



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302
Main: 907.789-6160
Licensing: 907.789-6150
Fax: 907.789-6170

To: Alaska Board of Fisheries Date: January 3, 2018
From: Fate Putman, Chair *Fate Putman* Subject: 2019 AYK BOF Proposals
Dale Kelley, Commissioner *Dale Kelley*

The Commercial Fisheries Entry Commission (Commission) supports efforts by the Alaska Board of Fisheries (BOF) and commercial fishing industry to craft regulatory packages that improve the economics of a fishery, while helping to sustain fishery resources. We appreciate the opportunity to offer the following remarks on two proposals for alternative gear that you will consider at the upcoming Arctic/Yukon/Kuskokwim BOF meeting.

Proposals 89 & 99 Alternative Gear Types in Yukon River Districts 1-3

These proposals seek to establish alternative gear types for fisheries on the Lower Yukon River. Proposal 99 suggests beach seine as an alternative gear type in the Lower Yukon commercial salmon gillnet fishery under 5 AAC 05.330. Proposal 89 is written to allow retention of king salmon with fish wheels, dip nets, and beach seines under Yukon Area subsistence provisions at 5 AAC 01.220(n). ADFG Staff Comments indicate they have reason to believe that Proposal 89 is directed at both subsistence and commercial fisheries. Therefore, we want to flag this proposal as being of possible interest to CFEC, but only if it involves the use of alternative gear types in the S04Y gillnet fishery.

Since 2013, the BOF has authorized ADFG to allow, by emergency order, dip nets or beach seines as alternative gear in the historic Yukon River gillnet fishery, as a means to conserve king salmon during specific time periods.^[1] According to ADFG, about 2% of the commercial permit holders in this fishery are utilizing beach seines.^[2]

Lower Yukon is not the only area where BOF has permitted the use of beach seines as alternative gear. In 2016, the BOF approved [Proposal 133](#) as amended by language found in [RC47](#), which

^[1] [5AAC.05.362\(k\) Yukon River Summer Chum Management Plan](#)

^[2] [RC 2 ADFG Staff Comments](#)

allows beach seines to be operated under emergency order in Subdistricts 5 & 6 of the Norton Sound and Unalakleet River Management Area; again, specifically to conserve king salmon.^[3]

Proposal 99 has not been offered to address a conservation issue; the stated purpose is to provide for the use of alternative gear in this limited entry gillnet fishery during all open fishing periods.

CFEC acknowledges that the BOF retains the authority for methods and means, including the types of gear identified in 5 AAC 39.105. In general, CFEC has supported the use of alternative gear, particularly for conservation purposes, so long as that gear type does not increase efficiency of the fishery; is not already allocated to a limited fishery within the same CFEC administrative area; and, the new gear type and fishery are consistent with the Limited Entry Act.

Should the BOF move to allow the use of beach seines as alternative gear in the Lower Yukon gillnet fishery (S04Y), CFEC will evaluate the terms of the resulting regulatory package, to ensure that it comports with both the Alaska Constitution and Limited Entry Act, and determine if any additional action is required by this agency.

Thank you in advance for considering CFEC's perspective on the matter at hand. Please let us know if you have any questions or we can provide additional information.

^[3] [5 AAC 04.395 Subdistricts 5 and 6 of the Norton Sound District and the Unalakleet River King Salmon Management Plan](#)