PROPOSAL 44

5 AAC 01.XXX. New Section, and 5 AAC 06.377. Reporting requirements.

Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery, and report all king salmon harvested, as follows:

Limit the number of chinook salmon retained by the personal use subsistence netting and mandate reporting all chinook kept. Example: annual limit of 12 kings per person with harvest reported similar to sport harvest regulations. King salmon harvest "cards" submitted to ADFG

What is the issue you would like the board to address and why? To aid in conservation of king salmon and ensure Nushagak River escapement is met a reduction in harvest by the personal use subsistence netting. As stated in the "Nushagak River king salmon- Stock Status and Action Report" Nov 29, 2022" there is currently no ANS for king salmon. This additional harvest impacts numbers returning to the Nushagak, as chinook salmon runs have declined recently, all user groups should be part of the solution to sustaining the runs.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was submitted by myself as a suggestion to aid in king salmon recovery. In the past, the only user group that has been restricted is the sport fisherman, who have the least impact as far as harvest numbers.

PROPOSED BY: Kent Anderson, owner Alaska Salmon Camp Inc (EF-F26-036)

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PROPOSAL 45

5 AAC 06.370. Registration and reregistration.

Extend the date in which commercial fishermen must register or reregister in the Naknek-Kvichak District, as follows:

06.370[b] Registration and Reregistration in the Naknek-Kvichak District.
Setnet and Drift net salmon fishing is required to register or reregister from June 1 to July[17] **22**

What is the issue you would like the board to address and why? Naknek-Kvichak sockeye salmon runs have been peaking later in July. We need to extend the dates to assure the later salmon runs reach their escapement goals before opening it up to the entire Bristol Bay Fleet.

The Naknek/Kvichak salmon run peaks later than most other districts in Bristol Bay. And do to the mass increase of boats after the regulatory period ends July 17th, the district is still looking to get its optimum escapement goal. Changing district registration and reregistration end date from July 17th to **July 22nd** will ensure that management will have the necessary tools to manage for optimum escapement goals and will keep the allocation between gear types more manageable. This proposal will align with Regulation 5aac 06.331 Gillnet Specifications for protections of our King Salmon in season and later King runs.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I was encouraged by local Nak/Kvi AC members and local Naknek/Kvichak Fish Biologist.

PROPOSED BY: Richard J. Wilson (EF-F26-001)

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PROPOSAL 46

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

Amend the dates described in the *Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan*, as follows:

5AAC 06.364 Allocation in Naknek-Kvichak for Set and Drift Sockeye Salmon. Currently this regulation is consistent with 5AAC 06.320-that starts June 1st 9:00 am to 9:00am July 17th.

Change dates in 5AAC 06.364 to 9:00 am June 1st to 9:00 am July [17] **22nd** to be consistent with proposals on 06.320 and 06.370 [b] submitted by Richard Wilson

What is the issue you would like the board to address and why? Naknek-Kvichak sockeye salmon runs have been peaking later in July. We need to extend the dates to assure the later salmon runs reach their escapement goals before opening it up to the entire Bristol Bay Fleet. The Naknek/Kvichak salmon run peaks later than most other districts in Bristol Bay. And do to the mass increase in boats after the regulatory period ends July 17th, the district is still looking to get its optimum escapement goal. Changing the allocation plan end date from July17th **to July 22nd** will ensure that management will have the necessary tools to manage for optimum escapement goals and will keep the allocation between gear types more manageable. This proposal will align with Regulation 5aac 06.331 Gillnet Specifications for protection of our King Salmon in season and later King runs.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I was encouraged by local Nak/Kvi AC members and local Naknek/Kvichak Fish Biologist.

PROPOSED BY: Richard J. Wilson (EF-F26-002)

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PROPOSAL 47

5 AAC 06.320. Fishing periods.

Amend the dates in which commercial fishing may be allowed by emergency order in the Naknek-Kvichak District, as follows:

06.320 [c][1] From June 1 through July [17] **22** Salmon may only be taken by periods established by EO

06.320 [c][2] after 9 am July [17] **22** salmon may be taken from 9:00 am Monday to 9:00 am Sunday, or during periods established by EO.

What is the issue you would like the board to address and why? Naknek-Kvichak sockeye salmon runs have been peaking later in July. We need to extend the dates to assure the later salmon runs reach their escapement goals before opening it up to the entire BristolBay Fleet.

The Naknek/Kvichak salmon run peaks later than most other districts in Bristol Bay. And do to the mass increase in boats after the regulatory period ends July 17th, the district is still looking to get its optimum escapement goal. Changing the regulatory season end date from July 17th to **July 22nd** will ensure that management will have the necessary tools to manage for optimum escapement goals and will keep the allocation between gear types more manageable. This proposal will align with Regulation 5aac 06.331 Gillnet Specifications for protection of our King Salmon in season and later King runs.

This Proposal is formulated to include changes in **Proposals 06.370 [b] and 06.364**

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I was encouraged by local Nak/Kvi AC members and local Naknek/Kvichak Fish Biologist.

PROPOSED BY: Richard J. Wilson (EF-F26-003)

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PROPOSAL 48

5 AAC 06.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan.

Modify the fishing period ratio between the set gillnet and drift gillnet gear groups, and change the distance in which gear associated with set gillnet fishing must be removed in the Kvichak River Special Harvest Area , as follows:

Modify point (d) to

The drift gillnet and set gillnet fisheries will open separately, with a seasonal ratio of two drift gillnet fishing periods to every one set gillnet fishing period…..

[THE DRIFT GILLNET AND SET GILLNET FISHERIES WILL OPEN SEPARATELY, WITH A SEASONAL RATIO OF THREE DRIFT GILLNET FISHING PERIODS TO EVERY ONE SET GILLNET FISHING PERIOD….]

If point (d) is approved then modify point (e)(3) to read:

beyond 30 feet from the mean highwater mark, all gear associated with set gillnet fishing must be removed when it is not being used to fish in the KRSHA;

[(3) BEYOND 500 FEET FROM SHORE, ALL GEAR ASSOCIATED WITH SET GILLNET FISHING MUST BE REMOVED WHEN IT IS NOT BEING USED TO FISH IN THE KRSHA;]

This would allow the drift fishermen to be more effective when fishing the KRSHA since fish will gravitate toward the banks inside the river. By not having to avoid set net anchors 500’ off shore it will make it much easier. Leaving a top anchor point for set net fishermen is important, which is why I propose reducing it from 500’ to 30’ as opposed to just removing ALL gear.

My two modifications would allow more fishing opportunity for set net fishermen and make drift openings more effective at harvesting fish.

What is the issue you would like the board to address and why? I would like the board to consider some adaptations to the wording adopted at the March 2025 meeting which would make the KRSHA more appropriate for the Kvichak River rather than using rubber stamped wording from the Naknek River Special Harvest area.

One point of possible contention is altering the ratio of drift to set net openings. In a perfect world, we would use a dynamic ratio of openings based on actual participation. When drift participation increases they would receive more openings and vice versa, with the objective of providing economic viability for the set net fleet (which is less capable of transferring districts) while providing economic opportunity for the drift fleet that chooses to fish the KRSHA.

Here are some relevant points about why the NRSHA has a 3:1 ratio of openings. Had we continued to fish the NRSHA I believe we would have altered that ratio to be 2:1 because the 3:1 ratio didn’t roughly result in an 84/16 split. It is just that we only fished the NRSHA for 1.5 seasons at 3:1 and it lost its importance as something to be addressed at the board of fish meetings.

Prior to 2003 NRSHA had alternating openings and prior to that they were concurrent. (digital records online unavailable prior to 2003).

2003 December – Prop 57 established that the district allocation of 84% drift and 16% set be applied in the NRSHA. Fished the 2003-2005 season like this.

2006 December – Prop 95 replaced allocation in the NRSHA with 3:1 because low participation by drift lead to extended waiting by set net fleet. In 2005 set net fleet waited 9 tides between openings while drift fished. (proposed by my wife and I). Fished this ratio in 2006, part of 2007, and a week in 2018.

When comparing the NRSHA and the KRSHA that in the KRSHA industry experts expect less set net participation due to the remote location of the fishery and the great distance to cabins and homes in Naknek, while at the same time drift participation would increase due to the fact that the KRSHA encompasses 26 square miles of water at high tide compared to 13 square miles in the NRSHA. The ratio of participation shifting will have a large impact on how many openings are necessary in order to provide proportionate harvest opportunity. (openings * net length * #permits = fathoms of fishing opportunity)

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I discussed this issue members of the Naknek Kvichak Advisory Committee who attended the March 16, 2025 board of fisheries meeting as well as other drift and set fishermen over the phone.

PROPOSED BY: Reid Ten Kley (EF-F26-158)
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PROPOSAL 49

5 AAC 06.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan. Modify the ratio of fishing periods between set gillnet and drift gillnet gear groups, based on gear type specific participation in the Kvichak River Special Harvest Area, as follows:

The Board should create a dynamic ratio system to alternate fishing periods between drift gillnet and set gillnet that changes based on gear type participation.

(D) To the extent practicable, drift gillnet and set gillnet will open separately, with openings alternating between the two gear groups. After a total of four openings, the openings will alternate between the two gear groups with a ratio according to the participation during the most recent openings:

(1) Drift permits delivered were greater than 500, then 3:1 (Drift to Set openings)

(2) Drift permits delivered were greater than 300 but less than 500, the 2:1 (Drift to Set openings

(3) Drift permits delivered were less than 300, then 1:1 (Drift to Set openings)

(D) [THE DRIFT GILLNET AND SET GILLNET FISHERIES WILL OPEN SEPARATELY, WITH A SEASONAL RATIO OF THREE DRIFT GILLNET FISHING PERIODS TO EVERY ONE SET GILLNET FISHING PERIOD. THE FIRST FISHING PERIOD WILL OPEN TO SET GILLNETS.]

What is the issue you would like the board to address and why? I would like the Board to revise and rewrite sections of the newly adopted Kvichak River

Special Harvest Area Management plan to address fishing period allocative concerns and gear type specific disadvantages.

At its originating stages, the KRSHA was written to mirror the Naknek River Special Harvest Area. All of the other Special Harvest Area's management plans Bay-wide contain some of their own unique language that is specific to their unique river system(s).

During a traditional season (without Special Harvest Areas) in the Naknek/Kvichak, set gillnets have more potential fishing time "in district" than drift, yet set catches much less per permit than drift gillnet. Currently in the NRSHA, the fishing period ratio is 3:1 drift to set and set gillnets have and could experience undue hardship – One simply can't "make a season" with such little fishing time. The current drift to set ratio of 3:1 in the KRSHA puts set gillnets at an unfair disadvantage. The NRSHA regulations have changed many times in the last 25 years, and the 3:1 ratio is far from a "Standard". The NRSHA ratio of 3:1 was based on gear type success within the Naknek special harvest area, attempting to follow the Naknek/Kvichak district's allocation plan. These numbers were based on older historical data of drift to set permit ratios in the district.

Since the creation of the NRSHA, fishing fleets have been modernized. It is now common practice for drift gillnets to "chase fish". It is common to see higher numbers of drift boats

starting in Egegik and Nushugak (where the run is traditionally earlier), then come and finish the season in the Naknek/Kvichak (where the run is traditionally later). Set gillnets don't have the same mobile capabilities and can't easily change districts. The number of set permits in district remains relatively fixed, while the drift participation changes both during the season, and from year to year. The most fair and equitable way to set up a new special harvest area is to do so based on participation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I wrote the proposal on my own, but developed my proposal after attending the March 16th 2025 Board of Fisheries Meeting, reading the Naknek/Kvichak AC's suggestions, and discussing management options/opinions with district fishermen, associations, and individuals from the Naknek/Kvichak AC board.

PROPOSED BY: Aaron Schrier (EF-F26-173)

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PROPOSAL 50

5 AAC 06.355. Bristol Bay Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

Incorporate fish quality considerations into commercial salmon fishery management decisions in Bristol Bay, as follows:

Create **06.335(e): The department shall strive to manage the Bristol Bay commercial salmon fishery for the highest level of product value with a minimum of waste.**

What is the issue you would like the board to address and why? I would like the board to add economic and quality objectives to the opening section (a) of the management plan for salmon, similar as to what is given for herring.

In 5 AAC 39.222(b) under the General Provisions we have a goal to ensure "the sustained economic health of Alaska's fishing communities" however, in section 5 AAC 06.355 it would be helpful to state it for the Bristol Bay Sockeye Salmon Fisheries Management plan so that the quality of the harvestable surplus is taken into account because that is paramount in ensuring an economically sustainable fishery.

Practically, this could influence future regulations and management decisions such as: in the Wood River Special harvest area excess net permitted onboard a drift boat must be kept in a brailer bag (so that it can't be set, round-hauled full of fish, and picked while a fresh set of gear is laid out)- this is in contrast to the Naknek and Kvichak special harvest areas where no such restriction applies. Surely more fish can be caught in the later example, but they are of lower quality, and therefore suppress the value of the harvested fish, which harms the ultimate marketability of the salmon and reduces the long-term sustained economic health.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I discussed this issue at length with a broad group of fishermen, industry organizations, and other industry leaders through phone conversations, and think-tank discussions spanning several months.

PROPOSED BY: Reid Ten Kley (EF-F26-156)

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PROPOSAL 51

5 AAC 03.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan. Allow extra drift gillnet to be carried on board the vessel in the Kvichak River Special Harvest Area, as follows:

Replace point (f)(3)

notwithstanding 5 AAC 39.240, a person operating a commercial salmon fishing vessel in the Kvichak River Sockeye Salmon Special Harvest Area may carry additional drift or set gillnet gear on board the fishing vessel if the additional gear is stored in a net bag or in a brailer bag; for the purposes of this paragraph, "brailer bag" means a bag-shaped net on board a drift gillnet vessel used to lift fish from the hold of the vessel into a tender vessel, processing vessel, or processing facility;

[A VESSEL MAY NOT HAVE MORE THAN 150 FATHOMS OF DRIFT GILLNET ON BOARD THE VESSEL.]

What is the issue you would like the board to address and why? I would like the board to consider requiring drift vessels to carry extra gear onboard during the Kvichak River Special Harvest fishery so they can be more efficient when entering and exiting that fishery. For example they would not have to drop off extra gear at a tender or shore plant if they are fishing a dual permit.

