

**ALASKA BOARD OF FISHERIES
BRISTOL BAY FINFISH
DECEMBER 2–8, 2015**

PROPOSAL INDEX

Following is a list of proposals that will be considered at the above meeting sorted by general topic. A board committee roadmap will be developed and distributed prior to the meeting.

PROPOSAL NUMBER (70 proposals) SUBJECT

Commercial Salmon District Boundaries, Registration, Permit Stacking (32 proposals)

Alaska Peninsula Area/Bristol Bay Area Boundary (3 proposals) This set of proposals will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.

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| 22 | Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area. |
| 23 | Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area. |
| 24 | Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area. |

District Boundaries/Gear (6 proposals)

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| 25 | Expand district boundary lines. |
| 26 | Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27. |
| 27 | Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers. <i>(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)</i> |
| 28 | Change the character size requirements for set gillnet marking signs. <i>(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)</i> |
| 29 | Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's setnet site. |
| 30 | Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers. |
| 220 | Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods. |
| 221 | Prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites. |

Registration (14 proposals)

- 31 Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay.
- 32 Change the area registration date requirement for the Bristol Bay commercial salmon fishery.
- 33 Change the area registration date requirement for the Bristol Bay commercial salmon fishery.
- 34 Reduce the required waiting period when registering for a new district from 48 hours to 12 hours.
- 35 Require drift gillnet operations to register the day of fishing during emergency order periods.
- 36 Change the registration requirement for commercial salmon fishing in the Egegik District.
- 37 Change the area registration date requirement from June 25 to June 1 for the Naknek-Kvichak, Egegik, and Ugashik districts for the drift gillnet fleet.
- 38 Change registration requirements for fisheries under emergency order conditions and change the registration date for the Naknek-Kvichak, Egegik, and Ugashik districts from June 25 to June 18.
- 39 For the Naknek-Kvichak District, eliminate the registration date of June 25, and require registration only before fishing in the district.
- 40 Change the drift gillnet registration date in the Naknek-Kvichak District from June 25 to June 17.
- 41 Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date.
- 42 Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement.
- 43 Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District.
- 44 Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel.

Permit Stacking (9 proposals)

- 45 Reauthorize Bristol Bay set gillnet permit stacking.
- 46 Allow permit stacking for set gillnet operations.
- 47 Allow permit stacking for set gillnet operations and up to one and one-half the current legal limit of gear for one permit to be operated when permit stacking.
- 48 Allow permit stacking for set gillnet operations in the Bristol Bay Area.
- 49 Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign.
- 50 Allow permit stacking for set gillnet operations in the Egegik District.
- 51 Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay.
- 52 Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay and the operation of 200 fathoms of drift

- gillnet gear from a vessel with an individual holding two drift gillnet permits.
- 53 Increase the amount of drift gillnet gear allowed when two permit holders are jointly operating.

Commercial Salmon Management Plans and District Provisions (24 proposals)

Egegik/Ugashik (2 proposals)

- 54 Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing.
- 55 Modify set gillnet operations in the Ugashik District.

Naknek/Kvichak (5 proposals)

- 56 Create an inriver Alagnak River Salmon Fishery Management Plan.
- 57 Create an inriver Kvichak River Salmon Fishery Management Plan.
- 58 Expand the boundaries of the Naknek Section of the Naknek-Kvichak District.
- 59 Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District.
- 60 Create a special harvest area in the Graveyard Creek area.

Nushagak (14 proposals)

- 61 Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.
- 62 Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.
- 63 Change the seaward minimum distance between set gillnet gear in the Clark's Point area in the Nushagak District.
- 64 Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District.
- 65 In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches.
- 66 Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement.
- 67 Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals that have previously been implemented.
- 219 Address allocation impacts that may come from potential changes in escapement goals and trigger points in the Nushagak River Coho Salmon Management Plan.
- 68 Repeal Wood River Sockeye Salmon Special Harvest Area Management Plan.
- 69 Amend the Wood River Sockeye Salmon Special Harvest Area Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations.
- 70 Modify the Wood River Sockeye Salmon Special Harvest Area Management Plan to open separate drift and set gillnet fishing periods

- based on achievement of gear allocation instead of a fixed seasonal fishing period ratio.
- 71 Update the description of the Wood River Special Harvest Area by deleting references to regulatory markers.
- 72 Change the description of statistical areas in the Nushagak District by deleting references to department regulatory markers, and renaming the Nushagak Statistical Area.
- 73 Redefine the description of the Nushagak District and the Igushik Section in the Nushagak District by deleting references to department regulatory markers.
- 74 Redefine the description of closed waters for salmon in the Snake River in the Nushagak District by deleting a reference to department regulatory markers.

Togiak (3 proposals)

- 75 Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet.
- 76 Change the current description of the Osviak Section in the Togiak District by correcting a GPS coordinate in the description.
- 77 Change the Togiak District Salmon Management Plan to reflect recent department escapement goal changes, and remove coho and king salmon goals.

Subsistence, Sport, Commercial Herring (14 proposals)

Bristol Bay Subsistence (5 proposals)

- 78 Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage.
- 79 Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time.
- 80 Re-describe the subsistence fishing area in the Nushagak District that is restricted to three days per week by removing references to regulatory markers.
- 81 Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers.
- 82 Establish and adopt amounts reasonably necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District.

Bristol Bay Sport Fisheries (5 proposals)

- 83 Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River.
- 84 Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage.
- 85 Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage.

- 86 Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries.
- 87 Eliminate the use of egg-simulating lures in rainbow trout fishing.

Bristol Bay Herring (4 proposals)

- 88 Change the regulatory description for herring purse seine and hand purse seine.
- 89 Delete references to sac roe in the Bristol Bay Herring Management Plan.
- 90 Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets.
- 91 Redefine the description of closed waters for the Togiak herring fishery by deleting references to department regulatory markers.

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

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

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

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

Additionally, we recommend deleting 5 AAC 09.200 (1) and (2) (A) and (B) from Chapter 09. Alaska Peninsula Area and adding new fishing districts (e) and (f) to the Bristol Bay area. We recommend adding to 5 AAC 06.200 Fishing Districts and sections

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

(f) Port Heiden District:

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

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

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

1. Port Heiden is a member community in the Bristol Bay Economic Development Corporation;
2. The community of Port Heiden is within the Bristol Bay Coastal Resource Service Area;

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

PROPOSED BY: Native Village of Port Heiden (EF-C15-039)

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

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

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

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

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

We recommend adding to 5 AAC 06.200 Fishing Districts and sections

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

(f) Port Heiden District:

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

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

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

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

PROPOSED BY: Gerda Kosbruk (EF-C15-112)

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

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

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

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

PROPOSED BY: Larry K. Christensen (EF-C15-134)

PROPOSAL 25 – 5 AAC 06.100. Description of area. Expand district boundary lines, as follows:

I propose that when area managers recognize the need and opportunity to create a more valuable and orderly fishery, they have a set of additional boundary lines to utilize at their discretion. I envision these new lines to be in addition to the existing north/south lines primarily on the east side districts.

The offshore distance of the new sets of corners would remain relatively the same as the existing corner of each specific district. The subsequent lines perpendicular to the shore would have tentatively three optional distances further up or down the shoreline at potentially 3 mile intervals. The obvious candidates for these shoreward line extension options would be the Naknek Johnston hill line, North and South Egegik lines, and the North Ugashik line.

These new set of lines could be managed per EO.

Details and GPS coordinates to be determined.

What is the issue you would like the board to address and why? The issue that I am addressing is the inherent degradation of salmon quality, and the disorderly line fisheries created through the application of compacted terminus fisheries. The ADF&G does not have adequate flexibility in designating district specific openings in order to maximize the value of the fishery and conduct orderly fisheries once harvestable numbers are recognized. With the genetic study results of WASSIP, we know the relatively marginal interception rates of adjacent river systems and we can now better manage for optimum escapement goals, quality, and a much more orderly fishery. The current situations of concentrated combat line fishing are unnecessarily producing poor quality salmon, decreasing ex-vessel and tax values, gear damage, and injuries.

PROPOSED BY: Larry K. Christensen (EF-C15-130)

PROPOSAL 26 – 5 AAC 06.200. Fishing districts and sections. Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27, as follows:

At the end of the season when the escapement goals are met for the Naknek/Kvichak, Egegik and Ugashik Districts, or the 48-hour transfer is no longer required (July 17), fishing will be allowed in two new general district sections. The first would connect the Naknek Section-Johnston Hill Line and the North Line of Egegik running approximately three miles off shore. The second would connect the South Line of Egegik to the North Line of Ugashik running approximately three miles offshore. These new sections would remain open until July 27.

What is the issue you would like the board to address and why? At the end of the season, the fishery becomes very competitive at the northern and southern boundaries and only a few boats share the harvest.

PROPOSED BY: Kurt Johnson (EF-C15-118)

PROPOSAL 27 – 5 AAC 39.280. Identification of stationary fishing gear. Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.*):

Setnet markings signs shall include the name of the permit holder in letters at least 6" high and 1" wide, the same as the vessel name for drift vessels. The permit holder may include a phone number for contact.

What is the issue you would like the board to address and why? Currently drift boats and set net skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, drift vessels are required to have the vessel name in 6" letters. Normally a vessel or skiff can be contacted by physically approaching or by VHF using the vessel name. The regulations require the name of the fishermen operating a set gillnet to display the name of the fisherman operating it but there are no requirements for the size of the display of the fisherman's name. They could legally be 1" or less high and marking pen size thin. Set net identification signs can be a great distance, especially at low tide. In an emergency or other concern, the fisherman's name allows other to contact the fisherman by phone, VHF, or other means, and do so directly, especially when resources to track by Commercial Fisheries Entry Commission are closed. Require the set net fisherman's name to be in letters at least 6" high and at least 1" wide.

PROPOSED BY: Dan Barr (EF-C15-084)

PROPOSAL 28 – 5 AAC 39.280. Identification of stationary fishing gear. Change the character size requirements for set gillnet marking signs, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.*):

Insert "twelve inches" where now says "six inches" and add "with lines at least one inch wide."

What is the issue you would like the board to address and why? Currently drift boats and setnet skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, but shore side set net markings are only required to be six inches. With 20/20 vision, the maximum readable distance is only 200'. Regulations are now inconsistent, and

whereas driftnet vessels and set net skiffs can be easily approached for identification, a set net sign for contacting the permit holder for safety or resource issues can be at a distance of up to 1,200'.

PROPOSED BY: Dan Barr (EF-C15-086)

PROPOSAL 29 – 5 AAC 06.335. Minimum distance between units of gear. Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's setnet site, as follows:

5 AAC 06.335 Minimum distance between units of gear needs to include the wording "Except that a CFEC permit holder may operate seaward of their own set gillnet."

5 AAC 06.335. Minimum distance between units of gear. is amended to read:

(a) 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. **Except that a CFEC permit holder may operate seaward of their own set gillnet.**

What is the issue you would like the board to address and why? In the Egegik District it has been common practice for individual permit holders to have a gap between their 50 fathom set gillnet that is operated on a single site. This allows for easier and safer maneuvering under the running line. It has recently been pointed out that this practice is in conflict with 5 AAC 06.335 Minimum distance between units of gear.

PROPOSED BY: Laura Zimin (EF-C15-064)

PROPOSAL 30 – 5 AAC 06.331. Gillnet specifications and operations. Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers, as follows:

5 AAC 06.331(i) is amended to read:

(i) A set gillnet must be set on an area of beach that, at mean low tide, is connected by exposed land to the shore or to land not covered at high tide, except that in the Togiak District between **a point on the southernmost mouth of the Kulukak River at 58° 54.94' N. lat., 159° 43.81' W. long. to a point at the eastern entrance to Metervik Bay at 58° 54.94' N. lat., 159° 43.81' W. long.** [THE SOUTHERNMOST ADF&G REGULATORY MARKER LOCATED AT THE MOUTH OF THE KULUKAK RIVER AND THE ADF&G REGULATORY MARKER LOCATED AT THE EASTERN ENTRANCE TO METERVIK BAY], between Rocky Point and 160° 20' W. long., and between Togiak Reef and **a point near Mt. Aeolus at 58° 54.82' N. lat., 160° 44.06' W. long.** [THE ADF&G REGULATORY MARKER AT MT. AEOLUS], no part of a set gillnet may be more than 500 feet from the mean high tide mark and the set gillnet must be substantially perpendicular to the shoreline.

5 AAC 06.331(n) is amended to read:

(n) In the Nushagak District,

...
(2) from the cannery dock at Clark’s Point to [AN ADF&G REGULATORY MARKER AT] First Creek at XX' N. lat. XX' W. long., 500 feet from the mean high tide mark, or to the minus three foot low tide mark, whichever location is closer to the mean high tide mark;

(3) from First Creek at XX' N. lat., XX' W. long. to [AN ADF&G REGULATORY MARKER AT FIRST CREEK TO AN ADF&G REGULATORY MARKER AT] Third Creek at XX' N. lat., XX' W. long., 700 feet from the mean high tide mark;

(4) from [AN ADF&G REGULATORY MARKER AT] Third Creek at XX' N. lat., XX' W. long. to [AN ADF&G REGULATORY MARKER AT] Etolin Point at 58° 39.37' N. lat., 158° 19.31' W. long., 1,000 feet from the mean high tide mark.

