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ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON
COMMERCIAL, PERSONAL USE, SPORT, AND SUBSISTENCE
REGULATORY PROPOSALS
COMMITTEE OF THE WHOLE–GROUPS 1–3
FOR

BRISTOL BAY FINFISH

ALASKA BOARD OF FISHERIES MEETING
ANCHORAGE, ALASKA

November 29–December 3, 2022

Regional Information Report No. 5J22-04

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) meeting, November 29–December 3, 2022, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Acronyms and Abbreviations

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

Weights and measures (metric)

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

Weights and measures (English)

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

Time and temperature

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

Physics and chemistry

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

General

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

Acronyms

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

REGIONAL INFORMATION REPORT 5J22-04

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON COMMERICAL, PERSONAL USE, SPORT, AND SUBSISTENCE REGULATORY PROPOSALS COMMITTEE OF THE WHOLE–GROUPS 1–3 FOR

BRISTOL BAY FINFISH

ALASKA BOARD OF FISHERIES MEETING ANCHORAGE, ALASKA

NOVEMBER 29–DECEMBER 3, 2022

by
Alaska Department of Fish and Game

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

November 2022

ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on commercial, personal use, sport, and subsistence regulatory proposals for Bristol Bay finfish. These comments were prepared by the department for use at the Alaska Board of Fisheries meeting, November 29–December 3, 2022, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Keywords: Alaska Board of Fisheries (board), Alaska Department of Fish and Game (department), staff comments, regulatory proposals, fisheries, commercial, personal use, sport, guided sport, subsistence, Bristol Bay, finfish, regulations, management plans, escapement goals, stock of concern, methods, means, bag limits, allocation, herring, salmon.

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Summary of department positions on regulatory proposals for Bristol Bay finfish; Anchorage, November 29–December 3, 2022.

Proposal number	Department position	Issue
Group 1: Nushagak–Mulchatna King Salmon Management Plan and king salmon harvest reporting		
11	N/S/O	Make numerous amendments to the Nushagak-Mulchatna King Salmon Management Plan.
12	N/S/O	Make several changes to the management plan to reduce commercial king salmon harvest and increase sockeye salmon harvest.
13	N	Structure fishing periods in the Nushagak District so that pulses of king salmon, not subjected to commercial fishing pressure, may enter the Nushagak River.
Group 2: Subsistence salmon, sport fishing		
14	S	Reinstate provision that set gillnets are the only lawful gear for subsistence fishing for salmon in the Naknek, Alagnak, and Wood River Special Harvest Areas.
15	S	Allow use of small fishwheels to harvest salmon for subsistence purposes in the Ugashik Bay, Ugashik River, and Dago Creek drainages.
16	S	Repeal requirement that subsistence salmon fishing permits for the Naknek River Drainage may only be obtained at the King Salmon office of the Alaska Department of Fish and Game.
17	O/N	Limit guided angler access to sport fishing in a section of the Naknek River.
18	O	Prohibit use of salmon eggs for sport fishing.
19	O	Prohibit use of certain sport fishing tackle in a section of the Naknek River.
20	O	Prohibit use of bait and barbed hooks in the Wood River Lakes system.
21	O/N	Prohibit harvest of rainbow trout by non-resident anglers in a section of the Naknek River drainage.
22	O	Close Big Creek to sport fishing for salmon.
23	O	Allow retention of king salmon less than 20 inches in length in Big Creek.
24	O	Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage.
25	O	Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage.
26	O	Close tributaries and upper section of Naknek River to sport fishing for king salmon.
27	O/N	Create a nonresident annual limit for coho salmon in the Naknek River drainage.
28	O	Close the Nushagak, Nulchatna, and Nuyakuk River drainages to sport fishing for king salmon.
29	O/N	Restrict the Togiak River king salmon sport fishery until a minimum king salmon commercial harvest is achieved.
30	N	Create a youth-only sport fishery in the Naknek River drainage.
31	O	Require reporting of king salmon harvest in guided sport fisheries and commercial fisheries in Bristol Bay.
32	O	Require reporting of king salmon harvest in guided sport fisheries and commercial fisheries in Bristol Bay.

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

-continued-

Summary of department positions on regulatory proposals (page 2 of 2).

Group 3: Commercial salmon, commercial herring		
33	N	Increase maximum offshore operation distance for set gillnets in Ugashik District.
34	N/O	Increase minimum distance between units of drift and set gillnet gear in the Ugashik District.
35	N	Increase minimum distance between units of set and drift gillnet gear.
36	N	Limit the length of drift gillnet towlines to 100 feet.
37	N	Limit the length of drift gillnet towlines to 100 feet.
38	N	Limit the length of drift gillnet towlines to 25 fathoms.
39	N	Prohibit placement of set gillnet gear on the shore fishery lease site of another set gillnet permit holder.
40	N	Increase area available to set gillnet fishermen in the Graveyard Point area.
41	N	Adjust seaward boundary for set gillnet gear near in the Nushagak District.
42	N	Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard.
43	N	Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard.
44	N	Review provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard.
45	N/O	Provide drift gillnet vessels with a single permit holder onboard more fishing opportunity per opening than vessels with two permit holders onboard.
46	N	Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.
47	N	Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.
48	N	Delay the date at which fishermen may reregister to or from the Togiak District.
49	N/O	Reestablish a General District Salmon Management Plan.
50	N/O	Reestablish a General District Salmon Management Plan.
51	N/O	Reestablish a General District Salmon Management Plan.
52	N/O	Reestablish a General District Salmon Management Plan.
53	N/O	Reestablish a General District Salmon Management Plan.
54	N/O	Adopt an Eastside Bristol Bay late-season management plan.
55	O	Align Naknek Section southern boundary line with Naknek-Kvichak District southern boundary line.
56	O	Allow drift gillnet fishermen to make ‘test sets’ under certain circumstances.
57	N/O	Repeal set and drift gillnet allocations in the Naknek-Kvichak District.
58	S/N	Provide increased commercial salmon fishing opportunity in the Naknek River Special Harvest Area.
59	S	Repeal provisions directing the department to avoid continuous fishing with set gillnet gear in the Egegik District.
60	S	Align the Ugashik District fall fishing schedule with the Naknek-Kvichak District and Egegik District fall fishing schedules.
61	O	Require reporting of king salmon harvest by size class on fish tickets.
62	N/S	Allow all commercial gear types to fish for herring simultaneously in Bristol Bay.

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

COMMITTEE OF THE WHOLE–GROUP 1: NUSHAGAK-MULCHATNA KING SALMON MANAGEMENT PLAN AND KING SALMON HARVEST REPORTING (3 PROPOSALS)

Nushagak-Mulchatna King Salmon Management Plan (3 proposals)

PROPOSAL 11 – Make numerous amendments to the Nushagak-Mulchatna King Salmon Management Plan.

5 AAC. 06.361. Nushagak-Mulchatna King Salmon Management Plan and 5 AAC 67.022. Special Provisions for Season, Bag, Possession, and Size Limits, and Methods and Means in the Bristol Bay Area.

PROPOSED BY: Nushagak Mulchatna King Salmon Committee.

WHAT WOULD THE PROPOSAL DO? This would amend the Nushagak-Mulchatna King Salmon Management Plan; specific changes are summarized hereafter using numbering from the proposal. (1) Adds new purpose language to section (a) of the plan. (2) Adds new triggers based on forecast and inseason run size of Wood and Nushagak Rivers sockeye salmon. (3) Mandates the department conduct a test fishery before all commercial openings from June 1 through June 30. (4) Clarifies and modifies the Wood River sockeye salmon escapement trigger for the opening of commercial fishing in the Nushagak District; creates a Nushagak River sockeye salmon trigger for opening commercial fishing in the Nushagak District; and repeals section (e)(1) of the current plan that would conflict with the new proposed language. (5) Adds language regarding directed king salmon openings. (6) and (7) Restricts limits for king salmon in the sport fishery by specifying that only one of the four fish annual limit for king salmon 20 inches or greater in length may be 28 inches or greater in length. The proposal would stipulate a liberalization of bag limits by waiving the new annual limit of one king salmon 28 inch or greater in length when projecting over 95,000 fish inriver. Catch-and-release with a bait prohibition would replace closures as the most restrictive management action in the sport fishery. (8) Makes restrictions to the subsistence fishery discretionary.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan

(a) The purpose of this management plan is to ensure biological spawning escapement requirements of king salmon into the Nushagak-Mulchatna river systems. It is the intent of the Alaska Board of Fisheries (board) that Nushagak-Mulchatna king salmon be harvested in the fisheries that have historically harvested them. This management plan provides guidelines to the department in an effort to preclude allocation conflicts between the various users of this resource. The department shall manage Nushagak-Mulchatna king salmon stocks in a conservative manner consistent with sustained yield principles and the subsistence priority.

(b) The department shall manage the commercial and sport fisheries in the Nushagak

District as follows:

(1) to achieve an inriver goal of 95,000 king salmon present in the Nushagak River upstream from the department sonar counter; the inriver goal provides for

(A) a biological escapement goal of 55,000 - 120,000 fish;

(B) reasonable opportunity for subsistence harvest of king salmon; and

(C) a king salmon sport fishery guideline harvest level of 5,000 fish, 20 inches or greater in length;

(2) in order to maintain a natural representation of age classes in the escapement, the department shall attempt to schedule commercial openings to provide pulses of fish into the river that have not been subject to harvest by commercial gear;

(3) the department may close the commercial drift or set gillnet fishery if the harvest in the directed commercial king salmon fishery for either gear group is more than two sockeye salmon for every one king salmon.

(c) If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish, the guideline harvest level described in (b)(1)(C) of this section does not apply.

(d) If the spawning escapement of king salmon in the Nushagak River is projected to be more than 55,000 fish and the projected inriver return is less than 95,000 fish, the commissioner

(1) shall close, by emergency order, the directed king salmon commercial fishery in the Nushagak District; during a closure under this paragraph, the use of a commercial gillnet with webbing larger than five and one-half inches in another commercial salmon fishery is prohibited;

(2) repealed 5/31/2019;

(3) repealed 5/31/2019;

(e) If the spawning escapement of king salmon in the Nushagak River is projected to be less than 55,000 fish, the commissioner

(1) shall close, by emergency order, the sockeye salmon commercial fishery in the Nushagak District until the projected sockeye salmon escapement into the Wood River exceeds 100,000 fish;

(2) shall close, by emergency order, the sport fishery in the Nushagak River to the taking of salmon and prohibit the use of bait for fishing for all species of fish until the end of the king salmon season specified in **5 AAC 67.020** and **5 AAC 67.022(g)**; and

(3) shall establish, by emergency order, fishing periods during which the time or

area is reduced for the inriver king salmon subsistence fishery in the Nushagak River.

Bristol Bay Area King Salmon Sport Fishing Regulations:

Season: May 1–July 31

Annual limit of five king salmon 20 inches or longer in Bristol Bay salt and fresh waters. Of these five total king salmon, no more than four may be harvested from the Nushagak/Mulchatna River drainage. Harvest record required.

King salmon removed from the water must be retained. Any king salmon removed from the freshwater drainages of Bristol Bay from Cape Menshikof to Cape Newenham must be retained and becomes part of the bag limit of the person originally hooking it. If you intend to release a king salmon, you may not remove it from the water before releasing.

- In waters of the Nushagak/Mulchatna river drainage open to fishing for king salmon:

- King salmon limits:
    - 20 inches or longer:
        - Bag and possession limit of two fish, only one over 28 inches.
        - After taking a bag limit of king salmon 20 inches or longer from the Nushagak/Mulchatna River drainage, you may only use one unbaited, single-hook, artificial lures or flies in the Nushagak/Mulchatna River drainage for the remainder of the day.
    - Less than 20 inches:
        - Bag and possession limit of five fish.

- From its confluence with the Iowithla River, upstream to Harris Creek including the Iowithla River:

- May 1 – July 24: Open to fishing for king salmon.

- Upstream from its confluence with Harris Creek:

- Closed year-round to fishing for king salmon.
- Only one unbaited, single hook, artificial lures may be used year-round.

Under 5 AAC 01.336, there is a positive C&T finding for all finfish combined throughout the Bristol Bay Area, and an ANS of 157,000–172,171 salmon in the Bristol Bay Area, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Section 1 would add goal and objective language to the plan to better explain the purpose of the plan.

In Section 2, a 4-million sockeye salmon Nushagak River trigger would have resulted in the department managing for the lower end of the escapement goal range 80% of the time in the last

20 years and 85% of the time since enumeration with sonar began in 1980. An 8-million sockeye salmon Wood River trigger would have resulted in managing for the lower end of the escapement goal range 51 out of the last 58 years. In some years, these triggers would mandate the department manage the sockeye salmon fishery much more aggressively than current management. This would likely make it more difficult to achieve king and chum salmon escapement goals.

Section 3 would require the department to conduct a test fishery in the Nushagak District prior to all commercial openings through June 30. This would likely limit the department's ability to effectively manage the commercial fishery because it would take several hours to conduct and assess results of a test fishery, thereby delaying inseason management actions.

Section 4 would provide more clarity to the department and users on the implementation of the Wood River 100,000 sockeye salmon escapement trigger. This would also modify the trigger based on the forecasted run strength for Wood River sockeye salmon such that if the forecast was over 8-million sockeye salmon, the trigger would be 300,000 sockeye salmon. This would also set a trigger for the start of commercial fishing based on Nushagak River sockeye salmon forecast and escapement. These sockeye salmon triggers would provide concinnity between king salmon protection with sockeye salmon escapement goals.

In Section 5, adding language to the plan about a directed commercial king salmon fishery has no effect because this is already within the department's authority.

The effect of Sections 6 and 7 on sport harvest may be a shift in the composition of harvested fish with fewer fish over 28 inches being harvested; however, overall sport harvest numbers would likely not change significantly. Effort levels in the sport fishery would likely not change as a result of this proposal.

Section 8 would remove the requirement that the department must restrict the subsistence fishery under certain conditions and would specify allowable restrictions.

BACKGROUND:

Salmon abundances have varied within and among stocks and species since the *Nushagak Mulchatna King Salmon Management Plan* was originally adopted by the board in 1992. Total abundance of king salmon has varied, as has sockeye salmon abundance. The relative abundance of sockeye salmon between the Nushagak and Wood systems has also varied. For the most part during this time, the weak stock in the system was Nushagak River sockeye salmon whereas in recent years the Nushagak River king salmon stock has been weak. The department recommended that Nushagak River king salmon be identified as a Stock of Management Concern at the October 2022 work session. All this variation among and between stocks adds management complexity to the mixed stock fisheries of the Nushagak District.

Historically, the Wood River sockeye salmon run outproduced the Nushagak River sockeye salmon run on the order of 3:1, creating the potential to overharvest the weaker Nushagak River stock during increased fishing pressure on the stronger Wood River stock. To alleviate this problem, the board repurposed the Wood River Special Harvest Area (WRSHA) to protect Nushagak River sockeye salmon in 1997 (the WRSHA had been created previously to protect Nushagak River coho salmon while providing opportunity to harvest Wood River sockeye salmon). During the late 1990s and early 2000s, the WRSHA was then used many times as intended, protecting Nushagak River sockeye salmon. Nushagak king salmon had very strong

returns in the early 2000s, and there were several years with directed commercial king salmon openings. In the second half of the 2000s, Nushagak sockeye salmon increased in abundance, but Nushagak king salmon abundance declined. For most of the 2010s, both Nushagak sockeye and king salmon returns were fair to good. As recently as 2018, the inriver goal of 95,000 king salmon was achieved. Starting in 2017, Wood and Nushagak River sockeye salmon stocks started producing record high returns. The Nushagak District sockeye salmon run record was set in 2017 at 20.0 million fish, then broken again in 2018 at 33.8 million fish. The 12.7 million total sockeye salmon return of 2020 is the lowest return since 2017 but would rank as the third largest return ever when compared to all years before 2017.

During this same period, king salmon runs have been below average both statewide and to the Nushagak River. In the Nushagak River, 2018 was a strong year, but all other years since 2017 have ranged from poor to fair.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. There are some sections of the proposal, however, which the department **SUPPORTS** because they would clarify the plan and likely improve fisheries management. There are also sections the department **OPPOSES** because they would increase regulatory complexity without providing any additional fishery management benefit.

Sections that would clarify the Plan or otherwise improve fishery management, that the department **SUPPORTS**:

- Section 1, because it seeks to define specific management objectives of the plan
- Section 4, because it seeks to clarify projected escapement language, and sets and modifies triggers based on forecasts (contingent upon further discussion of trigger numbers)
- Sections 6 and 7, which have some aspects that clarify language
- Section 8, because it provides management flexibility for the subsistence fishery

Sections that would complicate the regulations without benefiting management, that the department **OPPOSES**:

- Section 2, because it reduces management flexibility and does not add any authority not already found in 5 AAC 06.355 (d)(1)
- Section 3, because it is impractical to conduct a test fishery before every commercial opening and because it is also outside the board's authority to require the department to spend funds on a program
- Section 5, because the department already has the authority to consider directed commercial king salmon openings, and the additional language may result in less conservative king salmon management in some situations

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal may result in an additional cost to the department if the department is required to conduct test fisheries.

PROPOSAL 12 – Make several changes to the management plan to reduce commercial king salmon harvest and increase sockeye salmon harvest.

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan.

PROPOSED BY: Nicholas Dowie, Michael Jackson, Frank Woods.

WHAT WOULD THE PROPOSAL DO? This would restrict mesh size in the Nushagak District to 4.75 inches or smaller until July 1, adjust the Wood River trigger, and add a sockeye salmon escapement trigger in the Nushagak River for opening the commercial salmon fishery.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 06.331. Gillnet specifications and operations

(a) Gillnet mesh size restrictions are as follows:

(1) gillnet mesh size may not exceed five and one-half inches during periods established by emergency order for the protection of king salmon and in the Naknek-Kvichak and Ugashik Districts from June 1 through July 22;

(2) gillnet mesh size may not be less than five and three-eighths inches during periods established by emergency order for the protection of pink salmon;

(3) gillnet mesh size may not exceed four and three-quarters inches during periods established by emergency order for the protection of sockeye and coho salmon;

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan

(e) If the spawning escapement of king salmon in the Nushagak River is projected to be less than 55,000 fish, the commissioner

(1) shall close, by emergency order, the sockeye salmon commercial fishery in the Nushagak District until the projected sockeye salmon escapement into the Wood River exceeds 100,000 fish;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would likely reduce commercial harvest of king salmon by an unknown amount. This may also increase harvest of king, sockeye, and chum salmon in years of poor king salmon abundance by implementing a sockeye salmon escapement trigger in the Nushagak River, which is lower than what the department has been using in recent years of low king salmon abundance.

BACKGROUND:

Salmon abundances have varied within and among stocks and species since the *Nushagak Mulchatna King Salmon Management Plan* was originally adopted by the board in 1992. Total abundance of king salmon has varied, as has sockeye salmon abundance. The relative abundance

of sockeye salmon between the Nushagak and Wood systems has also varied. For the most part during this time the weak stock in the system was Nushagak River sockeye salmon whereas in recent years, Nushagak River king salmon have been weak. The department recommended that Nushagak River king salmon be identified as a Stock of Management Concern at the October 2022 work session. All this variation among and between stocks adds management complexity to the mixed stock fisheries of the Nushagak District.

