

**PROPOSAL 172 – 5 AAC 15.357. Chignik Area Salmon Management Plan.** Increase the passage of sockeye salmon above the Chignik River weir to provide additional subsistence fishing opportunity, as follows:

The following draft regulatory language was developed and approved by all five Tribal councils:

5 AAC 15.357. Chignik Area Salmon Management Plan is amended to read:

(b)

(3) from the end of the transition period, described in (2) of this subsection until September 14,

...  
(B) the department shall manage the commercial fishery to allow for the passage of at least 150,000 [50,000] sockeye salmon above the Chignik River weir, in addition to late-run sockeye salmon escapement needs, to provide an in river harvestable surplus above the Chignik River weir in August and September of at least [75,000] 25,000 fish in August and [75,000] [25,000] fish from September 1 through September 15;

Increasing the numbers of late-run sockeye salmon required to be passed through the weir will result in additional late season subsistence harvest opportunity.

**What is the issue you would like the board to address and why?** During the past four years, subsistence fishers of Chignik Bay, Chignik Lake, Chignik Lagoon, Perryville, and Port Heiden have experienced challenges when attempting to harvest late-run sockeye salmon returning to Chignik Lake and its tributaries. Many elders and high harvesting subsistence fishers indicate that sockeye salmon used to be available in the Chignik Lake watershed well into the winter months for as long as they can remember, until the recent four years. Historically, local subsistence fishers depended upon the availability of red fish well into January and February, but recently fishers are unable to locate fish in the traditional subsistence fishing areas of the Chignik Lake watershed as early as December.

The same issue was brought to the board before and action was taken to establish the existing in-river goals. Local subsistence fishers believe that the existing in river escapement goals are no longer satisfying the subsistence needs of residents in all five communities. The current escapement goals and management practices in August require modification in order to provide for traditional subsistence opportunities during the fall and winter months.

According to 5 AAC 15.357 (b)(3)(B), ADF&G managers must allow at least 50,000 sockeye salmon to pass through the Chignik Weir in addition to the late-run sockeye salmon escapement needs. This is to provide an in-river harvestable surplus above the Chignik River weir in August of at least 25,000 fish in August and an additional 25,000 fish from September 1 through September 15. The Chignik Lake late-run sockeye salmon escapement goal for the month of August for spawning purposes, as it is published in the ADF&G escapement objective schedule, is 40,000 to 53,000 sockeye salmon (not including the 50,000 fish for in river subsistence harvestable surplus). During August 2007–2014, the spawning escapement goal (not including the additional 25,000 sockeye salmon passing through the weir for subsistence in August) fell below once, exceeded six times and met twice. While escapement was not met only once during the past eight years, subsistence users are continually unable to harvest their late-run sockeye salmon.

The current escapement goals set for September 1–15 may be the reason that subsistence fishers are unable to get their fish. The ADF&G has only met the escapement goal for September 1–15 twice in the last eight years (2007°2014). During only two of those years were sockeye salmon passed through the weir for escapement needs above the in-river subsistence harvestable surplus goal.

Local subsistence fishers are concerned because the later arriving salmon normally have a commensurate later stream life and are the fish believed to be available to subsistence fishers during the winter months. Not managing the September 1–15 portion of the late sockeye run of the Chignik River to provide for the regulation required passage of subsistence fish is unacceptable. Modification of management practices and goals are necessary to provide for subsistence opportunities of sockeye salmon well into the winter months.

Five tribal councils have joined together to submit this proposal to the board requesting greater opportunity for subsistence fishers during their traditional harvesting months or December-March.

The five Tribal councils submitting this proposal request that the board increase the additional late-run escapement goal for August and September 1–15 to provide opportunity for subsistence fishers. The five Tribal councils recommend adding 50,000 sockeye salmon to the August goal and 50,000 sockeye to the September 1–15 goal above what is currently in regulation (currently there are 25,000 additional fish in August and 25,000 additional fish during Sept. 1–15).

Local community members and active fishers have been informed that the late-run has recently been managed for the lower end of the goal ranges with hopes of protecting feed for juvenile salmon and to therefore increase the size of the late-run. While this effort may scientifically be justifiable, the reduction of the goals and management to minimize late-run escapement has directly impacted or eliminated portions of the late season subsistence fisheries and action is required to provide greater subsistence opportunity. All of the reasons contributing to the decline of the late fall and winter sockeye salmon population may not be known (intercept fisheries, climate change, ocean conditions, etc.), the numbers of sockeye salmon passing through the weir is known and manageable. From 2007–2014, as little as 21,000 late-run sockeye salmon passed through the weir from August 1–September 15 to meet spawning needs not including the 50,000 sockeye salmon required for subsistence opportunity.

**PROPOSED BY:** The federally recognized tribes of Chignik Bay, Chignik Lagoon, Chignik Lake, Perryville & Port Heiden (EF-C15-131)  
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**PROPOSAL 173 – 5 AAC 15.350. Closed waters.** Reduce waters closed to commercial fishing for salmon in Kujulik, Portage, and Ivanof bays in the Chignik Area, as follows:

5 AAC 15.350 is amended to read:

5 AAC 15.350 Closed Waters. Salmon may not be taken in the following waters:

...

(9) Kujulik Bay: west of a line from 56 32.54' N. lat., 158 01.38' W. long. to 56 34.22 N. lat., 158 03.26' W. long.; and north of a line from 56 32.54' N. lat., 158 01.38' W. long. to 56 35.49' N. lat., 157 59.06' W. long.;

(10) Portage Bay: west of a line from 56 11.34' N. lat., 158 35.23' W. long. to 56 11.10' N. lat., 158 35.54' W. long.;

...