The reason for putting extra gear in brailer bags is to not allow nets to be fished, round hauled and picked on deck while new gear is set back out. This practice harms fish quality and erodes economic viability for the fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I discussed this issue with several drift and set net fishermen who are interested in the quality of our harvest, and the long-term impact that round haul fish have on the ex-vessel price every year.

PROPOSED BY: By: Reid Ten Kley (EF-F26-157)

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PROPOSAL 52

5 AAC 72.XXX. New Section.

Create an Upper Egegik River Sockeye Salmon Special Harvest Area Management Plan, as follows:

5. AAC xx.xxx Upper Egegik River Sockeye Salmon Special Harvest Area Management Plan.

a) The goal of this plan is to prevent the foregone harvest (overescapement) of sockeye salmon into the Egegik River, while furthering attempts to maintain Allocation goals.

b) The commissioner may open, by emergency order, the Upper Egegik Special Harvest Area to fishing by set gillnet or drift gillnet or both set and drift gillnet concurrently when the commissioner projects that the sockeye salmon escapement into the Egegik river will exceed the minimum of the escapement goal range.

c) The commissioner shall open, by emergency order the Upper Egegik Special Harvest Area to fishing by set gillnet or drift gillnet or both set and drift gillnet concurrently when the commissioner projects that the sockeye salmon escapement into the Egegik river will exceed the mid point range of the escapement goal range.

d) The commissioner shall open, by emergency order the Upper Egegik Special Harvest Area to fishing by both set and drift gillnet concurrently when the commissioner projects that the sockeye salmon escapement into the Egegik river will exceed the maximum range of the escapement goal range.

e) opener provisions of c) and d) of this section shall be concurrent and of equal or longer duration to any opener called for the regular Egegik district or a 110 version of it.

f) The Upper Egegik Special Harvest Area is all waters above a line from 58 12.80'N, 157 17.04'W and 58 12.28'N, 157 18.53'W to a line between 58 12.30'N , 157 11.74'W and 58 11.98'N , 157 11.74'W.

g) The Upper Egegik Special Harvest Area is known as UESHA.

h) When the UESHA is open under this section,

1) Set gillnet gear may be only operated as follows:

(A) a set gillnet may not exceed 25 fathoms in length;

(B) a set gillnet may not be set or operated within 150' of another set gillnet;

(C) no part of a set gillnet may not be set or operated more than 300' from the 18' high tide mark;

(E) the shoreward end of a set gillnet must go dry at low tide;

(F) a set gillnet may not be set within 500' of a deployed drift gillnet.

2) drift gillnets may be operated as follows:

(A) no more than 75 fathoms of drift gillnet may be used to take salmon with one drift gillnet permit in use on one vessel.

(B) a vessel with one permit in use, may not have more than 150 fathoms of drift gillnet on board;

(C) no more than 100 fathoms of drift gillnet may be used to take salmon with two drift gillnet permits in use on one vessel;

(D) a vessel with two permits in use, may not have more than 200 fathoms of drift gillnet on board;

(E) no part of a drift gillnet may be operated within 150 feet from the side of a set gillnet.

What is the issue you would like the board to address and why? The goal of this plan is to help management prevent the over escapement of Salmon into the Egegik River by creating an upper section of the Egegik District.

Over escapement In Egegik has historically occurred, resulting in a loss to the State, the region, the community, and its participants.

Simultaneously maintaining Allocation Goals and Escapement Goals can at times put those two goals in an adversarial relationship to one another. Restricting opportunity to one gear type to maintain Allocation has in the past resulted in overescapement on occasion, whereas not restricting one gear type when Allocation Goals are unable to be met, results in Allocation goals becoming secondary, and get ignored, which also has also happened in the past.

Having an additional tool of a supplemental Upper Egegik Special Harvest Area (UESHA) available to the managing Biologist to help maintain both Escapement and Allocation would help limit waste (overescapement), while helping maintain Allocation.

Tailoring the opening of the proposed Special Harvest Area during emergency management to one or both of the Gear types (Set and/or Drift) to run concurrently or separately to Egegik district openings, when Escapement Goals are expected to be met or exceeded with the Egegik district at large or during 110 line situations, will assist Management in maintaining Allocation Goals without restricting or impacting the harvest of fish within the regular Egegik District or other Districts. Emphasis added on 'other districts' considering the potential use of a KVSHA.

In every day terms, if one gear type is falling behind in allocation **while escapement is exceeding goals** this (if implemented) will provide an extra opportunity for that gear type to 'catch up' without incumbering the other- or other districts. If implemented it would allow a gear type or both, opportunity to salvage on what would otherwise become over escapement.

(Generalized description)

(from existing upper boundary to the top of High Bluff is the proposed UESHA)

(the proposed UESHA north side river marker (high bluff) is 3 miles upstream of the original upper north side river marker)

(for comparison, the original upper marker is nearly 6 miles upstream of coffee point)

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, I spoke with many participants of both gear types, as well as processing managers in and about Egegik during the summer of 24 to gather input. I also Spoke with Stacey Vega (2025's managing biologist) regarding this matter early in 2025 roughing out this concept, she advised looking to the Ugashik Special Harvest Area's 'language' as a standard or starting point. I conversed with Mitch Seybert (the chair of the BB advisory committee) as an individual, most recently who endorses this concept as drafted in this proposal.

PROPOSED BY: Luke Gardner (EF-F26-115)

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PROPOSAL 53

5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.
Close a portion of the Egegik District to mitigate illegal fishing activity, as follows:

5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

(a) The goal of this plan is to:

(1) minimize the interception of sockeye salmon migrating through the Egegik District and bound for spawning systems within the Naknek-Kvichak and Ugashik Districts, while providing opportunities within the Egegik District to harvest Egegik River sockeye salmon that are in excess of the spawning escapement goal.

(2) **Provide the Commissioner an option to mitigate illegal fishing activities within the Egegik District.**

(b) The Egegik Special Harvest Area consists of the waters south of a line between 58° 18.05' N. lat., 157° 33.15' W. long. and 58° 17.93' N. lat., 157° 32.67' W. long., east of a line between 58° 18.05' N. lat., 157° 33.15' W. long. and 58° 09.91' N. lat., 157° 34.55' W. long., and north of a line between 58° 09.91' N. lat., 157° 34.55' W. long. and 58° 09.44' N. lat., 157° 32.97' W. long. Unless otherwise specified in this section, the applicable provisions in 5 AAC 06.001 - 5 AAC 06.380 apply to the Egegik Special Harvest Area.

(c) The commissioner may close, by emergency order, that portion of the Egegik District bounded by a line from 58° 19.10' N. lat., 157° 36.65' W. long. to 58° 18.05' N. lat., 157° 33.15' W. long. to 58° 09.91' N. lat. 157° 34.55' W. long. to 58° 11.00' N. lat., 157° 38.10' W. long. to 58° 19.10' N. lat., 157° 36.65' W. long. if

(1) the Naknek-Kvichak or Ugashik District is closed to fishing because the total season escapement is projected to be below the lower end of the escapement goal range;

(2) all conservation measures have been taken within the district where the escapement is projected to be below the lower end of the escapement goal range; and

(3) interceptions of Naknek, Kvichak, or Ugashik sockeye stocks within the Egegik District have been documented by past studies and in-season indicators.

(4) **illegal fishing activities are excessive and consistent in areas west of a line between 58° 18.05' N. lat., 157° 33.15' W. long. and 58° 09.91' N. lat., 157° 34.55' W. long., and cannot be effectively prevented by Enforcement resources. Closing this portion of the Egegik District for this purpose is not conditional on (1), (2), or (3) of this section.**

(d) If a district closed under (c)(1) of this section is reopened to fishing, the commissioner shall reopen that portion of the Egegik District that was closed under (c) of this section.

(e) The department shall attempt to issue an emergency order under this section at least 48 hours before the effective time of the opening or closing.

(f) If the midpoint of the escapement goal range is achieved in the Egegik District and the district boundary line has been moved into the Egegik Special Harvest Area, the 48-hour transfer notification period remains in effect for the Egegik District.

What is the issue you would like the board to address and why? Enact SHA boundaries before closing areas due to illegal fishing.

The last week of the 2024 sockeye fishing season in Egegik ended abruptly when the ADFG biologist shut the fishery down because a few fishermen were fishing illegally in an excessive and consistent manner in closed waters over the Egegik north line. The State Troopers had left the fishery and moved on to other areas of Alaska, and the remaining local enforcement could not effectively prevent the illegal fishing activities.

While closing the fishery absolutely stopped the handful of illegal-fishing fishermen, it also stopped a number of legal-fishing fishermen from fishing as well. There are fishermen who fish up-river in the Egegik district in the late season, who never even see the north line. These fishermen had nothing to do with any illegal fishing activities, yet they were penalized just as were those who were doing the illegal fishing.

This proposal offers ADFG biologists another tool in their tool box which may prevent illegal fishing from occurring, and still allow those fishermen who choose to fish legally, to keep fishing.

The situation as it currently exists:
Presently during the late season, the Egegik North Line has a handful of drift net fishermen who consistently fish over the line. Occasionally they get a ticket from an airplane, but the scant amount of late-season enforcement does not seem to stop this illegal fishing activity.

The illegal fishing is occurring over the northern line immediately seaward of the coastal shoreline. The tidal current moves perpendicular to the line, so if a vessel were to fish over that line, the current may carry their boat and net into legal waters. These illegally-set nets seldom drift into legal waters, since the offending vessels are set in very shallow water where the current moves very slowly or not at all, and are usually set out at ¼ mile or more over the line.

The majority of fish caught in this area show up primarily on the ebb tide, as the water is leaving Bristol Bay, the beach is increasing, and the sandbars are becoming exposed. This area is almost exclusively west of the Egegik Special Harvest Area (SHA) western boundary line, and therefore would all be happening in closed waters, if the SHA was in effect.

Situation if this proposal were enacted:
This proposal offers the Egegik run manager another tool in the instance where fishermen are consistently fishing illegally and the only option is to close the fishery. The new option is to move the western boundary line from the standard western boundary line, and into the western SHA boundary line.

While it is true that fishermen could just as easily set illegally over the SHA western boundary line, the fact of the matter is they will not do it. The current would carry them parallel to the western SHA boundary, and NEVER OVER IT (into legal waters), making setting in these closed waters "too blatantly illegal," even for those veteran fish-thieves who frequent the illegal waters north of the Egegik north line.

Plus, if this SHA boundary measure were enacted as a result of illegal fishing, peer pressure from the rest of the fleet would not allow the offending vessels to set over the SHA western boundary line. It would be obvious that management has already taken a limited action to avoid illegal fishing, and it is just as clear (as evidenced by the 2024 late-season closure) that the next step would be full-district closure if any illegal fishing continues.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Matt Marinkovich (EF-F26-041)

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PROPOSAL 54

5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

Repeal the *Nushagak River Coho Salmon Management Plan*, as follows:

5 AAC 06.368 is repealed:

5 AAC 06.368. Nushagak River Coho Salmon Management Plan. Repealed.

[(A) THE PURPOSE OF THIS MANAGEMENT PLAN IS TO PROVIDE GUIDELINES TO ENSURE AN ADEQUATE SPAWNING ESCAPEMENT OF COHO SALMON INTO THE NUSHAGAK RIVER SYSTEM. IT IS THE INTENT OF THE BOARD OF FISHERIES (BOARD) THAT NUSHAGAK COHO SALMON BE HARVESTED BY THE FISHERIES THAT HAVE HISTORICALLY HARVESTED THEM. THE PLAN IN THIS SECTION PROVIDES MANAGEMENT GUIDELINES TO THE DEPARTMENT IN AN EFFORT TO PRECLUDE ALLOCATION CONFLICTS BETWEEN VARIOUS USERS OF THIS RESOURCE. THE DEPARTMENT SHALL MANAGE COHO SALMON STOCKS IN A CONSERVATIVE MANNER CONSISTENT WITH SUSTAINED YIELD PRINCIPLES AND THE SUBSISTENCE PRIORITY.

(B) THE DEPARTMENT SHALL MANAGE THE COMMERCIAL FISHERY IN THE NUSHAGAK DISTRICT TO ACHIEVE AN INRIVER RUN GOAL OF 70,000 - 130,000 COHO SALMON PRESENT IN THE NUSHAGAK RIVER UPSTREAM FROM THE DEPARTMENT SONAR COUNTER LOCATED NEAR THE VILLAGE OF PORTAGE CREEK BY AUGUST 25. THE INRIVER GOAL PROVIDES FOR

(1) THE DEPARTMENT'S SUSTAINABLE ESCAPEMENT GOAL OF 60,000 - 120,000 COHO SALMON UPSTREAM FROM THE SONAR COUNTER BY AUGUST 25;

(2) A REASONABLE OPPORTUNITY FOR SUBSISTENCE HARVEST OF COHO SALMON; AND

(3) A DAILY BAG AND POSSESSION LIMIT OF FIVE COHO SALMON, AND A GUIDELINE HARVEST LEVEL OF 2,000 FISH IN THE SPORT FISHERY; THE SPORT FISHERY GUIDELINE HARVEST LEVEL OF 2,000 FISH DOES NOT APPLY IF THE TOTAL INRIVER COHO SALMON RETURN IS PROJECTED TO BE GREATER THAN 120,000 FISH BY AUGUST 25; THE DEPARTMENT SHALL MANAGE THE SPORT FISHERY TO ENSURE THAT THE SUSTAINABLE ESCAPEMENT GOAL OF 60,000 - 120,000 COHO SALMON IS ACHIEVED.