Historically, the Wood River sockeye salmon run outproduced the Nushagak River sockeye salmon run on the order of 3:1, creating the potential to overharvest the weaker Nushagak River stock during increased fishing pressure on the stronger Wood River stock. To alleviate this problem, the board repurposed the Wood River Special Harvest Area (WRSHA) to protect Nushagak River sockeye salmon in 1997 (the WRSHA had been created previously to protect Nushagak River coho salmon while providing opportunity to harvest Wood River sockeye salmon). During the late 1990s and early 2000s, the WRSHA was then used many times as intended, protecting Nushagak River sockeye salmon. Nushagak king salmon had very strong returns in the early 2000s, and there were several years with directed commercial king salmon openings. In the second half of the 2000s, Nushagak sockeye salmon increased in abundance, but Nushagak king salmon abundance declined. For most of the 2010s both Nushagak sockeye and king salmon returns were fair to good. As recently as 2018, the inriver goal of 95,000 king salmon was achieved. Starting in 2017, Wood and Nushagak River sockeye salmon stocks started producing record high returns. The Nushagak District sockeye salmon run record was set in 2017 at 20.0 million fish, then broken again in 2018 at 33.8 million fish. The 12.7 million total sockeye salmon return of 2020 is the lowest return since 2017 but would rank as the third largest return ever when compared to all years before 2017.

During this same period king salmon runs have been below average both statewide and to the Nushagak River. In the Nushagak River, 2018 was a strong year but all other years since 2017 have ranged from poor to fair.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal related to changing mesh size. The department **SUPPORTS** updating and clarifying the management plan but **OPPOSES** the Wood and Nushagak River sockeye salmon trigger numbers proposed here because they would result in more aggressive management than recently practiced.

COST ANALYSIS: Approval of this proposal could result in an additional direct cost for a private person to participate in this fishery if they needed to buy smaller mesh gear. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 13 – Structure fishing periods in the Nushagak District so that pulses of king salmon, not subjected to commercial fishing pressure, may enter the Nushagak River.

5 AAC 06.361. Nushagak-Mulchatna King Salmon Management Plan.

PROPOSED BY: Brian Kraft.

WHAT WOULD THE PROPOSAL DO? This would require that, from June 1 through July 10, commercial sockeye salmon openings in the Nushagak District not be allowed more than one hour before high tide and must close at least 4 hours before the next high tide.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan

(d) To achieve the allocations specified in (b) of this section, consistent with the management principles of **5 AAC 06.355** and other applicable provisions of this chapter, the commissioner

(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; set and drift gillnet fishing periods may be established at different times to obtain the set and drift gillnet sockeye salmon allocations specified in (b) of this section or at other times consistent with **5 AAC 06.355**;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This may allow additional pulses of king salmon into the Nushagak River drainage. This would also reduce the department's ability to control sockeye salmon escapement during certain periods, would severely limit the department's ability to manage for allocation goals and thus have differential effects on gear groups, and would reduce ability to provide harvest opportunity based on inseason information.

BACKGROUND: The department manages the Nushagak District commercial salmon fishery to achieve inriver, escapement, and allocation goals. To do this, commercial openings are scheduled based on several factors, including the gear type, time, area, fleet size, and weather. Set gillnet openings are scheduled based on the *Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan* (5 AAC 06.367). This plan requires set gillnet openings begin two and one-half to three hours before high tide if the tide is less than 18 feet and more than three hours before high tide if the tide is greater than 18 feet. This requirement is a compromise between set gillnet users. It allows the truck-based fleet that fishes at Ekuk Beach to get on and off the beach around the tide. It also allows the skiff-based fleet to have water to access and operate their skiffs. There are no criteria for when drift openings must occur, but the practice has been to start drift openings at least one hour before high tide and fish until low tide depending on opening duration. If an opening is longer than seven hours, the additional fishing time is added to the front end of the opening. This is done to prevent a line fishery from occurring on the next flood. In some cases, the department will make longer openings to accommodate inclement

weather conditions. The set gillnet fleet typically goes to continuous fishing once the drift gillnet fleet is opening twice a day for the foreseeable future in order to control sockeye salmon escapement. The Nushagak District is 35 miles long; based on what we know about king salmon travel times, 4 hours is not sufficient for newly arrived king salmon to transit the district without being exposed to commercial fishing gear.

For most of the 2010s, both Nushagak River sockeye and king salmon returns were fair to good. In 2018, Nushagak king salmon escapement was above the 95,000 inriver goal. Starting in 2017, Wood and Nushagak River sockeye salmon stocks began producing unprecedentedly large returns. The total sockeye salmon run record for the Nushagak District of 15.7 million fish, set in 2006, was shattered in 2017 with a total run of 20.0 million and shattered again in 2018 with a total run of 33.8 million. The 12.7 million total sockeye salmon return of 2020 is the lowest return since 2017 and would rank as the third largest return ever when compared to all years before 2017. There were also huge runs in 2021 and 2022: 2021 at 28 million was the second largest run on record until 2022 surpassed it at 30 million. The Wood River sockeye salmon escapement has exceeded the upper end of the goal range every year since 2017, and the Nushagak River sockeye salmon escapement has exceeded the upper end of the escapement goal range every year except 2019.

During this same period, Nushagak River king salmon and king salmon statewide have been producing below average returns. In the Nushagak River, 2018 was a strong year but all other years since 2017 have been poor to fair. The department recommended that Nushagak River king salmon be identified as a Stock of Management Concern at the October 2022 work session.

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

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

COMMITTEE OF THE WHOLE–GROUP 2: SUBSISTENCE SALMON, SPORT FISHING (19 PROPOSALS)

Subsistence Salmon (3 proposals)

PROPOSAL 14 – Reinstate provision that set gillnets are the only lawful gear for subsistence fishing for salmon in the Naknek, Alagnak, and Wood River Special Harvest Areas.

5 AAC 01.320. Lawful gear and gear specifications.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? In special harvest areas of Bristol Bay, the use of gillnets for subsistence fishing would be restricted to set gillnets only.

WHAT ARE THE CURRENT REGULATIONS? Within the boundaries of any district, including special harvest areas, salmon may be taken by only drift or set gillnet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would not affect current fishery management or fishing practices.

BACKGROUND: In 2018, the board clarified the definition of a district to include special harvest areas. This unintentionally opened the Naknek, Alagnak, and Wood River special harvest areas to subsistence fishing for salmon with drift gillnet gear. These areas had previously been restricted to subsistence fishing for salmon with set gillnets only.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to address an unintended regulatory change that inadvertently changed gear specifications and operations.

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

SUBSISTENCE REGULATION REVIEW:

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

PROPOSAL 15 – Allow use of small fishwheels to harvest salmon for subsistence purposes in the Ugashik Bay, Ugashik River, and Dago Creek drainages.

5 AAC 01.320. Lawful gear and gear specifications.

PROPOSED BY: Gust Sonny Griechen.

WHAT WOULD THE PROPOSAL DO? Allow the use of fish wheels in Ugashik Bay, Ugashik River, and Dago Creek, within the subsistence fishery.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be harvested for subsistence purposes in Bristol Bay with the required permit. There are no bag, possession, or seasonal limits in the subsistence salmon fishery. Salmon may be taken by gear types listed in 5 AAC 01.010 unless restricted under the terms of a subsistence fishing permit. In Bristol Bay, within any district, salmon may be taken only by drift and set gillnets. Outside the boundaries of any district, salmon may only be taken by set gillnet, except that salmon may also be taken by dip nets in the waters described in 5 AAC 01.310. Other gear specifications pertain to specific areas within Bristol Bay. No additional gear specifications exist for Ugashik Bay, Ugashik River, and Dago Creek. Currently, the fish wheel is not a legal subsistence fishing gear type in the Bristol Bay Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Subsistence users would be able to operate fishwheels when subsistence fishing for salmon in Ugashik Bay, Ugashik River, and Dago Creek. This could allow the user to moderate their subsistence catch in times of high salmon abundance and allow for the release of nontarget species. Additionally, this could increase the quality of fish put away for subsistence uses, depending on design and operation of fish wheels.

BACKGROUND: The board found that salmon of the Bristol Bay Area support customary and traditional (subsistence) uses (5 AAC 01.336). In 1993, the board established a range of 157,000–172,171 salmon for all of Bristol Bay as the amount reasonably necessary (ANS) for subsistence uses. Between 1985 and 2021, average subsistence salmon harvest in the Ugashik District was approximately 1,600 fish, with the majority of those being sockeye salmon (Table 15-1). The customary and traditional worksheet prepared for the board in February 1993 does not list fish wheels as a gear type used to traditionally harvest salmon.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it provides additional subsistence opportunity in a situation where the department does not foresee any negative biological or management impacts to the fishery. Adoption of this proposal would require a modification to the current subsistence salmon permit to acknowledge the use of fish wheels.

COST ANALYSIS: Approval of this proposal may result in an additional direct cost for a private person to participate in this fishery. Subsistence users wishing to use the proposed fishwheel specifications would need to purchase materials to build fishwheels.

SUBSISTENCE REGULATION REVIEW:

1. Are these stocks in a nonsubsistence area? No.
2. Are these stocks customarily and traditionally taken or used for subsistence? Yes. The board has found that all finfish in the Bristol Bay Area are customarily and traditionally taken or used for subsistence (5 AAC 01.336).
3. Can a portion of these stocks be harvested consistent with sustained yield? Yes.

4. What amounts are reasonably necessary for subsistence uses? The board has established that 157,000–172,171 salmon, including 55,000–65,000 Kvichak River drainage sockeye salmon, and 250,000 usable pounds of finfish other than salmon are the amounts reasonably necessary for subsistence uses of finfish in the Bristol Bay Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

PROPOSAL 16 – Repeal requirement that subsistence salmon fishing permits for the Naknek River Drainage may only be obtained at the King Salmon office of the Alaska Department of Fish and Game.

5 AAC 01.330. Subsistence fishing permits.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Repeal requirement that subsistence salmon fishing permits for the Naknek River drainage may only be obtained at the King Salmon office of the Alaska Department of Fish and Game.

5 AAC 01.330. (d) would be amended to read:

> (d) **Repealed.** [SUBSISTENCE SALMON FISHING PERMITS FOR THE NAKNEK RIVER DRAINAGE WILL BE ISSUED ONLY THROUGH THE ADF&G KING SALMON OFFICE.]

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 01.330 (d) requires subsistence salmon fishing permits for the Naknek River drainage be obtained through the ADF&G office in King Salmon.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal will provide additional options to obtain subsistence permits for the Naknek River drainage.

BACKGROUND:

Bristol Bay Permits

In 1993, the board found that salmon of the Bristol Bay Area support customary and traditional (subsistence) uses (5 AAC 01.336). The board established a range of 157,000–172,171 salmon as the amount reasonably necessary for subsistence uses. Under state regulations, all Alaska state residents are eligible to participate in subsistence salmon fishing. Permits are required to harvest salmon for subsistence purposes, and there is no seasonal or annual limit for salmon harvested in Bristol Bay. Only one subsistence fishing permit may be issued to each household per year. Subsistence permits are issued free of charge and are issued only to Alaska residents. The permit includes a harvest calendar for recording daily harvests by species and location. Except for the Naknek River drainage, Bristol Bay Area subsistence permits are available at the ADF&G online store; department offices in Dillingham, King Salmon, and Anchorage; and from vendors in most area communities.

Naknek River Drainage Permits

As noted above, permits are required for harvesting salmon for subsistence uses in Bristol Bay by state regulation. Beginning in the 1980s, a substantial increase in the number of people who obtained subsistence salmon permits for the Naknek River drainage occurred. In 1979, 243 permits were issued, and in 1980, 358 permits were issued. Of the 358 permits issued in 1980, 41% were issued to people with an address in a community outside of the Bristol Bay area. In December 1980, the board adopted new regulations to require that subsistence salmon fishing permits for the Naknek River drainage be issued only to persons domiciled in the Naknek and Kvichak River drainages, and Naknek River drainage subsistence salmon fishing permits were only to be issued

through the department's King Salmon office. The reasoning for the latter part of the regulation was that "local [subsistence permit] issuance allows the staff to closely monitor the number of units fishing per area and to screen applicants for residency requirement" (ADF&G 1982:52[1]).

The 1981–1984 permit regulations were as follows:

1. Subsistence salmon fishing permits
   a. were required and limited to one per household, 5 AAC 01.330 (a) and (c);
   b. were to be "issued only to those persons domiciled in the Naknek and Kvichak River drainages," 5 AAC 01.330 (d)
   c. were to be issued only through the Department of Fish and Game Office in King Salmon, 5 AAC 01.300 (a) and (d)

In 1982, a personal use fishery was established in the Naknek River, allowing nonlocal Alaska residents to fish for salmon under personal use regulations. For two years (1985 and 1986), the subsistence fishery was open to all Alaska residents. The eligibility regulations changed back to permitting only local residents for the next four years (1987–1990). As a result of Alaska Supreme Court ruling in *McDowell et al. v. State of Alaska*, from 1990 to today, the state subsistence fishery is open to all Alaska residents; however, the provision that subsistence permits for the Naknek River drainage must be obtained from the ADF&G office in King Salmon remained in regulation (5 AAC 01.330(d)).

The majority of the subsistence harvest is sockeye salmon, with additional numbers of king, chum, and pink salmon. From 2016 to 2020 (most recent five years of data available), an average of 263 Naknek River permits were issued. Of these, 171 came from area communities (King Salmon, Naknek, and South Naknek), and 92 came from other areas. The average harvest from 2016 to 2020 in the Naknek River subsistence fishery by local permit holders was 16,124 salmon or 69% of the total salmon harvest, and the average harvest by nonlocal permit holders was 7,318 or 31% of the total salmon harvest.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. If adopted, subsistence fishers will no longer be required to travel at their own expense to the King Salmon office, which may be closed after hours and on the weekends. As a result, this change may make acquisition and use of the permits easier for subsistence fishers.

The department has no conservation concerns with allowing permits for the Naknek River subsistence fishery to be issued in other communities, as well as online. Managers have emergency order time and area authority and other tools to address any escapement concerns. Residency requirements will be vetted by the department the same way they are for other subsistence permits, by a statement on the permit that the applicant swears to via signature.

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

[1] ADF&G (Alaska Department of Fish and Game). 1982. Annual Management Report, 1981, Bristol Bay Area. Alaska Department of Fish and Game, Division of Commercial Fisheries, Annual Management Report BB.1982, Anchorage. http://www.adfg.alaska.gov/FedAidPDFs/AMR.CF.BB.1982.pdf.

Sport Fishing Guides (1 proposal)

PROPOSAL 17 – Limit guided angler access to sport fishing in a section of the Naknek River.

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

PROPOSED BY: Joe Klutsch.

WHAT WOULD THE PROPOSAL DO? Commercial entities, including rental boat operators, would be limited to eight anglers at a given time in the Naknek River drainage from ADF&G regulatory markers located one-half mile upstream of Rapids Camp upstream to ADF&G markers near Trefon's Cabin from June 8 through October 31 (Figure 17-1). Guided anglers would be identified by wearing identification badges.

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

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Guided angler effort would likely decrease in this section of the Naknek River drainage by an unknown amount with little effect on catch and harvest of rainbow trout, Dolly Varden/Arctic char, Arctic grayling, and northern pike and an unknown effect on harvest of sockeye, coho, chum, and pink salmon. The impact on overall angler effort is unknown because the department does not have information on the numbers of anglers that use nonguided commercial services such as rental boats, transporters, or fishing clubs. It would also increase regulatory and enforcement complexity.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River from 2007 to 2016 ranged from a high of 2,266 anglers in 2016 to a low of 1,304 anglers in 2007 with an average of 1,751 anglers (Table 17-1). Similarly, from 2007 to 2016, the number of guided trips ranged from a high of 1,040 in 2016 to a low of 527 in 2010 with an average of 733 guided trips and the number of guide businesses ranged from a high of 18 in 2008 to a low of 11 in 2016, averaging 13 guide businesses (Table 17-2). Guided anglers catch and harvest of sockeye and coho salmon remained steady from 2007 to 2016. Harvest of resident species has been low and steady while catch has increased corresponding to increasing number of anglers (Table 17-1).

Based on the Statewide Sport Fish Harvest Survey (SWHS), angler effort (guided and unguided) for the upper Naknek River has been stable from a high of 8,559 angler days in 2016 to a low of 3,415 angler days in 2012 with a recent 5-year average of 5,760 (Table 17-3). Estimated sport harvest and catch of rainbow trout, Dolly Varden/Arctic char, Arctic grayling, northern pike, sockeye, coho, chum, and pink salmon has been stable in recent years (Table 17-3).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity, reduce angler opportunity by an unknown amount, and may be difficult to enforce. The department is **NEUTRAL** on the allocative aspects of this proposal. Catch and harvest of rainbow trout, Dolly Varden/Arctic char, Arctic grayling, northern pike, sockeye, coho, chum, and pink salmon in the Naknek River drainage sport fishery suggest that these populations are stable under existing regulations.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is expected to result in an additional direct cost for the department through implementation of an angler identification system (badges).

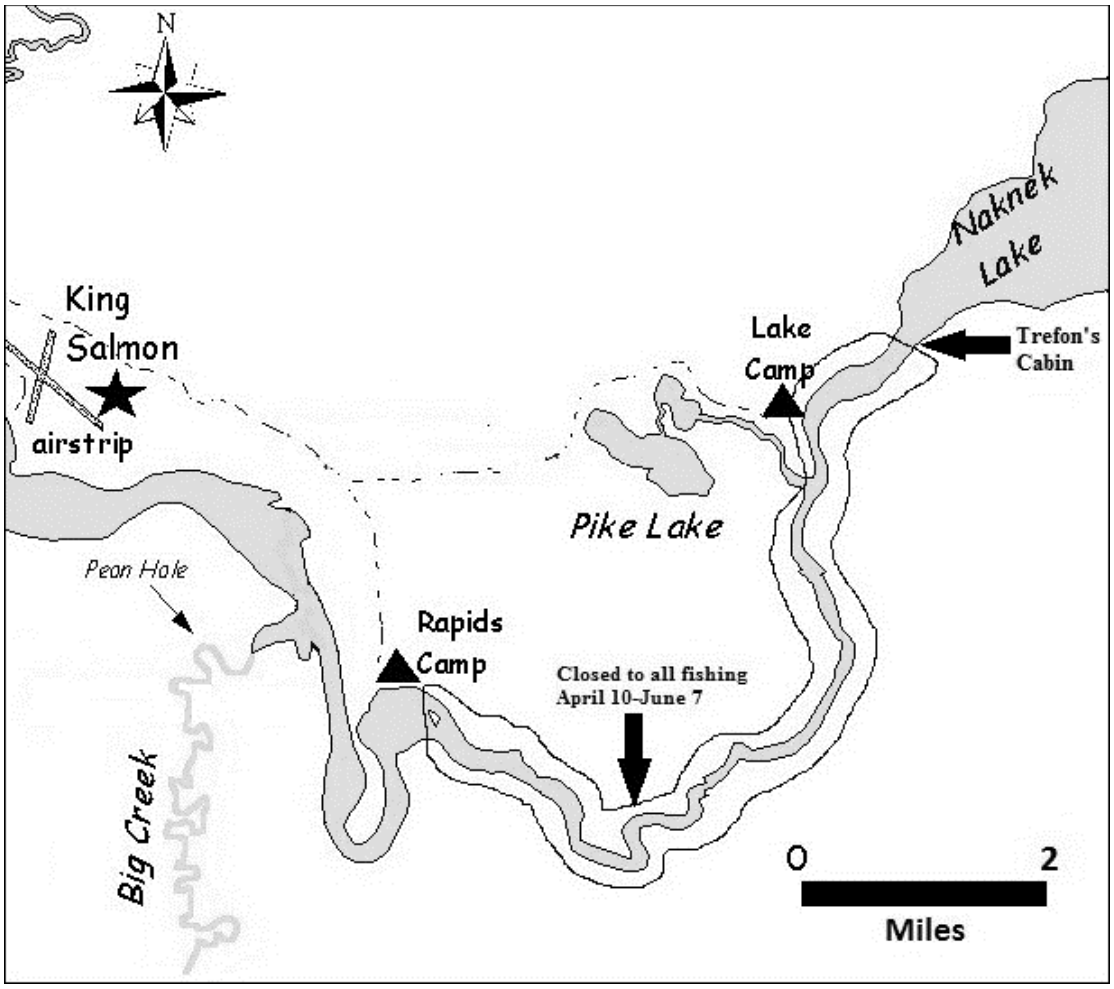

Figure 17-1.–Upper Naknek River drainage.