(13) Ivanof Bay: west of a line from 55 50.60' N. lat., 159 30.56' W. long. to 55 53.23' N. lat., 159 31.13' W. long.; and east of a line from 55 52.26' N. lat., 159 28.23' W. long. to 55 54.03' N. lat., 159 29.15' W. long.;

**What is the issue you would like the board to address and why?** Chignik pink and chum salmon runs are typically underutilized. It is estimated that conservatively an average of two million dollars are lost to the commercial fishery annually because of over escapement and too conservative management. To reduce these losses not only should some weekly fishing occur in Chignik inter-bays, as addressed in a companionship proposal, but several closed water areas in the Chignik Management Areas should be reduced to improve access to harvestable surpluses while still providing adequate sanctuary areas for escapement. It is understood that closed water line adjustments can be made inseason, but too characteristically nothing is done in time to avoid over escapement and fish quality problems with an abundance of water-marked and dark fish harvested that the processor discards (grinds).

The three closed waters areas proposed for size reductions are in bays where in the late 1970's some "creek robing" was occurring. This was when fish quality was not a major issue due to canning and at a time when shallow seines were common. As a consequence, the Department expanded many closed waters areas in the Chignik area. Now due to fish quality concerns, peer pressure, and better education, deeper draft boats and seines, and surveillance, the problem no longer exists. What we have now is an artifact of too much restriction.

Certainly the Department has the tools to move markers inseason, but the record indicates complacency, in part because of weather, aircraft availability, and unwillingness to timely survey and what some characterize as "tunnel vision" on sockeye salmon management. Chignik's pink and chum salmon runs need to be managed proactively, not managed from behind. In line with this, bays where current closed waters warrant an adjustment to improve access to local pink and chum salmon surpluses while still ensuring escapement protection include:

- a. Ivanof Bay (Area 275-40);
- b. Portage Bay (Area 273-84); and
- c. Kujulik Bay (Area 272-50).

**PROPOSED BY:** Chignik Fish and Game Advisory Committee (HQ-F15-034)  
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**PROPOSAL 174 – 5 AAC 15.357. Chignik Area Salmon Management Plan.** In July and August close Chignik Area commercial salmon fisheries between Castle Cape and Kupreanof Peninsula when the Southeastern District Mainland is closed to commercial salmon fishing with set gillnet gear, as follows:

When there is low escapement in the SEDM area and the set netters aren't able to fish, Chignik fishermen are shut down and are not able to harvest salmon from Castle Cape to Kupreanof Peninsula in Area L.

**What is the issue you would like the board to address and why?** During the months of July and August if there is insufficient escapement in the SEDM and the set net fishermen are shut

down and cannot fish then the fishermen in Area L, Chignik area should also be shut down so that escapement goals can be met in the SEDM area.

Chignik fishermen are intercepting salmon bound for streams in the SEDM.

**PROPOSED BY:** Jack R. Foster Jr, Amy M. Foster (EF-C15-072)  
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**PROPOSAL 2 – 5 AAC 28.540. Possession limits for Chignik Area.** Allow bycatch retention of Pacific cod in the Chignik Area salmon seine fishery, as follows (*This proposal will be heard at the Pacific cod meeting and heard and deliberated on at the Alaska Peninsula / Chignik / Aleutian Islands Finfish meeting.*):

Allow the taking of Pacific cod as a bycatch under a Chignik Area L salmon permit only during the salmon seining operations.

Cod must not be the target species and no more than XX% would be allowed of each delivery.

**What is the issue you would like the board to address and why?** Bycatch of Pacific cod during the salmon seining season by seiners. The resources is being wasted and has lost potential revenue.

**PROPOSED BY:** Al Anderson (HQ-F15-073)  
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**PROPOSAL 175 – 5 AAC 15.3XX. Chignik Pink Salmon Management Plan.** Create a pink salmon management plan in the Chignik Area, as follows:

5 AAC 15.3XX. CHIGNIK PINK SALMON MANAGEMENT PLAN. (a)The goal of this plan is to ensure that Chignik’s pink and chum salmon runs are managed to assure timely harvest opportunity and good product quality and to achieve the Department’s biological escapement goals.

(b) The Department shall manage the terminal waters of the 11 Chignik Management Area bays as listed from 24 June through 31 August for local pink and chum salmon. Fishing time will be one 72-hour period per week. However, the commissioner may extend or reduce weekly fishing time by bay or bay aggregate depending on pink and chum salmon run strength and escapement requirements and/or evidence of sockeye salmon targeting when waters outside the bay(s) in the same district are closed. Because in some bays fish tend to leave designated closed water areas on minus tides, the commissioner may close or limit fishing within part or all of those bays to protect escapement when minus tides are slated to occur.

