery. For example, 700 tons or 3% in 2019. In 2020, the base allocation becomes 10% to the Dutch Harbor fishery. This reduces both the purse seine and gillnet quotas for the Togiak fishery. Additional quota transferred in 2020 would become permanent in 2021 and the Togiak fishery quota for both purse seine and gillnet will have been reduced by as much as 5% in two years.

BACKGROUND: In recent years, the value of Togiak herring caught in the sac roe fishery has been such that most gillnet fishermen don't find it financially viable to participate in the fishery. As a result, very little of the gillnet quota has been harvested in each of the last three years (Table 45-1).

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 45-1.– Comparison of Togiak and Dutch Harbor herring fishery allocations and harvest performance, 1997–2018.

	Dutch Harbor				Togiak					
		Harvest			Gillnet			Purse seine		
Year	Total allocation	Gillnet	Purse seine	GHL remaining	GHL	Harvest [a]	GHL	GHL	Harvest [a]	GHL
1997	1,645		1,950	-305	5,464	5,164	300	16,391	18,649	-2,258
1998	1,590		2,025	-435	5,280	5,952	-672	15,840	16,824	-984
1999	2,082		2,437	-355	6,914	4,858	2,056	20,741	14,368	6,373
2000	1,728		2,014	-286	5,738	5,464	274	17,215	14,957	2,258
2001	1,572	107	1,332	240	6,268	6,491	-223	14,624	15,879	-1,255
2002	1,578	134	2,664	-1,086	6,288	5,216	1,072	14,673	11,833	2,840
2003	1,662	108	1,379	283	6,624	6,505	119	15,457	15,158	299
2004	1,899	216	1,038	861	7,568	4,980	2,588	17,658	13,888	3,770
2005	1,365	0	1,154	211	5,667	5,841	-174	13,224	15,071	-1,847
2006	1,715	[b]	952	763	7,059	7,132	-73	16,471	16,821	-350
2007	1,779	[b]	1,248	531	7,090	4,012	3,078	16,544	13,120	3,424
2008	1,722	[b]	1,534	188	6,864	4,832	2,032	16,017	15,691	326
2009	1,600		1,310	290	6,378	4,140	2,238	14,882	12,967	1,915
2010	1,950		1,941	9	7,772	7,540	232	18,134	18,816	-682
2011	1,867		1,795	72	7,442	5,907	1,535	17,364	16,970	394
2012	1,627		1,807	-180	6,487	4,027	2,460	15,135	12,994	2,141
2013	2,262		1,764	498	9,017	8,244	773	21,040	19,366	1,674
2014	2,099		1,645	454	8,367	6,016	2,351	19,523	19,544	-21
2015	2,184		1,972	212	8,704	1,156	7,548	20,309	20,240	69
2016	2,166		208	1,958	8,635	80	8,555	20,148	14,799	5,349
2017	1,727		1,270	457	6,883	1,342	5,541	16,060	15,787	273
2018	1,810		1,188	622	7,212	[b]	[b]	16,829	16,490	339
Average										
20-year	1,809	113	1,574	234	7,052	4,987	2,066	17,053	15,755	1,298
1998–2007	1,697	113	1,624	73	6,450	5,645	805	16,245	14,792	1,453
2008–2017	1,920		1,525	396	7,655	4,328	3,327	17,861	16,717	1,144

Note: Blank cells represent no data.

[a] Harvest in tons and includes deadloss and test fish harvest.

[b] Confidential information

PROPOSAL 46 – Increase the amount of harvestable surplus Togiak herring allocated to the purse seine fleet from 70 percent to 88 percent

5ACC 27.865. Bristol Bay Herring Management Plan

PROPOSED BY: Robert Heyano

WHAT WOULD THESE PROPOSALS DO? This seeks to change the Togiak sac roe herring fishery allocation so that 88% of the harvest is allocated to the purse seine fleet.

WHAT ARE THE CURRENT REGULATIONS?. The maximum exploitation rate for Bristol Bay herring stocks is 20%. Before opening the Togiak District herring fishery for sac roe and other herring products, approximately 1,500 short tons of herring are set aside for the Togiak District herring spawn-on-kelp fishery, and seven percent of the remaining available harvest for the Dutch Harbor food and bait fishery. If the actual spawn-on-kelp harvest is less than the herring spawn-on-kelp guideline harvest level, the department may reallocate 50% of the remainder to the Togiak District herring fishery.

After the herring spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the Togiak District herring fishery with 30% of the allocation available to the gillnet fleet and 70% of the allocation available to the purse seine fleet.

WHAT WOULD BE THE EFFECT IF THESE PROPOSALS WERE ADOPTED? This would increase the Togiak District sac roe herring fishery allocation for the purse seine fleet by 25.7% and decrease the gillnet allocation by 60%. This would likely result in increased utilization of the Togiak District sac roe herring guideline harvest level.

BACKGROUND: In recent years the value of Togiak herring caught in the sac roe fishery has been such that most gillnet fishermen don't find it financially viable to participate in the fishery. As a result, very little of the gillnet quota has been harvested in each of the last three years (Table 45-1).

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

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.