Dylan Braund & Tom Rollman Jr.

March 10, 2023

Alaska Board of Fisheries Alaska Department of Fish and Game Board Support Services 333 Raspberry Road Anchorage, AK 99518

Re: Nushagak King Salmon Management

Dear Chair Carlson-Van Dort and Alaska Board of Fish Members,

Please consider the following amendments:

NEW PLAN 5 AAC 06.### (likely 391). Nushagak District King Salmon Stock of Concern Management Plan.

- (a) The purpose of this management plan is to provide management tools and guidelines for the management of Nushagak District salmon fisheries, while Nushagak River king salmon are listed as a stock of management concern, that will result in the sustained yield of king salmon stocks large enough to meet sustainable escapement goals while allowing for harvest opportunity in the subsistence, sport, and commercial fisheries. It is envisioned that the Nushagak River king salmon stock of concern status and this plan would remain in effect until the king salmon escapement is within the escapement goal for three or more years.
- (b) While the Nushagak River king salmon are listed as a stock of management concern, it is the (board) intent that all Nushagak District salmon stocks are managed conservatively through June 28 to protect Nushagak River king salmon, consistent with the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222).
- (c) The department shall manage commercial fisheries in the Nushagak District as follows:
 - 1. To achieve an inriver goal of 95,000 king salmon in the Nushagak River consistent with the Nushagak King salmon management plan (5 AAC 06.361(b)(1));
 - When the Wood River sockeye salmon forecast or inseason projection is less than <u>5 million</u> (was 7 million) the department shall manage for the current SEG of 700,000 to 1.8 million fish.
 - 3. When the Wood River sockeye salmon forecast or inseason assessment of run size is greater than <u>5 million</u> (was 7 million) the department shall manage to achieve a Wood River sockeye salmon OEG of 700,000 to an upper bound that is up to <u>15%</u> (was 10%) of the Wood River total run size above the 1,800,000 upper bound of the SEG, based on the preseason forecast and inseason assessment of run size.
 - 4. When the Nushagak River sockeye salmon forecast or inseason projection is less than <u>2 million</u> (was 2.5 million) the department shall manage for the current SEG of 370,000 to 900,000 fish.
 - 5. When the Nushagak River sockeye salmon forecast or inseason assessment of run size is greater than <u>2 million</u> (was 2.5 million) the department shall manage to achieve a Nushagak River sockeye salmon OEG of 370,000 to an upper bound that is up to <u>17%</u> (was 15%) of the Nushagak total run size above the 900,000 upper bound of the SEG, based on the preseason forecast and inseason assessment of run size.
- (d) Prior to 9:00 a.m. June 28, if the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commissioner;
 - 1. Shall close by emergency order, the sockeye salmon commercial drift gillnet fishery in the Nushagak District, and the sockeye salmon commercial set net fishery in the Nushagak Section of the Nushagak District until:

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- i. The sockeye salmon sonar estimate in the Nushagak River is projected to exceed 6% of the Nushagak River sockeye salmon run based on the Nushagak River sockeye salmon preseason forecast and inseason assessment of run size (with a floor of 500,000); or
- ii. <u>The sockeye salmon count past the Wood River tower is projected to exceed 6% of the</u> <u>Wood River sockeye salmon run based on the Wood River sockeye salmon preseason</u> <u>forecast and inseason assessment of run size.</u>
- (e) In the Nushagak River drainage, excluding the Wood River drainage, 1. the annual limit for king salmon 20 inches or greater in length is four fish, of which only one fish may be 28 inches or greater in length. Draft Plans under discussion by the Nushagak King Salmon Committee 2-24-23 4 2. If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may increase the annual limit for king salmon to 4 king salmon 20 inches or longer (no restriction to one fish over 28 inches).
- (f) Subsistence fisheries will be managed in accordance with current regulations.

* The purpose of the Wood and Nushagak OEGs is to conserve king salmon by establishing a range of acceptable sockeye salmon escapements above the SEG, in years of high sockeye salmon abundance. This allows the department to restrict commercial fisheries at times they would otherwise be fishing to control sockeye salmon escapement.

Thank you for your consideration on these suggestions and for your public service.

Sincerely,

D. J. P.A.

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