1. Agripina Bay (Area 272-96) all waters west of a line from 57 05.20 N. lat., 156 26.16 W. long. to 57 07.10 N lat., 156 24.58 W. long.;
2. Chighinagak Bay (Area 272-90) all waters north of a line from 56 55.52 N. lat., 156 47.50 W. long. to 56 59.33 N lat., 156 38.01 W. long.;

3. Nakalilok Bay (Area 272-80) all waters north of a line from 56 55.15 N. lat., 156 56.07 W. long. to 56 54.54 N lat., 156 50.53 W. long.;
4. Yantarni Bay (Area 272-72) all waters north of a line from 56 48.26 N. lat., 157 08.25 W. long. to 56 49.17 N lat., 157 05.21 W. long.;
5. Amber Bay (Area 272-70) all waters northwest of a line from 56 46.37 N. lat., 157 24.35 W. long. to 56 48.11 N lat., 157 17.23 W. long.;
6. Kujulik Bay (Area 272-50) all waters west of a line from 56 33.26 N. lat., 157 49.19 W. long. to 56 36.30 N lat., 157 40.45 W. long.;
7. Kuiukta Bay (Area 273-80) all waters north of a line from 56 01.11 N. lat., 158 38.28 W. long. to 56 02.15 N lat., 158 35.13 W. long.;
8. Fishrack Bay (Area 273-72) all waters north of a line from 55 59.27 N. lat., 158 46.50 W. long. to 55 59.21 N lat., 158 43.37 W. long.;
9. Ivan Bay (Area 273-72) all waters north of a line from 55 58.00 N. lat., 158 53.08 W. long. to 55 59.14 N lat., 158 48.12 W. long.;
10. Humpback Bay (Area 275-50) all waters north of a line from 55 49.52 N. lat., 159 24.29 W. long. to 55 49.56 N lat., 159 22.12 W. long.; and north of a line from 55 50.13 N. lat., 159 21.36 W. long. to 55 51.24 N lat., 159 18.57 W. long.;
11. Ivanof Bay (Area 275-40) all waters north of a line from 55 47.36 N. lat., 159 30.05 W. long. to 55 47.42 N lat., 159 26.16 W. long.

**What is the issue you would like the board to address and why?** While sockeye salmon are well managed in the Chignik Management Area (CMA), other species could use major attention. In the CMA, excluding the Chignik River system, the Department identifies 161 pink salmon spawning streams and 137 with chum salmon runs. For a variety of reasons the pink and chum returns to these streams are typically well underutilized/underexploited. A recent analysis by Chignik Regional Aquaculture Association estimates that conservatively, an average of two million dollars is being lost to the commercial fishery annually because of escapement excesses. Needed is discrete management of Chignik pink and chum salmon. Firmly believed is that Chignik pink and chum salmon management plan can be implemented by weekly bay fisheries from late June through August without compromising conservation or impacting management of other species.

We recognize that the Department has the ability to provide timely fishing opportunity on Chignik's healthy pink and chum salmon stocks. However, having that ability and effecting such has been problematic. The current standard is that near full escapement must be documented via aerial surveys first before an intra-bay fishery could be called. Another is that it has become rather standard policy that the fleet and/or industry must request a specific bay or bay aggregate fishery for such to be "considered." The problem is that this does not work for a multitude of reasons. Weather, aircraft availability, and willingness to survey typically result in flights and subsequent opening occurring too late, if at all, to ensure reasonable marketability of ensuing harvests and prevention of excessive escapements. Expecting the fleet and/or industry to prospect the CMA and then "plead" for a fishery opening is ineffective and not proactive fisheries management.

Excessive pink and chum escapements obviously provide no benefit, and unfortunately, as previously identified, this has become the Chignik norm. Requested is proactive not reactive

pink and chum salmon management. In accordance, we respectfully ask that the Board authorize directed weekly pink and chum salmon fisheries in selected Chignik bays when our local stocks begin entering in late June. This is important for both Chignik fishermen and our only Chignik-based processor, Trident Seafoods. No longer should economic and biological losses occur because of Chignik pink and chum salmon fisheries opening too late, over escapement, and water-marked and dark fish being harvested and then ground-up at the processing plant because of no market value.

Some would profess that status quo pink and chum management works. It does not for the multitude of reasons detailed previously. Others would say that a standard weekly opening would likely cause escapement shortfalls. That too is short on foundation. If fish abundance is low, fleet effort will be minimal even with 3 day/week openings. Four days of non-fishing per week combined with closed waters areas should provide ample escapement. Certainly weekly fishing time can be reduced or even suspended and closed waters areas increased by emergency order if an escapement issue occurs.

**PROPOSED BY:** Chignik Fish and Game Advisory Committee (HQ-F15-035)

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**PROPOSAL 176 – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.** Amend Southeastern District Mainland commercial salmon set gillnet fishery season opening times and fishing periods, as follows:

Reestablish the Southeastern District Mainland (SEDM) set net fishery beginning June 6, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;

a) notwithstanding of this paragraph, the final commercial fishing period will end at 10:00 p.m. July 25.

**What is the issue you would like the board to address and why?** Modify the Southeastern District Mainland Management Plan to establish fishing periods for the set net fleet from June 6 through July 25.

Reestablish the SEDM set net fishery to be 88 hours fishing and 32 hours off continuously starting June 6 at 6:00 a.m. until June 9 at 10:00 p.m. for 88 hours open and 32 hours closed then opened again June 11 at 6:00 a.m. for another 88 hours and closed 32 hours continuously this schedule until July 25th managed under its own system, for the set netters. Due to political pressures from outside the area the set net fleet has been squeezed out of fishing on the mainland onto less productive sites on the islands overcrowding and reducing catches to a point where viability is uncertain.

While Chignik fishermen realized historic returns in 2011 despite continuous fishing in the SEDM by the set net fleet only we realized moderate returns with no obvious effect on Chignik. 2014 we weren't able to fish on the SEDM while Chignik continued to harvest great catches of salmon.

Because of the recent high catches of salmon in the Chignik area and the less impressive SEDM catches there should be new valuable information to be calculated into the SEDM management plan. Considering this proposal only asks for what has been in place before in this area, fishing time this area originally had, it should not be too hard to simplify the plan into its own SEDM Management Plan, minus the political distractions. This proposal would be very similar to the reinstatement of the June Shumagin Island fishery.