Table 17-1.–Upper Naknek River guided sport fishing effort and rainbow trout, Dolly Varden/Artic char, Arctic grayling, northern pike, sockeye salmon, and coho salmon harvest and catch, 2007–2016.

		Rainbow trout		Dolly Varden/Arctic char		Arctic grayling		Northern pike		Sockeye		Coho	
Year	Anglers	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch
2007	1,304	8	2,870	4	910	1	84	0	37	1,491	3,153	806	999
2008	1,614	11	3,330	15	471	0	46	0	11	1,720	2,802	1,523	1,867
2009	1,590	23	4,008	1	735	0	98	0	8	1,600	2,657	807	972
2010	1,347	9	4,601	2	915	1	179	0	36	1,603	3,160	358	723
2011	1,708	8	5,051	0	656	0	276	0	7	1,734	771	556	778
2012	1,623	19	5,414	7	662	2	338	6	68	1,653	2,280	556	714
2013	1,898	19	6,409	1	459	0	313	5	27	2,129	2,809	838	935
2014	1,962	16	6,857	5	1,383	2	639	1	17	2,068	2,720	970	1,263
2015	2,200	7	9,560	16	3,935	3	626	2	80	3,134	4,677	798	960
2016	2,266	2	10,654	1	2,009	0	380	1	61	2,341	3,753	708	830
Average													
2007–2016	1,751	12	5,875	5	1,214	1	298	2	35	1,947	2,878	792	1,004
2012–2016	1,990	13	7,779	6	1,690	1	459	3	51	2,265	3,248	774	940

Source: Freshwater Guided Logbook Program

Note: Includes all guided effort, harvest, and catch of species in Naknek River from Rapids Camp to Trefon's Cabin (Report code R0275).

Table 17-2.–Upper Naknek River guide businesses and guided sport fishing trips from June 8 to October 31, 2007–2017.

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

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

[a] 2017 data are preliminary.

Table 17-3.–Upper Naknek River Rainbow Trout, Dolly Varden/Arctic char, Artic grayling, sockeye, coho, chum, and pink salmon harvest and catch 2004–2021.

		Rainbow trout		Dolly Varden/ Arctic char		Arctic grayling		Northern pike		Sockeye		Coho		Chum		Pink	
Year	Effort	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch	Hrvst	Catch
2004	6,022	141	13,428	88	2,273	0	734	30	91	828	3044	1661	2981	0	65	15	6354
2005	4,540	143	9,918	81	1,185	43	1,398	129	183	342	1104	849	1932	0	430	0	46
2006	5,729	104	10,944	153	1,898	6	202	87	311	1164	5353	1430	3699	16	1361	120	3601
2007	7,391	0	13,665	0	1,834	10	351	0	8	2368	6024	1202	2537	26	520	0	58
2008	5,732	108	11,588	45	1,321	0	438	25	286	3596	6066	2020	3271	11	344	65	1159
2009	5,950	0	16,584	0	3,943	0	498	0	276	3019	9859	1625	4280	11	45	0	721
2010	6,657	215	12,006	171	2,084	0	1,226	10	215	1118	2653	1207	3368	12	511	25	2634
2011	5,277	367	16,081	205	3,052	0	805	14	20	1570	4521	397	797	0	200	0	25
2012	3,415	0	8,901	0	1,272	0	916	146	685	2037	5946	637	2058	34	191	46	485
2013	5,714	47	11,153	49	2,737	0	1,697	16	242	2470	2877	1018	1298	0	348	30	253
2014	4,698	0	10,746	0	2,544	0	859	0	54	2344	3693	1557	3348	0	808	154	3635
2015	4,460	0	13,847	39	3,526	47	1,014	0	139	2540	5313	773	2525	0	390	0	121
2016	8,559	60	30,871	0	4,958	16	1,205	0	200	3219	8817	1011	2223	0	344	0	3275
2017	5,185	64	16,066	40	1,663	0	734	33	385	1479	4022	1725	3449	0	1897	0	174
2018	4,922	10	9,066	0	2,440	0	1,680	0	311	1728	5948	1552	4202	10	816	0	1611
2019	6,178	71	13,842	139	1,566	0	751	0	169	3020	5849	784	1233	33	306	0	288
2020	3,954	147	8,603	0	604	13	285	8	592	3406	6066	376	508	0	106	0	318
Average 2004–2020	5,552	87	13,371	59	2,288	8	870	29	245	2,132	5,127	1,166	2,571	9	511	27	1,456
2016–2020	5,760	70	15,690	36	2,246	6	931	8	331	2,570	6,140	1,090	2,323	9	694	0	1,133
2021	7,432	0	7,519	0	475	0	384	109	379	3,024	10,376	940	1,470	0	165	614	839

Source: *SWHS.* Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Note: Effort, harvest and catch of species in Naknek River from Rapids Camp to Trefon's Cabin (SWHS Report code R0275).

Methods and Means (3 proposals)

PROPOSAL 18 – Prohibit the use of salmon eggs for sport fishing.

5 AAC 67.020. General provisions for seasons and bag, possession, annual, and size limits for the Bristol Bay Area.

PROPOSED BY: Mark Gagliano.

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of salmon eggs as bait in all Bristol Bay freshwater drainages and salt waters.

WHAT ARE THE CURRENT REGULATIONS? There are currently no specific restrictions in Bristol Bay regarding the use of "salmon eggs" as bait. Under special regulations there are bait restrictions in place for the following areas, drainages, and date ranges. In the Ungalikthluk River drainage, bait is prohibited year-round. In the Wood River drainage, the use of bait is prohibited year-round in both the Agulowak and Agulukpak Rivers. The Nushagak/Mulchatna drainage has the following restrictions: bait is prohibited year-round in the Nushagak River upstream of Harris Creek; the Koktuli River drainage; the Mulchatna River drainage between its confluences with the Stuyahok River and with the Koktuli River; the Nuyakuk River from the outlet of Tikchik Lake to just below Nuyakuk Falls; the Stuyahok River drainage; and the Tikchik River drainage. Within the Kvichak and Alagnak River drainages, restrictions on the use of bait are as follows: bait is prohibited year-round in the Kvichak River drainage except in waters of lakes more than one-half mile from inlet or outlet streams, and the Alagnak River drainage. The use of bait is prohibited from June 8 to October 31 in the Gibraltar River drainage, Copper River drainage, Moraine Creek drainage, and Lower Talarik Creek. In all flowing waters of the Naknek River drainage, bait is prohibited from March 1 to November 14. Bait is prohibited year-round in all flowing waters upstream of Rapids Camp and in the Brooks River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would likely reduce catch and harvest rates by an unknown amount in sport fisheries where use of bait is allowed. Sport anglers that prefer using bait to sport fish may move to other fisheries. The frequency of salmon eggs being used as bait is unknown.

BACKGROUND: In Bristol Bay, bait prohibitions are typically used to afford protection in special management areas for rainbow trout and as a tool implemented by emergency order to reduce salmon catch and harvest rates. In some cases, such as the Naknek River, bait restrictions serve a dual purpose by protecting rainbow trout and reducing catch of king salmon.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This proposal would reduce sport fishing opportunity with unknown conservation benefit. There are no biological or conservation concerns related specifically to the use of bait in fisheries where it is currently allowed.

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

PROPOSAL 19 – Prohibit the use of certain sport fishing tackle in a section of the Naknek River.

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

PROPOSED BY: Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? The use of egg imitations would be prohibited unless the egg imitation is a fixed part of a fly or lure longer than one inch in length in waters upstream from the ADF&G markers located one-half mile above Rapids Camp to ADF&G markers located at Trefon's Cabin at the outlet of Naknek Lake (Figure 19-1).

WHAT ARE THE CURRENT REGULATIONS? In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams, only unbaited, single-hook, artificial lures or flies may be used year-round. All sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout. The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish less than 18 inches, and from November 1 to June 7 is five fish less than 18 inches. Under statewide regulations, an attractor, including a bead, when used with an artificial fly, artificial lure, or bare hook, must be either fixed within two inches of the bare hook, fly, or lure, or be free sliding on the line or leader.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in decreased catch rates for anglers, increased regulatory complexity, and prohibition of a vast range of tackle under one inch in length commonly used by anglers targeting rainbow trout, Arctic grayling, and Dolly Varden/Arctic char.

BACKGROUND: In 1990, the board adopted regulations for conservative management of wild rainbow trout in the Bristol Bay area. Conservative wild stock management does not necessarily preclude limited harvest of rainbow trout. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is likely, but by managing the area's wild rainbow trout stocks conservatively, the potential for serious long-term resource problems is minimized. From a social perspective, conservative wild stock management is consistent with the wishes and desires of most of the public presently using the resource. The *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), the *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222), and the region's regulations contain policies and regulations that protect the biological integrity of wild trout stocks and maximize their recreational benefit and economic potential. Little data exist on the effects of egg-simulating lures on rainbow trout stocks; however, the Naknek River drainage rainbow trout fishery is conservatively managed with no bait and single-hook regulations, conservative bag limits, and a spawning season closure to maintain wild stocks. The rainbow trout catch by guided anglers in the Upper Naknek River sport fishery increased from 2007 to 2016, with angler-days increasing from 2,387 in 2007 to 2,787 in 2016 and catch increasing from 4,921 in 2007 to 11,634 in 2016 (Table 19-1). No data are available since 2017. For comparison, based on previous studies in a section of the Kenai River (Moose River upstream) that is equivalent in length where rainbow trout abundance appears to be similar, the recent average annual sport catch

of rainbow trout by guided anglers has been approximately 50,000 fish. Many of these fish are caught on egg simulating lures, and there are no biological concerns with this population of rainbow trout.

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

COST ANALYSIS: Approval of this proposal may result in an additional direct cost for a private person to participate in this fishery because they may need to purchase new tackle to comply with the new regulation. Approval of this proposal is not expected to result in additional direct cost for the department.

Table 19-1.–Upper Naknek River guided sport fishing effort, guided trips, guide businesses, and rainbow trout harvest and catch, 2007–2017.

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

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

[a] 2017 data are preliminary.

PROPOSAL 20 – Prohibit the use of bait and barbed hooks in the Wood River Lakes system.

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

PROPOSED BY: Jordy Perrego.

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of bait and barbed hooks in the Wood River Lakes system as follows: from the outlet of the Agulapak River into Lake Nerka north to Kulik Lake and its streams and tributaries only unbaited, single barbless/pinched barbed hook artificial lures, September 1–June 7; only unbaited, single barbless/pinched barbed hook artificial flies, June 8–August 31.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations requiring barbless hooks in the State of Alaska. In the Agulukpak River from the outlet of Lake Beverly to the island located 1.2 miles downstream, from September 1 to June 7, only unbaited, single-hook, artificial lures or flies may be used, and from June 8 to August 31, only unbaited, single-hook, artificial flies may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would decrease catch rates in the sport fishery in the Wood River Lakes system by an unknown amount and increase regulatory complexity. Hooks may be removed from fish more easily since it is generally considered to be less difficult to remove a barbless hook from a fish, and mortality of released fish may decrease by an unknown amount. A "barbless or pinched barbed hook" would need to be defined.

BACKGROUND: In February 1990, the board modified nearly all regulations for rainbow trout fisheries in the two management areas now known as the Bristol Bay Area and Kuskokwim–Goodnews Area (Figures 20-1, 20-2, and 20-3). The adopted regulations essentially implement the *Southwest Alaska Rainbow Trout Management Plan* without adopting the plan's language into regulation. As part of these regulatory changes, special management areas were created to both protect wild trout stocks and provide a diversity of angling opportunities. The Agulukpak River was identified as a special management area and established as a fly only, unbaited, single hook fishery from June 8 to August 31. In the Bristol Bay Area, bait prohibitions are typically used to afford protection in special management areas for rainbow trout and as a tool implemented by emergency order to slow down salmon catch and harvest rates. In some cases, such as the Naknek River, bait restrictions serve a dual purpose by protecting rainbow trout and reducing catch of king salmon. Catch-and-release fishing practices have triggered concern over mortality caused by use of barbed hooks. Results of studies conducted on trout species have shown barbless hook usage to have negligible effects on hooking mortality, leading researchers to conclude no biological justification for barbed hook restrictions (Schill and Scarpella. 1997. Barbed Hook Restrictions in Catch-and-Release Trout Fisheries: A Social Issue. North American Journal of Fisheries Management 17:873-881.).

Based on the SWHS, angler effort for the upper Wood River Lakes has been stable with a high of 2,061 angler-days in 2013, a low of 497 in 2020, and an average of 985 angler-days per year from 2012 to 2021. An average of 70 percent of the effort occurs in the Agulukpak River (Table 20-1).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Adoption of this proposal would reduce sport fishing opportunity with little apparent conservation benefit. At this time there is no biological or conservation concern related to the use of bait or barbed hooks in fisheries where it is currently allowed.

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

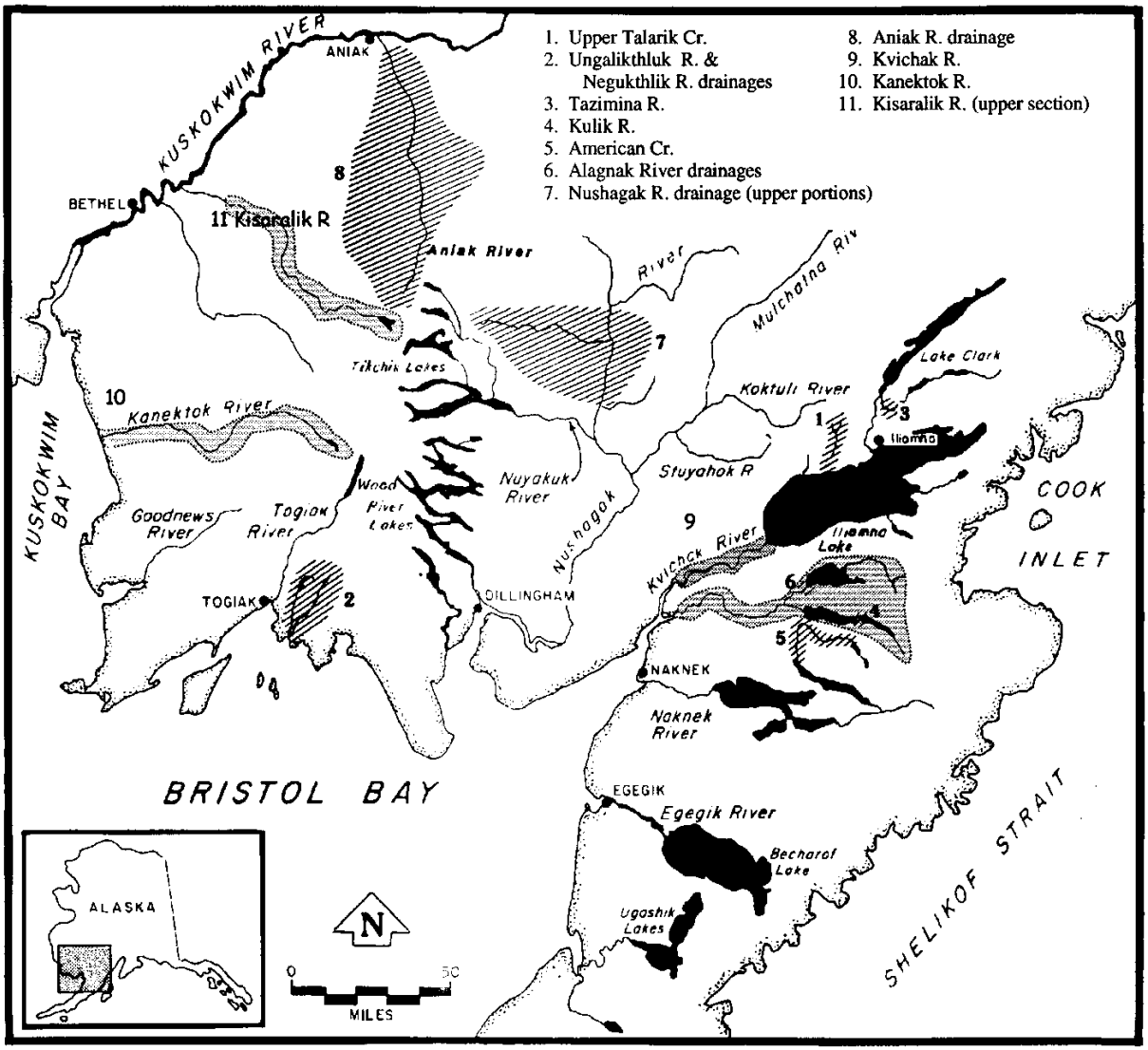

Figure 20-1.–Catch-and-release special management areas for rainbow trout in the Bristol Bay Area.