(C) IF THE TOTAL INRIVER COHO SALMON RETURN IN THE NUSHAGAK RIVER IS PROJECTED BY THE DEPARTMENT TO BE LESS THAN 120,000 BUT AT LEAST 70,000 FISH BY AUGUST 25, THE COMMISSIONER SHALL CLOSE, BY EMERGENCY ORDER, THE DIRECTED COHO SALMON COMMERCIAL FISHERY IN THE NUSHAGAK DISTRICT BY AUGUST 1; AND

(1) REPEALED 4/16/2016;

(2) THE COMMISSIONER MAY RESTRICT, BY EMERGENCY ORDER, THE COHO SALMON SPORT FISHERY IN THE NUSHAGAK RIVER DRAINAGE UPSTREAM FROM THE DEPARTMENT SONAR COUNTER LOCATED NEAR THE

VILLAGE OF PORTAGE CREEK SO THAT THE HARVEST DOES NOT EXCEED 2,000 COHO SALMON BY ONE OR MORE OF THE FOLLOWING:

(A) REDUCE THE BAG AND POSSESSION LIMIT;

(B) PROHIBIT THE USE OF BAIT;

(C) RESTRICT FISHING TIMES AND AREAS;

(D) RESTRICT TERMINAL TACKLE TO SINGLE-HOOK ARTIFICIAL LURES; AND

(E) ALLOW CATCH-AND-RELEASE FISHING ONLY;

(3) IT IS THE INTENT OF THE BOARD THAT THE LOWER THE PROJECTED INRIVER COHO SALMON RETURN IS, THE MORE RESTRICTIVE THAT MANAGEMENT MEASURES WILL BE IN THE SPORT AND COMMERCIAL FISHERIES UNDER THIS SECTION.

(D) IF THE TOTAL INRIVER COHO SALMON RETURN IN THE NUSHAGAK RIVER IS PROJECTED BY THE DEPARTMENT TO BE LESS THAN 70,000 FISH AND THE NUMBER OF SPAWNERS IS PROJECTED TO BE MORE THAN 60,000 FISH ON AUGUST 25, THE COMMISSIONER SHALL

(1) CLOSE, BY EMERGENCY ORDER, THE DIRECTED COMMERCIAL FISHERY NO LATER THAN AUGUST 1;

(2) CLOSE, BY EMERGENCY ORDER, THE COHO SALMON SPORT FISHERY IN THE NUSHAGAK RIVER DRAINAGE; AND

(3) RESTRICT THE COHO SALMON SUBSISTENCE FISHERY IN THE NUSHAGAK RIVER DRAINAGE BY ESTABLISHING PERIODS BY EMERGENCY ORDER, DURING WHICH

(A) COHO SALMON MAY BE TAKEN ONLY FROM

(I) 9:00 A.M. MONDAY TO 9:00 A.M. TUESDAY;

(II) 9:00 A.M. WEDNESDAY TO 9:00 A.M. THURSDAY; AND

(III) 9:00 A.M. FRIDAY TO 9:00 A.M. SATURDAY; AND (B) SET GILLNETS MAY NOT BE MORE THAN 10 FATHOMS IN LENGTH.

(E) IF THE NUMBER OF COHO SALMON SPAWNERS IN THE NUSHAGAK RIVER IS PROJECTED BY THE DEPARTMENT TO BE LESS THAN 60,000 FISH BY AUGUST 25, THE DEPARTMENT SHALL CLOSE THE SUBSISTENCE, COMMERCIAL, AND SPORT FISHERIES.]

What is the issue you would like the board to address and why? In 2025, the Alaska Department of Fish and Game recommended discontinuing the Nushagak River coho salmon escapement goal due to a lack of coho salmon stock assessment. The *Nushagak River Coho Salmon Management Plan* (plan) was adopted in 1996 when the department was actively assessing the Nushagak River coho salmon stock. The plan is structured around coho salmon escapement level triggers that direct specific management actions. The department has not conducted enumeration for coho salmon on the Nushagak River since 2018 and has only enumerated coho salmon 4 times since 2004. Over the past

20 years, triggers in the plan have rarely been used to manage fisheries targeting Nushagak River coho salmon.

It is unlikely the department will be able to enumerate coho salmon escapement in the Nushagak River in the future or collect enough data to evaluate run timing and escapement goals. Anecdotal reports indicate that run timing has changed over the last 20 years, shifting later. If this is the case, it may render the dates defined in the plan impractical to implement even if coho salmon escapement data were to become available in the future.

Commercial interest in coho salmon has declined since the adoption of this plan. Most processors cease buying operations in the Nushagak District by the end of July, well before the August 10 historical midpoint of the coho salmon run. Without escapement data, the department will not provide directed commercial fishing opportunities on Nushagak River coho salmon. The subsistence and sport fisheries will continue to be managed per regulations established by the board.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-023)

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PROPOSAL 55

5 AAC 06.368. Nushagak River Coho Salmon Management Plan.
5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.
Repeal the *Nushagak River Coho Salmon Management Plan*, as follows:

Delete 5 AAC 06.368. Nushagak River Coho Salmon Management Plan and the reference to the plan within the Wood River Sockeye Salmon Special Harvest Area Management Plan (c)(D)(2).

What is the issue you would like the board to address and why? ADFG is recommending that the Nushagak Coho escapement goal be eliminated. With the elimination of the escapement goal, there is no longer a reason to have a management plan directing ADFG on how to manage a fishery to ensure that a goal that no longer exists is met.

Also, ADFG has not been counting Coho salmon in the Nushagak for many years.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Robert Heyano (EF-F26-082)
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PROPOSAL 56

5 AAC 06.331. Gillnet specifications and operations.

Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery, as follows:

Remove the words (and subject to (v) of this section) from section (n).

Make the introductory language of 5 AAC 06.331(n) is amended to read:

(n) 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 operate by another CFEC salmon interim-use or entry permit holder. In addition, not part of a set gillnet, anchor, peg, stake, buoy, or other device used to set the gillnet may be seaward of the following offshore locations:

What is the issue you would like the board to address and why? The existing seaward boundary for setnet operations on Ekuk Beach, defined in 5 AAC06.331(n), will not exist after May 31, 2026 due to the sunset language in 5 AAC 06.331 (v).This boundary, adopted in 2023, replaced the previous measurement methodology which was unreliable due to fluctuations of the beach caused by weather and tide. The current boundary has provided an enforceable limit to operation of setnets by giving fishermen and enforcement an easily identifiable boundary. The boundary established under 5 AAC 06.331(n) should be maintained and the sunset provision in 5 AAC 06.331(v) should be removed.

5 AAC 06.331(n) works very well for the set gill net fishery on Ekuk Beach. It gives set and drift net fishermen as well as law enforcement a stable, easily-defined seaward boundary for set gillnet gear. The current outer limit is a fixed boundary based on latitudes and longitudes that do not fluctuate. This is a huge improvement from the previous boundary which was keyed to high and low water marks which fluctuate continually. In this section of the Nushagak, the beach is gravel and changes daily. The mean high-water mark fluctuates shoreward and seaward many feet depending on tide size and wind conditions. When there is a strong storm during a high tide, the mean highwater level, approximately 19 feet above mean low water, moves significantly shoreward. Later, over a few days of calm weather and small tides the beach fills back in and may move seaward even more significantly. The minus 3-foot tide mark, which also previously defined the outer limit, is very difficult to measure. The minus 3-foot tide level occurs rarely, and even when it does, it varies with wind conditions.

Both the mean high water and mean low water levels are based on a tidal benchmark that is located in Clarks Point miles away from Ekuk Beach. This benchmark is not accessible for fishermen or enforcement, and requires specialized equipment and knowledge to locate, measure, and compare with individual sites. Without an accessible benchmark, and with a continually changing beach, it is extremely difficult for law enforcement and fishermen to accurately establish the mean high water or the minus 3-foot tide mark. Technically, a person could attempt to average the tide levels over many days and estimate boundaries, but because the beach is not stable, this method cannot give accurate, repeatable, or defensible results. In reality, to accurately establish either of these tide levels, one must hire a professional land surveyor to survey from the tidal benchmark in Clarks Point to the site, which may be up to 20 miles away.

The outer set gillnet boundary adopted by the Board in 2023 is effective and should be retained.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. 5 AAC 06.331(n) was a collaborative effort between set and drift net users, enforcement and the Board of Fisheries in 2023. I have discussed with and have the support from many set gillnetters for this proposal.

PROPOSED BY: John O'Connor (EF-F26-071)

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PROPOSAL 57

5 AAC 06.331. Gillnet specifications and operations.

Adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery, and prohibit drift gillnet gear from coming into contact with set gillnet gear , as follows:

06.331(n) sets a seaward limit for operation of set gillnets by establishing defined coordinates as the outer boundary. This set of coordinates should also function as a shoreward boundary for drift gillnets and related equipment, preventing drift boats and drift gillnets from entangling with set gillnets, lines, and other equipment.

Revised Section:

06.331(n) In the Nushagak District, and subject to (v) of this section, 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 following offshore locations; and no part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be shoreward of the following offshore locations while the drift gillnet is in the water:

New Section:

(w) No part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be operated so as to come into contact with a set gillnet, line, anchor, peg, stake, buoy, or other device used to operate the setnet.

What is the issue you would like the board to address and why? Drift boats and drift gillnets are being operated inside the coordinates defined in 06.331(n), which define the seaward limit for setnet operations along Ekuk Beach, and have often been entangled in setnets and setnet lines and gear. This entanglement endangers fishermen, damages setnets, running lines, anchors, pegs, stakes, buoys, and other devices and prevents continued operation of the setnet for at least 1 tide, and often longer depending on the size of the following low tides, creating a material loss of catch for the setnet operation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, I collaborated with fishermen on Ekuk Beach and will work with the Nushagak Advisory Committee to review this proposal at their convenience.

PROPOSED BY: Christine O'Connor, Jamie O'Connor, Sonja Rootvik Ewing, Kevin Ewing, Warren Libby, Avi Friedman, Noris Friedman, Celia Friedman, Jeff Rasco, Haley Rasco, Michelle Atkiq Snyder, Logan Ball, Travis Ball, Terri Stone, Dave Reynolds, Dayle Ferry, Grayson Sanborn, Margot Stroop, Julia Harding King, Cameron Libby, Grayson Libby, Benjamin Ahrens, Bryon Wilson, Dennis Ball, Trace Oxentenko-Ball, Lauri Libby Rootvik, Sean O'Connor,

(EF-F26-117)

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PROPOSAL 58

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

Modify the trigger to open the Wood River Special Harvest Area when the total run is estimated to be over 5 million fish, as follows:

Modify the trigger to open the WRSHA to match the Wood River OEG when its used in-season.

(3) when the escapement of sockeye salmon into the Wood River exceeds 1,600,000 (1,100,000) fish and the escapement is projected to exceed 2,000,000 (1,400,000 fish);

What is the issue you would like the board to address and why? Currently, the department may open the Wood River Special Harvest Area (WRSHA) when the escapement of sockeye salmon into the Wood River exceeds 1,100,000 fish and the escapement is projected to exceed 1,400,000 fish. The current SEG for the Wood River Sockeye run is 700,000-1.8 million and was established in 2015.

In 2022 the BOF adopted the Nushagak King Action plan that created an OEG for the Wood River sockeye in years where it was estimated to be larger than 5 million in total run size. The in-season trigger described above was not modified to match instances where an OEG is in use.

In instances where it is estimated that the Wood River sockeye run is greater than 5 million fish, the OEG is in place with 700,000 sockeye as the lower bound,, and the upper bound is 15% of the Wood River run size above the 1.8 million fish upper bound of the SEG. So if a total run to the Wood River was estimated to be 5 million fish, the upper bound of the OEG would be 2,550,000 (SEG of 1,800,000 plus 15% of 5 million (750,000) = 2,550,000).

The trigger to open the WRSHA needs to be modified to match the OEG when it's in use.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Frank Woods (EF-F26-097)

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PROPOSAL 59

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation, as follows:

WHEN THE WRSHA IS OPEN UNDER (c) (3) OF THIS SECTION THE WOOD RIVER WILL BE OPEN TO THE GEAR TYPE THAT IS BEHIND IN ALLOCATIONFOR THE NUSHAGAK DISTRICT INITIALLY. THEN EVERY 48 HOURS THEOPPOSITE GEAR TYPE WILL BE ALLOWED TO FISH FOR UP TO 48 HOURSALTERNATING BACK AND FORTH BETWEEN THE TWO GEAR TYPES REGARDLESS OF ALLOCATION PERCENTAGES. THIS WOULD ONLY APPLYWHEN THE NUSHAGAK DISTRICT AND WRSHA ARE OPENSIMULTANEOUSLY.

What is the issue you would like the board to address and why? THE WOOD RIVER SPECIAL HARVEST MANAGEMENT. (WRSHA)

CURRENTLY WRSHSA ALLOWS THE GEAR TYPE BEHIND IN THEIR ALLOCATION TO FISH FIRST AND CONTINUE FISHING IN THE WRSHSA AS LONG AS THEY REMAIN BEHIND IN THEIR ALLOCATION. DUE TO THE LACK OF SET NET GEAR NUMBER FLUCTUATION AND RADICAL FLUCTUATION IN DRIFT GEAR NUMBERS, SET NET GEAR IS ALMOST EXCLUSIVELY GETTING TO FISH IN THE WRSHA WITH ALMOST NO OPPORTUNITY FOR DRIFT NET GEAR.

THIS IS DOES NOT SEEM EQUITABLE FOR SET NET GEAR TO GET ALL THE WRSHA OPENINGS AND THE DRIFT NET GEAR GETS ALMOST NONE OF THE WRSHA OPENINGS.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. NO, BUT I DID VISIT WITH TIM SANDS BIOLOGIST OF NUSHAGAK DISTRICT REGARDING THIS ISSUE AND HAVE TALKED WITH NUMBER OF OTHER FISHERMAN WHO AGREE WITH ME ON THIS ISSUE.

PROPOSED BY: Leo Jennings (EF-F26-004)

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PROPOSAL 60

5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan. Increase the length of a set gillnet in the Wood River Special Harvest Area, as follows:

5 AAC 06.358. **Wood River Sockeye Salmon Special Harvest Area Management Plan**

(d) When the Wood River Special Harvest Area is open under this section, the following apply within the open waters:

(1) set gillnets may be operated only as follows:

(A) a set gillnet may not exceed **37.5** [25] fathoms in length;

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

Lengthen set gillnets in the Wood River Special Harvest Area (WRSHA) from 25 fathoms to 37.5 fathoms. This would mirror what's already allowed in the Naknek River Special Harvest Area (NRSHA) under 5 AAC 06.360. When the WRSHA was originally created, openings were concurrent with drift fishers. It made sense then to have shorter set gillnets because the drift fleet was fishing at the same time. When regulations changed in 2012 to have separate gear openings, the need to reduce gear conflict went away. Since the WRSHA is primarily used to harvest surplus salmon, additional gear would help to maximize harvest. The WRSHA also allows for more room between set gillnets (250' vs 150') compared to the NRSHA, making even more room for these longer nets.

a) What would happen if nothing is changed? Setnetters in the WRSHA would continue to fish with 25 fathoms, but would lose fishing opportunity they might have if allowed to fish 37.5 fathoms like setnetters in the NRSHA.

b) What are other solutions you considered? Why did you reject them? None

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, discussions were had amongst various Nushagak setnetters who were all in favor.