If nothing is changed the local set net fishermen will continue to be denied access to historical fishery areas, which is affecting the viability of set netting in the area and continues to overcrowd in the islands. The value of the permits will diminish in value along with the viability of the set net fishery as the islands have a few good producing sites to be shared by too many.

No one will suffer if this proposal is passed. After the 2011 season which Chignik area realized massive returns and to this day yearly continue to have great catches and returns, the SEDM didn't see any spectacular fish runs in the area proving beyond a doubt the management plan for SEDM is seriously compromised and needs a serious overhaul in order for the once profitable historic fishery to be returned to the set net fishermen.

Other solutions I considered was asking the board to put an L on my permit card right alongside Area M, if we are going to be managed under Area L regulations then we should be able to also set net in Area L. My immediate goal is to have the board seriously consider my proposal more than a cursory examination and to take into account the fact that SEDM set netters have had undo hardships put upon us, from previous board decisions and have in effect been squeezed out of a historic and traditional fishery, which has resulted in the devaluation of the permits, our business and sites that we have fished for well over 60 years. It is our desire as set netters to once again realize and obtain the SEDM fishery that has been historically and traditionally fished by ourselves, our parents and our grandparents well before statehood with an ultimate goal to sustain a living and pass down this fishery to our children and grandchildren, our future generation of fishermen.

**PROPOSED BY:** Jack R. Foster Jr and Amy M. Foster (EF-C15-054)  
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**PROPOSAL 177 – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.** Revise the Southeastern District Mainland Salmon Management Plan to allow commercial salmon fishing with set gillnet gear concurrent to the Chignik Area commercial sockeye salmon fishery, as follows:

Conduct concurrent fishing periods between Area L (Chignik) and Southeast District Mainland (SEDM).

- a) the elimination of the harvest of 300,000 red salmon in the Chignik area before set net fishermen in the SEDM can harvest salmon;
- b) to fish concurrently while Area L (Chignik) fishermen are fishing Area M set net fishermen are fishing in the SEDM area;



**What is the issue you would like the board to address and why?** The SEDM Salmon Management Plan guidelines are currently being based on a fictitious assumption that 20% of the fish caught in the SEDM are local stocks, while the other 80% are Chignik bound. This 80% figure needs to be eliminated from the SEDM Management Plan. SEDM set net fishermen are only allowed to harvest 7.6% of what Chignik fishermen harvest. Before any fishermen in the SEDM can harvest any fish Chignik fishermen have to harvest a minimum of 300,000 red salmon before we can begin to put our nets in the water and harvest our local stock of red salmon.

We rarely catch or come close to catching the 7.6 allocation, which is a low number for a historical fishery. We seldom fish on the SEDM because of the restrictions set forth upon the fishery. This allocation needs to be eliminated. 2014 fishermen in the SEDM weren;t allowed to harvest any salmon in the SEDM area and are being denied access to their historical fishery which is affecting the viability of set netting in the area. The harvest of 300,000 red salmon in the Chignik area before set netters on the SEDM can harvest salmon needs to be eliminated and done away with.

When Chignik area fishes, we as set netters would like to fish at the same time on SEDM District.

**PROPOSED BY:** Jack Foster Jr. & Amy M. Foster (EF-C15-070)

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**PROPOSAL 178 – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.** In the Southeastern District Mainland establish weekly fishing through July 10 for set gillnet gear and from July 11 through July 25 establish 48 hour open fishing periods and closures for set gillnet and purse seine gear, as follows:

Modify the Southeastern District Mainland (SEDM) Management Plan to establish weekly fishing periods from June 10 through July 10 for set gillnet gear and from July 11 through July 25 establish 48 hour openings followed by 48 hour closures for both set gillnet and seine gear.

From June 10 through July 10 the SEDM will be open for set gillnets four days followed by three days closed per week. From July 11 through July 25 will be open 48 hours followed by 48 hour closures for set gillnet and seine gear.

**What is the issue you would like the board to address and why?** Lost fishing opportunities in the SEDM of Area M.

**PROPOSED BY:** John A. Foster (EF-C15-081)

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**PROPOSAL 179 – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.** Amend the Southeastern District Mainland Salmon Management Plan to establish that 40 percent of the sockeye salmon taken in the East Stepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay sections are considered to be of Chignik River origin, as follows:

5 AAC 09.360(f) is amended to read:

...

(f) The estimate of sockeye salmon destined for the Chignik River has been determined to be **40%** [80%] of the sockeye salmon harvested in the East Stepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay Sections, and before July 1 in the Northwest Stepovak Sections.

**What is the issue you would like the board to address and why?** The Genetic Stock Assessment for the SEDM indicated the actual percentage of Chignik bound salmon caught in the SEDM is lower than 80%.

**PROPOSED BY:** John A. Foster (EF-C15-083)

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**PROPOSAL 180 – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.** Require all salmon harvested in the Southeastern District Mainland fishery to be landed within the Southeastern District, as follows:

All salmon harvested in the Southeastern District Mainland through July 25 must be landed in the Southeastern District Mainland. No vessel that has landed salmon under the Southeastern District Mainland may have salmon on board when more than one mile outside the Southeastern District Mainland with the following exceptions: (1) a vessel that has landed salmon in the Southeastern District Mainland may have on board up to 50 salmon for personal use, if the salmon have been headed and gutted; (2) a boat may transport salmon landed in the Southeastern District Mainland, not covered under exception (1) above, beyond the Southeastern District Mainland provided a fish ticket is completed in accordance with AS 16.05.671 provisions and before exiting the Southeastern District Mainland. The commissioner may waive the requirements of this section when necessary.