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the regulations describing gillnet specifications and operations. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

(Editor note: Complete coordinates were not available at the deadline for proposals and will be available prior to the meeting.)

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-007)

PROPOSAL 220 - 5 AAC 06.XXX. Vessel specifications and operations. Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods, as follows:

All net barges, floating processors, tenders and hard fixed buoys to be removed in open water fishing for the drift fleet, 30 min before the opener to 1 hour after high water.

All net barges, floating processors, tenders and hard fixed buoys to be anchored outside the west line. Only to come into the district if the Egegik district is closed to the drift fleet.

Any fixed net barges or not-in-rotation tenders being used on standby outside the Egegik district. To ease the constriction of the Egegik district.

The area behind Goose Point will be the new Tender Alley, or the area for tenders and net barges. This area typically over the years is not a heavily fished area and is also protected during bad weather.

As in the Naknek district all tenders and net barges are anchored outside the district. Egegik needs to follow suit to allow more fishing grounds, so as to ease the tensions of a constricted

fishing area and for safety concerns to crew and vessels that get wrapped around the buoys and anchored vessels while the district is open for drift fisherman.

What is the issue you would like the board to address and why? Tenders and net barges anchored in/on the open fishing grounds of the Egegik district from inside Coffee Point or around Coffee Point to the outside west line of district. (known as Tender Alley) There should not be fixed or fully anchored buoys (net barges, processors and derelict vessels) or vessels anchored in open fishing waters during drift net district openers.

It is a dangerous situation of wrapping nets and gear around anchor buoys, tenders and non-useable floating hazards.

PROPOSED BY: Marc Vance (EF-C15-019)

PROPOSAL 221 - 5 AAC 06.341. Vessel specifications and operations. Prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites, as follows: Additional subparagraph in 5 AAC 06.341 Vessel Specs and Operation to address tender to set net distance.

5 AAC 06.341 Vessel specifications and operations.

....

(c) No tender, buyer or fish transport vessel shall willfully or intentionally interfere with commercial fishing operations, sites and gear. No tender, buyer or fish transport vessel shall not take mooring, anchor or remain stationary for an extended period within 1,500 feet of an operational set net site.

What is the issue you would like the board to address and why? The issue is tenders encroaching upon set net sites to impede drifters from drifting legal distances from set net sites. In Togiak there is a tender owner that also operates multiple set net sites and he uses his tender to block drifters from fishing legally outside of his sites.

Alaska Statue Sec. 16.10.055 Interference with commercial fishing gear. A person who willfully or with reckless disregard of the consequences, interferes with or damages the commercial fishing gear of another person is guilty of a misdemeanor. For the purposes of this section “interference” means the physical disturbance of gear which results in economic loss of fishing time, the “reckless disregard of consequences” means a lack of consideration for the consequences of one’s acts in a manner that is reasonably likely to damage the property of another.

PROPOSED BY: Togiak Fish and Game Advisory Committee (EF-C15-056)

PROPOSAL 31 – 5 AAC 06.370. Registration and reregistration. Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay, as follows:

In all Bristol Bay commercial salmon fishing districts no fishing is allowed until registered blue card are filled out with area to be fished and submitted to Alaska Department of Fish and Game staff.

The transfer time of 48 hours will be in effect in Ugashik, Egegik, Naknek, Kvichak and Nushagak.

What is the issue you would like the board to address and why? In the Bristol Bay commercial salmon fishery no transfer restrictions have affected management and created a large mobile fleet that brings fish from one district to another which affects the genetic studies being done in Bristol Bay. It also affects all early openings with a cautious management approach, Quality of fish are being sacrificed.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-101)

PROPOSAL 32 – 5 AAC 06.370. Registration and reregistration. Change the area registration date requirement for the Bristol Bay commercial salmon fishery, as follows:

Return to regulation prior to 2010— "5 AAC 06.370. Registration and reregistration. (a) Before taking salmon in Bristol Bay, each commercial salmon set gillnet or drift gillnet CFEC permit holder shall register for a district described in 5 AAC 06.200. Each drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. Initial district registration is accomplished by completing a registration form provided by the department and returning the completed form to the department office in Dillingham or King Salmon. For the purposes of this section, a CFEC permit holder and a drift gillnet vessel may be registered in only one district at a time." And this means no waiting until June 25 to register for a specific fishing district.

What is the issue you would like the board to address and why? The issue is the unrestricted mobility of the drift fleet until June 25. We propose to go back to the district registration of drift permits as it was prior to 2010. The Egegik District has earlier run timing than the rest of the Bay so the entire Bristol Bay fleet can potentially fish in Egegik District when we are under regulations starting June 16 and they are on free week. With all of those extra boats it makes it extremely difficult for our biologist to distribute fish inside the district and achieve early escapement which should be our top priority.

PROPOSED BY: Tom Huffer Sr., Egegik Setnetters Association (EF-C15-009)

PROPOSAL 33 – 5 AAC 06.370. Registration and reregistration. Change the area registration date requirement for the Bristol Bay commercial salmon fishery, as follows:

5 AAC 06.370 is amended to read:

(a) All Bristol Bay permit holders must declare what district they wish to fish in on or before the third Friday of June of every year, which will then require permit holders to adhere to the present 48 hour wait time for transferring to another district.

(b) For the permit holders who wish to not fish until a later date can do so, but when they do wish to fish, must declare which district they wish to fish in.

What is the issue you would like the board to address and why? Current law allows Bristol Bay drift permit holder to fish in any district without what declaring what district they wish to fish until June 25 +/- a day. Currently, fish biologists are unable to accurately manage given districts run strengths based on the ever change fleet strength. Secondly, canneries are struggling with adapting to the ever changing fleet jumping from one district to another without any wait time. Third, the catch quota between the setnet and drift fleet is skewed so greatly at the beginning of the season, which leads to unneeded challenges during heavy fishing periods. Fourth, it has become apparent vessels are catching fish in one district and then running to another district, fishing then selling their catch from more than one district at one time. This provides issues with run strength from one district to another. Finally, the river drainages for the various districts are seeing their front end of the escapement numbers are being reduced due to the current law.

PROPOSED BY: Chad Sorenson (EF-C15-012)

PROPOSAL 34 – 5 AAC 06.370. Registration and reregistration. Reduce the required waiting period when registering for a new district from 48 hours to 12 hours, as follows:

Modify the language in the regulation to reflect a waiting period of 12 hours instead of 48 hours.

Draft language. Substitute 12 hours in the place of 48 hours in all language referencing transfer waiting period for drift gillnet vessels and permit holders in 5 AAC 06.370.

What is the issue you would like the board to address and why? When transferring from one district to another during the Bristol Bay salmon fishery a vessel and its' permit holder(s) must wait 48 hours from the time of notification of transfer to begin fishing again. This regulation is a relic of management regimes long ago. The current regulation penalizes fishermen that simply want the opportunity to harvest available surpluses in a district other than where they are fishing at the present time. In the past processors have been adamant that they need district registration to be able to know where their fleet is and will be fishing in order that they can plan for tender placement and proper service. Leaving the notification requirement in place and reducing the waiting period to 12 hours provides the tracking that processors need while allowing the fishing fleet to operate under a management regime similar to that of every other salmon fishery in the state. The present regulation is difficult and costly to enforce and often results in significant abuse resulting in significant illegal fishing activities.

PROPOSED BY: Matthew Luck (EF-C15-020)

PROPOSAL 35 – 5 AAC 06.370. Registration and reregistration. Require drift gillnet operations to register the day of fishing during emergency order periods, as follows:

All drift fishers shall drop district registration cards on day they start to fish during emergency order period

What is the issue you would like the board to address and why? Repeal district registration date of June 25. New language to read; all drift vessels shall drop district registration cards on the day they start fishing during emergency order period. It is unfair on local fleets in Egegik and Ugasik to have large groups of boat racing between districts. Most boats are from Naknek and Nushagak. All districts should have same set of rules.

PROPOSED BY: Kim Rice (EF-C15-076)

PROPOSAL 36 – 5 AAC 06.370. Registration and reregistration. Change the registration requirement for commercial salmon fishing in the Egegik District, as follows:

5 AAC 06.370 is amended to read:

(2) In the Nushagak District **and Egegik District**, a

(A) commercial salmon drift gillnet CFEC permit holder shall register for that district...

What is the issue you would like the board to address and why? Early registration in Egegik District. With Egegik starting emergency order regulations having open transfer puts undue hardship on Egegik fishermen. This creates a regulatory nightmare due to potential illegal fishing in closed waters and illegal deliveries with boats leaving one district for another without delivering their fish causing inaccuracies in district fishing results.

PROPOSED BY: Stanley O. Johnson (EF-C15-015)

PROPOSAL 37 – 5 AAC 06.370. Registration and reregistration. Change the area registration date requirement from June 25 to June 1 for the Naknek-Kvichak, Egegik, and Ugashik districts for the drift gillnet fleet, as follows:

Require boats to register June 1 by district, before fishing in these areas to restore a more ordered and methodical process to the start of the fishery. This process was used successfully in the past and will make it much easier to manage and lower cost for fishermen, processors, and the Department.

5 AAC 06.370(a)(4) is amended to read:

(4) beginning **June 1** [JUNE 25], before taking salmon in the Naknek, Kvichak, Egegik, and Ugashik Districts, a commercial salmon drift gillnet CFEC permit holder shall register for one of these districts;

What is the issue you would like the board to address and why? Change area registration in Naknek, Kvichak, Egegik, and Ugashik to June 1 instead of June 25. Late June registration in these three districts makes it difficult to manage for fishermen, processors and the Department, and adds unneeded costs.

The fleet arrives early and runs from area to area in a “mob” regardless of any accumulations of harvestable fish, running up unneeded boat and fuel cost. Early registration eliminates the mob. Fishermen enter the districts as fish develop, spreads out catching effort and improves cost for fishermen.

Department area managers have to guess as to how many boats will be in a district because of no early registration and free roaming of boats between districts. Not knowing how many boats will participate in an opening makes it difficult to guess how much time should be allowed for that particular opening and matching boat numbers with fishing time. Oftentimes too little, or worse, too much fish is taken based on a guess. Early registration better allows the manager to know before an opening how many boats to expect.

Fish is often sold illegally out of the district it is caught in as boats travel from district to district. The Department therefore has no real way of knowing what districts early fish are actually caught in. Early registration eliminates out of district selling.

Early unregistered fishing in these districts, by a large fleet, is for the most part not managed by enforcement as they are not typically deployed at that time. Early registration reduces a large fleet in one area and would cut down on line violations and instigating a line fishery right at the front end of the fishery.

Not knowing where the majority of the fleet will be from opening to opening makes it difficult for a processor to guess where to position tenders and hard to manage. Having boats register for a particular area early eliminates the need for guessing and provides better tender service for the fishermen.

Late area registration requires the processor to start tender contracts early to provide coverage for all areas in anticipation of a large early fleet, and not necessarily for any early fish. This runs up unneeded tender costs. Early area registration allows the processor to start tenders by area, as fish and fleet develop, lowering tender contract days and fuel cost.

Polling of fleet indicates that the vast majority of fishermen would like to eliminate late area registration and go back to the previous method of having to drop the blue card and register before fishing any district. Fishermen can still fish early, just register for a district and go fishing. However, with early registration they can start the season on their own schedule and not the mobs.

PROPOSED BY: Spencer Fuentes (EF-C15-010)

PROPOSAL 38 – 5 AAC 06.370. Registration and reregistration. Change registration requirements for fisheries under emergency order conditions and change the registration date for the Naknek-Kvichak, Egegik, and Ugashik districts from June 25 to June 18, as follows:

Blue card registration needs to be dropped in a district that is in emergency order (EO) fishing conditions.

1. To alleviate the going back and forth from district to district in the early season, a vessel needs to declare a district if the area goes to EO openings. Making the 48-hour transfer to get out of that area mandatory to fish a free and open area that has not gone on Emergency Order.
2. To change the drop date of the blue card to June 18th (moved up 7 days). The salmon season is under full swing as of that date and ADF&G should be under full control of the districts earlier than the current date of June 25th. Making the EO to all rivers systems on June 18th.

What is the issue you would like the board to address and why? District Blue card registration for district fishing

PROPOSED BY: Marc Vance (EF-C15-018)

PROPOSAL 39 – 5 AAC 06.370. Registration and reregistration. For the Naknek-Kvichak District, eliminate the registration date of June 25, and require registration only before fishing in the district, as follows:

Register to fish as soon as you start fishing, as it used to be.

What is the issue you would like the board to address and why? Change the drift registration, register or (drop blue cards) in the Naknek/Kvichak District when you start fishing instead of June 25th.

This is how it used to be. When it was changed to June 25th, the run timing was different. The last few years the fish have been returning earlier. Lately by the 25th, the run of fish is starting to come in more than had been anticipated. The fishing fleet is getting more and more mobile and because of these circumstances the Naknek/Kvichak has been getting quite overcrowded.

PROPOSED BY: Randolph Alvarez (EF-C15-025)

PROPOSAL 40 – 5 AAC 06.370. Registration and reregistration. Change the drift gillnet registration date in the Naknek-Kvichak District from June 25 to June 17, as follows:

Change drift registration in the Naknek/Kvichak District to June 17th from its present date of June 25th.