PROPOSED BY: Tom Rollman, Levi Rollman, Rick Wysocki, and Bert Luckhurst (EF-F26-125)

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PROPOSAL 61

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan. Repeal provisions allowing commercial fishing, adopt date specific provisions for opening commercial fisheries based on king salmon inriver projected run size, and prohibit the retention of king salmon in the sport fishery , as follows:

Adopt additional restrictions to protect King escapements. These include early season limitations on opening of the commercial fisheries, provisions for no-fishing windows in the commercial fisheries and prohibition of retention in the sport fishery.

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

…

(d) **Notwithstanding sections (2) through (5) of this plan,** [B]**b**efore 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 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~~].

[~~(1) THE SOCKEYE SALMON SONAR ESTIMATE IN THE NUSHAGAK RIVER IS PROJECTED TO EXCEED SIX PERCENT OF THE NUSHAGAK RIVER SOCKEYE SALMON RUN BASED ON THE NUSHAGAK RIVER SOCKEYE SALMON PRESEASON FORECAST AND INSEASON ASSESSMENT OF RUN SIZE; OR~~

~~(2) THE SOCKEYE SALMON COUNT PAST THE WOOD RIVER COUNTING TOWER IS PROJECTED TO EXCEED 10PERCENT OF THE WOOD RIVER SOCKEYE SALMON RUN SIZE BASED ON THE WOOD RIVER SOCKEYE SALMON PRESEASON FORECAST AND INSEASON ASSESSMENT OF RUN SIZE.~~]

(e) **Notwithstanding sections (2) through (5) of this plan, from 9:00 a.m. June 28 through July 4, if the Nushagak king salmon inriver run size is projected to be less than 95,000, the commissioner shall close concurrently, 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 for a minimum of 12-hours per day.**

(f) The department shall manage the sport fishery in the Nushagak River drainage, excluding the Wood River drainage, as follows:

- 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;
- if the total inriver king salmon run return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may, by emergency order, increase the annual limit for king salmon to four king salmon, 20 inches or greater in length, with no restrictions for fish over 28 inches in length.
- **retention of king salmon may be prohibited if the Nushagak king salmon inriver run size is projected to be less than 55,000 fish.**

[~~(f)~~] **(g)** Subsistence fisheries will be managed in accordance with the rest of this title.

What is the issue you would like the board to address and why? Numbers of Nushagak River King Salmon have continued to declined since the 2022 Stock ofConcern designation and action plan adoption. Record low numbers of King Salmon wereestimated at the inriver sonar in 2023 and 2024.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Not applicable

PROPOSED BY: Kenai River Sportfishing Association (EF-F26-006)
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PROPOSAL 62

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Prohibit commercial fishing in the Nushagak District until June 28 or until the minimum escapement goal of 55,000 king salmon are counted at the Portage Creek sonar, as follows:

No Nushagak District commercial drift or set netting prior to June 28th unless chinook salmon counts at Portage Creek sonar has exceeded minimum escapement number (55,000)

What is the issue you would like the board to address and why? Commercial netting during the peak of chinook salmon migrating thru the Nushagak district has had a harmful impact on the numbers of kings allowed to return to the river, by refraining from any netting activity prior to June 28th will allow more kings in river to spawn and also provide for increased recreational and subsistance catch.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have possessed a Choggiung Land Use Permit (LUP) to operate a sport fishing camp since 2004. I have seen a decline in chinook salmon numbers especially since around 2010 when sockeye netting was allowed to begin June 15-18. I do not have solid evidence, just my memory. I have consulted annually with other LUP operators and we all feel the same way. The chinook need to be allowed in river to sustain the run, our limited number of sport fisherman have the least amount of impact on the chinook runs. (as cited in Table 1 of the "Nushagak River King Salmon – Stock Status and Action Plan" Nov 29, 2022)

PROPOSED BY: Kent Anderson, owner Alaska Salmon Camp Inc (EF-F26-035)

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PROPOSAL 63

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Amend the *Nushagak District King Salmon Stock of Concern Management Plan*, as follows:

5 AAC 06.391 (e)

(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;] **the daily limit for king salmon under 20 inches is five per day and five in possession, the annual limit for king salmon 20 inches or greater in length is four fish, only one of which may be 28 inches or greater in length, and the one king salmon 28 inches or greater in length may only be retained after a minimum inriver goal of 70,000 is reached, window closures will be implemented for the king salmon sport fishery consistent with a tidal schedule, daily king salmon harvest below the sonar site will be reported for inseason estimates, all required sport fishing annual harvest record cards will also record king salmon under 20 inches and cards will be submitted to ADF&G after the completion of fishing;**

(2) if the total inriver king salmon run return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may, by emergency order, increase the annual limit for king salmon to four king salmon, 20 inches or greater in length, with no restrictions for fish over 28 inches in length**, with the elimination of closure windows**.

What is the issue you would like the board to address and why? Add regulations to sports fisheries as part of the Nushagak District King Salmon Management Plan.
Currently, all specific regulatory language for triggers has been removed and the sport fishery is managed based on ADF&G emergency orders (EOs). The Board of Fisheries queried ADF&G during the development of the Nushagak District King Salmon Stock of Concern Management Plan about the need for specific regulatory language. At the time, ADF&G stated that EO authority would be more responsive and adaptive to inseason data. This has not been the case, and triggers or data for issuance of EO(s) is unclear, with the fishery being restricted to catch and release only in July.

Enumeration of Chinook salmon and assessing run strength is much worse in years of high Sockeye escapement. Previous removal of regulatory language was based on sonar being a poor inseason indicator of Chinook run strength (sonar was only 40-60% enumeration). The accuracy is now considered to be even less accurate on years with large Sockeye escapement. Minimum inriver escapement goals are likely reached in these years when considered for decreased enumeration compared with historical assessments. Chinook harvested below the sonar should be reported daily as their harvest can have a negative impact on inseason inriver escapement projections.

Regardless of the projected Chinook escapement, the sport fishery allows a daily harvest of 5 Chinook under 20 inches in length, an annual harvest of larger sizes (4 Chinook, only one of which can be greater than 28 inches). ADF&G has stated that anglers are encouraged to harvest smaller Chinook, as they have little impact on spawning success and the genetic health of the population,

and removal is actually beneficial, as small Chinook skew the genetics of the population toward smaller Chinook, whereas large Chinook can be 10x more fecund than Chinook half their size. Additional protection for harvest of larger Chinook and windowed closures for migration through the river to their spawning grounds should be favored by sport fishermen for increased inriver conservation and genetic diversity.

A lack of regulations for a primarily commercially guided sports fishery (90% nonresident, 95% guided) and a phase-out instead of phase-in approach is inconsistent for Chinook conservation. Additionally, the required Sport Fishing Annual Harvest Record Card should be submitted to ADF&G, online or otherwise, at the end of the season to increase available data for the stock of concern.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Proposal was developed from countless conversations and correspondence with fishermen and ADF&G.

PROPOSED BY: Nicholas Dowie and John O'Connor (EF-F26-155)
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PROPOSAL 64

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Open the Wood River Special Harvest Area to drift and set gillnet gear until one of the king salmon stock of concern triggers is met, as follows:

While the Nushagak District is being managed by the King Salmon stock of concern management plan fishers be allowed to fish in the Wood River Special harvest area until one of the triggers is met.

What is the issue you would like the board to address and why? While the fishers are waiting for extra sockeye escapement due to the king salmon stock of concern management plan allow fishers, set net and drift net, to fish in the Wood River special harvest area.

This management plan has three triggers that if one is met the fishers can fish in the district. Triger 1) requires 10 percent of Wood River sockeye forecast to be past counting tower, Triger 2) requires 6 percent of Nushagak River sockeye forecast to be past Portage Creek sonar, Triger 3) June 28 nine am.

When the Wood River reaches its 10 percent trigger the escapement goal is almost met before the fishers are allowed to fish and assuring over escapement.
Fishing during this time in the Wood River Special Harvest area would slow down the escapement rate but still allow escapement into the Wood River and allow king salmon escapement up the Nushagak River.

When the Wood River reaches it 10 percent trigger it is almost assured to meet the trigger for allowing fishing into the Wood River Special Harvest area within a day or two with one gear type.

To reach this 10 percent escapement goal takes a lot of fish, and once they start swimming into the Wood River it is very hard or impossible to slow the escapement down especially with there being a gap between the fishing district and the Wood River, a lot of fish can be in this gap. Resulting in over escapement.

2025 Wood River forecast is 8 million fish, 10 percent is 800,000 sockeye. Wood River Special Harvest Area management states once Wood River escapement reaches 1.1 million and projected to reach 1.4 million the Wood River Special Harvest area is to open to fishing to one gear type.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I wrote this proposal with the help of my family who are all Bristol Bay fishers.

PROPOSED BY: Rick Tennyson (EF-F26-089)

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PROPOSAL 65

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan. 5 AAC 06.367, and Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

Remove Wood River Special Harvest Area from Nushagak District allocation calculations, and amend *Nushagak District King Salmon Stock of Concern Management Plan* to include set gillnet specific provisions, as follows:

A multifaceted solution is needed to remedy this set gillnet hardship.

1. Include specific language to current regulated allocation in 5 AAC 06.367 to specify that the Wood River Special Harvest District catch is not included within Nushagak Section allocation.

2. Establish a lower threshold of the three independent triggers for set gillnet fleet different than the drift gillnet fleet, such as:
   i. Change date to June 26th at 9am for set gillnet only
   ii. Trigger of 5% of run added to SEG for OEG for Wood River
   iii. Trigger of 3% of run added to SEG for OEG for Nushagak River

3. Eliminate set gillnet window closures after 75% of historic Chinook passage from district (starting July 2nd as there is travel time from the district to sonar, ~2-2.5 day difference for salmon entering the district and passing the sonar)

Suggested language:

5 AAC 06.367

(C) Wood River Special Harvest Area does not count within the Nushagak District allocation plan.

5 AAC 06.391

(d) Before 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 shall close, by emergency order, the sockeye salmon commercial drift gillnet fishery in the Nushagak District, and **before 9:00 a.m. June 26, if the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commissioner shall close, by emergency order,** the sockeye salmon commercial set **gillnet** [net] fishery in the Nushagak Section of the Nushagak District **to allow for management of allocation**

(1) the sockeye salmon sonar estimate in the Nushagak River is projected to exceed six percent of the Nushagak River sockeye salmon run based on the Nushagak River sockeye salmon preseason forecast and inseason assessment of run size **for the drift gillnet fleet and three percent for the set gillnet fleet**; or

(2) the sockeye salmon count past the Wood River counting tower is projected to exceed 10 percent of the Wood River sockeye salmon run size based on the Wood River

sockeye salmon preseason forecast and inseason assessment of run size **for the drift gillnet fleet and five percent for the set gillnet fleet**; and

(3) after 75% of projected Chinook passage have passed from the district, window closures shall be discontinued and Sockeye will be managed for escapement and allocation.

What is the issue you would like the board to address and why? The Nushagak District set gillnet harvesters, in the Ekuk Village set gillnet statistical area, have experienced a disproportionate economic burden as an unintended consequence of the Nushagak Chinook Conservation Management Plan. Hundreds of set gillnet harvesters, fishing over 70 sites, on Ekuk Beach in the Nushagak District have seen significant harvest share decline as a result of recent management actions and reduced critical early season fishing time. In season loss of harvest share has declined by approximately 37% in 2023 and 2024, compared to the 10-year prior average, and this is compounded with the later start date. This puts the future of the fishermen and the processing facility at risk.

The management strategy, as implemented, has resulted in the set gillnet fleet harvesting 15% of the Nushagak Section sockeye salmon, instead of the designated 20%. ADF&G has historically managed the set gillnet fleet differently than the drift gillnet fleet, but now the gear groups are managed relatively the same, and much is based on foregone harvest emergencies. The set gillnet fleet in the Nushagak Section starts on the same day as the drift gillnet fleet and there is a much larger utilization of windowed closures for set gillnet. This results in ~75% of all drift gillnet gear emphasizing more toward a "southline" district boundary, which prevents sockeye from moving to stationary gear.

Set gillnet fishermen, need additional regulatory guidance to protect their multigenerational heritage, and the historic Ekuk Village fishery should be protected and preserved. In many ways, Ekuk represents the epitome of Alaska's Seafood Task Force's vision for the future: providing access, opportunity, economic sustainability, and helping to maximize the value of some of the highest quality salmon produced in Bristol Bay.

Additional fishing time over the drift gillnet fleet and adherence to the traditional share of harvest volume are imperative for Ekuk operations and processor to be sustainable. Small or even average historical sockeye returns in the future would be devasting.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Proposal was created with coordination with fishermen, consultants, and frequent communication for information with ADF&G.

PROPOSED BY: Alaska's Best Seafood (EF-F26-135)

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PROPOSAL 66

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

Modify the sport fishing gear allowed in *Nushagak District King Salmon Stock of Concern Management Plan*, as follows:

5AAC 06.391 (e) Add (3) Appropriate Sports Fishing Gear used for king salmon on the Nushagak River and Nushagak River Drainages that are open for king salmon fishing from June 1st-July 31st.

Sports fishing for king salmon may only be conducted by use of the following:

A closely attended single line attached to not more than one artificial lure with a single barless hook which includes the following:

- **One plug with single barbless hook**
- **One spoon with single barbless hook**
- **One spinner with single barbless hook**
- **One artificial fly with single barbless hook**

Bait, scent sprays, and liquid scents of any type are prohibited.

What is the issue you would like the board to address and why? From my experience of being a lodge owner and guiding on the Nushagak River daily during the King salmon sports fishing season for 8 years, I have seen the difference of catching King salmon with and without bait, and the damage that occurs using bait and scent with a barbed hook. Using a barbed hook can cause tearing of the mouth, which can be exacerbated by using bait as this increases the possibility of the king salmon getting hooked further into the mouth. This can cause the fish to bleed and increase the rate of mortality. These king salmon, traveling upriver, some more than 80 miles, can be caught multiple times on their way to their spawning grounds. From my experience, use of bait is very efficient and significantly increases the number of times these fish are caught in transit, which compounds the damage previously mentioned.