**What is the issue you would like the board to address and why?** An incentive to underreport sockeye salmon harvested in the Southeastern District Mainland fishery exists. With RSW standard equipment in the seine fleet, extra value paid for dock deliveries in Sand Point, knowledge that the SEDM fishery is regulated on the number of fish harvested, and concurrent fisheries taking place not limited by an allocation therein lies opportunity and an enticement to misreport.

The importance of accurate accounting of sockeye salmon harvested under the Southeastern District Mainland Management Plan is clear. The Southeastern District Mainland fishery is linked to the Chignik and the Cape Igyak fisheries. All three work under a joint allocation scheme, and therefore it is important that no one area or fishery take the liberty of not completely reporting harvest numbers. There is also importance in making certain that stock assignments are

as accurate and precise as possible for the purpose of run reconstruction which serves for forecasting and spawner–recruit analysis. Other advantages exist too. Tightening catch reporting standards in the Southeastern District Mainland is consistent with the Sustainable Salmon Fisheries Policy for the State of Alaska: 5 AAC 39.222, Section 3 *salmon management* (i)“*management should ..... incorporate procedures to assure effective monitoring, compliance, control, and enforcement.*”

In accordance, the Southeastern District Mainland Salmon Management Plan should be amended to provide a landing requirement on the salmon harvested in that fishery. While not expected, at times tender services in the SEDM may not always be available or may be inconvenient. Further, many seiners may prefer a Sand Point delivery because of the price incentive for a dock delivery. It is therefore reasonable that a landing requirement regulation provide a means for legal deliveries to be made outside SEDM waters. Such can be accomplished by AS 16.05.671 *Transportation and sale of certain fish by an agent of the fisherman who caught the fish*. Under this statute a fisherman could easily obtain blank fish tickets to transport SEDM harvested salmon outside the area including Sand Point.

**PROPOSED BY:** Chignik Fish and Game Advisory Committee (HQ-F15-036)  
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**PROPOSAL 181 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.** Repeal the South Unimak and Shumagin Islands June Salmon Management Plan, as follows:

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

Repealed

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

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

**PROPOSED BY:** Jesse Foster (EF-C15-030)  
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**PROPOSAL 182 – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.** Modify the South Unimak and Shumagin Islands June Salmon Management Plan to shift the opening date for the drift gillnet fishery to coincide with the set gillnet fishery opening date, as follows:

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

(1) for set gillnet **and drift gillnet** gear, ...

(2) for seine [AND DRIFT GILLNET] gear, ...

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

**PROPOSED BY:** Concerned Area M Fishermen (EF-C15-044)

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

5 AAC 09.365 is amended to read:

...

(d)

(2)

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

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

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

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

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

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

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

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (HQ-F15-080)  
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**PROPOSAL 185 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.XXX Dolgoi Island Section Salmon Fisheries Management Plan.** Establish a Dolgoi Island Section and Dolgoi Island Section Management Plan, as follows:

5 AAC 09.XXX. Dolgoi Island Area Management Plan (a) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik sockeye salmon is expected to be more than 600,000 fish and the department determines the runs are as strong as expected, the department shall manage the Dolgoi Island Area fishery through July 25 to where fishing in the Dolgoi Island Area (stat areas: 283-15 thru 283-26 and 284-36 thru 284-42) will close when fish ticket records first tabulate to more than a 120,000 sockeye harvest except that after July 9 Sections 283-23 and 283-25 may open for the harvest of local-stocks irrespective of the 120,000 sockeye restriction. Excluded are all designed terminal stock harvest areas as defined in regulation.

(b) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik sockeye salmon is expected to be less than 600,000 there will be no commercial salmon fishery allowed in the Dolgoi Island Area until a harvest of 300,000 sockeye salmon in the Chignik Area is achieved.

After July 8, after at least 300,000 sockeye salmon have been harvested in the Chignik Management Area, and provided escapement goals are being met, the department shall manage the Dolgoi Island Area fishery through July 25 to where fishing will close when fish ticket records first tabulate to more than a 120,000 sockeye harvest except that after July 9 Sections 283-23 and 283-25 may open for the harvest of local-stocks irrespective of the 120,000 sockeye restriction and the Chignik Area minimum sockeye harvest requirements. Excluded are all designed terminal stock harvest areas as defined in regulation.

(c) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be at least 600,000 and the first nm fails to develop as predicted and it is determined that a total sockeye salmon harvest in the Chignik Area of 600,000 may not be achieved by July 25, commercial salmon fishing in the Dolgoi Island Area (stat. areas: 283-15 thru 283-26 and 284-36 thru 284-42) will be curtailed in order to allow a minimum harvest in the Chignik Area of at least 300,000 sockeye salmon. After July 8, after at least 300,000 sockeye salmon have been harvested in the Chignik Area, and provided escapement goals are being met, the department shall manage the Dolgoi Island Area fishery through July 25 so that the number of sockeye salmon harvested in the Chignik Area will be at least 600,000. Additionally, when fish ticket records through July 25 first tabulate to more than a 120,000 sockeye harvest the Dolgoi Island Area will close to commercial fishing except that after July 9 Sections 283-23 and 283-25 may open for the harvest of local-stocks irrespective of the 120,000 sockeye restriction and the Chignik Area minimum sockeye harvest requirements. Excluded are all designed terminal stock harvest areas as defined in regulation.