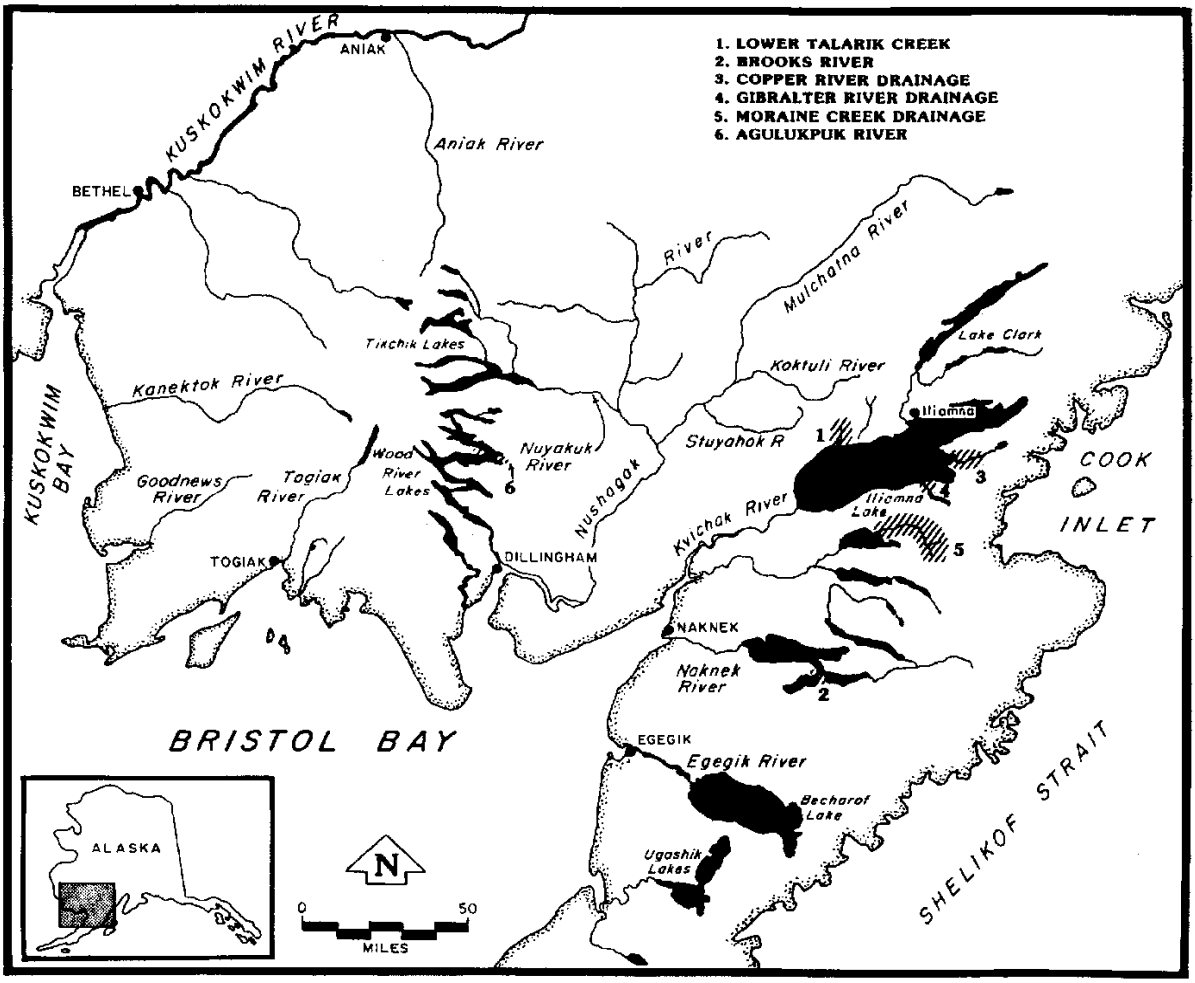

Figure 20-2.–Catch-and-release special management areas for rainbow trout in the Bristol Bay Area where gear is limited to unbaited, single-hook, artificial flies.

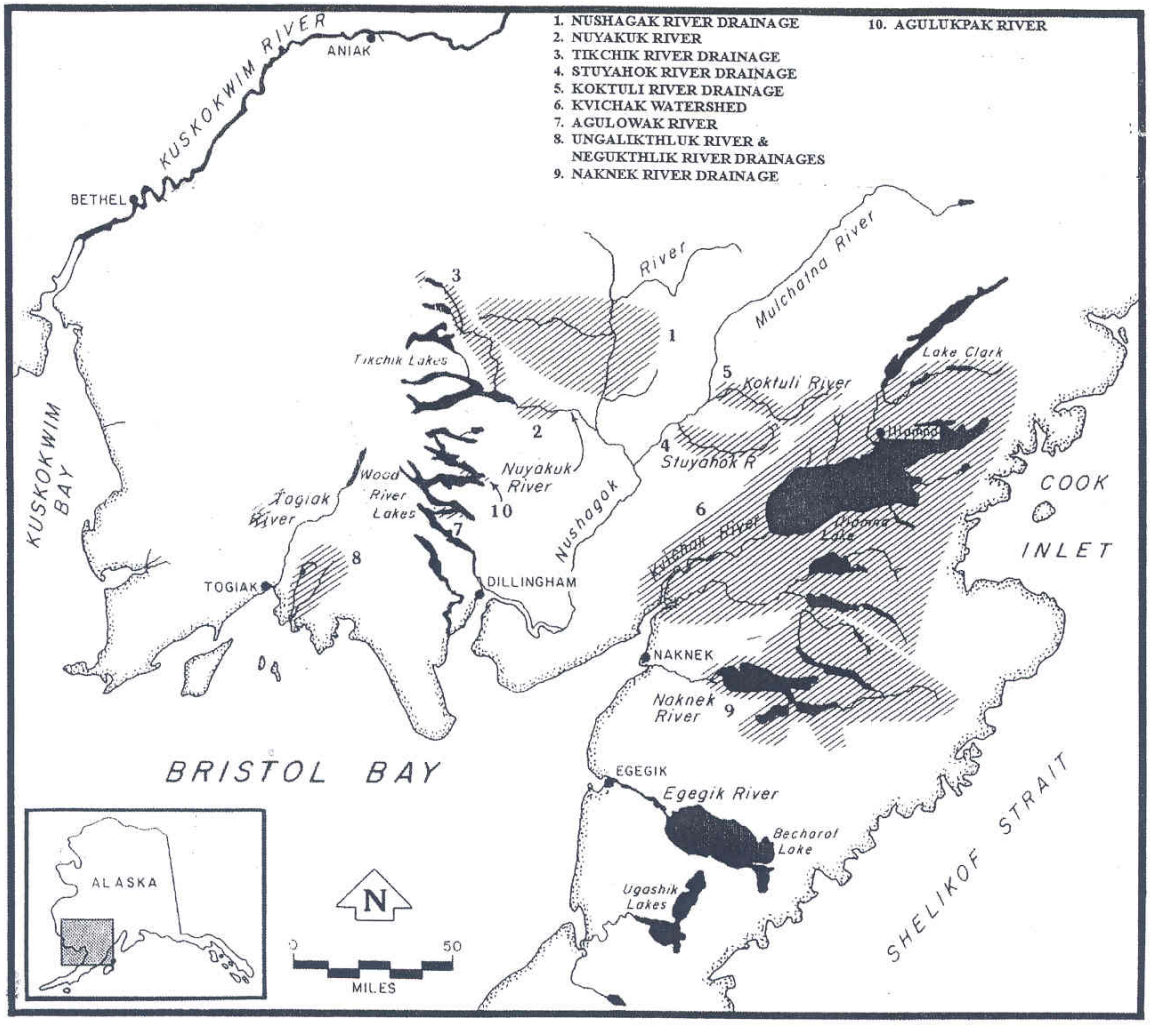

Figure 20-3.–Unbaited, single-hook artificial lure special management areas for rainbow trout in the Bristol Bay Area.

Table 20-1.–Effort in angler-days for the upper Wood River Lakes system 2012–2021.

Year	Agulukpak R.	Upstream of Agulukpak R.	Total
2012	738	455	1,193
2013	689	1,372	2,061
2014	796	113	909
2015	678	22	700
2016	1,131	92	1,223
2017	1,026	43	1,069
2018	599	96	695
2019	389	289	678
2020	159	338	497
2021	668	158	826
Average 2012–2021	687	298	985
Percent	70%	30%	100%

Source: *SWHS*. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Rainbow Trout (1 proposal)

PROPOSAL 21 – Prohibit harvest of rainbow trout by non-resident anglers in a section of the Naknek River drainage.

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

PROPOSED BY: Joey Klutsch.

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

WHAT ARE THE CURRENT REGULATIONS? In all flowing waters upstream from an ADF&G regulatory marker located at Rapids Camp, including all waters within one-quarter mile of all lake and outlet streams, only unbaited, single-hook, artificial lures or flies may be used year-round. Additionally, all sport fishing is closed in the Naknek River above the ADF&G regulatory marker located at Rapids Camp, in Brooks River, and in American Creek from April 10 to June 7 to protect spawning rainbow trout (Figure 21-1). The bag and possession limit for rainbow trout in the Naknek River drainage from June 8 to October 31 is one fish less than 18 inches, and from November 1 to June 7 is five fish, less than 18 inches.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be minimal reduction of overall harvest of rainbow trout in the Naknek River drainage sport fishery. Eliminating nonresident harvest opportunity will likely result in minimal biological benefit.

BACKGROUND: Based on freshwater guide logbook data, guided nonresident rainbow trout harvest has averaged 19 fish from 2007 to 2016 (Table 21-1). Recent total (guided and unguided) rainbow trout catch and harvest in the Naknek River drainage sport fishery suggests that the rainbow trout population is stable under current regulations (Table 21-2).

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

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

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

Table 21-1.–Naknek River guided nonresident angler rainbow trout harvest, 2007–2017.

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

[a] Less than 4 businesses reporting.

[b] 2017 data are preliminary.

Table 21-2.–Naknek River drainage sport fishing effort and rainbow trout harvest and catch, 1996–2021.

Year	Total effort (angler-days)[a]	Harvest[a]	Catch[a]
1996	11,971	603	16,888
1997	13,673	246	13,737
1998	13,988	388	12,795
1999	21,189	343	17,946
2000	22,529	450	30,738
2001	12,401	160	16,198
2002	21,020	760	30,635
2003	13,398	171	26,183
2004	16,956	272	20,497
2005	12,699	175	16,431
2006	14,928	196	15,555
2007	17,744	307	25,692
2008	14,444	175	19,886
2009	16,850	60	31,097
2010	16,828	226	22,555
2011	14,465	589	21,869
2012	12,704	48	15,794
2013	12,723	47	15,779
2014	16,202	94	21,650
2015	14,621	416	21,311
2016	15,813	101	36,501
2017	14,851	150	21,257
2018	14,256	89	11,653
2019	13,973	88	19,927
2020	7,850	158	14,339
Average			
1996–2020	15,123	252	20,677
2016–2020	13,349	117	20,735
2021	13,756	14	11,246

Note: "NA" means data not available.

[a] Effort, harvest and catch estimates for Naknek River drainage excluding Brooks River and American Creek.

Sport Salmon (8 proposals)

PROPOSAL 22 – Close Big Creek to sport fishing for salmon.

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

PROPOSED BY: Naknek Kvichak Advisory Committee.

WHAT WOULD THE PROPOSAL DO? All waters of Big Creek upstream of its confluence with the Naknek River would be closed to fishing for all salmon species from June 1 to July 31.

WHAT ARE THE CURRENT REGULATIONS? There is no retention of king salmon in all waters of Big Creek upstream of its confluence with the Naknek River from May 1 to July 31 (catch-and-release fishing only). Sport fishing for salmon other than king salmon in the Naknek River, including Big Creek, is open the entire year with a bag and possession limit of five fish. Downstream of an ADF&G marker located at Rapids Camp, gear is limited to unbaited, artificial lures only from March 1 to November 14.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Sport fishing opportunity for all salmon species and harvest opportunity for chum, coho, pink and sockeye salmon in Big Creek would be eliminated. This may also decrease catch-and-release mortality of king salmon by an unknown amount.

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

Historically, the Big Creek king salmon runs have been assessed via aerial survey; however, due to budget constraints, these surveys have been inconsistent in recent years. Additionally, the surveyor has changed several times, therefore these surveys provide a very rough estimate of run strength and are considered a minimum estimate. The average annual king salmon aerial survey index (1970–2014) is 1,789 (Table 22-1). King salmon begin their spawning migration up the Naknek River to Big Creek during mid to late June. Spawning in the Big Creek drainage commences in early August and peaks in mid to late August, therefore spawning fish are protected by the spawning season closure beginning August 1. Additionally, based on aerial survey data, nearly all spawning takes place upstream of river mile nine.

From 2007 through 2012, the annual guided sport catch of king salmon in Big Creek averaged 82 fish (Table 22-2). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as a proximal reference (6.6%, based on the Nushagak King Salmon Catch and Release

Mortality Project results), the average annual mortality in the guided sport fishery would be approximately five king salmon. The Big Creek drainage was reopened to catch-and-release sport fishing for king salmon after the December 2015 board meeting and the preliminary annual guided sport catch of king salmon from 2016 to 2017 averaged 252 fish (calculated from Table 22-2). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as a proximal refence as above, the average annual mortality in the guided sport fishery would be approximately 17 king salmon.

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

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

Table 22-1.–Unexpanded aerial escapement counts for king salmon in the Big Creek drainage, 1970–2015.

Year	Count	Year	Count
Average 1970-1974	868	1995	1,905
1975	779	1996	1,576
1976	970	1997	1,783
1977	NS	1998	2,085
1978	NS	1999	2,250
1979	NS	2000	1,112
1980	30	2001	2,009
1981	790	2002	2,015
1982	1,930	2003	NS
1983	4,220	2004	4,081
1984	3,420	2005	NS
1985	NS	2006	NS
1986	1,542	2007	1,975
1987	1,353	2008	2,110
1988	3,600	2009	2,834
1989	860	2010	NS
1990	2,000	2011	NS
1991	2,340	2012	NS
1992	895	2013	NS
1993	1,710	2014	NS
1994	2,531	Average 1970-2014	1,789
		2015[a]	1,014

Note: NS = no survey.

[a] Inexperienced surveyor and fair counting conditions therefore count is considered a minimum.

Table 22-2.–Guided sport fishing effort (trips) and guided sport catch of king salmon from Big Creek, 2007–2017.

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

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

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

[c] 2017 data are preliminary.

PROPOSAL 23 – Allow retention of king salmon less than 20 inches in length in Big Creek.

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

PROPOSED BY: Andrew K. Christiansen.

WHAT WOULD THE PROPOSAL DO? Allow retention of king salmon less than 20 inches in length in Big Creek.

WHAT ARE THE CURRENT REGULATIONS? In the Naknek River drainage, in all flowing waters from March 1 to November 14, only unbaited, artificial lures or flies may be used. Upstream from ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, king salmon fishing is closed year-round. Within a one-quarter mile radius of the mouth of Big Creek, king salmon may be retained. Big Creek upstream of its confluence with the Naknek River from May 1 to July 31, king salmon fishing is open to catch-and-release only, and all king salmon caught must be released immediately.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvest of king salmon less than 20 inches in length in Big Creek may increase by an unknown amount. Effort in Big Creek may increase as a result of new harvest opportunity.

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

Historically, the Big Creek king salmon runs have been assessed via aerial survey; however, due to budget constraints, these surveys have been inconsistent in recent years. Additionally, the surveyor has changed several times, therefore these surveys provide a very rough estimate of run strength and are considered a minimum estimate. The average annual king salmon aerial survey index (1970–2014) is 1,789 (Table 22-1). King salmon begin their spawning migration up the Naknek River to Big Creek during mid to late June. Spawning in the Big Creek drainage commences in early August and peaks in mid to late August, therefore spawning fish are protected by the spawning season closure beginning August 1. Additionally, based on aerial survey data, nearly all spawning takes place upstream of river mile nine.

From 2007 through 2012, the annual guided sport catch of king salmon in Big Creek averaged 82 fish (Table 22-2). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as a proximal reference (6.6%, based on the Nushagak King Salmon Catch and Release Mortality Project results), the average annual mortality in the guided sport fishery would be

approximately five king salmon. The Big Creek drainage was reopened to catch-and-release sport fishing for king salmon after the December 2015 board meeting and the preliminary annual guided sport catch of king salmon from 2016 to 2017 averaged 252 fish (Table 22-2). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as a proximal refence as above, the average annual mortality in the guided sport fishery would be approximately 17 king salmon.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. With king salmon abundance declining in recent years throughout Bristol Bay, a conservative approach regarding harvest of king salmon in spawning tributaries is warranted.

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

PROPOSAL 24 – Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage.

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

PROPOSED BY: Naknek Kvichak Advisory Committee; Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? This proposal would reduce the bag and possession limit for king salmon over 20 inches in the Naknek River drainage to two male king salmon, only one of which may be greater than 28 inches in length. The annual limit would also be reduced from five king salmon to two male king salmon 20 inches or greater in length. Adoption of this proposal would prohibit retention of female king salmon, requiring anglers to be able to identify a male king salmon by sight.

WHAT ARE THE CURRENT REGULATIONS? Under general regulations for Bristol Bay, the king salmon season is open from May 1 to July 31. There is an annual limit of five king salmon over 20 inches with harvest record required. In fresh waters for king salmon over 20 inches, the bag and possession limit is three fish, only one of which may be over 28 inches in length. For king salmon under 20 inches, the bag and possession limit is 10 fish. Any king salmon removed from the water must be retained. Under special regulations for the Naknek River drainage, in all flowing waters from March 1 to November 14, only unbaited, artificial lures or flies may be used. Upstream from ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, king salmon fishing is closed year-round. Within a one-quarter mile radius of the mouth of Big Creek, king salmon may be retained. King Salmon Creek upstream of the Alaska Peninsula Highway bridge is closed year-round to all king salmon fishing. Paul's Creek upstream of the Alaska Peninsula Highway bridge is closed year-round to all king salmon fishing. Big Creek upstream of its confluence with the Naknek River from May 1 to July 31, king salmon fishing is open to catch-and-release only, and all king salmon caught must be released immediately.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be an unknown decrease in harvest of king salmon in the Naknek River drainage as well as an increase in the catch and release of king salmon over 20 inches because anglers would have to release fish they believed to be female king salmon and those that exceeded the size limit once a 28-inch male king salmon was retained. Adoption of this proposal would add complexity to the regulations and would add an unenforceable element with the prohibition on retention of female fish.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the Naknek River drainage from 2007 to 2016 has ranged from a high of 4,198 anglers in 2016 to a low of 2,595 anglers in 2010 with an average of 3,672 anglers. Guided king salmon catch in the Naknek River drainage from 2007 to 2016 has ranged from a high of 1,871 in 2015 to a low of 1,196 in 2009 with an average of 1,499 fish (Table 24-1). Guided angler king salmon harvest during this period has ranged from a high of 898 in 2016 to a low of 435 in 2010 with an average of 707 fish (Table 24-1).

Based on the SWHS, the estimated king salmon sport catch from 2012 to 2021 has ranged from a high of 8,758 in 2016 to a low of 1,846 in 2021 with an average of 4,739 fish from the Naknek River drainage (Table 24-2). The sport harvest of king salmon from 2012 to 2021 has ranged from a high of 2,288 in 2012 to a low of 686 in 2020 with an average of 1,447 (Table 24-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 12,942 (Table 24-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would reduce harvest opportunity in the sport fishery and increase regulatory complexity in addition to adding unenforceable regulatory language. The department has the authority to restrict bag limits inseason by emergency order and the department exercised this authority in 2022 on the Naknek River king salmon sport fishery.

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

Table 24-1.–Guided Naknek River effort in number of anglers and king salmon harvest and catch, 2007–2016.