Currently we are operating within the Nushagak District King Salmon Stock of Concern Management Plan. During this time of concern methods to protect these salmon once they reach the river should be considered of high importance. Under this plan there needs to be a restriction on Methods and Means for Sports Fishing for King Salmon. To give them the best opportunity to survive we must decrease the mortality rate. By going to artificial lures and flies with a single barbless hook, we can lower the efficiency of angler's gear, reducing the number of times a fish is caught during its journey, and thus reducing the damage, without depriving anglers the opportunity of a lifetime to fish for Kings on the Nushagak River.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No, I am a Dillingham resident and previous lodge owner with 8 years of guiding experience on the Nushagak River. I have also participated in commercial drift fishing for salmon in the bay throughout most of my life. I still actively sportfish with friends and family on the Nushagak River early in the king salmon run before I start commercial fishing for the season.

PROPOSED BY: Travis Wren (EF-F26-142)
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PROPOSAL 67

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

Modify the sport fishing gear, size restrictions and area open for king salmon in the Nushagak River drainage, as follows:

This proposed regulation would add language to an existing section of regulations within the Nushagak / Mulchatna King Salmon Management Plan. Should this language be adopted, we think it ought to be added into regulation 5 AAC 67.022g. In addition, we think it would need to be incorporated into the Nushagak King Salmon Stock of Concern Plan. We also think the amended regulation would offer protection to spawning Kings in the Mulchatna River and its tributaries.

Language would be added to 5 AAC 67.022 to include the closure of King Salmon fishing in parts of the Mulchatna River and its tributaries until the end of the season or the lower end of the escapement goal is met. This all is meant to happen when the Department can no longer project that the King Salmon escapement will reach the lower end of the escapement goal which is currently 55,000 King Salmon.

Suggested regulation / action:
5 AAC 67.022g When the King Salmon escapement in the Nushigak River is projected to be less than 55,000 King Salmon the Commissioner shall [close] restrict by Emergency Order Nushagak and Lower Mulchatna river King Salmon sport fishing areas to

PROHIBIT:
A. The retention of Kings of any size.
B. The use of bait
C. In addition, the New Stuyahok River and the Mulchatna River and its tributaries upriver from the confluence the Old Man Creek including Old Man Creek itself will close to King Salmon fishing until the end of the season, or the lower end of the escapement goal is met.

What is the issue you would like the board to address and why? Declining numbers of Chinook salmon returning to the Nushagak / Mulchatna Drainage and the amount of stress put on kings who have spent much of their energy migrating to the spawning areas.

Currently the Nushagak River is closed to the sport fishing of King Salmon above Harris Creek year around. This is to avoid the harvest of King Salmon and lower other associated stress being put on King Salmon stocks and their spawning areas. This, by anglers, who would otherwise be targeting Kings there. King Salmon spawning in the Middle and Upper Mulchatna River and its tributaries would also benefit from this type of protection.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed the proposal ourselves. Suzie is the current Nushagak AC chairman. Tom was on the Nushagak AC from 2011 to 2024 and was one of the people appointed to the Nushagak Mulchatna King salmon committee.

PROPOSED BY: Susie Brito and Tom O'Connor (EF-F26-090)
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PROPOSAL 68

5 AAC 06.361 Nushagak-Mulchatna King Salmon Management Plan, and 06.391 Nushagak District King Salmon Stock of Concern Management Plan.

Adopt an optimal escapement goal for Nushagak River king salmon, as follows:

We recommend that the Board of Fisheries adopt an Optimal Escapement Goal (OEG) for Nushagak River king salmon:

-Biological Escapement Range: 102,530 to 119,882 spawners
-Sonar-Observed Equivalent: 59,467 to 69,532 spawners

These values were derived through a multi-step process:
1.Baseline Reference:
We used the average escapement from 1994–2006 (77,923 spawners) as a realistic rebuilding target. This period represents the last consistent era of Chinook productivity prior to the significant decline that began around 2007.

2.Adjustment for Fecundity Loss:
Research by Ohlberger et al. (2020) and others shows that reductions in size and age have led to a 24–35% decline in egg production per female. We adjusted the baseline escapement by dividing it by (1 - fecundity loss rate), which resulted in:

-~102,530 spawners needed (for 24% loss)
-~119,882 spawners needed (for 35% loss)

3.Correction for Sonar Undercounting:
ADF&G reports that the sonar site in the Nushagak River may undercount king salmon by up to 65%, with an average undercounting rate of ~42%. We applied this correction to the biological OEG estimates to determine what would be needed in sonar-observed escapement:

-~59,467 observed (low-end)
-~69,532 observed (high-end)

This proposal does not seek to change the SEG, which is under ADF&G's jurisdiction. Instead, the OEG would serve as a biologically grounded benchmark to guide management decisions and support realistic, sustainable rebuilding of the Chinook population.

What is the issue you would like the board to address and why? The current escapement management for Nushagak River king salmon is based on outdated size and productivity assumptions from the 1990s. No formal Optimal Escapement Goal (OEG) exists for Chinook in this system, and the existing Sustainable Escapement Goal (SEG)does not account for declines in fish size, fecundity, or sonar undercounting. As a result, rebuilding efforts are hindered by benchmarks that no longer reflect biological realities.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. This proposal incorporates peer-reviewed research (e.g., Ohlberger et al. 2020), ADF&G reports, and historical Nushagak Chinook data.

PROPOSED BY: Justin Crump (EF-F26-040)

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PROPOSAL 69

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.
Adopt a recovery goal for Nushagak River king salmon, as follows:

Adopt recovery goal for Nushagak River King Salmon as recommended in the Department's Status and Action Plan report.

5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

(a) The purpose of this management plan is to provide management tools and guidelines to the department for the managaement of Nushagak District salmon fisheries, while Nushagak River king salmon are listed as a stock of management concern, which 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.

(b) While the Nushagak River king salmon are listed as a stock of management concern, it is the intent of the board that all Nushagak District salmon stocks are managed conservatively through June 28 to protect Nushagak River king salmon, consistent with 5 AAC 39.222 (policy for the management of sustainable salmon fisheries). **The provisions of this management plan are in effect until the lower bound of the SEG (55,000):**

(1) is met or exceeded in three consecutive years and is expected to be met in future years or

(2) is met in four out of six consecutive years and is expected to be met in future years.

What is the issue you would like the board to address and why? The 2022 Nushagak River King Salmon Stock Status and Action Plan report to the Alaska Board of Fisheries recommended a recovery goal but this goal was not formalized.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Not applicable

PROPOSED BY: Kenai River Sportfishing Association (HQ-F26-005)

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PROPOSAL 70

5 AAC 06.200. Fishing districts and sections.

Extend the northern boundary in the Ugashik District, as follows:

Ugashik District: all waters south of a line from Cape Greig at 57*43.54' N. Lat., 157* 41.82' W. long to a point **THAT INTERSECTS WITH THE STATE WATERS 3 MILE BOUNDARY AT 57* 43.53' N. LAT., 157* 47.23' W. LONG., THEN EAST OF A LINE FROM 57* 43.53' N. LAT., 157* 47.23'W. LONG.,** to Cape Menshikof at 57* 28.34' N. Lat., 157* 55.84' W. long.

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

In the Ugashik District of Bristol Bay, extend the northern boundary line at Cape Greig west to the 3 mile State water boundary.

Currently, the Ugashik District northern boundary at Cape Greig extends from the beach to "a point approximately 1 mile offshore at 57* 43.54 N. Lat., 157* 43.80 W. Long., then east of a line from 57*43.54 N. Lat., 157*43.80 W. Long., to Cape Menshikof at 57* 38.34 N. Lat., 157* 55.84 W. Long.

At high water, there is enough physical space for approximately 5-6 boats to deploy their nets on the north boundary line, in an orderly fashion. At low tide approximately 40% of that fishing area becomes inaccessible and chaos seems to develop by virtue of this physical compression. We see no need for this measure of constraint. One only has to look to:

Point #1 – The Outer Port Heiden northern boundary – **to the south of Ugashik** – which extends from the beach, westward to the State waters 3 mile boundary.

Point #2 – And, to the Egegik southern boundary – **to the north of Ugashik** – which also extends from the beach, westward to the State waters 3 mile boundary.

Both of these points serve as precedent and working examples of a more "orderly fishery," which begs the question of the Board of Fisheries; *why isn't the Ugashik District afforded the same boundary determinations?*

Point #3 – Additionally, according to ADF&G test data, in the 2024 Egegik salmon fishery, it is reported that 1/3 of the total harvest from this district was made up of Ugashik area stocks.

Point #4 – In the Outer Port Heiden District, both WASSIP and University of Washington testing point to the overwhelming harvest of Ugashik area stocks.

Point #5 –These two districts seemingly enjoy harvesting Ugashik stocks but suffer no burden of escapement; that falls upon the registered Ugashik fleet, proper, who have recorded many days of closures and extremely short fishing windows while waiting for escapement. (In 2021, Ugashik did not receive a standard 12 hour opening until July 16th, just one day prior to the emergency order period being waived by regulation. This, in spite of the escapement goal of 1.4 million fish was completely overwhelmed by an actual 2.86 million!)

Point #6 – The prevailing thought at ADF&G is that Egegik interception of Ugashik stocks is just a normalized occurrence; something that is sort of built-in to their management strategy; certainly, no outrage or strategies to counter it. In fact, when Ugashik is struggling for escapement, the one and only tool that ADF&G managers have at their disposal is to pull Egegik in to the "110 Line" – a de facto admission that this is an ongoing event!
See 5AAC 06.359. In an attempt to conserve Ugashik bound stocks, should the Egegik district be redrawn to mirror the current Ugashik boundary?

Point #7 – Critics of this proposal will offer that any expansion of the Ugashik boundary could result in interception of Kvichak stocks. With little data to support such a claim, this becomes mere speculation.

This proposed boundary adjustment would increase the Ugashik fishing district by approximately 40% and allow the existing fleet an opportunity to harvest Ugashik area stocks **IN** the Ugashik District. Please note that this proposal does not seek to extend the southern boundary at Cape Menshikof out to 3 miles too. Rather, a modest expansion, as proposed, to afford the Ugashik fleet a bit more opportunity and elbow room.

Moreover, this proposal would also supplement the local tax base of Pilot Point by elevating the harvest of Ugashik bound fish in an area that is under their taxing authority.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Bristol Bay Reserve Association (EF-F26-088)
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PROPOSAL 71

5 AAC 06.XXX. New Section.

Reestablish a General District Salmon Management Plan, as follows:

When escapement goals have been achieved in Eastside Districts (Nakr ek/Kvichak, Egegik, Ugashik). Alaska Dept. of Fish and Game may have the option to enact a General District. The General District would consist of the waters specified in the May 17th, 2004, Board of Fish approved General District.

What is the issue you would like the board to address and why? Due to the lack of funds and manpower of Alaska Public Safety Enforcement. The orderly fishery of the Eastside districts deteriorates for the late season. Because of this situation, a fishery of line violations is created, and many permit holders are forced out of the fishery. Fish revenues only go to a few, under this situation. In 2024, ADF&G shut down the fishery due to reports of illegal fishing. This decision of Fore gone Opportunity severely effected the late season harvest.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Joel A Ludwig (EF-F26-028)

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PROPOSAL 72

5 AAC 06.XXX. New Section.

Reestablish a General District Salmon Management Plan, as follows:

When Sockeye escapement goals have been met in the Nushagak, Naknek-Kvichak, Egegik and Ugashik districts and the 48-hour transfer period has been waived: The East side district boundaries will extend into the LSHA (Late Season Harvest Area):

Option A:

Existing western boundary lines adjoin to create a General District. All waters east of a line from 58° 46.76' N 157° 03.57' W to 58° 38.50' N, 157° 22.23' W to 58° 19.10' N, 157° 36.65' W to 58° 11.00' N, 157° 38.10' W to 57° 43.54' N, 157° 43.80' W to 57° 28.34' N, 157° 55.84' W.

Option B:

Existing western boundary lines adjoin to create a General District. All waters east of a line from: 58° 43.73' N, 157° 42.71' W to 58° 38.50' N, 157° 22.23' W to 58° 19.10' N, 157° 36.65' W to 58° 11.00' N, 157° 38.10' W to 57° 43.54' N, 157° 43.80' W to 57° 28.34' N, 157° 55.84' W.

Option C:

All waters east of a line from: 58° 43.73' N, 157° 42.71' W to 58° 38.50' N, 157° 22.23' W to 58° 33.197 N, 157° 34.024 W to 58° 19.10' N, 157° 36.65' W to 58° 11.00' N, 157° 38.10' W to 57° 43.54' N, 157° 43.80' W to 57° 28.34' N, 157° 55.84' W.

Option D:

All waters east of a line from 58° 43.73' N, 157° 42.71' W to 57° 28.34' N, 157° 55.84' W.

Existing in-river closure areas remain in effect. Proposer is not an expert in writing regulatory language and understands and accepts that syntax and regulatory language may be added and/or altered in order to gain BOF approval and ADFG acceptance facilitating the passage of this proposal.

FEASIBILITY:

Coho, Chum and Chinook catch numbers if elevated will be apparent to the department via data collected from fish tickets and processors as well as ADFG's already scheduled in-season samplings which occur on the assembly lines of processors in Bristol Bay wherein totes of fish from tender loads are set aside for the department to gather data from.

If Coho, Chum and Chinook catch numbers become a concern to the ADFG, the boundary extension may be rescinded at the discretion of the department.

Scale sampling and catch data taken from processing lines after July 17th will be used to create a new dataset to determine the future of this Proposal.

If it is determined by the Alaska Department of Fish and Game that the Extended Boundary has resulted in elevated Coho, Chum or Chinook catch numbers, the boundaries can be reverted back at the discretion of the Department.

Tender Vessels will take deliveries within a reasonable distance of standard in-season district boundaries (~1-2.0: ____ nautical miles, a decision made by the BOF and/or in association with the guidance of ADFG managers) to ensure that catches are delivered to the proper fishing district and reported in their typical statistical areas so that fish tax is collected by the proper entities:

https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/bristolbay/bristol_bay_statareas_quickref.pdf

SUNSET CLAUSE:

If Coho, Chum and Chinook bycatch rates after July 17th are not consistent with historical averages or within a range ADFG managers deem reasonable, this proposal is subject to repeal at the discretion of the ADFG East Side fisheries managers.