What is the issue you would like the board to address and why? Registration or dropping of blue cards in the Naknek/Kvichak District. Last cycle the Board of Fish changed the drift registration. It was moved to June 25th from June 17th. I propose to move it back to June 17th. Since it was changed, the run timing has changed resulting in the run starting to be quite

significant by June 25. Because of that and the mobile fleet, the Naknek/Kvichak has been overcrowded before June 25.

PROPOSED BY: Randolph Alvarez (EF-C15-026)

PROPOSAL 41 – 5 AAC 06.370. Registration and reregistration. Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date, as follows:

In 5 AAC 06.370 I would delete the words "Beginning June 25" and begin the paragraph "Before taking".

What is the issue you would like the board to address and why? Although fishing begins June 1 and although the allocation period begins June 1 (5 AAC 06.365), district registration does not begin until June 25. That means a drift fisher can fish, for example, a period in Egegik on June 20 and in Naknek on June 21 and back to Egegik for June 22. The law may require a fisher to land the catch in the district taken but we all know that during this non-regulated time, fishers catch in one district and deliver in another according to their convenience. ADF&G cannot manage the district allocation nor escapement properly. It is simple for a fisher to work one district and travel a few short hours to another district with fish on board, and fish the second district before delivering. It's my opinion that this practice corrupts the allocation in the Egegik and Naknek districts where it would seem fish are caught and leave Egegik unreported and deliver in Naknek, thus under reporting the catch and drift allocation in Egegik and over reporting in Naknek. The ADF&G cannot look at a boat and know which district it is registered for, and management is therefore made more difficult. District registration should begin when fishing begins, consistent with the allocation regulation period.

PROPOSED BY: Tony Neal (EF-C15-031)

PROPOSAL 42 – 5 AAC 06.370. Registration and reregistration. Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement, as follows:

5 AAC 06.370(a)(2)(B) is amended to read:

(B) commercial salmon set gillnet CFEC permit holder shall register for [A STATISTICAL AREA IN] that district;

Repeal the sections in 5 AAC 06.370 that require setnet permit holders to transfer between statistical subdistricts in the Nushagak. Specifically 5 AAC 06.370 (I)

What is the issue you would like the board to address and why? The statistical areas of the Nushagak District which commercial set gill CFEC permit holders must register in addition to district registration is a cumbersome and restrictive process. It creates confusion without benefiting set net permit holders. Not only does it create additional paperwork for Tenders, Fish

and Game, Processors, and Fishers but it restricts where permit holders may fish in the Bay causing loss in catch and revenue by requiring a 48 hour time that nets must be out of the water when transferring between sub districts. It restricts commercial set gill CFEC permit holders from responding to changing conditions in the Bay leaving many people on the sidelines while the fish pass them by. There is no other district in Bristol Bay that has these statistical sub districts or the 48-hour transfer time associated with them.

PROPOSED BY: Gregg James Marxmiller (EF-C15-116)

PROPOSAL 43 – 5 AAC 06.370. Registration and reregistration. Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District as follows:

5 AAC 06.370 (a) Registration and reregistration is amended to read:

(2) in the Nushagak District, a

...

(B) commercial salmon set gillnet CFEC permit holder shall register for a statistical area in that district;

(I) In the Nushagak District a CFEC salmon set gillnet permit holder intending to fish in a statistical area for which the permit holder is not registered, shall register for the new statistical area; **if transferring into the Nushagak District from any other fishing district, the permit holder must register** at least 48 hours before fishing in the new statistical area **(in accordance with 5 AAC 06.370 (b)).** [A SET GILLNET PERMIT HOLDER SHALL ALSO REGISTER THE SET GILLNET FOR THE NEW STATISTICAL AREA. REREGISTRATION IS ACCOMPLISHED BY THE PERMIT HOLDER, OR THE PERMIT HOLDER'S AUTHORIZED AGENT, COMPLETING A FORM PROVIDED BY THE DEPARTMENT AND SUBMITTING THE COMPLETED FORM, IN PERSON, TO AN AUTHORIZED REPRESENTATIVE OF THE DEPARTMENT. THE 48-HOUR NOTIFICATION PERIOD BEGINS WHEN THE REREGISTRATION FORM IS SIGNED BY THE AUTHORIZED REPRESENTATIVE OF THE DEPARTMENT. THE SET GILLNET PERMIT HOLDER MAY NOT FISH IN THE ORIGINAL STATISTICAL AREA DURING THE 48-HOUR NOTIFICATION PERIOD. THE NOTIFICATION PERIOD MAY BE REDUCED BY COMMISSIONER'S ANNOUNCEMENT.] Reregistration is not required to fish **different statistical areas within the Nushagak so long as you accurately record the fishing district and statistical area at the point of sale in accordance with 5 AAC 39.130(c)(7).** [AFTER 9:00 A.M. JULY 17.]

What is the issue you would like the board to address and why? The Nushagak District is currently the only fishing district within the Bristol Bay Area that requires set net permit holders to wait a 48-hour transfer period before fishing at a different location (known as a statistical area) within the same fishing district. Some less established, or new entrants into the fishery do not hold a shore fishery lease at a productive site; this would allow that person to find a more productive sight without being forced to miss out on the opportunity to fish their gear due to ADF&G office hours. Missing out on a single tide while waiting for the transfer period to be completed or rescinded could result in the substantial loss of opportunity.

Other solutions considered: Keep the 48-hour transfer period into and out of the Igushik River section. The Igushik River section is generally managed separately from the rest of the Nushagak District, allow fisherman to move from all one statistical area to another without having to reregister unless moving into/out of the Igushik section.

PROPOSED BY: Kevin McCambly and Kayla Miller (EF-C15-127)

PROPOSAL 44 – 5 AAC 06.370. Registration and reregistration. Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel, as follows:

Addition of language in the existing regulation to tie the vessel transfer requirements to permit transfer requirements that are already in place.

5 AAC 06.370. Registration and reregistration is amended to read:

(k) Notwithstanding (b) of this section, a CFEC permit holder **and fishing vessel** registered before 9:00 a.m. July 17 in the

(1)Togiak District may not take salmon in the Nushagak, Naknek-Kvichak, Egegik or Ugashik District from 9:00 a.m. June 1 to 9:00 a.m. July 27

(2)Nushagak, Naknek-Kvichak, Egegik or Ugashik District may not take salmon in the Togiak District from 9:00 a.m. June 1 to 9:00 a.m. July 27

What is the issue you would like the board to address and why? Togiak is a late run fishery and has regulations restricting when you can transfer in and out of the district. Permits that fish in other districts cannot transfer to Togiak until a set date and likewise permits that fish in Togiak cannot transfer to other districts until the same set date. The regulations for the rest of Bristol Bay concerning transferring in and out of districts restrict both the permit and the vessel and Togiak’s transfer period should reflect the same restrictions on the vessel and permits. A permit holder who fishes another district can get another permit holder to drop their registration in Togiak and fish the same vessel that has already capitalized on the salmon run in another district.

PROPOSED BY: Togiak Fish and Game Advisory Committee (EF-C15-057)

PROPOSAL 45 – 5 AAC 06.331. Gillnet specifications and operations. Reauthorize Bristol Bay set gillnet permit stacking, as follows:

5 AAC 06.331 (f) Gillnet specifications and operations. Allow multiple permit use as follows:

...

(f) **Except as provided in (u) of this section,** a person may not operate more than two set gillnets, and the aggregate length of set gillnets operated by that person may not exceed 50 fathoms in length. Notwithstanding 5AAC 39.240 (a), a person may assist in operation or transportation of additional set gillnet gear when the CFEC interim-use or entry permit card holder of the additional gear is present in compliance with 5 AAC 39.107.

...
(u) A CFEC permit holder who holds two Bristol Bay set gillnet CFEC permits may operate no more than four set gillnets, with no more than 100 fathoms of set gillnet gear in the aggregate. 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. Both of the permit holder's five-digit CFEC permit serial numbers followed by the letter "D" to identify the gillnet as a dual permit set gillnet must be located on the identification buoys required by 5 AAC 39.280 and 5 AAC 06.334. At least one cork every 10 fathoms along the cork line must be plainly and legibly marked with both CFEC permit numbers of the CFEC permit holder. All identifiers must be displayed in a manner that are plainly visible and unobscured and have permanent symbols in a color that contrasts with the background.

What is the issue you would like the board to address and why? To address the continued decrease in the ability for commercial set net fishermen to make a viable living off of fishing only one set net permit, SO4T, in Bristol Bay. It has become increasingly difficult for anyone to make a living off of one set net permit, even with multiply sites.

PROPOSED BY: Rose Beach (EF-C15-088)

PROPOSAL 46 – 5 AAC 06.331. Gillnet specifications and operations. Allow permit stacking for set gillnet operations, as follows:

I apologize that I cannot offer draft language, this is not an existing regulation that needs revising.

I would offer the language used in the time that S04T stacking was allowed. I would ask a restriction that prevented a dual permit holder from fishing both permits on one site.

What is the issue you would like the board to address and why? I ask the Board of Fisheries to approve permit stacking for S04T set net permit holders, so that one individual cannot only own two permits but can also fish two permits. I would prefer to see a tail on that regulation that prohibited a dual permit holder from fishing both permits on one site, say by alternately fishing one net while simultaneously picking another on the shore.

My primary reason for asking for permit stacking is defensive, we need to be able to fish our permits enough to make money and not be driven from the fishery by costs and restrictions.

We live in Homer and set net in Egegik. There are presently seven of us in one family, fishing three sites with three permits. With employment, school, disability, and other time constraints, it is impossible for us to have the same three permit holding persons there for the season from start to finish. Set netting is not a particularly profitable business and a family has to have other primary employment. Primary employment and school schedules drives who can be there and who can't. Although we are capable of fishing three sites for the full season, we cannot have the same three persons as permit holders for the full season. Given transfer restrictions and inefficiency during the season, we cannot transfer at will. Permit stacking allows our family to fish the full season and maximize our investment.

I was reading a report done by CFEC during the last board meeting for the permit stacking proposals. CFEC concluded that permit stacking was utilized by non-locals, like us, and non-residents, but not locals to Bristol Bay and that was presented as a detriment to the locals. I think the conclusion was wrong. A local Bristol Bay family does not need to stack permits because a non-fishing permit holder can more or less legally go down to the beach and hang out while others fish, thus no need to find an active permit holder. A permit holding grandmother can go to the beach near her home, sit in a camp chair, and watch her grandchildren fish her site. That's wonderful, I support that. That family can fish the whole season. But my wife, a permit holding grandmother who loves to watch her grandchildren fish, cannot do that. We have to travel out to Bristol Bay from Homer; she can't go home after the fishing period and take care of other family or employment needs. The grandchildren cannot always come to the Bay in time, they have school, college, sports. In another example, a local permit holder who was, say 17 and a senior in high school could play sports and attend school and fish, because the site was close to home. Our kids cannot do that. If we could stack our permits, we could fish more periods with all our permits and be able to make set netting economically viable.

I was told that permit stacking raised the price of the permits, making them less available locally. We wouldn't know because we don't buy or sell, we only stacked within our family when it was allowed. Among the 8 or so families in our area that did stack when it was allowed, none bought permits. The reason was always the same, family convenience allowing the family group to more efficiently fish what they already have. I suppose stacking could cause some rise in cost of a permit because it allows more efficiency in set netting and thus more income to a permit holder.

There was a lot of previous opposition to stacking among local Bristol Bay permit holders because it was said that the price of permits would go up. In my view, local people can take advantage of having permit-holding family members nearby, so they don't need stacking. In my view, that is an allocation to locals at the expense of non-local Alaska residents like our family.

In my view, locals will benefit the most of the three groups by permit stacking. It's my understanding BBEDC will finance permits for Watershed residents. That is a wonderful advantage not available to us in Homer. By stacking, locals could in theory double the number of permits owned locally, using financing from BBEDC. I believe the greatest beneficiaries to set net permit stacking are the local residents.

But we all will benefit and we need the help.

Thank you.

PROPOSED BY: Tony Neal

(EF-C15-033)

PROPOSAL 47 – 5 AAC 06.331. Gillnet specifications and operations. Allow permit stacking for set gillnet operations and up to one and one-half the current legal limit of gear for one permit to be operated when permit stacking, as follows:

Bristol Bay set net permit holders would be able to hold and actively operate two setnet permits at the same time. However, the total aggregate of gear in the water (fishing) would be equal to 1–

1/2 times the legal limit of gear for a single permit in the area fished. (i.e.; if the legal about of gear is 50 fathoms, then the dual permit holder would be able to operate 75 fathoms.)

Reasoning is that this may enable and encourage a non-transferable permit holder to obtain another permit as a hedge against potential future loss of the income source for his/her family and also allow them to hold the family fishing site. By limiting gear, the extra permit may not be enough incentive to encourage others to buy in to the fishery.

What is the issue you would like the board to address and why? The issue this proposal would address is the continuing migration of Bristol Bay set net permits away from Alaskan residents and local Bristol Bay residents in particular. Presently there are about 100 non-transferable Bristol Bay set gillnet permits on the books. At one time there were 155. All but 18 of these permits were issued to Alaska residents, the vast majority of whom resided in Bristol Bay. When the holder of a non-transferable permit dies, his permit is gone— no longer available to the family. Most of these permit holders have no other permit in the family.