(d) All salmon harvested under the Dolgoi Island Area Salmon Management Plan must be landed in the Dolgoi Island Area (stat areas: 283-15 thru 283-26 and 284-36 thru 284-42). No

vessel that has landed salmon under the Dolgoi Island Area Management Plan may have salmon on board when more than one mile outside the Dolgoi Island Area with the following exceptions:

(1) a vessel that has landed salmon under the Dolgoi Island Area Salmon Management Plan may have on board up to 50 salmon for personal use, if the salmon have been headed and gutted; (2) a boat may transport salmon landed in the Dolgoi Island Area, not covered under exception (1) above, beyond the Dolgoi Island Area provided a fish ticket is completed in accordance with AS 16.05.671 provisions and before exiting the Dolgoi Island Area.

After July 9, Sections 283-23 and 283-25 are excluded from all landing requirements as defined in this section (d). The commissioner may waive the requirements of this section when necessary.

**What is the issue you would like the board to address and why?** Amend the current management plan covering the Dolgoi Island Area (stat areas: 283-15 thru 283-26 and 284-36 thru 284-42) to provide fishing opportunity on local pink and chum salmon stocks while ensuring that the area is regulated to limit excessive pre July 26<sup>th</sup>, harvest of non-local fish, namely on Chignik bound sockeye salmon.

The Dolgoi Island Area supports a major June and post-June sockeye salmon interception fishery based on the three year WASSIP study (2006–08). Primarily intercepted are Chignik, East of Wassip (Kodiak/U. Cook Inlet), and Bristol Bay (BB) sockeye salmon. During the June fishery Chignik sockeye average 43% of the catch followed by East of Wassip sockeye at 27% and BB at 25%. In Post June, the catch is dominated by the Chignik sockeye at 51% and East of Wassip sockeye at 43%. South Peninsula sockeye stocks average less than 1% of the June and post June Dolgoi Island harvests.

Through July 25 the Dolgoi Island Area operates as targeted fishery on non-local sockeye salmon and, in many years, has had a major impact on Chignik-bound sockeye salmon. In the WASSIP years (2006- 08) the Dolgoi sockeye catch averaged 20% of the terminal harvest in the Chignik Area. In 2008, the Dolgoi Island Area fishery was open through July 25 when both the Igvak and SEDM fisheries were entirely shut down due to weak Chignik runs. 40% of the 2008 Dolgoi catch through July 25 in 2008 was Chignik-bound sockeye salmon.

A management plan is needed on Dolgoi Island Area fishery through July 25 that provides a reasonable harvest limit and accountability on the sockeye salmon catch. Such is justified because it is the only interception fishery where the dominant stock is Chignik-bound sockeye salmon that does not operate under a plan that recognizes annual variations in the strength of the two Chignik sockeye runs, Area L through July 25 harvest preferences, and the Igvak and Southeast Mainland District allocations.

Specifically we are calling for the Board of Fisheries to adopt a June through July 25 plan that sets an upper harvest limit on the Dolgoi Island Area fishery and a requirement that the fishery be managed to ensure a minimum harvest level in the Chignik Management Area as similarly

provided under the Cape Igvak and Southeastern District plans, but does not compromise terminal fishing on local pink and chum salmon. Lastly for accountability purposes, we ask that the BOF place a modest landing requirement on the Dolgoi Island Area through July 25.

**PROPOSED BY:** John Jones- Agent for United Chignik Salmon Fishermen (HQ-F15-001)  
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**PROPOSAL 186 – 5 AAC 09.200. Description of districts and sections; and 5 AAC 09.XXX Dolgoi Island Section June Salmon Fisheries Management Plan.** Establish a Dolgoi Island Section and Dolgoi Island Section June Management Plan, as follows:

**(1) Dolgoi Island Area June Management** (a) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik Rivers system sockeye salmon is expected to be more than 600,000 fish and the early run develops to where in the Chignik Area at least 300,000 early run sockeye salmon are expected to be available for harvest and surplus to escapement goals, the commissioner may establish commercial fishing periods in the Dolgoi Island Area (stat. areas: 283-15 thru 283-26 and 284-36 thru 284-42) as follows:

(1) beginning on June 7 commercial fishing periods will begin at 6:00 a.m. and run 66 hours until midnight two days later and then close for 54 hours and reopen at 6:00 a.m. three days later;

(2) notwithstanding (1) of this paragraph, the final commercial fishing period will end at midnight on June 27.

(b) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be less than 600,000, no June commercial salmon fishing shall occur in the Dolgoi Island Area until a harvest of 300,000 sockeye salmon in the Chignik Area is achieved. If the 300,000 has been achieved the commissioner may establish commercial fishing periods in the Dolgoi Island Area as follows:

(1) beginning on June 7 commercial fishing periods will begin at 6:00 a.m. and run 66 hours until midnight two days later and then close for 54 hours and reopen at 6:00 a.m. three days later;

(2) notwithstanding (1) of this paragraph, the final commercial fishing period will end at midnight on June 27.

(c) All terminal harvest areas as specified in regulation are excluded from (a) and (b) sections.

**(2) Dolgoi Island Area July 6-25 Management** (a) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be less than 600,000 there will be no commercial salmon fishing in the Dolgoi Island Area (stat. areas: 283-15 thru 283-26 and 284-36 thru 284-42) until a harvest of 300,000 sockeye salmon in the Chignik Area, as described in 5 AAC 15.100, is achieved. After July 8, after at least 300,000 sockeye salmon have been harvested in the Chignik Area, and provided escapement goals are being met, the department shall manage the Dolgoi Island Area fishery through July 25 so the number of sockeye salmon harvested in the Chignik Area will be at least 600,000. Subject to the above, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) the first fishing period will begin at 6:00 a.m. and run 25 hours until 7:00 a.m. the following day; commercial fishing will then close for 71 hours and re-open under (2) of this subsection;

(2) following the closure under (1) of this section, commercial fishing periods will begin at 6:00 a.m. and run for 27 hours until 9:00 a.m. of the following day; commercial fishing will then close for 69 hours and re-open at 6:00 a.m. three days later.