What is the issue you would like the board to address and why? The Alaska State Troopers and their effective district boundary enforcement presence withdraws from the Bristol Bay watershed on or around July 15th-17th annually. This leaves the fishery with un-monitored boundaries aside from an increasingly rare aerial fly-by. The daily catch and escapement numbers dwindle but fleet effort remains high.

Without enforcement, the vast majority of late season fishing vessels compete for narrow bands of sockeye on north or south boundary lines in the Naknek-Kvichak, Egegik and Ugashik districts. More often than not, the competition becomes illegal and vessels that are willing to fish over the boundary line displace the fishing vessels that are unwilling to do so.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I personally authored the language for this proposal by gathering information from an ADFG biologist, ADFG statistician and major processing managers.

PROPOSED BY: David Vardy (EF-F26-111)

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PROPOSAL 73

5 AAC 06.XXX. New Section.

Reestablish a General District Salmon Management Plan, as follows:

When escapement in all of the east side districts have been met and the fish and game started the fall fishing schedule of fishing 6 days a week that all areas of the general district from 2004 board of fish approved be open as well to include all gear groups. With the limited enforcement because of the late season and law enforcement officers return back to their areas. With the closure of all east side districts last year because lack of enforcement and what happened in Egegik know as the north business closing commercial fishing because of violations on the water. We had a large forgone harvest in Kvichak district in 2024. I feel that local fisherman have the most to gain if fish late because majority of the fleet wide have left the fishery.

What is the issue you would like the board to address and why? I would like to address the late season salmon fishing on the east side of bristol bay. I think having a general district will encourage local participation into the fishery and help keep revenue in our region.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: George Wilson Jr (EF-F26-124)

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PROPOSAL 74

5 AAC 06.XXX. New Section.

Reestablish a General District Salmon Management Plan, as follows:

The prior described illegal activity can only occur if the district boundaries that are defined to reduce interception of other districts fish in season are retained after all districts have met their escapement goals for the season. I propose that after **ALL** individual districts have met their escapement goals for the season that the fishery would revert to The General District last used for commercial harvest the 2004 season. As defined in 5AAC 06.356. the General District consists of waters of the Bristol Bay Area north and east of a line from a point on Cape Constantine at 58¸ 26.14' N. lat., 158¸ 45.91' W. long. to a point at 58¸ 27.22' N. lat., 158¸ 36.21' W. long., to a point at 58¸ 32.30' N. lat., 158¸ 13.26' W. long., then following the territorial sea boundary line around Etolin Point and continuing along the territorial sea boundary line to the latitude of Cape Menshikof at 57¸ 28.34' N. lat., except those waters within, and those waters draining into, the regular districts described in 5 AAC 06.200.

This action would stop rewarding illegal activity and reduce the need for late season law enforcement expenditures while affording equal harvesting opportunities to the entire fleet.

Proposed verbiage:

At any time in the Bristol Bay regulated Sockeye season that ALL escapement goals have been met in all districts of Bristol Bay the General District defined in 5AAC 06.356 shall be opened for the remainder of the Sockeye season until such time that management switches to the Coho management plan.

What is the issue you would like the board to address and why? Late season criminal activity is making fishing not economically viable for fishermen obeying the law. 2024 was a great example of a handful of closed water violators causing the entirety of a district (Egegik) to be closed to all parties. This has gone on for many years after the regulated season ends and law enforcement departs due to their schedule and budget limitations. With limited enforcement presence a small group of criminals fish continuously in closed waters causing the legal fishermen to move to less productive districts or end their seasons out of frustration causing financial hardship to their operations. It is well known Bristol Bay has issues with aggressive fishermen who push the boundary all season long and it is an ongoing struggle with law enforcement to corral the offenders. The persistent issue is that the remainder of the fleet who are law abiding permit holders are financially impacted even further with the late season fish being harvested by criminals as well due to a lack of law enforcement presence.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal is not from any official group or committee.

PROPOSED BY: Doug Morgan (EF-F26-144)

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PROPOSAL 75

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

5 AAC 06.333. Amendment Requirements and1specifications for use of200 fathoms of drift gillnet in Bristol Bay. Allow one person holding two drift gillnet limited entry permits to operate up to 200 fathoms of drift gillnet gear in Bristol Bay.

Adopt and allow "Permit stacking" one person owning two permits to operate both permits in the same way two separate Bristol Bay drift gillnet CFEC permit holders can under 5 AAC 06.333

What is the issue you would like the board to address and why? 5 AAC 06.333, allows "dual permit vessels" for two separate permit holders. I recommend the Alaska Board of Fisheries amend the current regulation to include "Permit stacking" allowing one person owning two pem1its to operate both permits in the same way two separate Bristol Bay drift gillnet CFEC pe1mit holders can under 5 AAC 06.333

The Board's authority to allow permit-stacking is set out in AS 16.05.25 I (i), which was enacted in 2006 as House Bill 251 (HB 251)

Allowing one person to operate two pe1mits has many direct benefits.

It will allow the fishery to get closer to fully realizing the optimum number of drift vessels/permits. This will benefit both drift and set net permit holders, by the reduction of one vessel, and I 00 fathoms of fishing gear for every vessel that becomes a dual. Due to the exponentially increased costs for operating a vessel that we have seen, coupled with the low ex-vessel prices this is more essential than ever.

Allowing captains to purchase a second permit allows them to invest in their business and saves them the unpredictable expense of a lease that is a lost cost. It will also decrease the demand for emergency transfer permits allowing for the lease costs to be more affordable for fisherman staring out.

It will help the fishe1man who may have to choose between loss of income or family obligations. For example, husbands and wife, who both have permits, currently have to decide between losing part of their income and one of their permits if they want to have children or to find a family member to watch their children while fishing so they do no lose part of the income. With the cost of living right now most people cannot afford to lose income, or may not have someone they can trust to watch their children for that long.

The captain operating the vessel and holding both permits will be fully responsible for operating in a lawful manner. Unlike currently regulations where the second permit holder, who may not have the same control as the captain, is held just as responsible.

The main argument in past years against both the current dual permit vessels. Along with the proposed single owner, dual permits. Has been; that it could be a factor in increasing the cost of permits, therefore possibly reducing the number of new fishermen entering the fishery. The new entrant's data from CFEC actually shows the opposite to be true. Bristol Bay Has experienced a higher rate of new entries after dual permit were allowed in 2004 when compared to prior years as well as other drift gillnet fishery around the state. The only thing that Has proven over time to reliably reduce the value of permits. has been the reduction of profitability of the fishery as a whole. I don't believe any stakeholder in the fisheries sees that as an ideal goal.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Justin Arnold (EF-F26-030)

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PROPOSAL 76

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

Amend language and add to the existing regulation; 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay. Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows: Allow a Bristol Bay Drift fisherman who owns two Bristol Bay Drift permits to fish from the same vessel and operate 200 fathoms of driftnet.

What is the issue you would like the board to address and why? Current regulation allows Two Bristol Bay drift gillnet CFEC permit holders to concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear under this section, except (1) in the Togiak District; (2) in a special harvest area. This regulation is the product of negative economic impacts on our salmon fishery experienced in the early to mid 2000's, during this economic downturn a special State of Alaska fisheries task force was created to look at ways to make the fishery more economically feasible, following legislation allowed one individual to own two permits aimed at reducing the number of participants in the fishery and making it economically sustainable to operate through the up and down economic cycles of the Bristol Bay salmon market.

Most recently the Bristol Bay Salmon fishery has experienced another economic downturn that has had negative impacts on the entire fleet of Bristol Bay Drift fishermen. This negative economic downturn has Bristol Bay Drift fishermen looking for alternatives to be economically sustainable in cyclical seafood environment.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was put together and has broad support among the Bristol Bay Drift fleet.

PROPOSED BY: Abe Williams (EF-F26-067)

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PROPOSAL 77

5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

This proposal is for a new Bristol Bay permit category, the "E" permit, which mirrors exactly the current “D” permit in privileges and restrictions. It is created of 2 single permits, under one name, which are permanently consolidated. The "E" permit can never be "undone". The current "D" permit and "Single" permit regulations would stay exactly the same.

These “E” permits would have their own value which the open market would find. The number of E permits would be limited to 300. E permits would be regulated exactly the same as "D" permits. The benefit to the "E" permit holder is everything stays under one name, and less stress to achieve 200 fathoms of legal drift gear and long-term stability and planning.

The benefit to the fleet is "cost free" permanent fleet reduction. 1 less potential vessel fishing, and 100 fathoms less gear in the water permanently with every “E” permit. 300 "E" permit consolidations would permanently remove 30,000 fathoms of potential gear.

To achieve this amount of permanent gear reduction in a traditional buyback would cost $30 million @150k for a single permit. Basically, the cost of buying and retiring 200 single permits.

What is the issue you would like the board to address and why? Excessive fishing capacity in the Bristol Bay Gillnet fishery. The fishery is not economically stable.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have presented this idea to many board members of the BBRSDA and any watershed person who will engage with me. Limiting "E" conversions to 300 is my attempt at maintaining liquidity and mitigating watershed concerns which have been expressed to me.

PROPOSED BY: Glenn Biernacki (EF-F26-113)

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PROPOSAL 78

5 AAC 06.333. Requirements and specifications for the use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

A single person may hold two Bristol bay drift permits (S30T) and fish both of those permits on a single vessel. Allowing them 200 fathoms without a second person holding a permit on the vessel.

The permit holder of both permits would only be accessed 3 points in total for the first violation of "Fishing in closed waters", "Fishing during closed season or period", Fishing with gear not allowed in fishery", "Fishing before expiration of transfer period", "Fishing with under length or over length vessel". If another violation occurs in the 3 year probationary period the second offense would be 6 points. Giving the permit holder a total of 9 points. Essentially treating the owner of both permits as one person which they are regarding demerit points.

What is the issue you would like the board to address and why? I would like to address the issue of the Dual permit or "D" permit in the Bristol Bay drift fishery. I believe if you can legally fish two permits aboard one vessel then you should be able to own and fish both permits. The fishery has changed dramatically since fishing a D became allowed in 2004. The capabilities of the fleet have changed as well as the global market for our fish. We now have fewer processors set up to buy for 2025 than I've seen in my 17 year Bristol Bay career both as a crewman and vessel owner/operator. With accounting for inflation we've had record low ground prices recently. Stacking permits have been beneficial for putting less net in the water and allowing fishermen to have less boats to deal with on the grounds which are already crowded as it is. This helps everyone in the fleet make more money. Crewmen benefit from this as well by making more money and giving them more opportunity to invest into the fishery if they'd like. In 2024 there were around 1200 vessels fishing most of the season with 441 registered D boats. Every D boat helps the rest of the fleet by taking 600 feet of net out of the water and a vessel. In 2023 according to the state and a recent National Fisherman article the average vessel grossed $105,030. I believe it was similar for 2024 as well. The final numbers haven't been released but the fishery was only up from 117 million in 2023 to 128 million dollars in 2024. This is not much money when you look at the current cost of insurance, fuel, nets, parts, upgrades, and RSW systems people invest in every season just to go fishing. The D allows the potential for more profit for everyone.

An argument against stacking is it could make it harder for people to buy into the fishery. I don't believe this is true. Many people can't afford to buy a second permit and will still need to hire a permit holder to be their D or will medically lease their dual permit. Also allowing permit stacking would allow families to keep permits in the family. This could benefit everyone from local watershed residents to people who currently shuffle a D permit around. There is plenty of access to the fishery currently. Used boat prices are at an all time low, and you can buy a great boat for cheaper than you could over the last 7 years. I feel many people who want to buy a permit and be a dual permit holder before buying their own boat won't be affected much by this change to the current regulation. Another problem I've seen is deckhands with medically transferred permits in their name receive CFEC points for a ticket due to the operator. If they were to buy a permit for the next season now they have points against their name for something they didn't do. Essentially punishing the dual permit holder making it harder for them to individually succeed later on. There

will still be a demand for permit holders looking to secure a spot as a "D" for the season. It is common practice to lease a permit and take that money out of the overall gross, which affects crew so they make less off the D then if the owner could own both permits.

There was a CFEC optimal vessel study done saying the optimum number of boats to fish Bristol Bay is 800-1200 vessels. I feel making it possible to own and fish two permits could keep the fishery healthy and sustainable and within that optimal range.

With over 1800 permits in existence even if every boat was a "D" boat you would still have 900 plus boats and I don't see that happening. As far as tickets and points go with the cfec a dual permit holder would only receive a total of 3 points for their first offense total for both permits. With an additional 6 points to their name upon a second violation within the 3 year probationary period. It seems if you accessed 3 points per permit for a first offense all of the sudden if they made a second mistake they'd be suspended from the fishery which seems harsh. An example would be if someone got web in the wheel and got ebbed out over a line and got their net back late they would only receive a total of 9 points. Not 18 points. For both offenses.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I've spoke with many peers who are for stacking. Clearing up space on the fishing grounds and giving everyone more space.

PROPOSED BY: Hayden Hinschied (EF-F26-129)

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PROPOSAL 79

5 AAC 06.331. Gillnet specifications and operations.

Increase offshore operation distance for set gillnets in Ugashik District, as follows:

Increase maximum offshore operation distance for set gillnets in Ugashik District, as follows:

(m)(8) [in the Ugashik District, in that portion of the east bank of the Ugashik River from a point at 57° 30.74'N lat., 157° 24.10'W. Long. To 57° 32.27' N. lat., 157° 24.36'W. long., no part of a set gillnet may be more than 800 feet from the 18-foot high tide mark.]

What is the issue you would like the board to address and why? An extensive mudbank is continuing to develop along the inshore end of our area in which we fish our set gillnets. This impedes us from fishing as effectively as we have in the past(decrease in functional fishing time). The current offshore distance limitation of 800 feet from the 18-foot high tide mark precludes us from fishing the full extent of our allowable gear and denies us the efficient use of the fishing time allowed. We continue to lose opportunities due to fewer hours of available fishing time because our nets are not in the water.