The following proposal would help Alaska residents make their set gillnet operations more viable. Presently, entry permit holders may hold two entry permits for the same fishery, but they may only actively fish one of them. (In the Bristol Bay set gillnet fishery) This proposal, while potentially affecting all of Bristol Bay set gillnet permit holders, is designed to specifically protect the non-transferable permit holder and their families.

PROPOSED BY: John Schandelmeier (EF-C15-034)

PROPOSAL 48 – 5 AAC 06.331. Gillnet specifications and operations. Allow permit stacking for set gillnet operations in the Bristol Bay Area, as follows:

Allow Bristol Bay set net fishermen to have dual permits.

Fisherman in the Bristol Bay salmon fishery are allowed to hold and legally fish two set net permits per person.

What is the issue you would like the board to address and why? I would like the board to once again allow set net fishermen to have two set net permits in their names. This was allowed from 2009–2012 in Bristol Bay. During that time, my family purchased a set net operation from a family for whom I worked as a deckhand for eight years. Our long term goal is to raise our family fishing in the Bay every summer and pass it on to them the way it was passed on to me. Right now my kids are young, but are finally at the point where they can come out for part of the fishing season. However, it is a challenge to have them out there for the whole season. Additionally, I would like to be able to come out earlier and stay later to take full advantage of all the fishery has to offer. So, while I could simply not fish her permit during those times, that option is not financially viable for our family. The only other option is to have the permit in a deckhand’s name since they are there for the whole fishing season. This is not a great option either for obvious reasons.

While it's easy to dismiss my request, I feel the board has a responsibility to give it more consideration. I am not asking for something that has not been done. To the contrary, I entered the fishery as a permit holder when they did allow permit stacking. What I have been unable to understand is why the board would have allowed the stacking of set net permits for a short three year period. That decision should have been a long term decision as I reasoned it had to be. Why would you allow people to legally purchase a \$40,000 asset and then require them to sell it 3 years later? This is a logistical nightmare that is unwarranted. All the arguments for letting the regulation sunset were weak; less new people entering the fishery, less local and native fishermen did not mandate reversing the decision. They were obvious outcomes of the experimental regulation period. Nothing happened in that time that was a surprise and certainly nothing that should lead everyone in the fishery to revert back to the way it was before.

Everyone knows fishing is a feast and famine industry to be in. But allowing stacking of two permits was a great way to help fishermen make fishing a more reliable source of their livelihood. Some year's the return are low or we go through valleys where the price drops. Having two permits helps weather those storms. It helped us. It didn't hurt anyone (that's my argument of course), and it certainly didn't impact the health of the fishery. If you were to reinstate set net permit stacking it would make our family grateful. We would have less to juggle in paperwork, I would be able to maximize the use of the permits we fish and would probably be able to stay out longer to make Bristol Bay a larger part of how my family supports and sustains itself.

PROPOSED BY: Corey Lockbeam (EF-C15-080)

PROPOSAL 49 – 5 AAC 06.331. Gillnet specifications and operations. Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign, as follows:

I recommend the board allow: Two setnet permit holders can register as a Dual and fish 75 fathoms of gear on one site. If the two permit holders opt to fish as a dual they would not be able to fish the extra 25 fathoms on another site at the same time. This would remove 25 fathoms of gear from the water and help consolidate operations and limit costs and delivery and picking time. Setnet signs would list both permit numbers and dual to signify this.

What is the issue you would like the board to address and why? I would like the board to address the lack of setnet permit holders not having a dual permit option to fish additional gear on one site as the drift permit owners do on one boat. Setnet permit holders should have the option as drifters do to consolidate operations, limit costs and better manage their business. It will help save fuel costs due to long travel time between sites and faster delivery time for higher quality fish. For example a fishing family with two permits and two sites far from each other could consolidate and fish both on one site. Two permits registered as dual would be allowed to fish 75 fathoms of gear on one site. The other 25 fathoms would not be allowed to fish at the same time. This removes 25 fathoms from the water.

PROPOSED BY: Jim Reynolds (EF-C15-082)

PROPOSAL 50 – 5 AAC 06.331. Gillnet specifications and operations. Allow permit stacking for set gillnet operations in the Egegik District, as follows:

Allow set gillnet dual permit stacking in the Egegik District of Bristol Bay. Allow other districts to opt into the dual permit program if the set gillnet stakeholders in each district choose to.

What is the issue you would like the board to address and why? The issue is setnet permit stacking in Bristol Bay. We had setnet permit stacking for three years before the Board of Fisheries took it away. The program worked like it was supposed to. There were no problems. We had over 82% positive comments at the last board cycle for Bristol Bay. It was a sound program that allowed setnet fishers to not have to transfer between family members all the time. It added some stability to many setnet families allowing some flexibility in what family member could be present. It allowed a family member to take a summer off to go to special training that they couldn't get any other time than fishing season. Permit stacking also allowed a person to grow their fishing operation. Many young people are not looking at setnet fishing as a future because the upside is not there. By being limited to one permit they can see most single setnet operation just break even. Most all of the dual permit holders were family groups. Those permits were transferred back to family members not sold, nothing changed. Setnet permit prices didn't change by repealing dual permit program the board made it more difficult to juggle permits with in the family. Setnet permit stacking helped keep fishing families together. This program helped Alaska families

PROPOSED BY: Kim Rice (EF-C15-078)

PROPOSAL 51 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay. Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay, as follows:

Under the current regulation 5 AAC 06.333, the option of "permit stacking" is only allowed for two separate permit holders. I recommend the Alaska Board of Fisheries amend the current regulation under 5 AAC 06.333 to include individuals owning two Bristol Bay Salmon drift permits the same access of "permit stacking" as two separate permit holders.

What is the issue you would like the board to address and why? Under the current regulation, two Bristol Bay drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate 200 fathoms of drift gillnet gear. In 2002, the Alaska Legislature passed House Bill 286, amending Alaska Statute 16.43.140 (c). This law allows individuals the ability to concurrently hold two salmon limited entry permits in the same permit fishery. House Bill 251 provided the Alaska Board of Fisheries the authority to grant fishing privileges to the second permit held by an individual, otherwise known as permit stacking.

PROPOSED BY: Abe Williams (EF-C15-096)

PROPOSAL 52 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay. Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay and the operation of 200 fathoms of drift gillnet gear from a vessel with an individual holding two drift gillnet permits, as follows:

This proposal would allow an owner of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel.

What is the issue you would like the board to address and why? Currently, the full benefit of permit stacking ("D" Permits) is not being realized. We are falling short of the potential improvement in fish quality and reduction of fishing vessels (Optimum Number Study).

PROPOSED BY: Kurt Johnson (EF-C15-122)

PROPOSAL 53 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay. Increase the amount of drift gillnet gear allowed when two permit holders are jointly operating, as follows:

5 AAC 06.333 Requirements and specifications to use 300 fathoms of drift gillnet gear is amended to read:

(a) Two Bristol Bay drift gillnet CFEC permit holders may currently fish from the same vessel and jointly operate up to 300 fathoms of drift gillnet gear under this section

What is the issue you would like the board to address and why? Section 333 Requirements and Specifications for use of 200 fathoms of drift gill net gear in Bristol Bay."

"Laws and regulations governing the use or disposal of natural resources shall apply equally to all persons similarly situated with reference to the subject matter and purpose to be served by the law or regulation."

See also; Committee B report RC 81. Board of Fisheries (2009) Passed 5-1, 2009, for setnet permit stacking 5 AAC 06.333(f) with no optimum number study.

1858 Limited Entry Permits divided by two, is the optimum number.

No Optimum Number Study is required.

PROPOSED BY: Todd Granger (EF-C15-032)

PROPOSAL 54 – 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan. Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing, as follows:

5 AAC 06.359.X is amended to read:

The commissioner shall close the Egegik District outer line, according to the coordinates of the Egegik District Special Harvest Area, during a 5 day period when the interception of sockeye salmon stocks migrating through the Egegik District are the highest.

What is the issue you would like the board to address and why? The issue I would like the board to address is the interception of sockeye salmon stocks within the Egegik District. The proposal reduces the unwarranted allocation of harvest from the Naknek/Kvichak and Ugashik terminal fisheries to Egegik interception fishery. This allocation has a particularly direct impact on set net fishers in the Naknek/Kvichak and Ugashik districts due to the inability to move sites. It is already the intent of Fish and Game to keep interception rates low. A regulation exists (5 AAC 06.359(c)(3)) stating that in an effort to reduce interception of sockeye salmon migrating through the Egegik District bound for Naknek, Kvichak and Ugashik River systems, the commissioner may close the Egegik District outer line if "interceptions of Naknek, Kvichak, or Ugashik sockeye stocks within the Egegik District have been documented by past studies and in season indicators".

I believe that the results of the Western Alaska Sockeye Salmon Identification Project presented at the Bristol Bay Finfish Board of Fisheries meeting in Naknek 2012 show the rates of interception in different districts at different times and can be used to help reduce those interception rates in the Egegik District. If nothing changes, interception will continue at rates that are unnecessarily high.

PROPOSED BY: Eric Meyer (EF-C15-071)

PROPOSAL 55 – 5 AAC 06.331. Gillnet specifications and operations. Modify set gillnet operations in the Ugashik District, as follows:

5 AAC 06.331(m)(8) is amended to read:

5 AAC 06.331. Gillnet specifications and operations. (m) In the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts, no part of a set gillnet may be more than 1,000 feet from the 18-foot high tide mark, except that ...

(8) in the Ugashik District, in that portion of the east bank of the Ugashik River from a point at 57° 30.74' N. lat., 157° 24.10' W. long. to 57° 32.27' N. lat., 157° 24.36' W. long., no part of a set gillnet may be more than 600 feet from the 18-foot high tide mark, **except that a set gillnet may extend to 1,000 feet from the 18-foot high tide mark if**

(A) notwithstanding the provisions of (i) of this section, the shoreward end of the set gillnet is at least 400 feet from the 18-foot high tide mark;

(B) the anchoring devices for the set gillnet are not more than 100 feet from the set gillnet;

(C) the set gillnet is not attached to a running line connected to the beach; and

(D) during closed periods, all set gillnet gear, except buoys and anchors, more than 600 feet from the 18-foot high tide mark must be removed from the water.

What is the issue you would like the board to address and why? Returning the fishing distance in the Ugashik District section 321-50 to the minimum distance, 1,000 feet that the rest setnetters are governed by with the modifications as stated.

PROPOSED BY: Roland Briggs (EF-C15-045)

PROPOSAL 56 – 5 AAC 06.XXX. Alagnak River Salmon Fishery Management Plan. Create an inriver Alagnak River Salmon Fishery Management Plan, as follows:

Possible (Suggested) Management Scenario:

Prior to allocation period no fishing allowed. During the allocation period June 20 to July 17 and only after escapement has been achieved for the Alagnak River then open the river 1/4 mile above the mouth for a distance 1 mile up river to commercial fishing for both set and drift net fishing. An Alagnak in river fishery to be managed in keeping with the management guidelines established for other rivers in the Bristol Bay Region.

After the allocation period, (currently July 17) open the Alagnak River for commercial harvest on an every other day basis. For example: 24 hours on Monday, Wednesday, and Friday Closed Tuesday, Thursday, Saturday, and Sunday. In every case, both during and after the allocation period, the actual days to be fished and timing of the fishery will be subject to daily decisions of the local management biologist.

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

Manage the Alagnak River Fishery to increase economic recovery of harvestable salmon.

The Alagnak River has from time to time produced salmon in excess of the required escapement and over escapement has occurred. This over escapement could be harvested by permitted drift and set net fishers for the economic wellbeing of the industry.

Levelock Village Council is developing a village owned fish processing facility that would purchase fish from fishers on the Alagnak River. The Levelock plant will be operated with a local hire policy and an employee recruitment plan that will extend all .of the villages along the Kvichak and Lake Iliamna watershed. The plant will bring increased economic activity to area and in doing so help the surrounding economies. The facility will provide residents with opportunities for increased employment as well as allowing for the development processing technical and business management skills. A fishery on the Alagnak River after the allocation period would provide a source of fish that the Levelock Plant could compete for that would benefit the local economy after the main season has passed and into the late summer

The fishery will be open to all permitted fishers. There will be no exclusivity for purchasing or processing, any licensed processor will be able to purchase fish.

PROPOSED BY: Levelock Village Council (HQ-F15-061)

PROPOSAL 57 – 5 AAC 06.XXX. Kvichak River Salmon Fishery Management Plan. Create an inriver Kvichak River Salmon Fishery Management Plan, as follows:

Possible (Suggested) Management Scenario:

Prior to allocation period no fishing allowed. During the allocation period June 20 to July 17 no in river fishing allowed. After the allocation period extend the Kvichak upper fishing limit line to a point 15 miles up the river to commercial fishing for both set and drift net fishing. Manage the Kvichak River for commercial harvest on an every other day basis. For example: 24 hours on Monday, Wednesday, and Friday. Closed Tuesday, Thursday, Saturday and Sunday. In every case the actual days to be fished and timing of the fishery will be subject to daily decisions of the local management biologist.

The fishery will be open to all permitted fishers. There will be no exclusivity; any licensed processor will be able to purchase fish.