		King salmon	
Year	Anglers	Harvest	Catch
2007	3,815	896	1,738
2008	3,738	741	1,623
2009	3,585	660	1,196
2010	2,595	435	1,228
2011	3,515	608	1,407
2012	3,547	795	1,438
2013	3,895	768	1,310
2014	3,819	642	1,374
2015	4,012	622	1,871
2016	4,198	898	1,802
Average			
2007–2016	3,672	707	1,499
2012–2016	3,894	745	1,559

Source: Freshwater Logbook Program

Note: Effort, harvest and catch numbers from Naknek River and tributaries including Naknek Lake.

Table 24-2.–Naknek River drainage effort in angler days and king salmon harvest and catch, 2011–2021.

		King salmon	
Year	Effort	Harvest	Catch
2012	12,704	2,288	5,731
2013	12,723	1,242	2,875
2014	16,202	1,071	3,698
2015	14,621	1,096	3,770
2016	15,813	2,070	8,758
2017	14,851	2,073	4,422
2018	14,279	2,029	6,434
2019	13,973	1,192	7,898
2020	7,850	686	1,960
2021	13,756	723	1,846
Average			
2012–2021	13,677	1,447	4,739
2017–2021	12,942	1,341	4,512

Source: SWHS. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Note: Effort, harvest and catch numbers from Naknek River drainage excluding American Creek and Brooks River.

PROPOSAL 25 – Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage.

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

PROPOSED BY: Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? This would reduce the bag and possession limit for king salmon over 20 inches in the Naknek River drainage to two male king salmon, only one of which may be greater than 28 inches in length. The annual limit would also be reduced from five king salmon to two male king salmon 20 inches or greater in length. Adoption of this proposal would prohibit retention of female king salmon, requiring anglers to be able to identify a male king salmon by sight.

WHAT ARE THE CURRENT REGULATIONS? Under general regulations for Bristol Bay, the king salmon season is open from May 1 to July 31. There is an annual limit of five king salmon over 20 inches, with harvest record required. In fresh waters for king salmon over 20 inches, there is a bag and possession limit of three fish, only one of which may be over 28 inches in length. For king salmon under 20 inches, the bag and possession limit is 10 fish. Any king salmon removed from the water must be retained. Under special regulations for the Naknek River drainage in all flowing waters from March 1 to November 14, only unbaited, artificial lures or flies may be used. Upstream from ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, king salmon fishing is closed year-round. Within a one-quarter mile radius of the mouth of Big Creek, king salmon may be retained. King Salmon Creek upstream of the Alaska Peninsula Highway bridge is closed year-round to all king salmon fishing. Paul's Creek upstream of the Alaska Peninsula Highway bridge is closed year-round to all king salmon fishing. Big Creek upstream of its confluence with the Naknek River from May 1 to July 31, king salmon fishing is open to catch-and-release only and all king salmon caught must be released immediately.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be an unknown decrease in harvest of king salmon in the Naknek River drainage as well as an increase in the catch-and-release of king salmon over 20 inches because anglers would have to release fish they believed to be female king salmon and those that exceeded the size limit once a male king salmon 28 inches or greater in length was retained. Adoption of this proposal would add complexity to the regulations and would add an unenforceable element with the prohibition on retention of female fish.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the Naknek River drainage from 2007 to 2016 has ranged from a high of 4,198 anglers in 2016 to a low of 2,595 anglers in 2010 with an average of 3,672 anglers (Table 25-1). Guided king salmon catch in the Naknek River drainage from 2007 to 2016 has ranged from a high of 1,871 in 2015 to a low of 1,196 in 2009 with an average of 1,499 fish (Table 25-1). Guided angler king salmon harvest during this period has ranged from a high of 898 in 2016 to a low of 435 in 2010 with an average of 707 fish (Table 25-1).

Based on the SWHS, the estimated king salmon sport catch from 2012 to 2021 has ranged from a high of 8,758 in 2016 to a low of 1,846 in 2021 with an average of 4,739 fish from the Naknek River drainage (Table 25-2). The sport harvest of king salmon from 2012–2021 has ranged from a high of 2,288 in 2012 to a low of 686 in 2020 with an average of 1,447 (Table 25-2). Angler effort for the Naknek River drainage has been stable from highs of over 20,000 angler-days in 1999, 2000, and 2002 to a recent 5-year average of 12,942 (Table 25-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would reduce harvest opportunity in the sport fishery and increase regulatory complexity, in addition to adding unenforceable regulatory language. The department has the authority to restrict bag limits inseason by emergency order and the department exercised this authority in 2022 on the Naknek River king salmon sport fishery.

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

Table 25-1.–Guided Naknek River effort in number of anglers and king salmon harvest and catch, 2007–2016.

		King salmon	
Year	Anglers	Harvest	Catch
2007	3,815	896	1,738
2008	3,738	741	1,623
2009	3,585	660	1,196
2010	2,595	435	1,228
2011	3,515	608	1,407
2012	3,547	795	1,438
2013	3,895	768	1,310
2014	3,819	642	1,374
2015	4,012	622	1,871
2016	4,198	898	1,802
Average			
2007–2016	3,672	707	1,499
2012–2016	3,894	745	1,559

Source: Freshwater Logbook Program

Note: Effort, harvest and catch numbers from Naknek River and tributaries including Naknek Lake.

Table 25-2.–Naknek River drainage effort in angler days and king salmon harvest and catch, 2011–2021.

		King salmon	
Year	Effort	Harvest	Catch
2012	12,704	2,288	5,731
2013	12,723	1,242	2,875
2014	16,202	1,071	3,698
2015	14,621	1,096	3,770
2016	15,813	2,070	8,758
2017	14,851	2,073	4,422
2018	14,279	2,029	6,434
2019	13,973	1,192	7,898
2020	7,850	686	1,960
2021	13,756	723	1,846
Average			
2012–2021	13,677	1,447	4,739
2017–2021	12,942	1,341	4,512

Source: SWHS. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Note: Effort, harvest and catch numbers from Naknek River drainage excluding American Creek and Brooks River.

PROPOSAL 26 – Close tributaries and upper section of the Naknek River to sport fishing for king salmon.

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

PROPOSED BY: Karl Anderson.

WHAT WOULD THE PROPOSAL DO? The following sections of the Naknek River drainage would be closed to fishing for king salmon year round: the waters of the Naknek River from "Painter Bob's Cabin" upstream to the ADF&G marker at Trefon's Cabin near the mouth of Naknek Lake; all waters of Big Creek upstream of its confluence with the Naknek River; all waters of King Salmon Creek upstream from the ADF&G markers at the confluence of the Naknek River; and all waters of Paul's Creek upstream of its confluence with the Naknek River (Figure 26-1).

WHAT ARE THE CURRENT REGULATIONS? Sport fishing for king salmon in the Naknek River mainstem is open from May 1 to July 31. Upstream from ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, king salmon fishing is closed year-round. King Salmon Creek and Paul's Creek from an ADF&G regulatory marker located at each creek's confluence with the Naknek River upstream to the upstream side of the Alaska Peninsula Highway bridges are closed to sport fishing from June 1 to July 31. Upstream of the Alaska Peninsula Highway bridges, sport fishing for king salmon is closed year-round. There is catch-and-release only of king salmon in all waters of Big Creek upstream of its confluence with the Naknek River from May 1 to July 31. The bag and possession limit for king salmon 20 inches or longer is three fish, of which only one may be 28 inches or longer, with an annual limit of five fish. For king salmon less than 20 inches in length, the bag and possession limit is 10 fish, with no annual limit. Sport fishing for salmon, other than king salmon, in the Naknek River (including Big Creek) is open the entire year with a bag and possession limit of five fish. Downstream of an ADF&G marker located at Rapids Camp (including Big Creek), gear is limited to unbaited, artificial lures only from March 1 to November 14 and upstream of an ADF&G marker located at Rapids Camp, gear is limited to unbaited, single-hook, artificial lures only.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All sport fishing opportunity for king salmon in portions of the Naknek River drainage would be eliminated and king salmon sport fishing regulations and enforcement would be complicated by adding additional closed sections to the waters of the Naknek River drainage. This may also decrease the harvest and catch-and-release mortalities of king salmon by an unknown number. This may shift effort to the sections that remain open to sport fishing for king salmon, but overall harvest would not likely increase.

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

From 2001 to 2012, Big Creek supported a catch-and-release king salmon sport fishery and prior to 2001 harvest was allowed. The Big Creek drainage was closed to sport fishing for king salmon beginning in 2013. The Naknek River within a one-quarter mile of the confluence with Big Creek was included in the 2013 closure to protect king salmon staging to ascend Big Creek. However, based on a lack of suitable holding water, fish do not appear to hold in this section of the Naknek River. Additionally, the closure included the entire width of the Naknek River, requiring anglers to remove their lines from the water while drift fishing through this section of river. Big Creek was reopened to catch-and-release sport fishing in 2015 and the boundary prohibiting harvest was changed to resolve the above-mentioned issue of prohibiting drift fishing in the main Naknek River channel. In 2019, that portion of the Naknek River from ADF&G regulatory marker at Rapids Camp upstream to the ADF&G regulatory marker at Trefon's cabin was closed to sport fishing for king salmon year-round.

From 2007 through 2012, the annual guided sport catch of king salmon in Big Creek averaged 82 fish (Table 26-1). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as an approximal reference (6.6%, based on the Nushagak King Salmon Catch and Release Mortality Project results), the average annual mortality in the guided sport fishery would be approximately five king salmon. The Big Creek drainage was reopened to catch-and-release sport fishing for king salmon after the December 2015 board meeting and the preliminary annual guided sport catch of king salmon from 2016 to 2017 averaged 252 fish (calculated from Table 26-1). Using the estimated catch-and-release mortality for king salmon in the Nushagak River as above, the average annual mortality in the guided sport fishery would be approximately 17 king salmon.

Based on freshwater logbook data, guided sport fishing effort in the upper Naknek River has been increasing slightly since 2007, ranging from a low of 1,809 angler-days in 2010 to a high of 2,827 angler-days in 2015 and averaging 2,587 angler-days from 2012 to 2016 (Table 26-2). Based on the SWHS data, total sport fishing effort in the Naknek River drainage has been relatively steady since peaks in the late 1990s and early 2000s, ranging from a low of 7,850 angler days in 2020 to a high of 22,529 angler-days in 2000 and averaging 13,349 angler-days from 2016 to 2020 (Table 21-2).

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

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

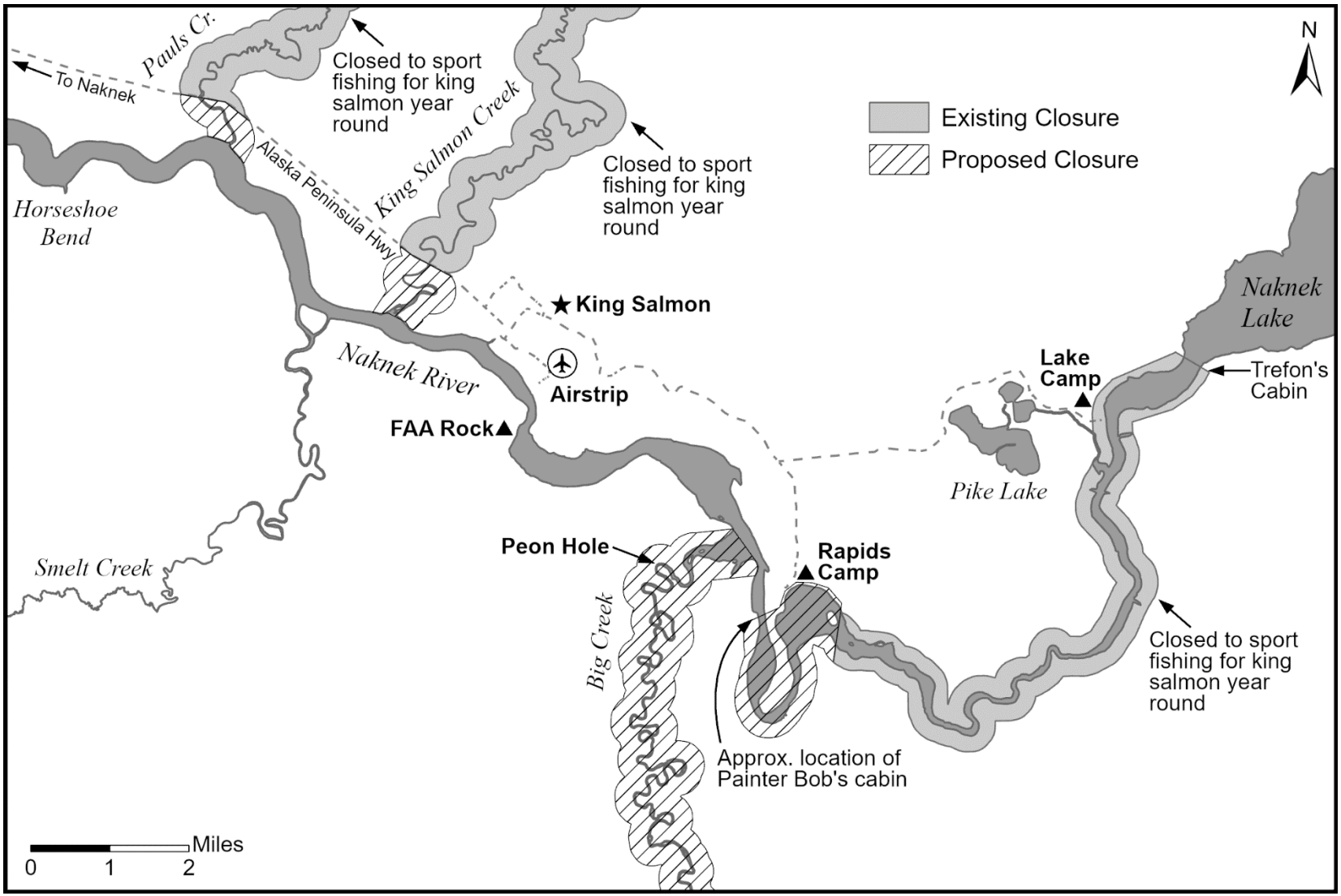

Figure 26-1.–Upper Naknek River drainage with existing and proposed closure areas.

Table 26-1.–Guided sport fishing effort (trips) and guided sport catch of king salmon from Big Creek, 2007–2017.

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

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

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

[c] 2017 data are preliminary.

Table 26-2.–Guided effort in angler-days, and king salmon harvest and catch in the Naknek River drainage from the ADF&G marker at Rapids Camp to the ADF&G marker at Trefon's Cabin at the mouth of Naknek Lake, 2007–2017.

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

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

[a] 2017 data are preliminary.

PROPOSAL 27 – Create a nonresident annual limit for coho salmon in the Naknek River drainage.

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

PROPOSED BY: Naknek Kvichak Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Establish an annual limit of 15 coho salmon for nonresident anglers in the Naknek River drainage.

WHAT ARE THE CURRENT REGULATIONS? Under general regulations for Bristol Bay, the bag and possession limit for coho salmon is five fish. Under special regulations for the Naknek River drainage, in all flowing waters from March 1 to November 14 only unbaited, artificial lures or flies may be used. In all flowing waters upstream from an ADF&G regulatory marker located one-half mile upstream of Rapids Camp, including all waters within one-quarter mile of all lake inlet and outlet streams, only unbaited, single-hook, artificial lures or flies may be used year-round. Upstream from ADF&G markers located one-half mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake from March 1 to April 9 and from June 8 to July 31 only unbaited, single-hook artificial lures or flies with a gap between the point and shank of one-half inch or less are allowed. For the remainder of the year, only unbaited, single-hook, artificial lures or flies may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There may be an unknown decrease in harvest of coho salmon in the Naknek River drainage as well as a potential increase in the catch-and-release of coho salmon.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the Naknek River drainage, 2007–2016 has ranged from a high of 4,198 anglers in 2016 to a low of 2,595 anglers in 2010 with an average of 3,672 anglers per year. Guided coho salmon catch in the Naknek River drainage, 2007–2016 has ranged from a high of 4,500 in 2008 to a low of 1,688 in 2010 with an average of 2,661 fish (Table 27-1). Guided angler harvest of coho salmon during this period has ranged from a high of 3,081 in 2008 to a low of 960 in 2010 with an average of 2,022 fish (Table 27-1).

Based on the SWHS the estimated nonresident coho salmon sport catch from 2017 to 2021 has ranged from a high of 11,740 in 2017 to a low of 2,311 in 2020 with an average of 5,414 fish from the Naknek River drainage (Table 27-2). The nonresident sport harvest of coho salmon from 2017 to 2021 has ranged from a high of 5,548 in 2017 to a low of 1,176 in 2020 with an average of 2,853 (Table 27-2). Nonresident angler effort for the Naknek River drainage has been stable since 2012 from a high of 10,882 in 2016 to a low of 5,995 in 2020 with a recent 5-year average of 9,001 angler-days (Table 27-2). Resident effort, catch, and harvest of coho salmon have been fairly stable in recent years and make up an estimated average of 29 percent, 18 percent, and 21 percent of respective totals (Table 27-2).

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

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

Table 27-1.–Guided Naknek River effort in number of anglers and coho salmon harvest and catch 2007–2016.

	Anglers			Coho salmon	
Year	Resident	Nonresident	Total [a]	Harvest	Catch
2007	NA	NA	3,815	1,891	2,464
2008	237	3,476	3,738	3,081	4,500
2009	240	3,294	3,585	2,125	2,928
2010	195	2,385	2,595	960	1,688
2011	246	3,243	3,515	1,900	2,646
2012	329	3,209	3,547	1,819	2,278
2013	355	3,473	3,895	2,006	2,297
2014	330	3,438	3,819	2,657	3,325
2015	370	3,502	4,012	2,033	2,478
2016	341	3,782	4,198	1,747	2,008
Average					
2007–2016	294	3,311	3,672	2,022	2,661
2012–2016	345	3,481	3,894	2,052	2,477

Source: Freshwater Logbook Program

Note: Effort, harvest and catch numbers from Naknek River and Tributaries including Naknek Lake.

[a] Total does not equal sum of resident and non-resident because it also contains comped and unknown categories

Table 27-2.–Naknek River drainage effort, harvest and catch of coho salmon by residency.

Year	Resident effort (angler-days)	Nonresident effort (angler-days)	Total effort (angler-days)	Resident harvest	Nonresident harvest	Total harvest	Resident catch	Nonresident catch	Total catch
2012	2,835	9,869	12,704	249	2,990	3,239	317	6,113	6,430
2013	5,478	7,245	12,723	461	2,308	2,769	639	2,865	3,504
2014	6,731	9,475	16,206	2,006	4,037	6,043	3,278	7,034	10,312
2015	5,525	9,096	14,621	853	3,258	4,111	1,083	6,348	7,431
2016	4,228	10,882	15,110	1,066	2,170	3,236	1,296	4,152	5,448
2017	5,082	9,769	14,851	263	5,548	5,811	441	11,740	12,181
2018	4,574	8,672	13,246	1,447	3,650	5,097	2,583	7,230	9,813
2019	3,654	9,739	13,393	1,488	1,765	3,253	2,169	2,572	4,741
2020	1,855	5,995	7,850	442	1,176	1,618	456	2,311	2,767
2021	2,928	10,828	13,756	203	2,126	2,329	317	3,218	3,535
2017–2021									
Average	3,619	9,001	12,619	769	2,853	3,622	1,193	5,414	6,607
Percent	29%	71%	100%	21%	79%	100%	18%	82%	100%

Source: SWHS. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Note: Effort, harvest and catch numbers from Naknek River drainage excluding American Creek and Brooks River.