In 2016 the BOF adopted the "criteria for Board Deliberations on Commercial Set Gillnet Proposals Impacted by Coastal Erosion" (2016-238-FB) which outlines the criteria that the board will consider and weigh when deliberating on a proposal related to set gillnet sites impacted by coastal erosion. The case stated above clearly fits Criteria #1 which states that issues that arise form land that has either eroded or accreted through natural or artificial causes contiguous to the leasehold.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed with the help of the Ugashik Village Set Netters.

PROPOSED BY: William Albecker, Lisa Albecker & Ugashik Village Set Netters

(EF-F26-083)

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PROPOSAL 80

5 AAC 06.331. Gillnet specifications and operations.

Allow joint venture set gillnet fishing operations in Bristol Bay, as follows:

Add new regulation: 5 AAC 39.2XX. Joint Venture Set-net Fishing Operations.
(a) In Bristol Bay, two salmon set gillnet CFEC permit holders may form a Joint Venture and combine their gear under the following conditions:

(1) a Joint Venture permit must be obtained from a local representative of the department before a Joint Venture may start operations;

(2) only one Joint Venture permit per year will be issued for each Joint Venture;

(3) the Joint Venture permit must be signed by both CFEC permit holders and each must have a copy of the Joint Venture permit readily available for inspection;

(4) the Joint Venture permit may be canceled by the department upon the request of one of the Joint Venture operators;

(5) the gear and site markers required by 5 AAC 39.280 must bear the five-digit CFEC permit serial number of both permit holders;

(6) no single set gillnet may exceed the regulatory maximum length prescribed in regulation for the applicable fishing area,

(7) a Joint Venture may operate no more than the regulatory maximum amount of gear per CFEC permit allowable for the applicable fishing area; and

(8) both parties of the Joint Venture are legally responsible for the operation of all gear of the Joint Venture.

What is the issue you would like the board to address and why? Currently, the opportunity for Joint Venture (JV) set-net operations in Alaska commercial fisheries is limited to the Kodiak area under 5 AAC 18.331. This provision has been a useful tool for Kodiak set-net harvesters from which other set-net harvesters can benefit.

JV operations, where one permit holder may deliver fish harvested under a partnered permit holder's CFEC permit, can help communities and fleets respond to economic, geographic, and logistical constraints while improving product quality and revenue.

Extending this provision to Bristol Bay set netters would give small-scale family operations greater flexibility in tailoring harvest strategies particularly in remote or under-capitalized areas. The limitation to two CFEC permits per JV adheres to the limited entry program's owner-operator intent while providing this flexibility.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed in parallel with the discussions surrounding HB 117 and the request for clarification in delivery norms and requirements from impacted set-net fleets.

PROPOSED BY: Jamie O'Connor (EF-F26-169)

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PROPOSAL 81

5 AAC 06.330. Gear.

Allow the use of stationary, non-entanglement nets to harvest salmon in the Bristol Bay Management Area, as follows:

Create 06.330(c): **Salmon may also be taken by stationary non-entanglement nets in the districts described in 5 AAC 06.200 so long as any such fish harvesting net is operated within 1,000 feet of the mean high water line, remains 300' from any other Gear as defined in 5 AAC 06.330, and utilizes mesh size not less than two and one-half inches and not larger than three and one-half inches. This provision will become invalid on December 1, 2028.**

This would provide 3 seasons of fishing with alternate gear in order to test the primary research objectives.

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

I would like the board to create an alternate gear type for the Bristol Bay fishery, even if it is only temporary in nature or as authorized by the Commissioner like they did in the Kenai area in 2024 on a case-by-case basis.

During the last 30 years we have witnessed immense change in the seafood market, such as aquaculture salmon surpassing wild salmon products, novel product forms emerging, Russia has a significant place in the salmon market using fish traps and they are nearing 100% utilization, multi-faceted sustainability messages have emerged, gill nets can only mitigate so much incidentally caught salmon under conservation concern, and a highly volatile ex-vessel value price cause fishermen to doubt the economic viability of the fishery.

Primary research objectives:

1. Evaluate the ability of an alternate harvest method to exclude harvest for stocks of concern, such as the Nushagak Chinook salmon.
2. Evaluate the commercial viability of alternative harvest methods in Bristol Bay.
3. Establish a market premium that could be obtained by alternate harvest methods.
4. Provide a conduit for a multitude of critical research projects, including enumeration, for all five salmon species.

I will provide further substantive detail on the merits of this proposal through the public comment forum along with feedback from other leading experts in our fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I made a similar proposal in 2019 at the board of fish meeting and during the past two years spent countless hours discussing this issue with a panel of industry experts ranging from veteran processors who managed and ran many of the successful major processors in Bristol Bay, drift and set gillnet fishermen (resident and non-resident), and biologists who are involved in the data aggregation and sampling that keep our fishery sustainable.

PROPOSED BY: Reid Ten Kley (EF-F26-159)

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PROPOSAL 82

5 AAC 06.341. Vessel specifications and operations.

Amend multiple vessel specifications and adopt additional vessel specifications, as follows:

Revised Language

5 AAC 06.341. Vessel specifications and operations.

(a)No vessel registered for salmon net fishing may be more than 32 feet in overall hull length. An anchor roller may not extend more than sixteen inches beyond the32-foot overall hull length, and any portion that extends beyond the 32-foot overall length may not be more than twelve inches in width or height.

(b)For the purposes of this section,

(1) Anchor Roller; means a device used solely in aid of deploying and retrieving anchor gear, and does not provide any additional flotation, planing surface to the vessel.

(2) Fish Drop-out Basket; means a device used to prevent the loss of fish from a gillnet after the fish leaves the water and before it is brought on board the vessel, a fish drop-out basket does not provide any additional flotation to the vessel.

(3) Gillnet Roller; means a device used solely in aid of deploying and retrieving drift gillnet gear, a gillnet roller does not provide any additional flotation vessel and may not extend more than Twelve inches beyond the vessels transom.

(4) Outdrives; means part of the propulsion system of a vessel used for either steering or thrust, an outdrive does not provide any additional flotation to the vessel.

(5) Outdrives, water jet guards; means a device of skeletal or structural construction used to protect the outdrive/water jet unit of a vessel, an outdrive/ water jet guard may be incorporated in conjunction with a fish catcher and provides safety from side, and top incursions, below water jet guards mean a device used to protect jets and steering nozzels from shallow water groundings and gear entanglement, guards and trim gaurds located directly beneath individual jets and steering nozzels any solid surface applied may only be equal to or less than the jets intake opening beneath the hull and does not provide any additional flotation.

(6) Overall Length; means the straight-line measurement between the extremities of the vessels bow and transom, but does not include fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs, outdrives, jet drives, jet drive or outdrive guards, steering rudders, boarding ladders, cooling systems, exhaust tips, exhaust baffles, jet housing.

(7) Trim Tab; means an extension of the bottom of a vessel, at the transom or jet housing, which is no more than 18 inches long at its longest point, Trim Tabs do not provide any

increased flotation, and their function is to provide trim to a vessel while underway. Trim Tabs may be incorporated with water jet reverse nozzels and gaurds and do not provide additional floatation.

(8) Water Jet; means part of propulsion system of a vessel used for either steering or thrust, a "water jet drive" does not provide additional flotation to the vessel, and may require adaptive boxes aft of the transom, these boxes should be no greater than eight inches deep and eight inches from the sides, top and bottom of the jets manufacturers recommended mounting instructions.

(9) Safety&Equipment; means part of the vessels safety accessories, cooling systems, rudders, exhaust tips, baffles, and Jet mount housings, all equipment listed may not exceed beyond eighteen inches from the

What is the issue you would like the board to address and why? Concerns regarding vessel length specifications identified in a letter dated February 142023 from Alaska Wild Life Troopers, in response to increasing concerns from "fishermen".

Current regulation 5AAC06.341 (Section A). provides for a hull length of 32 feet from bow to stern transom. 5AAC06.341 (Section B) provides language that regulates
1.Anchor Rollers, 2. Fish Drop-Out Baskets, 3. Gillnet Rollers, 4. Outdrives, 5. Outdrive Guard, 6. Overall Lenth, 7. Trim Tabs.

The language in section B has many grey areas making the current regulation technically hard to enforce.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Developing this proposal was in conjunction with a wide collaboration of Bristol Bay Drift Fishermen, Boat Builders, Jet Manufactures, Marine engineering services, and State of Alaska Troopers.

PROPOSED BY: Abe Williams (EF-F26-014)
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PROPOSAL 83

5 AAC 06.341. Vessel specifications and operations.

Extend the overall length of a vessel registered for salmon net fishing in Bristol Bay, and modify multiple vessel specifications, as follows:

Revised Language

5 AAC 06.341. Vessel specifications and operations.

(a) **No vessel registered for Bristol Bay Salmon Driftnet Fishing may be more than 36 feet in overall hull length**. An anchor roller may not extend more than **sixteen inches beyond the 36-foot overall hull length**, and any portion that extends beyond the **36-foot** overall length may not be more than **twelve inches** in width or height.

(b) For the purposes of this section,

(1) Anchor Roller; means a device used solely in aid of deploying and retrieving anchor gear, and does not provide any additional flotation, planing surface to the vessel.

(2) Fish Drop-out Basket; means a device used to prevent the loss of fish from a gillnet after the fish leaves the water and before it is brought on board the vessel, a fish drop-out basket does not provide any additional flotation to the vessel.

(3) Gillnet Roller; means a device used solely in aid of deploying and retrieving drift gillnet gear, a gillnet roller does not provide any additional flotation vessel **and may not extend more than Twelve inches beyond the vessels transom.**

(4) Outdrives; means part of the propulsion system of a vessel used for either steering or thrust, an outdrive does not provide any additional flotation to the vessel.

(5) Outdrives, water jet guards; means a device of skeletal or structural construction used to protect the outdrive/water jet unit of a vessel, **an outdrive/ water jet guard may be incorporated in conjunction with a fish catcher and provides safety from side, and top incursions, below water jet guards mean a device used to protect jets and steering nozzels from shallow water groundings and gear entanglement, guards and trim gaurds located directly beneath individual jets and steering nozzels any solid surface applied may only be equal to or less than the jets intake opening beneath the hull** and does not provide any additional flotation.

(6) Overall Length; means the straight-line measurement between the extremities of the vessels bow and transom, but does not include fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs, outdrives, jet drives, jet drive or outdrive guards, **steering rudders, boarding ladders, cooling systems, exhaust tips, exhaust baffles, jet housing.**

(7) Trim Tab; means an extension of the bottom of a vessel, at the transom or jet housing, which is no more than 18 inches long at its longest point, Trim Tabs do not provide any increased flotation, and their function is to provide trim to a vessel while underway. **Trim Tabs may be incorporated with water jet reverse nozzels and gaurds and do not provide additional floatation.**

(8) **Water Jet; means part of propulsion system of a vessel used for either steering or thrust, a "water jet drive" does not provide additional flotation to the vessel, and may require adaptive boxes aft of the transom, these boxes should be no greater than eight inches deep and eight inches from the sides, top and bottom of the jets manufacturers recommended mounting instructions.**

(9) Safety&Equipment; means part of the vessels safety accessories, cooling systems, rudders, exhaust tips, baffles, and Jet mount housings, all equipment listed may not exceed beyond eighteen inches from the

What is the issue you would like the board to address and why? The current 32-foot vessel length for the Bristol Bay Drift fleet has become a safety and quality issue among the entire fleet. To meet the quality standards imposed by fish processors and market demands, the 32 foot length severely limits fish hold capacities, refrigeration efficiencies and effectiveness. Meeting these quality standards has become a necessary effort to achieve financial incentives by all processors these some of these incentives require floating fish in refrigerated sea water. Filling the vessels fish holds with both fish and refrigerated seawater compromises the safety and stability of the fishing vessels under the existing regulations.

Current regulation 5AAC06.341 (Section A). provides for a hull length of 32 feet from bow to stern transom. 5AAC06.341 (Section B) provides language that regulates
1.Anchor Rollers, 2. Fish Drop-Out Baskets, 3. Gillnet Rollers, 4. Outdrives, 5. Outdrive Guard, 6. Overall Lenth, 7. Trim Tabs.

The language in section B has many grey areas making the current regulation technically hard to enforce.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Developing this proposal was in conjunction with a wide collaboration of Bristol Bay Drift Fishermen looking to maximize safety and quality incentives.

PROPOSED BY: Abe Williams (EF-F26-048)
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PROPOSAL 84

5 AAC 06.341. Vessel specifications and operations.

Increase the overall length of vessels registered for salmon net fishing in Bristol Bay, as follows:

Change 5 AAC 06.341(a) and (b)(6) to read as follows:

(2) No vessel registered for salmon net fishing may be more than **34 feet, 2 inches** [32 feet] in overall length. [An anchor roller may not extend more than eight inches beyond the 32-foot overall length, and any portion that extends beyond the 32-foot overall length may not be more than eight inches in width or height.]

(3) For the purposes of this section,

(1) "anchor roller" means a device used solely in aid of deploying and retrieving anchor gear, and does not provide any additional flotation, planing surface, or structural support to the vessel;

(4) "fish drop-out basket" means a device used solely to prevent the loss of fish from a gillnet after the fish leaves the water and before it is brought on board the vessel; a "fish drop-out basket" does not provide any additional flotation, planing surface, or structural support to the vessel;

(5) "gillnet roller" means a device used solely in aid of deploying and retrieving drift gillnet gear; a "gillnet roller" does not provide any additional flotation or planing surface to the vessel;

(6) "outdrive" means part of the propulsion system of a vessel used for either steering or thrust; an "outdrive" does not provide any additional flotation or planing surface to the vessel;

(7) "outdrive guard" means a device of skeletal construction used solely to protect the outdrive unit of a vessel; an "outdrive guard" does not provide any additional flotation or planing surface and is not used for any other purpose such as a bench, platform, or storage area;

(8) "overall length" means the straight-line measurement between the extremities of the vessel [but does not include fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs,] **excluding** outdrives **and** [or] outdrive guards;

(9) "trim tabs" means an extension of the bottom of a vessel, at the transom, which is no more than 18 inches long at its longest point; "trim tabs" do not provide any increased flotation, and their sole function is to provide trim to a vessel while underway.

What is the issue you would like the board to address and why? Increase the drift gillnet vessel overall length to 34 feet, 2 inches, exclusive of outdrives and outdrive guards.

