

PROPOSAL 102

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

Reduce the area open to sport fishing for king salmon and modify the dates that bait is allowed in the Togiak River drainage, as follows:

TOGIAK RIVER DRAINAGE: • Unbaited, single-hook, artificial lures or flies may be used year-round. • July 11th-April 30: Bait is allowed. • King salmon: • 20 inches or longer: No retention allowed. All king salmon 20 inches or longer caught may not be removed from the water and must be released immediately. • Less than 20 inches: 10 per day, 10 in possession. • Upstream of the confluence of Pungokepuk River (59.2574230, -160.1978034) and the Togiak River: • Closed year-round to king salmon fishing.

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

At the 2022 Bristol Bay Finfish meeting, new sportfishing regulations were adopted to conserve King Salmon. These changes eliminated the use of bait, prohibited the retention of adult King Salmon, and restricted King Salmon targeting above the Geciak River.

In 2023, the Board of Fisheries passed Proposal 256 (formerly ACR 9) at the Lower Cook Inlet meeting, allowing bait use on the Togiak River after July 15th to target species other than King Salmon.

While we are grateful for the opportunity to use bait for Sockeye after July 15th, we respectfully request consideration for allowing bait use five days earlier, for the following reasons:

- King Salmon are still catch and release on the Togiak River, and we have no intention to request a retention season.
- As the primary outfitter on the river in June and July, we have implemented conservation tactics to prevent King Salmon mortality when using bait to target Sockeye and Chum.
- Lodge policy prohibits the use of cured salmon eggs to reduce mortality across all species.
- Bait may only be used on a jig/fly or lure that cannot be swallowed by any fish.
- King Salmon are typically not holding in the same water where Sockeye, Chum, and Pink Salmon are being targeted.
- Pressure from other outfitters in June and July has significantly decreased now that adult King retention is no longer allowed, thereby reducing potential incidental mortality.

Proposed Boundary Adjustment for King Salmon Regulations

Additionally, we would like to propose a more enforceable boundary for King Salmon targeting restrictions.

Currently, it is illegal to target King Salmon above the Geciak River. However, this presents several enforcement challenges:

- Other species can still be legally targeted above the Geciak River.
- Flies used for Chum and Rainbow Trout are also effective for King Salmon. This creates ambiguity for enforcement, as intent is hard to judge.
- If an angler is swinging a fly for Rainbows and catches a King above the Geciak, is that illegal? This creates a legal gray area.
- The closure above the Geciak River in 2023 was based on aerial surveys from the early 2000s, which suggested spawning activity between the Geciak and Pungokepuk Rivers. However, studies conducted by the U.S. Fish and Wildlife Service (USFWS) contradict these earlier findings.
- The Pungokepuk River is the legal upstream boundary for outfitters without special permits and lies approximately 4.5 miles above the Geciak.
- For clarity and practicality in enforcement, we propose shifting the no-King-Salmon fishing boundary from the Geciak River to the Pungokepuk River.

Supporting Data: Chinook Salmon Radiotelemetry Study Summary

Study: Estimation of Chinook Salmon Escapement, Distribution and Run Timing in the Togiak River Watershed (Tanner & Sethi, USFWS 2014)

Purpose: To assess Chinook Salmon spawning abundance, timing, and distribution using radiotelemetry and mark-recapture methods.

Key Findings:

- **Escapement Estimate:** ~13,050 Chinook Salmon entered the Togiak River in 2012.
- **Spawning Locations:**
 - o Only **2%** spawned in **Gechiak Creek**.
 - o No significant spawning activity was documented in the stretch between the **Geciak and Pungokepuk Rivers**, contrary to the 2022 claim during the BOF meeting.
 - o Most tributary spawners were found above the Pungokepuk River, primarily in Naylorun, Kemuk, and Ongivinuk Rivers (20+ miles above the Pungokepuk)
- **Run Timing:**
 - o Tributary-bound Chinook entered the river earlier than mainstem spawners.

Conclusion: The assertion that the majority of Chinook Salmon spawn between the Geciak and Pungokepuk Rivers is not supported by telemetry data. The majority of spawning occurs in tributaries above the Pungokepuk.

Final Recommendation

We respectfully propose two changes:

1. Allow bait use on the Togiak River starting **July 11th** instead of July 16th, with strict conservation measures already in place.
2. Move the no-King-Salmon-targeting boundary from the **Geciak River** to the **Pungokepuk River** (59.2574230, -160.1978034) for greater enforceability and

alignment with the best available science

These adjustments would support both conservation goals and practical enforcement while continuing to protect the core spawning population of Chinook Salmon in the Togiak River system.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal has been developed by Togiak River Lodge

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