PROPOSAL 28 – Close the Nushagak, Mulchatna and Nuyakuk River drainages to sport fishing for king salmon.

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

PROPOSED BY: Nanci Morris Lyon.

WHAT WOULD THE PROPOSAL DO? Close portions of the Nushagak River drainage and the entire Mulchatna and Nuyakuk River drainages to sport fishing for king salmon.

WHAT ARE THE CURRENT REGULATIONS? Under general regulations for Bristol Bay, the king salmon season is open from May 1 to July 31. There is an annual limit of five king salmon 20 inches or longer in Bristol Bay salt and fresh waters. Of these five king salmon, no more than four may be harvested from the Nushagak–Mulchatna River drainages. All harvested king salmon 20 inches or longer must be recorded. For king salmon less than 20 inches, there is a bag and possession limit of five fish. Any king salmon removed from the water must be retained. Under special regulations for the Nushagak–Mulchatna River drainages from May 1 to July 31, only one single-hook lure or fly or one single hook may be used. The use of bait is allowed. In waters of the Nushagak–Mulchatna River drainages open to fishing for king salmon, for fish 20 inches or longer, the bag and possession limit is two fish, only one over 28 inches. After taking a bag limit of king salmon 20 inches or longer from the Nushagak–Mulchatna River drainage, only unbaited, single-hook, artificial lures or flies may be used in the Nushagak–Mulchatna River drainage for the remainder of the day. From upstream on Nushagak River from the confluence of the Iowitha River to Harris Creek, including the Iowithla River, from May 1 to July 24 is open to sport fishing for king salmon. Upstream from its confluence with Harris Creek is closed year-round to sport fishing for king salmon with bait prohibited, only unbaited single hook, artificial lures may be used year-round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in an unknown decrease in effort and catch while prohibiting the targeting of king salmon in the sport fishery in affected portions of the Nushagak–Mulchatna River drainage.

BACKGROUND: The department recommended that the Nushagak River king salmon stock be identified as a stock of management concern at the October 2022 work session and is developing an action plan for this stock. The action plan will provide the board potential management actions for the Nushagak king salmon stock and suggested recommendations for delisting the stock of management actions. Based on freshwater logbook data, guided sport fishing effort in the Nushagak River drainage above the confluence of the Mulchatna River from 2007 to 2016 has ranged from a high of 1,008 anglers in 2007 to a low of 286 anglers in 2009 with an average of 689 anglers (Table 28-1). Guided catch and harvest during this period ranged from highs of 126 and 41 in 2007 and 2012, respectively, to lows of five and one in 2013 and 2011, respectively, with averages of 65 and 14 fish, respectively (Table 28-1).

Effort by guided anglers in the Mulchatna River drainage from 2007 to 2016 has ranged from a high of 949 anglers in 2015 to a low of 96 anglers in 2010 with an average of 456 anglers (Table

28-1). Guided catch and harvest during this period ranged from highs of 2,004 and 615 in 2015 and 2016, respectively, to lows of 12 and zero, both in 2010, with averages of 773 and 182 fish, respectively (Table 28-1).

Effort by guided anglers in the Nuyakuk River drainage from 2007 to 2016 has ranged from a high of 392 anglers in 2010 to a low of 219 anglers in 2007 with an average of 308 anglers. Guided catch and harvest during this period ranged from highs of 124 and 15 in 2016 and 2009, respectively, to lows of zero in 2007 for both. Most years have no harvest, and the 2007–2016 catch and harvest averaged 46 and two fish, respectively (Table 28-1).

Based on the statewide harvest survey (SWHS), the estimated effort by guided and unguided anglers from 2017 to 2021 in the Nushagak River above its confluence with the Mulchatna River has ranged from a high of 1,366 in 2018 to a low of 716 in 2019 with an average of 958 angler-days (Table 28-2). The sport catch and harvest of king salmon from 2017 to 2021 has ranged from highs of 1,294 and 404 in 2018 and 2017, respectively, to lows of 576 and 37, respectively in 2019, with averages of 981 and 300 fish, respectively (Table 28-2).

The estimated effort by guided and unguided anglers from 2017 to 2021 in the Mulchatna River drainage has ranged from a high of 4,595 in 2019 to a low of 801 in 2021 with an average of 1,976 angler-days (Table 28-2). The sport catch and harvest of king salmon from 2017 to 2021 has ranged from highs of 940 and 250 fish in 2018 to lows of 304 and 87 fish in 2017 and 2021, respectively, with averages of 531 and 136 fish, respectively (Table 28-2).

The estimated effort by guided and unguided anglers from 2017 to 2021 in the Nuyakuk River drainage has ranged from a high of 3,052 in 2018 to a low of 342 in 2020 with an average of 1,917 angler-days (Table 28-2). The sport catch and harvest of king salmon from 2017 to 2021 has ranged from highs of 1,342 and 164 in 2018 to lows of both zero in 2020 (and other years as well) with averages of 514 and 71 fish, respectively (Table 28-2).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would increase regulatory complexity and reduce sport fishing opportunity for king salmon with little apparent conservation benefit. A conservative spawning season closure of July 24 exists for these drainages to protect spawning king salmon. The department has the authority to restrict bag limits inseason by emergency order and the department exercised this authority in 2022 on the Nushagak River king salmon sport fishery.

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

Table 28-1.–Guided Upper Nushagak River drainage, Mulchatna River drainage, and Nuyakuk River drainage effort in number of anglers and king salmon harvest and catch, 2007–2016.

	Upper Nushagak [a]			Mulchatna			Nuyakuk		
Year	Anglers	Harvest	Catch	Anglers	Harvest	Catch	Anglers	Harvest	Catch
2007	1,008	6	126	374	12	349	219	0	0
2008	492	19	60	260	50	268	351	0	5
2009	286	38	97	112	13	66	276	15	53
2010	779	19	61	96	0	12	392	0	8
2011	731	1	34	185	12	83	249	0	32
2012	582	41	74	288	23	119	351	0	27
2013	634	1	5	650	316	1,184	334	0	46
2014	783	9	40	755	503	1,979	325	0	87
2015	818	5	100	949	274	2,004	315	6	80
2016	776	3	53	892	615	1,665	269	1	124
Average									
2007–2016	689	14	65	456	182	773	308	2	46
2012–2016	719	12	54	707	346	1,390	319	1	73

Source: Freshwater Logbook Program

[a] Effort, harvest, and catch numbers from the Nushagak River and tributaries upstream of confluence with the Mulchatna River excluding the Nuyakuk River drainage.

Table 28-2.–Total Upper Nushagak River, Mulchatna River, Nuyakuk River effort in angler-days and king salmon harvest and catch, 2007–2021.

	Upper Nushagak[a]			Mulchatna			Nuyakuk		
Year	Effort	Harvest	Catch	Effort	Harvest	Catch	Effort	Harvest	Catch
2007	1,802	438	1,917	3,084	287	1,876	2,145	170	1,758
2008	1,399	202	443	1,524	91	438	2,070	104	272
2009	1,739	82	284	1,157	58	756	1,419	0	0
2010	967	123	364	879	0	118	1,278	64	255
2011	955	90	243	1,548	82	1,477	4,255	50	703
2012	1,477	194	646	1,573	351	1,405	1,353	304	2,097
2013	1,743	289	1,219	1,415	236	997	1,485	117	350
2014	3,019	353	1,043	1,338	337	1,032	2,958	125	660
2015	1,987	394	2,266	2,949	138	854	1,624	108	108
2016	3,315	106	330	1,169	83	440	636	0	0
2017	930	404	1,071	1,806	95	304	3,030	82	224
2018	1,366	369	1,294	1,841	250	940	3,052	164	1,342
2019	716	37	576	4,595	140	356	1,283	111	914
2020	NA	NA	NA	837	107	404	342	0	0
2021	818	391	981	801	87	651	1876	0	91
Average									
2007–2021	1,588	248	906	1,768	156	803	1,920	93	585
2017–2021	958	300	981	1,976	136	531	1,917	71	514

Source: SWHS. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/..

[a] Effort, harvest, and catch numbers from the Nushagak River and tributaries upstream of confluence with the Mulchatna River excluding the Nuyakuk River drainage.

PROPOSAL 29 – Restrict the Togiak River king salmon sport fishery until a minimum king salmon commercial harvest is achieved.

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

PROPOSED BY: Jimmy Coopchiak.

WHAT WOULD THE PROPOSAL DO? Establish a trigger point of 2,000 king salmon harvested in the Togiak District commercial salmon fishery before general regulations would apply in the Togiak River king salmon sport fishery. Prior to the harvest of 2,000 king salmon in the commercial fishery, the sport fishery would be limited to a bag and possession limit of five king salmon 20 inches or less and only barbless, unbaited, single-hook artificial lures could be used during that time. All king salmon greater than 20 inches in length must be released during this time.

WHAT ARE THE CURRENT REGULATIONS? The Togiak River king salmon sport fishery falls under general regulations for the Bristol Bay Area. The king salmon season is open from May 1 to July 31. There is an annual limit of five king salmon over 20 inches, with harvest record required. In fresh waters, there is a bag and possession for king salmon over 20 inches in length of three fish, only one of which may be over 28 inches in length. For king salmon under 20 inches, the bag and possession limit is 10 fish. Any king salmon removed from the water must be retained.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Effort, catch, and harvest for king salmon in the Togiak River sport fishery would decrease by an unknown amount. The opening date for the king salmon sport fishery under general regulations would be different from season to season, creating an unpredictable fishery that would likely fail to open in some years. This proposal would increase regulatory and enforcement complexity with unknown and likely minimal biological benefit.

BACKGROUND: Based on freshwater logbook data, guided sport fishing effort in the Togiak River drainage from 2007 to 2016 has ranged from a high of 2,145 anglers in 2007 to a low of 856 anglers in 2010 with an average of 1,561 anglers per year (Table 29-1). Guided king salmon catch in the Togiak River drainage from 2007 to 2016 has ranged from a high of 8,323 in 2007 to a low of 1,896 in 2008 with an average of 3,746 fish (Table 29-1). Guided angler harvest during this period has ranged from a high of 1,076 in 2007 to a low of 455 in 2011 with an average of 638 fish. (Table 29-1).

Based on the statewide harvest survey (SWHS), the estimated king salmon sport catch from 2017 to 2021 has ranged from a high of 5,320 in 2017 to a low of 2,341 in 2021 with an average of 3,770 fish from the Togiak River drainage (Table 29-2). The sport harvest of king salmon from 2017 to 2021 has ranged from a high of 1,617 in 2019 to a low of 425 in 2020 with an average of 899 (Table 29-2). Angler effort for the Togiak River drainage has been stable from a high of 4,960 in 2017 to a low of 2,155 in 2020 with a recent 5-year average of 3,559 angler-days (Table 48-2).

Over the past decade, the commercial catch of king salmon in the Togiak District did not exceed 2,000 fish in 2014, 2020, 2021. The commercial catch exceeded 2,000 fish in 2011, 2012, 2013, 2015, 2016, 2017, 2018, 2019, and the sport fishery for king salmon on the Togiak River would

have been opened on June 30, July 5, July 10, July 8, July 6, July 8, July 11, and July 6, respectively (Table 29-3).

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This would reduce opportunity in the sport fishery and increase regulatory complexity. The department has the authority to restrict bag limits in season by emergency order and the department exercised this authority in 2022 on the Togiak River king salmon sport fishery. The department is **NEUTRAL** on the allocative aspects of this proposal.

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

Table 29-1.–Guided Togiak River drainage effort in number of anglers and king salmon harvest and catch, 2007–2016.

		King salmon	
Year	Anglers	Harvest	Catch
2007	2,145	1,076	8,323
2008	1,787	685	1,896
2009	1,224	539	4,242
2010	856	477	2,505
2011	1,092	455	2,935
2012	1,508	521	2,661
2013	1,510	543	2,753
2014	1,999	841	2,292
2015	1,603	515	4,048
2016	1,889	728	5,808
Average			
2007–2016	1,561	638	3,746
2012–2016	1,702	630	3,512

Source: Freshwater Logbook Program

Table 29-2.–Total Togiak effort in angler-days and king salmon harvest and catch, 2007–2021.

		King salmon	
Year	Effort	Harvest	Catch
2007	5,218	1,501	8,319
2008	4,944	892	2,453
2009	3,638	606	4,765
2010	3,638	591	5,213
2011	4,326	1,438	9,096
2012	9,526	859	6,719
2013	3,170	900	6,392
2014	8,098	2,166	10,617
2015	4,129	983	5,620
2016	3,159	787	5,405
2017	4,960	978	5,320
2018	3,803	641	4,014
2019	3,188	1,617	4,495
2020	2,155	425	2,679
2021	3,688	836	2,341
Average			
2007–2021	4,509	1,015	5,563
2017–2021	3,559	899	3,770

Source: SWHS. Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish http://www.adfg.alaska.gov/sf/sportfishingsurvey/.

Table 29-3.–Togiak District commercial king salmon harvest with the date that 2,000 fish were harvested for applicable years, 2011–2021.

Year	Total harvest	Date 2,000 harvest achieved
2011	6,657	6/30
2012	4,661	7/5
2013	2,700	7/10
2014	1,466	NA
2015	2,883	7/8
2016	3,329	7/6
2017	3,923	7/8
2018	3,457	7/11
2019	3,568	7/6
2020	767	–[a]
Average 2016–2020	3,009	
2021	727	–[a]

[a] Harvest of 2,000 king salmon in the commercial fishery not achieved.

Miscellaneous Sport (1 proposal)

PROPOSAL 30 – Create a youth-only sport fishery in the Naknek River drainage.

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

PROPOSED BY: Patricia Edel.

WHAT WOULD THE PROPOSAL DO? Establish a youth fishery zone on the Naknek River drainage from Smelt Creek to the ADF&G Counting Towers upstream of Rapids Camp on the second Sunday of each month from June through September. During the four youth fishing days, individuals 16 years of age and older would not be permitted to fish unless assisting youth, and guiding within this area would be prohibited.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no youth fishery zones in the Naknek River drainage.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow one day per month for youth, 15 years of age or younger, to fish without competition from adult anglers. This may allow youth a greater chance to catch fish on the Naknek River. It would also decrease the area in which adult anglers can fish for a total of four days per year. The creation of a youth fishery is not anticipated to increase harvest rates in the Naknek River drainage. Creating a youth fishery would add complexity to the regulations.

BACKGROUND: The Naknek River is located in eastern Bristol Bay and is the second most popular fishery in the area, hosting an estimated 13,349 angler-days on average annually from 2016 to 2020.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. There are no sustainability issues with the proposed youth fishery. The department is supportive of establishing youth fisheries around the state.

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

King Salmon Harvest Reporting (2 proposals)

PROPOSALS 31 and 32 – Require reporting of king salmon harvest in guided sport fisheries and commercial fisheries in Bristol Bay.

5 AAC 06.377. Reporting requirements.

PROPOSED BY: Brian Kraft, Bristol Bay Sport Fishing Association.

WHAT WOULD THE PROPOSALS DO? These would require all guided sport fishing operators to report all king salmon retained by size category daily and at the end of the season. It would also require all individual set and drift commercial permit holders in Bristol Bay to keep daily logs of king salmon retained, except in directed king salmon commercial openings.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 39.130 gives the department broad authority to require any information from processors regarding harvest that the department deems necessary. Currently, processors are required to submit daily reports with harvest by species, weekly reports with completed fish tickets and harvest by species, and final operations reports with harvest by species for each district. In the Nushagak District processors are also required to submit production data for king salmon that includes the number of king salmon reported on fish tickets and the total number of king salmon based on production. There is no requirement to report fish by size category.

In addition, 5 AAC 06.377 (b) Reporting Requirements, requires all king and coho salmon kept but not sold be reported on an ADF&G fish ticket at time of landing**,** and 5 AAC 67.020 (1)(A)(i) requires all anglers to obtain and complete a harvest record for sport caught king salmon as specified in 5 AAC 75.006.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? The commercial fishery requirements of these proposals would add a burden to users and the department with no fishery management benefit because the requirement to report harvest already exists. The sport fishery provisions would require the department to develop a new inseason reporting program specific to the Nushagak River drainage. These would also increase regulatory and enforcement complexity in the sport fishery. Finally, sport fishery catch and harvest information would help in commercial fishery management decision making, supplemental to data from other sources such as the sonar count or subsistence harvest permits.

BACKGROUND: In Bristol Bay commercial fisheries, king salmon are supposed to be sorted from other species at the time of delivery to processors, but due in part to the volume of fish being delivered, this is not consistently done. This is especially true for king salmon that are close in size to sockeye and chum salmon. The department has recently started requiring processors that buy salmon in the Nushagak District to provide production data on king salmon to better understand the actual commercial harvest. Fish kept for personal use are required by regulation to be reported on commercial fish tickets.

The Freshwater Sport Fish Guide Logbook program ran from 2006 through 2018 and was discontinued by the department after 2018. This program required logging of various fishery related information including effort, species harvested and released by all commercial sport fishing operators and included legal penalties for noncompliance. Data from freshwater logbooks were

not available inseason. In 5 AAC 67.020 (1)(A)(i), recording of king salmon over 20 inches in length is required for all sport fishing anglers harvesting king salmon in Bristol Bay.

DEPARTMENT COMMENTS: The department **OPPOSES** these proposals. Reporting requirements in the commercial fishery are generally regarded as sufficient and the additional requirements proposed are likely impractical and not beneficial to managers. The Freshwater Sport Fish Logbook Program that provided reporting similar to that described in the proposal was discontinued by the department in 2018.

COST ANALYSIS: Approval of these proposals is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of these proposals may result in an additional cost to the department to develop and implement an additional reporting program for Nushagak–Mulchatna king salmon.

COMMITTEE OF THE WHOLE–GROUP 3: COMMERCIAL SALMON, COMMERCIAL HERRING (30 PROPOSALS)

Gear Specifications and Operations; Vessel Specifications and Operations (15 proposals)

PROPOSAL 33 – Increase maximum offshore operation distance for set gillnets in Ugashik District.

5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: Ugashik Village Set Netters.

WHAT WOULD THE PROPOSAL DO? This would increase the offshore distance that set gillnets can be operated from the 18-foot-high water mark, from 600 to 800 feet. This would only apply to waters of statistical area 321-50 (Ugashik Village).

WHAT ARE THE CURRENT REGULATIONS? Currently, in the waters of the Ugashik River as defined in 5 AAC 06.331 (m)(8), set gillnets must be operated within 600 feet of the 18-foot high water mark.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow set gillnets to be operated further offshore in waters of statistical area 321-50. This could allow those operators to effectively fish a larger portion of tide when the fishing period encompasses the entire cycle.