What is the issue you would like the board to address and why? Manage the Kvichak River Fishery to increase economic recovery of harvestable salmon.

After the allocation period there are fish in the Kvichak River that could be harvested to benefit the economic wellbeing of the industry. By managing a fishery in the Kvichak River after the allocation period (currently July 17) fish could be harvested which would contribute to the economic wellbeing of the industry or the region as a whole.

Levelock Village Council is developing a village owned fish processing facility that would purchase fish from fishers on the Kvichak River. The Levelock plant will be operated with a local hire policy and an employee recruitment plan that will extend all of the villages along the Kvichak and Lake Illiamna watershed. The plant will bring increased economic activity to the area and in doing so help the surrounding economies. The facility will provide residents with opportunities for increased employment as well as allowing for the development processing technical and business management skills. A fishery on the Alagnak River after the allocation period would provide a source of fish that the Levelock Plant could complete for that would benefit the local economy after the main season has passed and into the later summer.

The fishery will be open to all permitted fishers. There will be no exclusivity for purchasing or processing, any licensed processor will be able to purchase fish.

PROPOSED BY: Levelock Village Council (HQ-F15-062)

PROPOSAL 58 – 5 AAC 06.200. Fishing districts and sections. Expand the boundaries of the Naknek Section of the Naknek-Kvichak District, as follows:

Move the Naknek section boundary line out to allow more area in the Naknek section of the Naknek/ Kvichak District. Approximately 1/4 – 1/3 mile on the upper-end at Libbyville and approximately 1/2 mile on the lower Johnston Hill line.

What is the issue you would like the board to address and why? The boundary line in the Naknek/Kvichak District that separates the Naknek District from the Kvichak District. The Naknek Section of the Naknek/Kvichak District is small and over crowded with allocation and in-river fishing in the Naknek River if the projected forecast for the Kvichak is below a 2.6 million return.

The Naknek section should be enlarged. At the boundary line at Libbyville, move the line about 1/4 – 1/3 mile out. At the lower boundary move that point where it intersects the Johnston Hill Line over about 1/2 mile. The problem with the lower line is when you set your net on the incoming tide at the outside corner, the current takes you over the boundary line and then back inside about the middle of where the ships anchor. On the upper end, the current takes you over the line a couple of miles before you get up to the upper corner boundary. By moving the line over it should allow a drift from the lower corner up to the ships without the current taking a drifting net over the line and allow for more time on the upper end.

PROPOSED BY: Randolph Alvarez (EF-C15-027)

PROPOSAL 59 – 5 AAC 06.350. Closed waters. Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District, as follows:

Change the GPS numbers on the east (Graveyard Point) side of the river.

What is the issue you would like the board to address and why? Our setnet site (which we have owned since 1954) is now out of the district.

PROPOSED BY: The Entire and Extended Armstrong Clan (HQ-F15-064)

PROPOSAL 60 – 5 AAC 06.XXX. Graveyard Creek Special Harvest Area Management Plan. Create a special harvest area in the Graveyard Creek area, as follows:

We request the Board of Fisheries to create a special harvest area or something similar to allow certain right(s) to be protected and preserved or simply restore our right to fish. We request this be done via grandfathered rights or creating special provisions created for cases similar in nature.

What is the issue you would like the board to address and why? Bristol Bay

The issue pertains to the permitted use of set net fishing inside of Graveyard Creek located in the Naknek, Kvichak River section which we are no longer allowed to fish. This event occurred over an extended period of days prior to the start of our season, after hiring and spending thousands of dollars to land ready to fish. After much agonizing and delay we accepted our fate and this was the end result made final by Alaska State Troopers. The threat of a criminal violation being issued by troopers or the seizure of our boat(s) and equipment left us devastated causing our entire family an extreme hardship.

That hardship has been ongoing and continues still. Our family has been negatively impacted and our right(s) affected. This area has been aggressively fished for decades by our entire family each and every period for years in the same historical places. Any data or science would have always included this area being fished. It has always been fished. The unique circumstances involve a complex variety of issues to consider so it is unlikely this issue will be easily resolved by the Board. However, we are optimistic. Our family's primary concern now pertains to our right(s) as fisherman and those rights should be protected. This should be reasonably acknowledged by anyone after being presented the facts surrounding our family's history with Graveyard Creek. The unforeseen actions taken by troopers without explanation or just cause have been damaging. Where did this decisive action begin and why? We have no answers and our rights to fish should be grandfathered or restored. We have fished this area specifically uncontested and free of any violations for our entire life now 3 generations later.

PROPOSED BY: Agostino Grossi (EF-C15-136)

PROPOSAL 61 – 5 AAC 06.335. Minimum distance between units of gear. Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

5 AAC 06.335 (b) Minimum distance between units of gear is amended to read:

No part of a drift gillnet may be operated within 300 feet of the side of a set gillnet and within 100 feet of the offshore end of a set gillnet. [THE 100-FOOT RESTRICTION DOES NOT APPLY SEAWARD OF THE OFFSHORE SETNET DISTANCE RESTRICTIONS SET OUT IN 5 AAC 06.331 (M) AND (N).]

-OR-

(e) In the Nushagak District, from the cannery dock at Clark's Point to an ADF&G regulatory marker at First Creek, no part of a drift net (including a drift gillnet vessel while operating fishing gear) may be within 100 feet of the offshore end of a set gillnet anchoring device, or outermost marker buoy.

What is the issue you would like the board to address and why? This proposal will help to ensure that drift gillnetters respect the set gillnetters who are fishing at their Shore Fishery Lease held with the state. Too often drifters wind up entangled in set net gear, leading to loss in opportunity to fish; loss of production; anchors, screw anchors, buoys, nets and lines getting damaged. This will help clear up any confusion as to whether or not a drift vessel operator is fishing in a legal manner. All other fishing districts in Bristol Bay have protections from drift gillnet fisherman "corking" offset gillnet fisherman who have no other viable spot to harvest salmon. The Nushagak District should have those same protections offered.

PROPOSED BY: Kevin McCambly and Karen Villnave (EF-C15-133)

PROPOSAL 62 – 5 AAC 06.335. Minimum distance between units of gear. Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District, as follows:

5 AAC 06.335 (b) Minimum distance between units of gear is amended to read:

In the Nushagak District, no part of a drift gillnet may be operated [WITHIN 100 FEET OF THE INSHORE END OF A SET GILLNET, EXCEPT THAT IN THE LOCATIONS DESCRIBED IN 5 AAC 06.331 (N), NO PART OF A DRIFT GILLNET MAY BE OPERATED] inshore of a set gillnet.

-OR-

In the Nushagak District, no part of a drift gillnet may be operated [WITHIN 100 FEET OF THE INSHORE END OF A SET GILLNET, EXCEPT THAT IN THE LOCATIONS DESCRIBED IN 5 AAC 06.331 (N), NO PART OF A DRIFT GILLNET MAY BE OPERATED] inshore of a set gillnet **from the Northern Boundary Line at Nushagak point (the east side of the bay) to the cannery docks at Clarks Point.**

What is the issue you would like the board to address and why? This will offer set gillnet operators fishing on their Shore Fishery Leases in the Nushagak District with the state some protections from drift gillnet gear operators. It is in line with all other fishing district regulations.

PROPOSED BY: Kevin McCambly (EF-C15-135)

PROPOSAL 63 – 5 AAC 06.331. Gillnet specifications and operations. Change the seaward minimum distance between set gillnet gear in the Clark’s Point area in the Nushagak District, as follows:

5 AAC 06.331(n)(2) is amended to read:

From the cannery dock at Clark’s Point to an ADF&G regulatory marker at First Creek, 500 feet from the mean high tide mark, or to the minus 3 foot low tide mark whichever location is closer to the mean high tide mark. **Except between 50° 49.945' N lat., 158° 33.456' W long., and 58° 49.241' N lat., 158° 33.061' W long. (at Clark’s Point Bluff mudflat) 750 feet from the mean high tide mark, or to the minus three foot low tide mark whichever location is closer to the mean high tide mark.**

What is the issue you would like the board to address and why? The existing regulation for the set net distance limit of 500 feet from the mean high tide mark results in the lack of sufficient water to fish for the set net sites on Clark’s Point bluff mudflat between 50° 49.945' N lat., 158° 33.456' W long., and 58° 49.241' N lat., 158° 33.061' W long. The set net sites in the specified area are now severely limited by the existing regulation as it does not accommodate the need for an extended limit in this area so the sites can have adequate fishing water/time. The specified area has always been a mud flat, but over the years it has filled in making the mud flat longer and

the area within and beyond the 500 feet distance shallower. This expansion of the mud flat exacerbates the need for an extended distance beyond 500 feet.

Extending this regulation to a 750 feet limit in the specified area would put the offshore distance in line with other set net areas that are situated in similar large mud flats in the Nushagak District. Other set net areas with long mud flats have either 700 to 1,000 feet limits for set netters. First Creek to Third Creek on Ekuk beach, Flounder Flats (Third Creek to Etolin Point), and Igushik are prime examples of similar mud flats with an extended adequate distance (700-1000 feet) to get sufficient water to fish. Clark's Point Bluff is the only fishing area with an extended mud flat that is restricted to 500 feet, severely reducing our sites access to adequate water and fishing time.

Extending the limit in the specified area to 750 feet would:

- a. Exhibit regulatory consistency with other similar areas in the Nushagak district.
- b. Adjust the regulation to accommodate for the reduced fishing opportunity due to the expanding mud flat.
- c. Provide adequate water for the set netters in the affected area to be able to have the opportunity to have sufficient fishing time/water for a successful season.

If this regulation does not change it will:

- a. Continue to arbitrarily restrict the specified set netters from having sufficient water to fish due to environmental changes therefore unnecessarily restricting the set netters opportunity for successful fishing seasons.

Other solutions we considered but rejected included a low tide set. However, due to the length of the mudflat it could be an unreasonable distance and hazard for gillnetters and set netters to be fishing that far out into the Bay.

PROPOSED BY: Alannah Hurley (EF-C15-119)

PROPOSAL 64 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan. Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District, as follows:

5 AAC 06.367 is amended to read:

(d) (1) may open, by emergency order, concurrent fishing periods and set gillnet only fishing periods at approximately two and one-half to three hours before high water, except that when a tide is greater than 18 feet, openings will begin at least three hours before high water: **drift gillnet openings will begin at least one hour before book high water:**

What is the issue you would like the board to address and why? Establish in regulation a minimum amount of flood tide fishing time for drift gillnets in the Nushagak fishing district. Currently many of the openings for the drift gillnets provide minimum amounts of flood fishing time. Flood fishing time provides for increases in harvest for time spent fishing when compared to ebb tide fishing.

PROPOSED BY: Robert Heyano

(HQ-F15-038)

PROPOSAL 65 – 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan. In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches, as follows:

5 AAC 06.367(e) is amended to read:

(e) Repealed ###/###/####. [IF THE COMMISSIONER DETERMINES IT NECESSARY FOR THE PROTECTION OF SOCKEYE SALMON, THE COMMISSIONER MAY OPEN, BY EMERGENCY ORDER, FISHING PERIODS IN THE NUSHAGAK DISTRICT DURING WHICH GILLNET MESH SIZE MAY NOT EXCEED FOUR AND THREE-QUARTERS INCHES.]

What is the issue you would like the board to address and why? Repeal section 5 AAC 06.367(e) in its entirety. There was no scientific evidence to support the passage of this amended language. The result of this regulation has not lead to the outcome desired when implemented in 2012. The requirement of having additional gear has created an extra cost; has resulted in more permit holders fishing smaller gear which leads to more roll-outs, or wanton waste. Commercial fishing gear can be hung in such a way as to minimize any fallout of untargeted species. Allow the permit holder greater choice and flexibility in the size of fishing gear utilized.

PROPOSED BY: Kevin McCambly

(EF-C15-132)

PROPOSAL 66 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan. Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement, as follows:

5 AAC 06.368 is amended to read:

(c) If the total in river coho salmon return in the Nushagak River is projected by the department to be less than **90,000** [100,000 BUT AT LEAST 60,000] fish by August 25 the department shall close, by emergency order, the [DIRECTED COHO] salmon commercial fishery in the Nushagak District by **midnight August 1** [July 23]

REMOVE; (1) [DURING EVEN-NUMBERED YEARS, MANAGE THE PINK SALMON COMMERCIAL FISHERY TO ACHIEVE A PINK SALMON ESCAPEMENT RANGE OF 1.2 TO 2.4 MILLION FISH (0.3 TO 1.5 MILLION FISH ABOVE THE BIOLOGICAL ESCAPEMENT GOAL) AND CLOSE THE DIRECTED PINK SALMON COMMERCIAL FISHERY NO LATER THAN 12:00 MIDNIGHT, AUGUST 1. DURING COMMERCIAL FISHING PERIODS UNDER THIS PARAGRAPH THE USE OF COMMERCIAL GILL NET WITH WEBBING LARGER THAN FOUR AND THREE QUARTER INCHES SHALL BE PROHIBITED FOR ALL FISHING PERIODS AFTER 12:00 MIDNIGHT JULY 23.]

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

(A) Change escapement trigger on the start date of the Coho Management Plan from a range of 130,000 to 70,000 to the biological escapement goal of 90,000 by August 25. This would give the department a fixed number to manage for instead of a broad range.