(b) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be at least than 600,000 commercial salmon in the Chignik Area and the department determines the runs are as strong as expected, the commissioner may establish, by emergency order, commercial fishing periods in the Dolgoi Island Area (stat. areas: 283-15 thru 283-26 and 284-36 thru 284-42) as follows:

(1) the first fishing period will begin at 6:00 a.m. and run 25 hours until 7:00 a.m. the following day; commercial fishing will then close for 71 hours and then reopen under (2) of this subsection;

(2) following the closure under (1) of this section, commercial fishing periods will begin at 6:00 a.m. and run for 27 hours until at 9:00 a.m. of the following day; commercial fishing will then close for 69 hours and re-open at 6:00 a.m. three days later.

(c) In years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be at least 600,000 and the first run fails to develop as predicted and it is determined that a total sockeye salmon harvest in the Chignik Area of 600,000 may not be achieved by July 25, commercial salmon fishing in the Dolgoi Island Area (stat. areas: 283-15 thru 283-26 and 284-36 thru 284-42) will be curtailed in order to allow a minimum harvest in the Chignik Area of at least 300,000 sockeye salmon. After July 8, after at least 300,000 sockeye salmon have been harvested in the Chignik Area, and provided escapement goals are being met, the department shall manage the Dolgoi Island Area fishery through July 25 so the number of sockeye salmon harvested in the Chignik Area will be at least 600,000. Subject to the above, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) the first fishing period will begin at 6:00 a.m. and run 25 hours until 7:00 a.m. the following day; commercial fishing will then close for 71 hours and then reopen under (2) of this subsection;

(2) following the closure under (1) of this section, commercial fishing periods will begin at 6:00 a.m. and run for 27 hours until at 9:00 a.m. of the following day; commercial fishing will then close for 69 hours and re-open at 6:00 a.m. three days later.

(d) All terminal harvest areas as specified in regulation are excluded from (a), (b), and (c) sections.

**What is the issue you would like the board to address and why?** The Dolgoi Island Area supports a major June and post-June sockeye salmon interception fishery based on the three year WASSIP study (2006-08). Primarily intercepted are Chignik, East of Wassip (Kodiak/U. Cook Inlet), and Bristol Bay (BB) sockeye salmon. During the June fishery Chignik sockeye average 43% of the catch followed by East of WASSIP sockeye at 27% and BB at 25%. In Post June, the catch is dominated by Chignik sockeye at 51% and East of WASSIP sockeye at 43%. South Peninsula sockeye stocks average less than 1% of the June and post June Dolgoi Island catch.



The pre July 26<sup>th</sup> Dolgoi Island Area fishery is by no means insignificant. In the WASSIP years (2006-08) the sockeye catch averaged 20% of the terminal harvest in the Chignik Management Area. Further evidence is that the fishery operated in 2008, a year when both Igvak and SEDM fisheries were closed (June 1 through July 25) due to weak Chignik runs. Per the WASSIP study an estimated 40% of the pre-July 26<sup>th</sup> Dolgoi catch was Chignik bound sockeye salmon in that year. In 2014 while the SEDM and Igvak fisheries were closed due to failure of the Chignik early run and a weak Chignik late run, the Dolgoi Island Area was opened and a total of 280,000 sockeye salmon were harvested through July 25 of which more than 136,000 are estimated to be Chignik sockeye salmon. South Peninsula sockeye barely contributed at less than 3,000 fish.

A management plan for the Dolgoi Island Area that addresses non-local interception of sockeye salmon which comprise an estimated 99+ % of the catch and is dominated by Chignik-bound fish is warranted. A reasonable plan would be a modest reduction in fishing time starting in June and continuing through July 25, coupled with a limit on the fishery whenever Chignik sockeye numbers are weak to where a Dolgoi Island Area harvest would impact the BOF-assigned harvest threshold for Area L and/or cause Chignik escapement shortfalls. Such is well justified. The Dolgoi Island Area is the only area where in June and July the dominant stock is Chignik bound sockeye salmon that does not operate under a plan that recognizes annual variations in the strength of the two Chignik sockeye runs, Area L pre July 26<sup>th</sup> harvest preferences, and the Igvak and Southeast Mainland District allocations.

There is no justification to limit or reduce harvest opportunity on any local South Peninsula stocks including pink and chum salmon, and therefore no change in the terminal harvest areas or management thereof should occur nor is proposed.

**PROPOSED BY:** Chignik Fish and Game Advisory Committee (HQ-F15-033)  
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**PROPOSAL 187 – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.** Modify the Post-June Salmon Management Plan for South Alaska Peninsula to provide the department authority to make openings for specific gear groups, as follows:

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

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

**PROPOSED BY:** John A. Foster (EF-C15-090)  
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**PROPOSAL 188 – 5 AAC 12.320. Weekly fishing periods.** Establish open commercial salmon fishing periods in the Unalaska District that coincide with the last two open fishing periods in July in the Shumagin Islands Section, as follows:

5 AAC 12.320 is amended to read:

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

**What is the issue you would like the board to address and why?** We would like the board to address the issue that evaluating pink salmon run strength to the Unalaska District solely by use of aircraft surveys, originating from the Sand Point Alaska Department of Fish and Game office, is not and should not be the only tool used to provide ADF&G with adequate information in which to open or not open the Unalaska District to commercial pink salmon fishing. Commercial salmon openings are another tool that can be used by ADF&G to judge run strength and can be used to good effect; especially in the far flung Unalaska District.