BACKGROUND: The waters in front of Ugashik Village are within the Ugashik River and are separated from the main portion of the Ugashik District. This is a traditional fishing area for those permit holders residing in the area, with 11 actively fished sites in 2022. Historically (through 2012), set gillnets here were allowed to operate within 1,000 feet from the 18-foot-high water mark. However, in July of 2011, the U.S. Coast Guard (USCG) found the entire 1,000-foot distance allowed by state regulation blocked the river enough to constitute an obstruction to navigation at nearly every tidal stage The distance was therefore adjusted to 600 feet at the 2012 board meeting, where it has remained since.

Over the past few seasons, the shoreline along the village where the fishing sites are located has been filling in with sediment. This has reduced the fishable area to far less than the 600 feet in regulation. With the changing river conditions since 2012, it is unclear whether the 800-foot distance now proposed would comply with USCG navigation regulations. The proposal authors cite the board finding "Criteria for Board Deliberation on Commercial Set Gillnet Proposals Impacted by Coastal Erosion" (2016-238-FB) to support their proposal.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If adopted, this will not impact management of the fishery.

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

PROPOSAL 34 - Increase minimum distance between units of drift and set gillnet gear in the Ugashik District.

5 AAC 06.335. Minimum distance between units of gear.

PROPOSED BY: Gust Sonny Griechen.

WHAT WOULD THE PROPOSAL DO? This would prohibit the operation of drift gillnet gear within 1,000 feet of the 18-foot high water mark in all waters of the Ugashik District. Additionally, drift gillnets would not be allowed to block the navigable waters of Dago Creek, which flows into the Ugashik District.

WHAT ARE THE CURRENT REGULATIONS? Currently, drift gillnets are allowed to be operated anywhere within the Ugashik District except that 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). In addition, the current closed waters of Dago Creek are set out in 5 AAC 06.350(d)(2). Also, there are no regulations stipulating that a drift gillnet cannot obstruct a stream and any channel or side channel of a stream.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would exclude drift gillnet fishermen from fishing locations they are currently allowed to fish. This could reduce the drift gillnet harvest and have allocation implications. They would not be able to operate near the shorelines of the entire district regardless of whether a set gillnet is present or not. However, this could decrease crowding and gear conflicts in the areas where set gillnets are present. Restricting the area open to drift gillnets around Dago Creek could allow other vessels to transit through the area more easily during commercial fishery openers.

BACKGROUND: In the Ugashik District, set gillnet operations are predominantly located along the eastern shore of Ugashik Bay, with little to no setnet effort occurring along the western shore of the bay and along the outside coastal portions of the district (Figure 34-1). Occasionally, there is conflict between the two gear groups. Drift gillnet operators regularly deploy gear close to set gillnet gear and may tangle with the set gillnet. In some instances, set gillnet operators may lose their offshore anchor and running line, making their site unfishable. At many sites, set gillnet operators need to set their offshore anchor and running line early in the spring on a large minus tide. Damage to this equipment from drift gillnet gear may result in significant lost fishing time.

Dago Creek serves as an anchorage for vessels in between fishing periods or to ride out storms during the season. It is also one of the only places in the district that vessels may utilize as an access point to land-based facilities and supplies and is used by set gillnetters to deliver to tenders.

DEPARTMENT COMMENTS: The department **OPPOSES** the portion of this proposal that would prohibit drift gillnet gear from operating along the shorelines of the entire district. This would decrease the department's ability to control escapements and manage for allocation. Also, it would be difficult for drift gillnet operators to determine the 18-foot high-water mark, let alone their distance from it, while on the water and especially at night. The department urges the board to seek guidance from the Alaska Wildlife Troopers when deliberating this proposal. The department is **NEUTRAL** on the remaining portion of this proposal and the allocation implications.

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

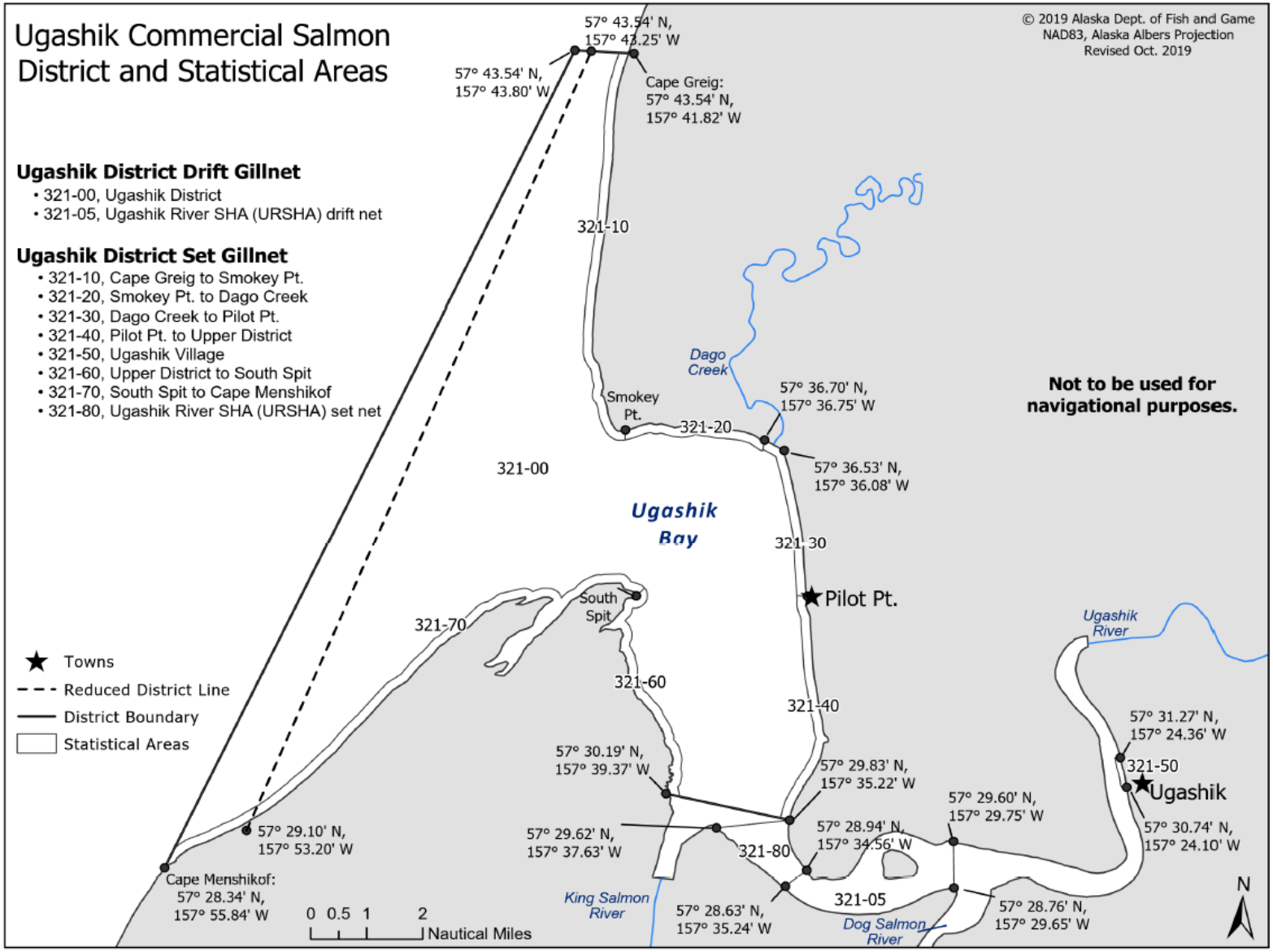

Figure 34-1.–Ugashik Commercial Salmon District and Statistical Areas, Bristol Bay.

PROPOSAL 35 – Increase minimum distance between units of set and drift gillnet gear.

5 AAC 06.335. Minimum distance between units of gear.

PROPOSED BY: Lower Bristol Bay Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would increase the minimum distance between the offshore end of a set gillnet and any part of a drift gillnet to 300 feet.

WHAT ARE THE CURRENT REGULATIONS? Currently, 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).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The increase in minimum distance between gear types, would decrease crowding and gear conflicts. Additionally, this would reduce available fishing area and potentially reduce harvest for drift gillnet gear.

BACKGROUND: Occasionally there is conflict between the two gear groups. Drift gillnet operators regularly deploy gear close to set gillnet gear and may tangle with the set gillnet. In some instances, set gillnet operators may lose their offshore anchor and running line, making their site unfishable. At many sites, set gillnet operators need to set their offshore anchor and running line early in the spring on a large minus tide. Damage to this equipment from drift gillnet gear may result in significant lost fishing time. By the same token, set gillnet operators sometimes put buoys out beyond where they effectively fish, which can have the effect of keeping drift gillnet operators away from their nets.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department urges the board to seek guidance from the Alaska Wildlife Troopers when deliberating this proposal.

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

PROPOSALS 36, 37, and 38 – Limit the length of drift gillnet towlines to 100 feet.

5 AAC 06.331 Gillnet specification and operations.

PROPOSED BY: Alexus Kwachka (Proposal 36), Erik Velsko (Proposal 37), and Timothy Gervais (Proposal 38).

WHAT WOULD THE PROPOSALS DO? Proposals 36 and 37 would establish a maximum length of 100 feet for a drift gillnet tow line, whereas Proposal 38 would set the maximum length at 25 fathoms (150 feet).

WHAT ARE THE CURRENT REGULATIONS? There are no established length restrictions for drift gillnet tow lines.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? Because there would be a newly established maximum length, it is unclear how exactly this would affect the fishery. If the new maximum length made shallow water access more difficult for drift gillnetters, this could reduce the drift gillnet harvest and benefit set gillnet permit holders, which predominantly operate in the shallower portions of the district. Making access more difficult for the drift gillnet fleet could also make it more difficult for the department to control escapements at times of high abundance.

BACKGROUND: Over the last decade, there has been a shift to manufacturing new drift gillnet vessels that can operate in shallower water. With this ability, vessels are deploying their drift gillnet in shallow areas or along the beach and then using a long tow line to tow the net out to deeper water with the falling tide. This allows the drift gillnet to remain submerged and fishing in shallow water, where sockeye salmon migrate once they enter the districts, while the vessel remains in deeper water to avoid grounding. Another purpose of tow lines is to further separate the vessel from the net during adverse weather conditions. Extremely long tow lines pose a navigational hazard, since it is difficult for other transiting vessels to determine where the gillnet is in relation to the vessel operating it.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on these allocative proposals.

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

PROPOSAL 39 – Prohibit placement of set gillnet gear on the shore fishery lease site of another set gillnet permit holder.

5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: Christopher John Erpelding.

WHAT WOULD THE PROPOSAL DO? This would prohibit other permit holders from installing an anchor, running line, or net within the boundaries of a shore lease site when the lessee is actively fishing that site.

WHAT ARE THE CURRENT REGULATIONS? When lessees are actively fishing at their established lease site, there are no fishery regulations that prohibit anchors, running lines, or gillnets from being operated there by another permit holder. However, there is a provision that prevents set gillnets from operating less than 300 feet from another set gillnet in the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts. In the Nushagak District, set gillnets must be operated at least 450 feet apart from one another.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the lease holder is present and actively fishing their shore lease site, this would restrict other permit holders from operating any part of their gear within the boundaries of that site. This could decrease crowding and possible conflicts amongst set gillnet operators.

BACKGROUND: Shore leases give an individual priority to a fish specific site within a commercial fishing district. However, when the lease holder is not present or fishing that site, it is handled on a first come, first served basis. If a lease holder does intend to fish and there is another individual fishing that site, then the lease holder can provide verbally or in writing their intent to fish and the other person is obligated to remove their nets from the area (11 AAC 64.020). There are approximately 210 leased sites in the Egegik District, with the majority of those located along the north shore of the district.

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

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

PROPOSAL 40 – Increase area available to set gillnet fishermen in the Graveyard Point area.

5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: Joe Echo-Hawk, Nathan Rispler, Reid Ten Kley, Alec Capps.

WHAT WOULD THE PROPOSAL DO? This would increase the area (approximately 1 mile) where set gillnets can be more than 1,000 feet from the 18-foot-high tide mark if the web of the shoreward end of the set gillnet is dry at the time of the opening. The area would be on the west side of Kvichak Bay.

WHAT ARE THE CURRENT REGULATIONS? No part of a set gillnet may be more than 1,000 feet from the 18-foot-high tide mark.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase the amount of beach where set gillnets can fish effectively and potentially increase set gillnet harvest. Management of the fishery would remain the same.

BACKGROUND: Minimum distance from shore regulations for set gillnets help to provide for an orderly fishery by reducing conflicts between set gillnets and drift gillnets. On the east side of the Naknek–Kvichak District from the mouth of the Naknek River to the mouth of the Kvichak River, most of the fishable beach has been leased under the Shore Fish Leasing Program. On the west side of the district, including the area in the proposal, there are relatively few shore fishery leases and set gillnet effort is generally lower. This area is also fished by drift gillnet permit holders, but generally has less effort than other parts of the district.

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

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

PROPOSAL 41 – Adjust seaward boundary for set gillnet gear near in the Nushagak District.

5 AAC 06.331. Gillnet Specifications and Operations.

PROPOSED BY: Nicholas Dowie, John O'Connor, Christine O'Connor.

WHAT WOULD THE PROPOSAL DO? This would increase the maximum distance from shore that set gillnets are allowed to be set in some parts of the Nushagak District. It would also clarify from where the offshore distance is measured.

WHAT ARE THE CURRENT REGULATIONS? In the Nushagak District, a CFEC salmon interim-use or entry permit holder may not set or operate a set gillnet seaward of set gillnets operated by another CFEC salmon interim-use or entry permit holder. In addition, no part of a set gillnet, anchor, peg, stake, buoy, or other device used to set the gillnet may be seaward of the locations found in 5 AAC 06.331 (n).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would give more area to the setnet fleet along Ekuk Beach, thus reducing the area where the drift gillnet fleet can fish. It would also clarify the maximum distance from shore by using survey data to establish the offshore distance maximum in this area.

BACKGROUND: Along the east side of the Nushagak District, the maximum distance from shore that any part of a set gillnet may be set is established relative to the mean high tide mark or the minus three (3) foot tide mark. This distance varies as one goes south from the Clark's Point dock to the south line. This offshore distance is designed to provide fishing opportunity to the set gillnet fleet while also constraining them to a specific distance from shore so that the drift gillnet fleet can also have area to fish. The proponents suggest that the beach has changed over time due to erosion and that an update to the regulation is warranted. One of the proposers is a professional surveyor and may have already completed the requisite survey.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department refers the board to Alaska Wildlife Troopers' comments on the need for a surveyed offshore distance line for enforcement purposes.

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

PROPOSALS 42, 43, and 44 – Repeal provisions allowing operation of 200 fathoms of drift gillnet from a vessel with two CFEC permit holders onboard.

5 AAC 06.333. Requirement and specification for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Timothy Gervais and Frank G. Woods III.

WHAT WOULD THE PROPOSALS DO? These would repeal the dual drift operation language and make it so all drift gillnet vessels could fish no more than 150 fathoms of gear.

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

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? These would require all CFEC permits be fished on individual boats. They may result in an increase in individuals looking to find working boats and increase the number of permits for sale as people who do not want to operate their own boat sell their permits. This may result in a decrease in CFEC permit value and an increase in permit transfers. There could be a few years of adjustment with less gear in the water as people acquire boats and permits are transferred. If the board adopts these proposals in 2022, delaying implementation until the 2025 fishing season would help ameliorate some of these effects.

BACKGROUND: The legal gear limit for drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted that allowed use of 200 fathoms of gear when two permit holders are on the same vessel and the vessel is marked accordingly. The number of dual operations has increased gradually over the years. The average number of dual operations for the last 10 years is 355. The number of dual operations varies from year to year but has trended upward. Over the last 10 years, the low was in 2015 with 292 dual operations and the high was in 2020 with 403.

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

COST ANALYSIS: Approval of these proposals may result in an additional direct cost for CFEC permit holders working on dual permit vessels who wish to remain in the fishery and use their permits. Approval of these proposals is not expected to result in an additional cost to the department.

PROPOSAL 45 – Provide drift gillnet vessels with a single permit holder onboard more fishing opportunity per opening than vessels with two permit holders onboard.

5 AAC 06.333. Requirement and specification for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Norman Gloko.

WHAT WOULD THE PROPOSAL DO? This would make dual drift operations a different gear class that has less fishing time than single permit operations.

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

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would create a separate class of drift permit holder. It would reduce the incentive to participate in a dual operation. It would create confusion for users and complicate management.

BACKGROUND: The legal gear limit for drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted that allowed use of 200 fathoms of gear when two CFEC drift gillnet permit holders are on the same vessel and the vessel is marked accordingly. The number of dual operations has increased gradually over the years. The average number of dual operations for the last 10 years is 355. The number of dual operations varies from year to year but has trended upward. Over the last 10 years, the low was in 2015 with 292 dual operations and the high was in 2020 with 403.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it needlessly complicates fishery management; the department is **NEUTRAL** on the allocative aspects of creating a new gear group.

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

PROPOSALS 46 and 47 – Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.

5 AAC 06.333. Requirement and specification for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Hayden Linscheid and Douglas R. Elwell.

WHAT WOULD THE PROPOSALS DO? These would allow the owner of two CFEC drift gillnet permits to operate 200 fathoms of drift gillnet gear from a single vessel (permit stacking).

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

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

BACKGROUND: When the limited entry permit system was implemented in 1974, an individual was allowed to own only one permit. House Bill 286 was passed into law in 2002, allowing an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 was passed allowing the board to authorize additional gear with ownership of a second permit. These actions were taken to revitalize Alaska's salmon industry at a time when salmon exvessel prices were very low.

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

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but notes that the proposal could make it more difficult for new fishery participants to obtain a CFEC limited entry permit and enter the fishery.

COST ANALYSIS: Approval of this proposal may result in an additional direct cost for a private person to participate in this fishery if CFEC permit values increase. Approval of this proposal is not expected to result in an additional cost to the department.

Registration and Reregistration; Time and Area; Area and District Descriptions (9 proposals)

PROPOSAL 48 – Delay the date at which fishermen may reregister to or from the Togiak District.

5 AAC 06.370. Registration and Reregistration.

PROPOSED BY: Jimmy Coopchiak.

WHAT WOULD THE PROPOSAL DO? This would change the date where permits and vessels that fished in other Bristol Bay Districts would be allowed to fish in Togiak District from July 27 to August 4. It would change the date that permits and vessels that fished in Togiak would be allowed to fish in other districts from July 27 to August 4.

WHAT ARE THE CURRENT REGULATIONS? A CFEC permit holder and fishing vessel registered before 9:00 a.m. July 17 to fish in the Togiak District may not take salmon or be used to 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. A CFEC permit holder and fishing vessel registered before 9:00 a.m. July 17 to fish in the Nushagak, Naknek-Kvichak, Egegik, or Ugashik District may not take salmon or be used to take salmon in the Togiak District from 9:00 a.m. June 1 to 9:00 a.m. July 27.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would extend protection afforded to the Togiak fishery by an additional week. In years of larger returns this will keep effort low and increase the chance of foregone harvest in the Togiak District.