(B) Change the Coho Management Plan start date from July 23 to midnight August 1. It is difficult if not impossible to project coho escapement by the regulation date July 23 with only an average of 6% of the coho escapement in at that time. This hinders the ability to harvest potential surplus sockeye, pink, and coho salmon after July 23. By August 1 there is an average of 23.8% of coho escapement in, which provides the department needed information to manage the coho salmon season and ample opportunity to manage for shortfalls in the coho run.

(C) Eliminate 5AAC 06.368 (C-1) language pertaining to pink salmon from the Coho Management Plan. This language is cumbersome and no longer needed to protect the coho salmon run. This still maintains the ability to fish for pink salmon until midnight August 1.

PROPOSED BY: Travis Ball and Lloyd T. O'Connor (HQ-F15-002)

PROPOSAL 67 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan. Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals that have previously been implemented, as follows:

5 AAC 06.368 is amended to read:

(a) The purpose of this management plan is to provide guidelines to ensure an adequate spawning escapement of coho salmon into the Nushagak River system. It is the intent of the Board of Fisheries (board) that Nushagak coho salmon be harvested by the fisheries that have historically harvested them. The plan in this section provides management guidelines to the department in an effort to preclude allocation conflicts between various users of this resource. The department shall manage coho salmon stocks in a conservative manner consistent with sustained yield principles and the subsistence priority.

(b) The department shall manage the commercial fishery in the Nushagak District to achieve an inriver run goal of **70,000 – 130,000** [100,000] coho salmon present in the Nushagak River upstream from the department sonar counter located near the village of Portage Creek by August 25. The inriver goal provides for

(1) the department's **sustainable** [BIOLOGICAL] escapement goal of **60,000 – 120,000** [90,000] coho salmon upstream from the sonar counter by August 25;

(2) a reasonable opportunity for subsistence harvest of coho salmon; and

(3) a daily bag and possession limit of five coho salmon, and a guideline harvest level of 2,000 fish in the sport fishery; the sport fish guideline harvest level of 2,000 fish does not apply if the total inriver coho salmon return is projected to be greater than **120,000** [100,000] fish by August 25; the department shall manage the sport fishery to ensure that the biological escapement goal of **60,000 – 120,000** [90,000] coho salmon is achieved.

(c) if the total inriver coho salmon return in the Nushagak River is projected by the department to be less than **120,000** [100,000] but at least **70,000** [60,000] fish by August 25, the department shall close, by emergency order, the directed coho salmon commercial fishery in the Nushagak district by July 23; and

(1) during even-numbered years, manage the pink salmon commercial fishery to achieve a **minimum** pink salmon escapement **of 465,000**, [RANGE OF 1.2 TO 2.4 MILLION FISH] (**300,000** [0.3 TO 1.5 MILLION] fish above the **sustainable** [BIOLOGICAL] escapement goal) and close the directed pink salmon commercial fishery no later than 12:00 midnight, August 1; during commercial fishing periods under this paragraph, the use of a commercial gillnet with webbing larger than four and three-quarter inches shall be prohibited for all fishing periods after 12:00 midnight, July 23;

(2) the commissioner may restrict, by emergency order, the coho salmon sport fishery in the Nushagak River drainage upstream from the department sonar counter located near the village of Portage Creek so that the harvest does not exceed 2,000 coho salmon by one or more of the following:

- (A) reduce the bag and possession limit;
- (B) prohibit the use of bait;
- (C) restrict fishing times and areas;
- (D) restrict terminal tackle to single hook artificial lures; and
- (E) allow catch-and-release fishing only;

(3) it is the intent of the board that the lower the projected inriver coho salmon return is, the more restrictive that management measures will be in the sport and commercial fisheries under this section].

(d) If the total inriver coho salmon return in the Nushagak River is projected by the department to be less than **70,000 fish** [60,000] and the number of spawners is projected to be more than **60,000** [50,000] fish on August 25, the department shall

(1) close the directed commercial fishery no later than 12:00 midnight July 23;

(2) close the coho salmon sport fishery in the Nushagak River drainage; and

(3) restrict the coho salmon subsistence fishery in the Nushagak River drainage by establishing periods by emergency order, during which

(A) coho salmon may be taken only from 9:00 a.m. Monday to 9:00 a.m. Tuesday, from 9:00 a.m. Wednesday to 9:00 a.m. Thursday, and from 9:00 a.m. Friday to 9:00 a.m. Saturday; and

(B) set gillnets may not be more than 10 fathoms in length.

(e) If the number of coho salmon spawners in the Nushagak River is projected by the department to be less than **60,000 fish** [50,000] by August 25, the department shall close the subsistence, commercial, and sport fisheries.

What is the issue you would like the board to address and why? In 2012, the department reevaluated the existing escapement goal for Nushagak coho and pink salmon. This new goal has not been incorporated into regulation and the department feels it is appropriate that it is.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F15-018)

PROPOSAL 219 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan. Address allocation impacts that may come from potential changes in escapement goals and trigger points in the Nushagak River Coho Salmon Management Plan, as follows:

The Nushagak AC is aware that ADFG has submitted a proposal to change the trigger points and escapement goals from point estimates to ranges to be consistent with their current salmon management policies. While the Department's proposal seeks to remain neutral with regard to allocation, the changes may have allocative implications. In addition, with current escapement levels observed for Nushagak coho and pink salmon, portions of Section C 1 may warrant changes. It is the desire of the Nushagak AC with this proposal, to make all user groups aware of the potential for change. The original plan was the result of many hours of work of a large committee representing all user groups. The Nushagak AC did not have the time to assemble a similar committee. Out of respect for the original work, the AC was reluctant to make specific recommendations on short notice and without sufficient consultation.

What is the issue you would like the board to address and why? Address the potential allocative impacts to the Nushagak Coho Salmon Management Plan precipitated by the new escapement goal ranges for Nushagak coho and pink salmon recently recommended by ADFG. Specifically, section C 1 of the Plan is complicated and portions may be rendered moot or difficult to implement with the new escapement goal ranges. Additionally Nushagak coho runs seem to have increased from the levels recorded when the Plan was originally adopted. The very high pink salmon goals established in the original plan were adopted to assure adequate coho salmon escapement.

PROPOSED BY: Nushagak Fish and Game Advisory Committee (HQ-F15-070)

PROPOSAL 68 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan. Repeal the Wood River Sockeye Salmon Special Harvest Area Management Plan, as follows:

Repeal the Wood River Sockeye Salmon Special Harvest Area and Management Plan.

What is the issue you would like the board to address and why? Use of this Wood River Sockeye Salmon Special Harvest Area Management Plan (WRSHA) and area has been controversial from its inception. Many feel that any time the commercial fishery is put into this area, catch opportunity is not fair, is hard on gear, has major impacts on some fishers and buyers, and produces poor quality fish. Some feel the coho salmon run is strong enough that the WRSHA is not needed. Others believe there are alternative management actions that could be used to protect coho.

PROPOSED BY: Nushagak Fish and Game Advisory Committee (HQ-F15-072)

PROPOSAL 69 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan. Amend the Wood River Sockeye Salmon Special Harvest Area

Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations, as follows:

5 AAC 06.358(d)(3)(4) Delete that portion of (4) [EXCEPT AS SPECIFIED IN (5) OF THIS SUBSECTION.]

5 ACC 06.358(d)(3)(5) Delete (5) [WHEN THE WOOD RIVER SPECIAL HARVEST AREA IS OPEN UNDER (c)(3) OF THIS SECTION, THE GEAR GROUP THAT IS BEHIND IN THE ALLOCATION SPECIFIED IN 5 AAC 06.367(b) FOR THE NUSHAGAK DISTRICT.]

What is the issue you would like the board to address and why? Deleting the requirement to manage for the Nushagak allocations as specified in 5 AAC 06.367 when the Wood River Special Harvest Area is open in accordance to 5 AAC 06.358(c)(3). At the last Bristol Bay cycle the Board of Fisheries eliminated the 74 percent drift gillnet harvest and 26 percent set gillnet harvest for other openings in the Wood River Special Harvest area, and replaced it with a 3 drift gear fishing periods to every one set gillnet fishing periods. To be consistent with the Board’s intent, the entire Wood River Special Harvest Area should be managed on the same 3 to 1 ratio.

PROPOSED BY: Robert Heyano (HQ-F15-037)

PROPOSAL 70 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan. Modify the Wood River Sockeye Salmon Special Harvest Area Management Plan to open separate drift and set gillnet fishing periods based on achievement of gear allocation instead of a fixed seasonal fishing period ratio, as follows:

5 AAC 06.358 (d) Wood River Sockeye Salmon Special Harvest Area Management Plan is amended to read:

(4) except as specified in (5) of this subsection, when the Wood River Special Harvest Area is open, the drift gillnet and set and set gillnet fisheries will open separately, **for the gear group that is behind in the allocation specified in 5 AAC 06.367(b) for the Nushagak District. [WITH A SEASONAL RATIO OF THREE DRIFT GILLNET GEAR FISHING PERIODS TO EVERY ONE SET GILLNET FISHING PERIOD;]**

What is the issue you would like the board to address and why? Remove any mention of a "seasonal ratio" of 3:1 drift to set gillnet fishing periods in the Wood River Sockeye Salmon Special Harvest Area Management Plan (SSSHA). The use of the SSSHA should remain consistent under all circumstances, used as a tool for the management to avoid over-escapement into the Wood River; allowing for opportunity to harvest a surplus of fish; ensure that the allocation plan between both gear types (drift and set gillnet) dictates which gear type is allowed to fish in the SSSHA.

PROPOSED BY: Kevin McCambly (EF-C15-129)

PROPOSAL 71 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan. Update the description of the Wood River Special Harvest Area by deleting references to regulatory markers, as follows:

5 AAC 06.358(b) is amended to read:

(b) The Wood River Special Harvest Area consists of the waters of the Wood River from a line between **Hansen Point** [ADF&G REGULATORY MARKERS LOCATED] at 59° 06.05' N. lat., 158° 29.30' W. long. [(HANSEN POINT)] and **a point across from Hansen Point at 59° 06.29' N. lat., 158° 28.84' W. long. [(ACROSS FROM HANSEN POINT)]**, upstream to a line between **a point on the west shore downstream of the Muklung River** [ADF&G REGULATORY MARKERS LOCATED] at 59° 09.71' N. lat., 158° 32.61' W. long. **and a point on the east shore downstream of the Muklung River at [(ON THE WEST SHORE DOWNSTREAM OF THE MUKLUNG RIVER) AND] 59° 09.78' N. lat., 158° 31.99' W. long. [(ON THE EAST SHORE DOWNSTREAM OF THE MUKLUNG RIVER)]**, and from a line between **a point on the west shore upstream of Muklung River** [ADF&G REGULATORY MARKERS LOCATED] at 59° 10.44' N. lat., 158° 31.73' W. long. **and a point on the east shore upstream of the Muklung River at [(WEST SHORE UPSTREAM OF THE MUKLUNG RIVER) AND] 59° 10.23' N. lat., 158° 31.43' W. long. [(EAST SHORE UPSTREAM OF THE MUKLUNG RIVER)]** upstream to a line between a point **on the west shore downstream of Silver Salmon Creek** [ADF&G REGULATORY MARKERS LOCATED] at 59° 12.26' N. lat., 158° 33.34' W. long. [(WEST SHORE DOWNSTREAM OF SILVER SALMON CREEK)] and **a point on the east shore downstream of Silver Salmon Creek at 59° 12.20' N. lat., 158° 33.12' W. long. [(EAST SHORE DOWNSTREAM OF SILVER SALMON CREEK)]**.

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the description of the Wood River Sockeye Salmon Special Harvest Area Management Plan. The department has switched to latitude and longitude coordinates to define areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-011)

PROPOSAL 72 – 5 AAC 06.370. Registration and reregistration. Change the description of statistical areas in the Nushagak District by deleting references to department regulatory markers, and renaming the Nushagak Statistical Area, as follows:

5 AAC 06.370(l) is amended to read:

(l) In the Nushagak District,

...