In 2013, ADF&G biologists made only one aerial survey to the Unalaska District in mid-July. For the rest of July and August, weather conditions between Sand Point and the Unalaska District did not allow ADF&G biologists the chance to fly a survey and therefore the entire fishing district remained closed to pink salmon fishing. Allowing minimal fishing time in the Unalaska during late July is another tool ADF&G could use to evaluate run strength and avoids the problem of flying aerial salmon surveys in notoriously poor weather fishing districts.

In order to provide the Alaska Department of Fish and Game biologist with early run strength information, other than that collected by sporadic or nonexistent aerial surveys, we recommend that commercial fishing in the Unalaska District should be opened to coincide with the last two July openings in the Shumagin Island Section.

These two openings have two advantages. One, they are scheduled far enough into July to coincide with the start of the Unalaska pink salmon run. Two, these late July openings are simultaneous with the two last week Shumagin Island Section openings and help spread fishing effort out and thus eliminating a mad rush to the Unalaska District.

**PROPOSED BY:** Mike Kurtz and John Mitchell (HQ-F15-088)

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

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

**What is the issue you would like the board to address and why?** Too many latent permits being added to the Area M salmon fishery.

Allow seine salmon permit holders to operate additional gear under a dual permit lock together.

What we would like to call a "lock 2". Excessive activation of latent permits will result in too many fishing operations in the South Peninsula area to sustain reasonable livelihoods for the historic and current participants. In the past 10 years, an average of 49% of the available permits have been used in the fishery. We are asking for 20% gear increase in exchange for 100% of permit usage. With added permits to the current fishery we would be harmed by processor limits and loss in revenue to both the state and local economy tax base. Once the permits are locked together they cannot become unlocked or sold individually. Area M is currently in a rebuilding phase for salmon fishing. Our returns have been poor at best. This would also give relief to management, keeping track of less catcher vessels in the short seasons we have would be beneficial for rebuilding salmon stocks.

If nothing is done, more fishing operations will continue to be added to the current level and our escapement goals will continue to be low in local streams.

**PROPOSED BY:** Ray Koso and Don McCallum (EF-C15-093)  
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**PROPOSAL 190 – 5 AAC 09.332. Seine specifications and operations.** Change purse seine depth measurement standard from number of meshes deep to an equivalent depth measurement in feet and inches, as follows:

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

**What is the issue you would like the board to address and why?** Current regulation describes the allowable depth of a purse seine for the South Alaska Peninsula salmon fishery as 350 each 3.5 inch meshes plus 25 each seven inch meshes. Fishermen who recently purchased nets that were built with Indian web have experienced shrinkage that traditional American web does not exhibit. These fishermen are not allowed to modify their nets to equal depths of other fishermen's nets by simply adding a strip of web, because the seine depth regulation is based on number of meshes. This regulation assumes all nets will retain same hanging depths over time, thereby disadvantaging fisherman who have purchased these new Indian web nets.

**PROPOSED BY:** King Cove Fish and Game Advisory Committee (HQ-F15-095)  
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**PROPOSAL 191 – 5 AAC 09.331. Gillnet specifications and operations.** Repeal minimum mesh size standards for drift gillnet gear, as follows:

5 AAC 09.331(a)(2) is amended to read:

(2) a drift gillnet has no minimum mesh size.

**What is the issue you would like the board to address and why?** Driftnet mesh size. There is no minimum mesh size in any of the Area M Fisheries except in the post-June South Peninsula fishery in the Unimak District and a western portion of the SW District. This area is fished by

the entire fleet in June, without mesh size limits, which means that the drift gillnetters who fish in June have to purchase an additional net for Post-June. This imposes a substantial financial burden on drift netters, particularly local drifters that prefer fishing the South Peninsula over the North Peninsula in July. We also feel that it is a housekeeping proposal that would allow a more orderly driftnet fishery.

**PROPOSED BY:** King Cove Fish and Game Advisory Committee (HQ-F15-096)  
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**PROPOSAL 192 – 5 AAC 09.330. Gear.** Allow commercial fishing for salmon with set gillnets in the area between Popof Head and Dark Cliffs any time the area is closed to commercial salmon fishing with purse seine gear, as follows:

5 AAC 09.330 is amended to read:

5 AAC 09.330

...

(f) ...

(1) Salmon may be taken only with purse seines and hand purse seines in the area between Popof Head and Dark Cliffs (Popof Head) from June 1 through August 31 however, salmon may be taken by set gillnet gear during periods when the seine fishery is closed, and if by emergency order due to the presence of immature salmon.

**What is the issue you would like the board to address and why?** This proposal addresses that salmon may be taken only with purse seine and hand purse seine in the area between Popof Head and Dark Cliffs (Popof Head) from June 1 through August 31. However, salmon may be taken by set gillnet gear during periods when the seine fishery is closed by emergency order due to the presence of immature salmon. I would like to change the regulation so that the set net gear would be allowed to fish this area (Popof Head) when the seine fleet is not there and are closed to fishing this area whether it be due to immature salmon or that it is closed to seining while set net is open in the Shumigin Island section. If the regulation is not changed the set net fleet is losing an opportunity to utilize a portion of this open area.

**PROPOSED BY:** Jim Smith (EF-C15-097)  
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**PROPOSAL 193 – 5 AAC 09.301. Seaward boundary of districts.** Change the Southwestern and Unimak District seaward boundary, as follows:

5 AAC 09.301 is amended to read:

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

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

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

**PROPOSED BY:** Concerned Area M Fishermen (EF-C15-043)  
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