BACKGROUND: There was a provision to waive the transfer period into and out of Togiak District early as escapement levels dictated. That provision had been in regulation since the *Togiak District Salmon Management Plan* (TDSMP) was created by the board in 1996. At that time, the transfer period was waived on July 21 if the department could project escapement to exceed 150,000 by July 24. In 2009, the board changed the date when transfer into and out of Togiak District is allowed from July 24 to July 27. This change was made in response to a proposal that sought to remove the transfer in date entirely. At the same time, the trigger dictating when early transfer is allowed on July 21 was changed from 150,000 to 175,000 escapement. Only rarely has escapement allowed the waiving of this transfer period when the projected escapement goal was 150,000 in this provision. In 2012 the board removed the escapement-based trigger from regulation. Since 2012 the mid-point of the Togiak escapement goal has increased to 195,000 sockeye salmon. Escapement has exceeded the 270,000 upper end of the escapement goal range in 2018, 2019, and 2021 during the last 10 years.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department suggests that an escapement-based trigger based on the midpoint of the escapement goal range would be more consistent with management of other Bristol Bay districts. It would also provide a buffer against changes in escapement goals or run timing, allowing additional fleet to participate if runs are early or large and protecting the local fleet when runs are small or late.

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

PROPOSALS 49 to 54 – Reestablish a General District Salmon Management Plan. Adopt an Eastside Bristol Bay late-season management plan.

5 AAC 06.XXX. New Section.

PROPOSED BY: Joel A. Ludwig (Proposal 49), Kiril Z. Basargin (Proposal 50), Ken Dunsmore (Proposal 51), Alexus Kwachka (Proposal 52), David Vardy (Proposal 53), Matt Marinkovich (Proposal 54).

WHAT WOULD THE PROPOSALS DO? Proposals 49 and 51 would allow the department to open the General District (GD) by emergency order (EO) when escapement goals have been exceeded in eastside districts (Naknek–Kvichak, Egegik, and Ugashik). Proposal 50 would provide additional opportunities in the GD when escapement goals are met. Proposal 52 would open the GD when all eastside rivers have met the midpoint of their escapement goals on or after July 17. Proposal 53 would establish new GD lines from the Naknek Section to the Ugashik District north line and open this GD on July 17 if escapement goals have been met. Proposal 54 would establish new boundary lines to open areas between two adjacent districts that have met escapement goals such that the 48-hour district transfer requirement has been waived.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow fishing in terminal Bristol Bay districts associated with major river systems according to management plans. Each system is managed to achieve an escapement goal within an established range. In addition, the department attempts to manage harvest by gear group to achieve allocation targets established by the board, which vary by district.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? These proposals would allow commercial fishing on multiple species of salmon from stocks of unknown origin and run strength, including stocks from outside Bristol Bay. All GD harvest would be caught by drift gillnet gear, which could reduce set gillnet gear harvest and make it more difficult to meet the board's allocation objectives for each district.

BACKGROUND: In 2004, a large preseason run forecast prompted the board to adopt a plan allowing for use of the GD to help provide additional harvest opportunity. Approximately 1.7 million sockeye salmon were caught in the GD, which was open June 7 through June 22. The plan had a sunset date of December 31, 2004. Accordingly, the department submitted an agenda change request for consideration of the sunset clause in 2004 and the board allowed the regulation to sunset. Proposals to incorporate annual use of the GD came before the board in December 2006, 2009, and 2012. In March 2008, a petition to allow fishing in the southern section of the GD was submitted and denied. The GD creates management difficulties when fish caught in the GD need to be allocated to rivers of origin because of the mixed-stock nature of the harvest and delivery patterns of permit holders within the district. Inaccurate allocation of stocks may result in more inaccurate inseason harvest forecasting, estimates of total run, and other analytics. 5 AAC 06.355**,** *Bristol Bay Commercial Drift and Set Gillnet Sockeye Salmon Management and Allocation Plan*, instructs the department to manage Bristol Bay sockeye salmon fisheries terminally, using run-strength information developed in season. The plan directs that these stocks will be managed as they return to districts associated with major river systems under the following priorities: 1) achievement of biological escapement goals, 2) maintenance of genetic diversity, 3) providing any harvestable surplus of salmon to users. For this priority, the board expressed its intent that harvest

of any surplus continue to take place in traditional areas and allocated between user (gear) groups, while recognizing that interceptions of stocks from adjacent areas will occur. Under the fourth priority, the board further directed the department to minimize interception, to the extent practicable, without compromising the objectives.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of these proposals. The department is **OPPOSED** to the concept of the GD because of the nonterminal nature of the fishery, unknown impacts to nonlocal salmon species and stocks, and the resulting implications to management.

COST ANALYSIS: Approval of these proposals is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of these proposals may result in an additional cost to the department. Additional catch sampling would likely be required by extending the season. Additional genetic stock composition estimates would be needed to apportion the GD harvest to stock of origin.

PROPOSAL 55 – Align Naknek Section southern boundary line with Naknek–Kvichak District southern boundary line.

5 AAC 06.200. Fishing Districts and Sections.

PROPOSED BY: Matt Marinkovich

WHAT WOULD THE PROPOSAL DO? This would change the definition of the Naknek Section and Kvichak Section by removing the corner point as defined by a GPS coordinate and change the corner point to the intersection of two lines.

WHAT ARE THE CURRENT REGULATIONS? The district boundary line is defined by two points on the shore of each side of the Kvichak Bay. The section boundary lines are defined by the same points as on shore; however, they intersect at a point in Kvichak Bay that is not on the district boundary line but is close to the district boundary line.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, it would change the way in which enforcement documents closed waters violations. The change in fishing area would be negligible.

BACKGROUND: District and Section boundary lines were originally marked with closed waters markers consisting of signs and buoys. Subsequently Loran C lines were adopted and used to define the boundary lines. The current boundary line points have been defined using GPS since 2001.

The department has attempted to find a point that defines the section boundaries and is also on the district boundary line. These efforts have been unsuccessful because of using an approximately 18-mile-long straight line on the curved Earth to define the boundary and limited precision of GPS coordinates in regulation.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Adoption of this proposal would complicate enforcement and create confusion about longstanding boundary line definitions. The department urges the board to seek guidance from the Alaska Wildlife Troopers when deliberating this proposal.

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

PROPOSAL 56 – Allow drift gillnet fishermen to make 'test sets' under certain circumstances.

5 AAC 06.370. Registration and Reregistration.

PROPOSED BY: Matt Marinkovich.

WHAT WOULD THE PROPOSAL DO? This would allow S03T permit (Bristol Bay drift gillnet) holders to "test" their gear in a designated area by notifying the department without registering for a district. Revenues from fish caught would be forfeited to the department.

WHAT ARE THE CURRENT REGULATIONS? S03T permit holders must first register for a district and can then begin fishing immediately. To transfer districts, the permit holder must select the district to transfer to and serve a 48-hour district transfer notification wait period before fishing in that district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide an avenue for drift gillnet operations to test their vessels, gear, and crews prior to committing to fishing in a district. This would add additional complexity to regulations, district registration tracking, management, and enforcement.

BACKGROUND: Registration and reregistration regulations are longstanding provisions and have undergone several changes over time. The most recent change occurred in 2015 when initial registration became required prior to fishing. Before that change, district registration was not required until June 25. Some permit holders will wait to register ("drop their card") until they are confident which district will have the best fishing because they don't want to commit to a district and then wait 48 hours to transfer to a different district.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Tracking and enforcement of additional registration requirements would likely exceed the department's current capacity. This adds management complexity in that the "test" period of 8:00 a.m. to 8:00 p.m. would also have to coincide with open commercial periods. This would make early season "test" periods in the Nushagak District unlikely. The department urges the board to seek guidance from the Alaska Wildlife Troopers when deliberating this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal may result in an additional cost to the department. There would be increased staff time to develop a software registration program and for staff to assist fishers with registering. There would be additional enforcement presence needed to track and patrol "test" fishing areas to ensure compliance.

East Side Management (4 proposals)

PROPOSAL 57 – Repeal set and drift gillnet allocations in the Naknek-Kvichak District.

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

PROPOSED BY: Randolph Alverez.

WHAT WOULD THE PROPOSAL DO? This would repeal the Naknek–Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

WHAT ARE THE CURRENT REGULATIONS? The department shall manage the Naknek-Kvichak District set and drift gillnet fisheries to achieve biological escapement goals into the Kvichak and Naknek River systems and, to the extent practicable, distribute the harvestable surplus of sockeye salmon to drift and set gillnet fisheries as follows:

Drift gillnet – 84%; set gillnet – 16% with Kvichak Section 8% and Naknek Section 8%.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Repeal of the allocation plan would likely reduce the department's ability to establish set and drift gillnet fishing periods at different times and the ability to adjust drift gillnet fishing period start times to spread fish throughout the district.

BACKGROUND: *Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan* was adopted in November 1997. Prior to adoption of the allocation plan, fishing periods for set and drift gillnet gear commenced concurrently at approximately the 7-foot flood tide stage.

The primary management objective for the department is to manage for escapements within the escapement goal ranges. The secondary objective is to manage for harvest allocations as specified by the board in management and allocation plans.

Several factors complicate achieving allocations specified in the management plan. Drift gillnet permit holders can fish any of five districts in Bristol Bay within a year, while set gillnet permit holders tend to fish the same site annually. If drift gillnet permit holders transfer out of a district and therefore decrease fishing power, the only way to keep allocations the same would be to also decrease set gillnet fishing power; in years of high abundance, this would contradict our primary objective of controlling escapement. In 2017, 2018, 2021, and 2022, for example, the Nushagak District had four record high sockeye salmon runs, drawing an unusually large number of drift gillnet permit holders to the Nushagak District. This greatly reduced the number of drift gillnetters in the Naknek-Kvichak District while keeping the number of set gillnetters relatively constant. The reduced effort by only one gear type made it difficult to control the harvest ratios, as well as challenging to not exceed the Naknek River SEG despite near maximum fishing time allowed for both gear groups in the Naknek Section. In 2022, drift gillnets were fished in the Kvichak Section during every tide except for three when they were restricted to the Naknek Section. In 2018, 2019, and 2022, the Kvichak Section set gillnets were closed, whereas Naknek Section drift and set gillnets were open to fishing. In these years, the Naknek River exceeded the upper bound of the

SEG range, while Kvichak River escapements were well below the midpoint of the escapement goal.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. It is unclear what the management guidelines would be if this proposal is adopted. The department **OPPOSES** regulation changes that would limit management actions used to achieve escapement goals.

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

PROPOSAL 58 – Provide increased commercial salmon fishing opportunity in the Naknek River Special Harvest Area.

5 AAC 06.360. Naknek River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Matt Marinkovich

WHAT WOULD THE PROPOSAL DO? This would open the Naknek River Special Harvest Area (NRSHA) concurrently with the Naknek Section or Naknek–Kvichak District when Naknek River escapements are projected to exceed the escapement goal range. It would also decouple the NRSHA from the Egegik River Special Harvest Area (ERSHA) when the NRSHA is opened for reasons other than conserving Kvichak District salmon.

WHAT ARE THE CURRENT REGULATIONS? The NRSHA may be opened to conserve Kvichak River fish while providing opportunities to harvest surplus Naknek River fish. Drift gillnet and set gillnet fishing periods open separately with a seasonal ratio of three drift gillnet periods to one set gillnet period. Drift gillnet lengths are reduced to 75 fathoms and no more than 150 fathoms may be onboard. Set gillnet lengths are reduced to 37.5 fathoms and no more than 75 fathoms may be onboard. When the NRSHA is in use, dual vessel operations are not allowed to use the extra 50 fathoms in the ERSHA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide additional opportunities to harvest surplus Naknek River sockeye salmon. It is unknown if this would result in a higher catch compared to how the fishery is currently managed.

BACKGROUND: The NRSHA has long been used during times when the Kvichak River escapement was projected to be below the escapement goal. The Kvichak River was a stock of concern from 2001 to 2012. During this period, the NRSHA was frequently used to harvest more abundant Naknek River fish. The Naknek River has exceeded the upper end of the escapement goal range in four out of the last five years. Naknek River escapement can be difficult to control because of several factors including relative run size compared to the Kvichak River, king salmon conservation, the limited area of the Naknek Section, fleet size, and weather. The management of drift and set gillnet periods in the NRSHA has evolved over time. At one point, there were concurrent gear group periods. Gear group conflicts led to management with separate gear group openings.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to increase fishing opportunity in the NRSHA. This proposal has the potential to increase stock-specific harvest on surplus Naknek River sockeye salmon. The department is **NEUTRAL** on the allocative aspect that would be used to determine which gear group would fish in the NRSHA.

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

PROPOSAL 59 – Repeal provisions directing the department to avoid continuous fishing with set gillnet gear in the Egegik District.

5 AAC 06.365. Egegik District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Michael A. Duta.

WHAT WOULD THE PROPOSAL DO? This would repeal the regulation that directs the department to avoid continuous fishing in the Egegik District set gillnet fishery.

WHAT ARE THE CURRENT REGULATIONS? To the extent practicable, the department must avoid continuous fishing in the set gillnet fishery. Additionally, the department shall manage the Egegik District set and drift gillnet fisheries to first, achieve escapement goals into the Egegik River, and second, to distribute the harvestable surplus of sockeye salmon to the drift and set gillnet fisheries as follows: 86% drift gillnet and 14% set gillnet.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow the department more flexibility to open the setnet fishery continuously, which could help control escapements in some situations.

BACKGROUND: This regulation was adopted at the 2001 board meeting. In recent years, the Egegik River has experienced above average sockeye salmon runs. When high passage rates into the river needed to be controlled, commercial fishing opportunity has been provided on each tide. Over the last two years, fishing periods were offered daily on both tides, beginning June 24 (2021) and June 22 (2022) then continuing through the remainder of the season. Because of how the fishing periods are determined for the Egegik District and how the tides cycles are, there are times when the set gillnet fishery is closed for only a short amount of time, forcing the setnet operators to pull their gear and then redeploy in quick succession.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it will increase the department's ability to control escapements when there are high abundances of salmon and/or there is a relatively small drift gillnet effort in the district.

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

PROPOSAL 60 – Align the Ugashik District fall fishing schedule with the Naknek-Kvichak District and Egegik District fall fishing schedules.

5 AAC 06.320. Fishing Periods.

PROPOSED BY: Ken Dunsmore.

WHAT WOULD THE PROPOSAL DO? This would align the fall fishing schedule in the Ugashik District to that of the other eastside districts in Bristol Bay.

WHAT ARE THE CURRENT REGULATIONS? Currently, in the Ugashik District from July 17 through July 31, commercial fishing is allowed from 9:00 a.m. Monday to 9:00 a.m. Friday or by periods established by emergency order. Then beginning August 1 through September 30, commercial fishing is allowed weekly from 9:00 a.m. Thursday to 9:00 a.m. Monday.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Commercial fishing in the Ugashik District would be on a weekly schedule of 9:00 a.m. Monday to 9:00 a.m. Friday, or by other periods established by emergency order, from July 17 to September 30. This would increase weekly fishing time by a minimum of 48 hours and align the fall fishing schedule with the Naknek–Kvichak and Egegik Districts. With more fishing time, there may be increased interest from the processing sector to operate later into August.

BACKGROUND: The current fall schedule in the Ugashik District was adopted during the 2015 board cycle to accommodate the available markets at that time. Generally, in late July to early August, fishermen and processors end operations as the sockeye salmon run tails off. Processors operate plants with the consideration of having fish available to process on a daily basis. If the fishery closes for consecutive days, individual processors may not be able to economically justify that break and terminate operations for the season. Frequently, harvestable surpluses of salmon are available after such closures, but go unutilized because of lack of markets.

DEPARTMENT COMMENTS: The department **SUPPORTS** modifying the fall fishing schedule in the Ugashik District. This would increase the department's ability to adjust fishing time during the fall schedule dependent on salmon abundance and fishing effort by emergency order. It would also reduce regulatory complexity by aligning the fall schedule with that of the other two eastside districts and would improve coho salmon management.

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

Reporting Requirements (1 proposal)

PROPOSAL 61 – Require reporting of king salmon harvest by size class on fish tickets.

5 AAC 06.377. Reporting requirements.

PROPOSED BY: Nicholas Dowie and Michael Jackson.

WHAT WOULD THE PROPOSAL DO? This would require processors to report, at the end of their Bristol Bay buying operations, the number of king salmon purchased by size category. It would establish three size categories.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 39.130 gives the department broad authority to require any information from processors regarding harvest that the department deems necessary. Currently, processors are required to submit daily reports with harvest by species, weekly reports with completed fish tickets and harvest by species, and final operations reports with harvest by species for each district. In the Nushagak District, processors are also required to submit production data for king salmon that includes the number of king salmon reported on fish tickets and the total number of king salmon based on production. There is no requirement to report fish by size category.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would not affect the management of the commercial or sport fisheries because Bristol Bay Area escapement goals are based on the number of fish, not fish size.

BACKGROUND: In the Bristol Bay salmon fishery, the volume of harvest precludes sorting of fish by species at time of delivery. All salmon are supposed to be sorted by species (5 AAC 39.130 (c)) , but the reality is that this is impractical and not consistently done because of the large number of sockeye salmon compared to king salmon. This is especially true for king salmon that are closer in size to sockeye and chum salmon. The department has recently started requiring processors that buy salmon in the Nushagak District to provide production data on the number of king salmon processed by each processor to better understand the true commercial harvest.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. This proposal would increase regulatory complexity without improving fishery management.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal may result in an additional cost to the department. The department would need additional staff time to manage these additional data.

Herring (1 proposal)

PROPOSAL 62 – Allow all commercial gear types to fish for herring simultaneously in Bristol Bay.

5 AAC 27.865 Bristol Bay Herring Management Plan.

PROPOSED BY: Raymond May and Robert Nelson.

WHAT WOULD THE PROPOSAL DO? This would repeal 5 AAC 27.865 (b)(3), the regulation that limits the department to only opening an area to one gear type at a time for the Togiak herring fishery.

WHAT ARE THE CURRENT REGULATIONS? Under 5 AAC 27.865 (b)(3), the department may allow only one gear type to operate in an area during any open period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow the department to open an area to both purse seine and gillnet users at the same time. At current fleet sizes, this would simplify management and increase management flexibility.

BACKGROUND: At its peak, the Togiak sac roe herring fishery had over 300 purse seine vessels and 400 gillnet vessels participating in the fishery. There were user conflicts between gear groups and separating them made sense. Since then, fleet sizes have diminished substantially. There have been several years with fewer than five gillnet participants and 15 purse seine participants. In 2022, for example, there were nine purse seine vessels and no gillnet vessels. With small fleet sizes now, this regulation complicates management because it requires managers to close an area to one gear type before opening it to another gear type. For example, in bad weather, the department will open a gillnet area on the west side of Right Hand Point because the waters east of Right Hand Point are not fishable. This requires a closure for the purse seine fleet and then an opening for the gillnet fleet. There needs to be a time window from when the closure is announced to when it actually closes to allow the purse seine fleet to move out of the area. If the department is not aware of the fishing conditions until after the fact, the gillnet fleet may have no fishable area until the department can be advised of the situation and issue an announcement.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department **SUPPORTS** simplification of the management plan to provide greater time and area flexibility.

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