(3) Coffee Point Statistical Area: all waters of the Nushagak Section, as described in 5 AAC 06.200(3), between **a point two miles below Bradford Point at 58° 58.63' N. lat., 158° 33.62' W. long. and a point four miles below Coffee Point at 58° 52.90' N. lat., 158°**

43.30' W. long. [AN ADF&G REGULATORY MARKER AT 58° 58.63' N. LAT., 158° 33.62' W. LONG. (TWO MILES BELOW BRADFORD POINT) AND AN ADF&G REGULATORY MARKER AT 58° 52.92' N. LAT., 158° 43.19' W. LONG. (FOUR MILES BELOW COFFEE POINT)];

(4) Ekuk Statistical Area: all waters of the Nushagak Section, as described in 5 AAC 06.200(3), between **Ekuk at 58° 49.15' N. lat., 158° 33.30' W. long. and Etolin Point at 58° 39.37' N. lat., 158° 19.31' W. long.** [AN ADF&G REGULATORY MARKER AT 58° 49.15' N. LAT., 158° 33.30' W. LONG. (EKUK) TO AN ADF&G REGULATORY MARKER AT 58° 39.42' N. LAT., 158° 19.29' W. LONG. (ETOLIN POINT)];

(5) Clark's Point Statistical Area: all waters of the Nushagak Section, as described in 5 AAC 06.200(3), between **Clark's Point at 58° 50.71' N. lat., 158° 32.49' W. long. and Ekuk at 58° 49.15' N. lat., 158° 33.30' W. long.** [AN ADF&G REGULATORY MARKER AT 58° 50.71' N. LAT., 158° 32.49' W. LONG. (CLARK'S POINT) TO AN ADF&G REGULATORY MARKER AT 58° 49.15' N. LAT., 158° 33.30' W. LONG., (EKUK)];

(6) Queen's Statistical Area: all waters of the Nushagak Section, as described in 5 AAC 06.200(3), enclosed by a line from **a point at 58° 51.27' N. lat., 158° 30.34' W. long. to the outlet of Queen's Slough at 58° 51.41' N. lat., 158° 30.38' W. long.** [AN ADF&G REGULATORY MARKER AT 58° 51.27' N. LAT., 158° 30.34' W. LONG. TO AN ADF&G REGULATORY MARKER AT 58° 51.41' N. LAT., 158° 30.38' W. LONG. (OUTLET OF QUEEN'S SLOUGH)];

(7) **Combine** [NUSHAGAK] Statistical Area: all waters of the Nushagak Section, as described in 5 AAC 06.200(3), between **Nushagak Point at 58° 56.79' N. lat., 158° 29.53' W. long. and Clark's Point at 58° 50.71' N. lat., 158° 32.49' W. long.** [AN ADF&G REGULATORY MARKER AT 58° 56.79' N. LAT., 158° 29.53' W. LONG. (NUSHAGAK POINT) TO AN ADF&G REGULATORY MARKER AT 58° 50.71' N. LAT., 158° 32.49' W. LONG. (CLARK'S POINT)], except those waters described in (6) of this subsection.

What is the issue you would like the board to address and why? Remove references to department regulatory markers from the registration and reregistration section. The department has switched to latitude and longitude coordinates to define areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-009)

PROPOSAL 73 – 5 AAC 06.200. Fishing districts and sections. Redefine the description of the Nushagak District and the Igushik Section in the Nushagak District by deleting references to department regulatory markers, as follows:

5 AAC 06.200(a) and (a)(1) are amended to read:

(a) Nushagak District: all waters of Nushagak Bay north of a line from **a point at Nichols Hills at** [AN ADF&G REGULATORY MARKER AT APPROXIMATELY] 58° 33.77' N. lat., 158° 46.57' W. long. **to Etolin Point at** [(NICHOLS HILLS) TO AN ADF&G REGULATORY

MARKER LOCATED AT APPROXIMATELY] 58° 39.37' N. lat., 158° 19.31' W. long. [(ETOLIN POINT)].

(1) Igushik Section: all waters of Nushagak Bay **enclosed** [BOUNDED] by a line from **a point at Nichols Hills at** [AN ADF&G REGULATORY MARKER LOCATED AT APPROXIMATELY] 58° 33.77' N. lat., 158° 46.57' W. long., to a point at 58° 36.28' N. lat., 158° 34.40' W. long., to a point at 58° 44.80' N. lat., 158° 41.50' W. long., to **a point at** [AN ADF&G REGULATORY MARKER LOCATED AT APPROXIMATELY] 58° 46.13' N. lat., 158° 46.65' W. long.

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the regulations describing fishing districts and sections. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-006)

PROPOSAL 74 – 5 AAC 06.350. Closed waters. Redefine the description of closed waters for salmon in the Snake River in the Nushagak District by deleting a reference to department regulatory markers, as follows:

5 AAC 06.350(a)(4) is amended to read:

(a) The following locations in the Nushagak District are closed to the taking of salmon:

...

(4) those waters of the Snake River upstream from **the latitude of a line** [ADF&G REGULATORY MARKERS LOCATED] at 58° 52.80' N. lat.;

What is the issue you would like the board to address and why? Remove the reference to department regulatory markers from the description of closed waters. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-005)

PROPOSAL 75 – 5 AAC 06.350. Closed waters. Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet, as follows:

5 AAC 06.350. Closed Waters is amended to read:

...

(e)(3) from June 1 through **July 11** [JULY 15], those waters of the Togiak District inside a line from 59° 03.19' N lat., 160° 20.18' W. long. to 59° 01.76' N. lat., 160° 28.17' W. long. are closed to commercial fishing for salmon with a drift gillnet.

What is the issue you would like the board to address and why? The closed water section in the regulation was proposed by the community of Togiak in hopes of developing a Chinook management plan and to protect the Chinook salmon stock in Togiak. The problem is the unreasonable restriction of shallower calmer waters during the peak sockeye salmon fishing for a small amount of Chinook migrating through.

PROPOSED BY: Togiak Fish and Game Advisory Committee (EF-C15-055)

PROPOSAL 76 – 5 AAC 06.200. Fishing districts and sections. Change the current description of the Osviak Section in the Togiak District by correcting a GPS coordinate in the description, as follows:

5 AAC 06.200(e)(3) is amended to read:

(e) Togiak District:

...

(3) Osviak Section: waters within a line between Estus Point at **58° 46.86' N. lat., 161° 10.98' W. long.** [58° 46.85' N. LAT., 161° 10.98' W. LONG.] and Asigyugpak Spit at 58° 41.00' N. lat., 161° 18.20' W. long.

What is the issue you would like the board to address and why? Change the northeast coordinate defining the Osviak Section so that it is identical to the southwest coordinate of the adjacent Matogak Section. The department believes these two adjacent section-defining coordinates were intended to be identical and this will change them to be identical, reducing ambiguity in the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-020)

PROPOSAL 77 – 5 AAC 06.369. Togiak District Salmon Management Plan. Change the Togiak District Salmon Management Plan to reflect recent department escapement goal changes, and remove coho and king salmon goals, as follows:

5 AAC 06.369(b) is amended to read:

(b) The department shall manage the commercial fishery in the Togiak River Section of the Togiak District for a **sustainable escapement goal range of 120,000 – 270,000** [BIOLOGICAL ESCAPEMENT GOAL OF 150,000] sockeye salmon past the counting tower at Togiak Lake [AND BIOLOGICAL ESCAPEMENT GOALS OF 50,000 COHO SALMON, AND 10,000 KING SALMON IN THE TOGIK RIVER].

What is the issue you would like the board to address and why? Change the Togiak District salmon management plan to reflect the sockeye salmon sustainable escapement goal established by the department and remove coho and king salmon escapement goals from regulation to reflect recent department escapement goal review changes. These changes will reflect the current escapement management directives the department follows, removing any confusion and clarifying the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-010)

PROPOSAL 78 – 5 AAC 01.320. Lawful gear and gear specifications. Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage, as follows:

5 AAC 01.320 is amended to read:

From August 30 through **DECEMBER 31** by spear, dipnet, gillnet, **AND BEACH SEINE**. Along a 100 yard length of shoreline near the outlet of Naknek River as marked by ADF&G regulatory markers; at Johnny’s Lake on the Northwestern side of Naknek Lake; at the outlet of Idavians Creek on the North side of Naknek Lake; at the mouth of Brooks River from September 18 through December 31.

What is the issue you would like the board to address and why? Allow for beach seining to release non-targeted finfish species. Idavians Creek is a traditional location used by local residents. (At the mouth of Brooks River by spear, dipnet, gillnet, and beach seine from September 18 through December 31.) Separate season for Brooks River. Extend season to Dec 31 for said descriptions and include beach seine as additional method to harvest spawned out sockeye. The proposed seasons and methods will be in line with traditionally practiced subsistence practices of local residents.

The 2014 forecast for Bristol Bay sockeye for the Naknek River portion is estimated to be 3.35 million and escapement at 1.10 million into the Naknek River drainage. Forecast for harvest is estimated at 2.25 million. The Naknek River portion estimate does not account for the South Peninsula.

Spawned out sockeye have traditionally been harvested for personal (subsistence) use by the Katmai descendants. Harvest of spawned-out salmon occurs when the commercial/sport fishing season are inactive. It makes fall red fish (spawned out salmon) available to traditional and cultural descendants of Naknek Lake and its river drainages for all Naknek Lake and River descendants.

The methods, dates, and places do not reflect the proper access to our traditional and cultural foods. The harvest of spawned-out sockeye salmon has no significant commercial value, but is a traditional food source for local residents.

Title 36 CFR, Part 13. Alaska regulations. Katmai National Park and Preserve Special Regulations 13.1204 allows for a traditional redfish fishery for “Local residents who are

descendants of Katmai residents who lived in the Naknek Lake and River Drainage...” Seasons and methods for the take of redfish will be set by the Alaska Department of Fish and Game in the annual Subsistence and Personal Use Statewide Fishing Regulations booklet.

Our people, (rural residents of King Salmon, Naknek, South Naknek) traditionally had access to their traditional foods (subsistence resources) in Naknek Lake and its surrounding drainages. The current dates in regulation will not allow access to traditional food supply (resources) traditionally practiced by local traditional tribes.

PROPOSED BY: Bristol Bay Subsistence Regional Advisory Council (EF-C15-008)

PROPOSAL 79 – 5 AAC 01.310. Fishing seasons and periods. Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time, as follows:

Open it up seven days a week so people don’t have to come down river when it’s blowing hard, though in-river it can get quite rough at Paul’s Creek and Savonoski Crossing. Also for the convenience of doing fish when we have time not just two times a week. Over the past three years, biologists have Emergency Ordered this to open it up seven days a week. If the escapement should be in trouble it could always be cut back. The run to the Naknek River has been very strong. We enjoy being able to fish at our pace.

What is the issue you would like the board to address and why? I would like to change from the 9:00 a.m. June 23 to the 9:00 a.m. July 17 opens on Tuesday 9:00 a.m. to Wednesday 9:00 a.m. and Saturday 9:00 a.m. to Sunday 9:00 a.m. for safety concerns and convenience

PROPOSED BY: William Regan Jr. (EF-C15-035)

PROPOSAL 80 – 5 AAC 01.310. Fishing seasons and periods. Re-describe the subsistence fishing area in the Nushagak District that is restricted to three days per week by removing references to regulatory markers, as follows:

5 AAC 01.310(d) is amended to read:

(d) In the Nushagak District, in all waters upstream of a line **from a point approximately two miles south of Bradford Point at 58° 58.63' N. lat., 158° 33.62' W. long. and Nushagak Point at 58° 56.79' N. lat., 158° 29.53' W. long. to a point at Red Bluff on the west shore of the Wood River at 59° 09.58' N. lat., 158° 32.36' W. long., and to** [BETWEEN AN ADF&G REGULATORY MARKER LOCATED TWO STATUTE MILES SOUTH OF BRADFORD POINT AND AN ADF&G REGULATORY MARKER LOCATED ON NUSHAGAK POINT TO AN ADF&G REGULATORY MARKER LOCATED AT RED BLUFF ON THE WEST SHORE OF THE WOOD RIVER, AND TO AN ADF&G REGULATORY MARKER LOCATED AT] Lewis Point on the north shore on the Nushagak River **at 58° 59.46' N. lat., 158° 05.57' W. long.**, from 9:00 a.m. July 2 through 9:00 a.m. 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.

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the description of fishing seasons and periods. The department has switched to latitude and longitude coordinates to define areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-065)

PROPOSAL 81 – 5 AAC 01.320. Lawful gear and gear specifications. Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers, as follows:

5 AAC 01.320(b) – (d) are amended to read:

(b) Outside the boundaries of any district, salmon may only be taken by set gillnet, except that salmon may also be taken as follows:

- (1) in the Togiak River,
 - (A) excluding its tributaries, by spear;
 - (B) between the mouth of the river and upstream approximately two miles to **a line across the river from XX° XX' N. lat., XX° XX' W. long. to XX° XX' N. lat., XX° XX' W. long.** [THE ADF&G REGULATORY MARKERS], by a drift gillnet that is not more than 10 fathoms in length;
- (2) from August 30 through September 30, by spear, dip net, and gillnet along a 100 yard length of the west shore of Naknek Lake near the outlet to the Naknek River **between a line from XX° XX' N. lat., XX° XX' W. long and XX° XX' N. lat., XX° XX' W. long.** [AS MARKED BY ADF&G REGULATORY MARKERS];

...

(c) Except as specified in (b) of this section, the maximum lengths for gillnets and beach seines used to take salmon are as follows:

- (1) set gillnets may not exceed 10 fathoms in length in
 - (A) the Naknek, Egegik, and Ugashik Rivers;
 - (B) the Nushagak District during the emergency order subsistence openings described in 5 AAC 01.310(b);
 - (C) all waters **of Nushagak Bay upstream of a line from a point approximately two miles south of Bradford Point at 58° 58.63' N. lat., 158° 33.62' W. long. to Snag Point at 59° 03.18' N. lat., 158° 25.59' W. long.** [ENCLOSED BY A LINE FROM AN ADF&G REGULATORY MARKER LOCATED TWO STATUTE MILES SOUTH OF BRADFORD POINT TO AN ADF&G REGULATORY MARKER LOCATED AT NUSHAGAK POINT TO AN ADF&G REGULATORY MARKER LOCATED AT SNAG POINT];

(2) in the **remaining waters of the Wood River and Nushagak River not described in (c)(1)(C) of this section** [REMAINING WATERS OF THE AREA, INCLUDING THE WATERS OF THE WOOD RIVER AND NUSHAGAK RIVER THAT ARE UPSTREAM OF A LINE FROM AN ADF&G REGULATORY MARKER LOCATED AT NUSHAGAK POINT TO AN ADF&G REGULATORY MARKER LOCATED AT SNAG POINT], **set** gillnets may not exceed 25 fathoms in length;

(3) beach seines may not exceed 25 fathoms in length.

(d) No part of a set gillnet may be operated within 300 feet of any part of another set gillnet, except that

(1) **in** the Nushagak District from **a point approximately two miles south of Bradford Point at 58° 58.63' N. lat., 158° 33.62' W. long. to a point** [AN ADF&G REGULATORY MARKER LOCATED TWO STATUTE MILES BELOW BRADFORD POINT TO AN ADF&G REGULATORY MARKER LOCATED] at Red Bluff on the west shore of Wood River **at 59° 09.58' N. lat., 158° 32.36' W. long.**, no part of a set gillnet may be operated within 100 feet of any part of another set gillnet;

...

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the description of the lawful gear and gear specifications section. The department has switched to latitude and longitude coordinates to define areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

(Editor note: Complete coordinates were not available at the deadline for proposals and will be available prior to the meeting.)

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-066)

PROPOSAL 82 – 5 AAC 01.336. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses. Establish and adopt amounts reasonably necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District, as follows:

5 AAC 01.336(b) is amended by adding a new paragraph to read:

(b) The board finds that

(3) X,XXX – X,XXX pounds of herring spawn on kelp in the waters of the Togiak District as described in 5 AAC 27.805(a) are reasonably necessary for subsistence uses in the Bristol Bay Area.

What is the issue you would like the board to address and why? In 5 AAC 01.336 there are two customary and traditional use findings, one for all finfish and one for herring spawn on kelp in the Togiak District (5 AAC 01.336(a)). The board has adopted amounts reasonably necessary for subsistence for salmon and finfish other than salmon. There are no specific findings for the amounts reasonably necessary for subsistence for herring spawn on kelp. Recent data collected in the area includes comprehensive surveys in Togiak, Aleknagik, and Manokotak for the 2008 study

year and Dillingham for the 2010 study year. The department conducted directed herring spawn on kelp harvest assessment surveys in the Togiak District to document the harvest, use, and sharing patterns associated with this unique finfish resource annually from 2011 to 2015.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-003)

PROPOSAL 83 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area. Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River, as follows:

5 AAC 67.022 (k) is amended to read:

5 AAC 67.022

...

(k) In the fresh waters of the Bristol Bay Area where the use of bait is not allowed as described in **5 AAC 01.325(c)**, (**only including the Newhalen River from Mile 1 to 22**), a person may not apply to fishing gear or place in the water any substance for the purpose of attracting fish by scent, including

- (1) fish eggs in any form;
- (2) natural or preserved animal, fish, fish oil, shellfish, or insect parts;
- (3) natural or processed vegetable matter; and
- (4) natural or synthetic chemicals.

What is the issue you would like the board to address and why? The current “no chumming” regulation could potentially result in citations for Alaska residents who harvest whitefish and other non-salmon species under sport fishing regulations at traditional fish camps where salmon are processed that are harvested under subsistence regulations. This issue is specific to the area of the upper Newhalen River from River Mile 22 extending into Six Mile Lake, the Lake Clark drainage, and Lake Iliamna where the majority of subsistence salmon fishers process their harvest shore side, keeping their fish in the water to keep their catch cool during processing.

Persons sport fishing (using a rod-and-reel) at a subsistence camp, while there are fish parts in the water, are essentially violating the “no chumming” regulation and could be cited by the Alaska State Troopers for a sport-fishing violation. This situation often occurs when subsistence harvesters are targeting whitefish that are likely attracted to the scent of the sockeye salmon being stored submerged in fresh waters for processing or their parts returned to the water after processing which were harvested under subsistence regulations. Often these are children who are fishing with rod and reel while their parents clean fish nearby.

The Nondalton Tribal Council would like the Alaska Board of Fisheries to recognize this customary and traditional way of harvesting whitefish and other non-salmon species in the areas included in this proposal, by exempting this method of harvest from being considered “chumming.”

PROPOSED BY: Nondalton Tribal Council (EF-C15-115)

PROPOSAL 84 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area. Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage, as follows:

5 AAC 67.022(d)(11) is amended to read:

(11) the Big Creek drainage [, INCLUDING WATERS WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER] is closed to **the retention of all** [SPORT FISHING FOR] king salmon year round.

What is the issue you would like the board to address and why? Big Creek is the only portion of the Naknek drainage that is realistically available to fly fish for king salmon. All other waters of the drainage are too large, fast and deep to allow access by fly fishermen. King Salmon Creek and Paul’s Creek were closed to all fishing for king salmon many years ago and Big Creek was the only alternate left for fly fishermen to use as a location to fly fish for kings. By closing this creek it has totally eliminated the possibility for fly fishermen wanting to fish for king salmon in the Naknek drainage. In addition it has unintentionally displaced the gear fishery that has historically occurred in front of the mouth of the creek. By implementing the regulation to include the phrase "within 1/4 mile radius of its confluence with the Naknek River" it disrupted a fishery that has been in use for generations, for no biological reason.

This wording would allow for fly fishermen to access the creek for catch and release fishing only, it would allow for the gear fishery to return to historic use and still protect the king salmon in the drainage. Again, there was no biological concern for the creek when this regulation was implemented. This change will still show an abundance of caution for the king salmon fishery in the Naknek drainage while no longer displacing a user group and restoring a fishery that was and is not identified as being a problem for the resource or any social reason in the main stem of the Naknek River.

PROPOSED BY: Nanci Morris Lyon (EF-C15-062)

PROPOSAL 85 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area. Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage, as follows:

5 AAC 67.022(d)(11) is amended to read:

(11) the Big Creek drainage, including waters **from the confluence of Big Creek with the Naknek River** [WITHIN A ONE-QUARTER MILE RADIUS OF ITS CONFLUENCE WITH THE NAKNEK RIVER:].

Closed all year round to all king salmon fishing.

What is the issue you would like the board to address and why? This area boundary correction reflects the intent of the regulation proposal when it was originally made. The current

radius boundary interrupts fishing lanes in the main stem of the river and serves no conservation purpose.

PROPOSED BY: Joe Klutsch (HQ-F15-076)

PROPOSAL 86 – 5 AAC 67.020. Bag limits, possession limits, annual limits, and size limits for Bristol Bay. Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries, as follows:

This proposal would require anglers to record their harvest (and catch?) data on a department provided mail-in harvest ticket much like that for big game hunting in Alaska. The cards must be returned to ADF&G at the end of the Chinook salmon season in Bristol Bay.

What is the issue you would like the board to address and why? To address concerns for chinook (king) salmon catch and harvest data and to make more efficient use of the current requirement to record Chinook salmon harvests in the Bristol Bay sport fisheries. Numerous Bristol Bay residents express concern and doubt regarding the timeliness and accuracy of current methods for assessing the sport harvest and catch of area Chinook salmon. The Statewide Harvest Survey (SWHS) results are delayed by up to two years and are not trusted by many. Guided angler data is sent to ADF&G weekly. Other than the SWHS there is no in-season data collected on non-guided anglers unless an expensive onsite angler survey is conducted. ADF&G cannot survey all waters every season.

Bristol Bay area sport anglers of all ages are already required to record their Chinook salmon harvests on their license or on a special report card.

It is expected the data from these cards could be used by ADF&G to refine their assessment of harvest (and catch?) of Bristol Bay Chinook salmon.

PROPOSED BY: Nushagak Fish and Game Advisory Committee (HQ-F15-071)

PROPOSAL 87 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay area. Eliminate the use of egg-simulating lures in rainbow trout fishing, as follows:

5 AAC 67.022(d) is amended to read:
Only unbaited, single-hook artificial lures excluding plastic, rubber, neoprene, fiber, or any other material that simulates a fish egg or egg cluster may be used year round.

What is the issue you would like the board to address and why? Hook injury and mortality due to the use of egg simulators lures is causing excessive harm to rainbow trout populations catch and release techniques attempted by inexperienced fishermen are generally not effective especially younger age class fish. This would constitute a conservation measure.

PROPOSED BY: Joe Klutsch (HQ-F15-075)

PROPOSAL 88 – 5 AAC 27.832. Seine specifications and operations for Bristol Bay Area. Change the regulatory description for herring purse seine and hand purse seine, as follows:

5 AAC 27.832(a)(2) is amended to read:

(a) A herring purse seine or hand purse seine

...

(2) may not be more than **630** [625] meshes in depth [, OF WHICH NO MORE THAN 600 MESHES MAY HAVE A MESH SIZE LARGER THAN ONE AND ONE-HALF INCHES].

What is the issue you would like the board to address and why? Before 1998, gear specifications and operations for both herring gillnet and seine gear appeared in 5 AAC 27.831. At that time the provision was worded as follows:

(d) A herring purse seine or hand purse seine may not exceed 100 fathoms in length and not more than 625 meshes in depth, of which 600 meshes may not have a mesh size larger than one and one-half inches.

In 1998, when the seine specifications and operations were moved into their own section under 5 AAC 27.832, the text was changed to read as it currently reads in 5 AAC 27.832(a):

(a) A herring purse seine or hand purse seine

(1) may not exceed 100 fathoms in length; and

(2) may not be more than 625 meshes in depth, of which no more than 600 meshes may have a mesh size larger than one and one-half inches.

This changed the regulation from allowing a net to have no more than 25 meshes over one and one-half inches to allowing 600 meshes to be over one and one-half inches. The regulation appears to have changed inadvertently during the editing process. This proposal would correct this error and incorporate industry practices in building purse seines. Industry practices use 200.5 mesh strips to construct the base net. This net is then attached at the top and bottom to cork and lead lines with additional meshes. The number of meshes used at the top and bottom varies but can total 25. So to allow for the additional half meshes in the base strips it seemed appropriate to change the total number of meshes to 630. The industry standard is for a mesh size of one and one-half inches.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-008)

PROPOSAL 89 – 5 AAC 27.865. Bristol Bay Herring Management Plan. Delete references to sac roe in the Bristol Bay Herring Management Plan, as follows:

5 AAC 27.865 is amended to read:

5 ACC 27.865(b)(7) Delete the words [SAC ROE]

5 AAC 27.865(b)(8) Delete the words [SAC ROE]

What is the issue you would like the board to address and why? Delete all reference to sac roe in the Bristol Bay Herring Management Plan. With continuing weak markets for sac roe herring, the highest level of product quality could be other uses of herring than the roe. By removing the reference to "sac roe" could allow development of other product forms leading to new markets thus increasing the value of Togiak herring.

PROPOSED BY: Robert Heyano (HQ-F15-039)

PROPOSAL 90 – 5 AAC 27.865. Bristol Bay Herring Management Plan. Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets, as follows:

5 AAC 27.865 is amended to read:

5 AAC 27.865

(b)(8) After the spawn-on-kelp harvest and the Dutch Harbor food and bait fishery have been subtracted, the remaining harvestable surplus is allocated to the sac roe fishery. The department **may** [SHALL] manage for a removal of 30 percent of that surplus by the gillnet fleet and 70 percent by the purse seine fleet. To maintain those percentages inseason, the commissioner **may** [SHALL] make adjustments to fishing periods and fishing areas by emergency order. After the gillnet and purse seine fleet have harvested at least 50 percent of each gear group’s allocation, the commissioner may allow either fleet to harvest its remaining allocation without further restrictions.

What is the issue you would like the board to address and why? Delete the words “shall” and replace with “may”. The current low prices being paid for sac roe herring has resulted in a significant reduction in gillnet effort. Requiring the commissioner to manage for the 70/30 harvest of at least 50% of each gear’s allocation places additional unnecessary financial risks for all participants in a marginal profitable fishery in the best of conditions.

PROPOSED BY: Robert Heyano (HQ-F15-040)

PROPOSAL 91 – 5 AAC 27.850. Closed waters in Bristol Bay Area. Redefine the description of closed waters for the Togiak herring fishery by deleting references to department regulatory markers, as follows:

5 AAC 27.850 is amended to read:

5 AAC 27.850. Closed waters in Bristol Bay Area. (a) Metervik Bay is closed to herring fishing north of a line from **a point at** [AN ADF&G REGULATORY MARKER AT] 58° 49.10' N. lat., 159° 47.25' W. long. to **a point at** [AN ADF&G REGULATORY MARKER AT] 58°

49.97' N. lat., 159° 45.75' W. long. This closure does not apply to the taking of herring spawn on kelp.

(b) Ungalikthluk Bay is closed to the taking of herring north of a line from [AN ADF&G REGULATORY MARKER AT] Rocky Point at 58° 53.25' N. lat., 160° 14.25' W. long. to a point [(58° 53.25' N. LAT., 160° 14.25' W. LONG. TO AN ADF&G REGULATORY MARKER] at 58° 51.90' N. lat., 160° 09.75' W. long. This closure does not apply to the taking of herring spawn on kelp.

What is the issue you would like the board to address and why? Remove reference to department regulatory markers from the description of closed waters. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F15-004)