The 32’ limit is an original regulation, implemented when most Bristol Bay drift vessels were made of wood. These regulations were modified first in 1981, then nine years later in 1990, then eight years after in 1998. It is now 2025, and **it has been 27 years since the last modification to 5 AAC 06.341.**

The situation as it currently exists:

Since AAC 06.341 was first written, vessel design has improved to include anchor rollers, fish drop out baskets, gillnet rollers, outdrives, outdrive guards, trim tabs and several other extremities. Some of these are defined in 5 AAC 06.341. Despite the definitions being written as clearly as possible at the time, confusion about enforceability currently exists.

Situation if this proposal were enacted:

Changing the overall boat length from 32 feet to 34 feet, 2 inches adds 26 inches inclusive of extremities which have been agreed upon by previous BOF decisions. All other non-flotational extremities should be inclusive of that length **except for the outdrive units and the outdrive guard.**

This situation will provide clarity for existing vessels, new builds, and address enforcement concerns.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Matt Marinkovich (EF-F26-042)

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PROPOSAL 85

5 AAC 06.341. Vessel specifications and operations.

Remove vessel length and include in a separate regulation,, as follows:

I suggest that the current regulation found in 5AAC 06.341 which describes the overall vessel length and the specifics of what is allowed/not allowed be bifurcated into two separate sections. A new section titled 5AAC 06.340 would be created which would contain the overall vessel length limit of 32 feet, the second (5AAC 06.341) would contain the allowed devices that could extend beyond the 32-foot overall length.

I have outlined the guiding principles below that were used to formulate the draft regulation addressing the 32-foot vessel limit regulation. I put exceptions to items outside of 32-foot in two categories “flotation & planing surface” and “gingerbread” (non-competitive items placed aft of transom). Flotation and planning surface must remain consistent with current regulation as these items distinguish major competitiveness between vessels.

1) Make the regulation easy to understand and enforce.
2) Keep all flotation within the 32-foot dimension.
3) Keep all planning surfaces within the 32-Foot plus 18” dimension.
4) Recognize anchors are larger now than when the 8”x8”x8” provision was originally established.
5) Provide an area aft of transom for “gingerbread items” and try not to identify allowable items as it is difficult to identify and enforce.
6) Recognize outdrive guard and fish dropout basket may be incorporated into one structure.

5 AAC 06.340 [S AAC 06.341] Vessel specifications and operations
(New section)

(a) No vessel registered for salmon net fishing may be more than 32 feet in overall length.
(b) For the purposes of this section,

(1) "Overall length"_ means the straight-line measurement between the extremities of the vessel, any portion that extends beyond the 32-foot overall length is defined in section 5 AAC 06.341; 5 AAC 06.341 Vessel specifications and operations
(New language replaces currant regulation in 5 AAC 06.341)

(a) Overall Length as defined in 5 AAC 06.340 does not include anchor, anchor rollers, fish drop-out baskets, gillnet rollers, trim tabs, other attachments and devices mounted aft of transom defined in section (b)(5), cooling systems, outdrives and outdrive guards;
(b) For the purposes of this section,
(1) "Anchor roller"_ means a device used solely in aid of deploying and retrieving anchor gear, and does not provide any floatation, planing surface, seakeeping ability, deck space, winch or structural support to the vessel. An Anchor may extend beyond the 32-foot overall length in its retracted at rest position;
[Editor's note: The Oxford Dictionary defines "Seakeeping" as, "The ability of a vessel to withstand rough conditions at sea"]

(2) "Fish drop-out basket"_ means a device used to prevent the loss of fish from a gillnet after the fish leaves the water and before it is brought on board the vessel. Any portion of a fish drop-out basket that is aft of provisions in (b)(5) of this section is of skeletal and non-metallic web construction. A fish dropout basket does not provide any floatation, planing surface, storage area, structural support to a gillnet roller or the vessel;
(3) "gillnet roller"_ means a device used in aid of deploying and retrieving drift net gear; A gillnet roller mount on the bow of a vessel may not extend forward of the 32-foot overall length and stern gillnet roller attachment mount may not extend aft of (18) inches from the 32-foot overall length. Gillnet roller or attachment mount may not provide deck space or storage area beyond the 32-foot overall length. A gillnet roller does not provide any flotation or planing surface to the vessel;
(4) "trim tabs"_ means an extension of the bottom of a vessel, at the transom, which is no more than eighteen (18) inches aft of the 32-foot overall length. Jet reversing water flow ducting (scoop) is part of the trim tab and is no more than eighteen (18) inches aft of the 32-foot overall length. "Trim tabs" do not provide any floatation, and their function is to provide trim to a vessel while underway;
(5) "all other attachments and devices"_ means attachments and devices mounted aft of the transom not to exceed eighteen (18) inches aft of the 32-foot overall length and may be on, above or below the trim tabs. These attachments and devices do not provide any storage area, flotation or planing surface to the vessel;
(6) "Coolant Systems"_ means tubing or transom coolers used for refrigerated sea water systems or engines; above or below the trim tab and does not extend beyond 18 inches aft of the 32- foot overall length.
(7) "outdrive"_ means part of the propulsion system of a vessel used for either steering or thrust; an outdrive does not provide any floatation or planing surface to the vessel;
(8) "outdrive guard"_ means a device of skeletal construction used to protect the outdrive unit of a vessel. A fish drop-out basket of non-metallic web construction may be incorporated in the outdrive guard. Platforms may be incorporated within the area addressed in (b)(5) of this section. Platforms and benches are not permitted aft of the area addressed in (b)(5). An outdrive guard does not provide any floatation or planing surface and is not used for a storage area;

What is the issue you would like the board to address and why? The Bristol Bay vessel specifications are described in 5AAC 06.341 of the Alaska Administrative Code. The regulation limits drift gillnet vessels to 32 feet in overall length, with a few exceptions.

The 32-foot length limitation to commercial fishing vessels in Bristol Bay was established in 1949 and there have been just a few descriptive changes of that length throughout the years. The current regulation and description have been in effect since 1991.

The regulation defines “overall length” as the straight-line measurement between the extremities of the vessel, but does not include fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs, outdrives or outdrive guards. The regulation defines each of the items that are not included in the 32-foot measurement. Alaska Wildlife Troopers (AWT) enforcement efforts indicate many vessels that were measured were 32 feet in overall length, however AWT has noted multiple items that have been modified, added to, or repositioned on vessels beyond the 32-foot limit in the 32 years since the regulation was adopted.

•AWT has seen several anchor rollers that are longer than the allowed eight inches in length extending beyond the 32-foot length or are taller and wider than the allowed eight inches.

•Fish drop-out baskets have been modified significantly. Baskets are now being built out of large diameter aluminum tubing that is sealed and provides flotation when submerged under heavy loads. A fish drop-out basket may not provide flotation.

•Gillnet Rollers may extend beyond the 32-foot length, but the structure or mount the roller sits on are not authorized to extend beyond the 32-foot length. Vessels have extended their deck working space by building mounting structures off the stern of the vessel and moving the gillnet roller further back. These transom extensions of the hull beyond 32-footoverall length used to mount the gillnet roller on are not allowed per regulation.

•Outdrives are allowed to be beyond the 32-foot length, but they may not provide flotation or a planing surface. Traditionally jet outdrives were bolted directly to the stern. There are vessels now with an additional box built off the transom that the jet is mounted to. These boxes at times add flotation and planing surface. Additionally, there are vessels with hulls that are extended up to five feet long and three feet wide below their jet outdrives. This extension, unless part of the trim tab up to 18 inches, may not extend beyond 32-foot overall length.

• Outdrive guards have been built up with large diameter sealed aluminum tubing that traps air which proves flotation when submerged. Further, these have been made to extend the hull's planing surface and some have had aluminum decks added to them to provide a platform or bench. If the vessel has an outdrive guard below the jet unit, it may not provide flotation or a planing surface, and must be of skeletal construction. The "trim tab" can be included below the jet unit but may not be more than 18 inches long beyond the transom.

• Trim tabs have been modified and many now are an extension of the hull, at times creating voids that provide flotation. Trim tabs have been seen that extend more than the allowable 18-inches beyond the transom.

• There are numerous other items that have been added to transoms or bows that are not allowed to be beyond the 32 feet in overall length measurement. Only the items mentioned in the regulation and defined are not included in the overall length measurement and may be beyond the 32-foot measurement.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I developed this proposal based on ACR 5 from the October 12-13, 2023 AK BOF Work Session.

PROPOSED BY: Robert Heyano (EF-F26-044)

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PROPOSAL 86

5 AAC 06.341. Vessel specifications and operations.

Include a reference to overall vessel length in the definition of trim tabs, as follows:

"Trim tabs" means an extension of the bottom of a vessel, at the transom, which is no more than 18 inches long at its longest point **beyond the 32' overall length;** "trim tabs" do not provide any increased flotation, and their sole function is to provide trim to a vessel while underway**.**

What is the issue you would like the board to address and why? the definition of "Trim Tabs." Currently "trim tabs" are stated to be 18" long. This leaves confusion because they are under the section of things not included in the 32' overall length which causes a person to think the "trim tab" is beyond the 32' overall length. The definition does not specifically say so. Example: a 28' boat with a 24" trim tab could be considered illegal while only being 30' overall length. It is not clear if the 18" measurement is from the transom or from the 32' overall length.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I came up with it on my own

PROPOSED BY: Timothy Mikkelsen (EF-F26-007)

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PROPOSAL 87

5 AAC 06.341. Vessel specifications and operations..

Define refrigerated seawater transom cooler and include in vessel specification and operations, as follows:

"RSW Transom Cooler" means a Refrigerated Sea Water Transom Cooler used solely for chilling fish, which extends no more than 18" beyond the 32' overall length at its longest point; a "RSW transom cooler" does not provide any additional flotation or planning surface to the vessel.

What is the issue you would like the board to address and why? The provision for and addition of the definition of a "RSW transom cooler." Currently there is no provision for a RSW transom cooler to extend beyond the 32' overall length. This new technology greatly benefits product quality and therefore adds value to the fishing industry.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I came up with it on my own

PROPOSED BY: Timothy Mikkelsen (EF-F26-006)

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PROPOSAL 88

5 AAC 06.341. Vessel specifications and operations.

Remove anchor roller specifications, as follows:

I am respectfully asking the Board to remove the anchor roller regulation portion from AAC 06.341

What is the issue you would like the board to address and why? The Anchor Roller portion of this regulation is unnecessary and creates a safety issue. Boats have grown and anchors too. The roller is not performance enhancing, does not add floatation, nor planning service area.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have spoken with a number of Bristol Bay fishers

and I submit this proposal with their support

PROPOSED BY: Kevin Currier (EF-F26-107)

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PROPOSAL 89

5 AAC 06.341. Vessel specifications and operations.

Increase the allowable size of an anchor roller, as follows:

No vessel registered for salmon net fishing may be more than 32 feet in overall length. An anchor roller may not extend more than **15** [EIGHT] inches beyond the 32-foot overall length, and any portion that extends beyond the 32-foot overall length may not be more than **15** [EIGHT] inches in width or height.

What is the issue you would like the board to address and why? Size of Anchor roller. Currently the allowable 8" size of the anchor roller is too small especially for the bigger boats that are being built. 12" or 18" would probably fit most anchors used in Bristol Bay. Properly sized anchor gear is a matter of practicality and safety.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I came up with it on my own.

PROPOSED BY: Timothy Mikkelsen (EF-F26-008)

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PROPOSAL 90

5 AAC 06.341. Vessel specifications and operations.

Add gillnet roller specifications, as follows:

"Gillnet Roller" means a device used solely in aid of deploying and retrieving drift gillnet gear, **which extends no more than 30" beyond the 32' overall length at its longest point;** a "gillnet roller" does not provide any additional flotation or planning surface to the vessel.

What is the issue you would like the board to address and why? The definition of a "Gillnet Roller." Currently a Gillnet roller is defined only by use (with no physical limit). There are vessels that do not meet the sole use definition, but are difficult (and therefore expensive) to enforce. This has caused frustration for both lawful fishermen due to unfair competitive advantage for the lawbreakers and to Troopers trying to enforce the law.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I came up with it on my own after much discussion with other fishermen and Troopers David Bump and Aaron Frenzel.

PROPOSED BY: Timothy Mikkelsen (EF-F26-005)

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PROPOSAL 91

5 AAC 06.341. Vessel specifications and operations.

Amend the definition of an outdrive guard, as follows:

Change 5 AAC 06.341(b)(5) to read as follows:

(5) "outdrive guard" means a device of skeletal construction used solely to protect the outdrive unit of a vessel; an "outdrive guard" does not provide any additional flotation or planing surface and is not used for any other purpose such as a bench [, platform,] or storage area**, but may have horizontal platforms used solely for safe access to the "outdrive" equipment**;

What is the issue you would like the board to address and why? Allow horizontal platforms on "outdrive guards" for the purpose of safe access to the outdrive.

The "outdrive" provides thrust and propulsion to a vessel, with either propellers or jet propulsion. No matter what the circumstance, this essential piece of machinery protrudes from the stern of the vessel, to varying lengths, sometimes greater than four-feet from the transom.

The "outdrive guard" is necessary to keep the net from tangling with the outdrive, and to protect the outdrive from damage from other vessels. The outdrive guard must be of smooth material so the gillnet can pass over it and not snag, yet it must be strong enough to withstand impact from other vessels. To accommodate this, most outdrive guards are made from heavy-built aluminum pipe between 6" to 10" in diameter.

Even though the outdrive guard does a great job of keeping the net away from the outdrive, the net or towline sometimes become tangled in the outdrive, or there may be a mechanical issue that demands repair. Either way, it is not uncommon for the skipper or a crew member to climb down onto the outdrive guard to service the drive during these at-sea emergency situations. This often happens at an unexpected moment, and the job must be completed in whatever weather conditions exist.

An outdrive guard is generally built of 6" to 10" in diameter aluminum, is very slippery, and in its "skeletal" form offers nothing to hang onto if a person has climbed upon it to access the outdrive. A horizontal platform built upon the outdrive guard will provide safe access to the outdrive, and is an absolutely necessary safety concern.

The situation as it currently exists:

Most every vessel in Bristol Bay that has an outdrive protruding from its stern has an outdrive guard of some sort. Most of these already have horizontal platforms from which a person can access the outdrive. These safety-necessities are not currently compliant with 5 ACC 06.341

Situation if this proposal were enacted:

Nobody would have to remove their horizontal platform from their outdrive guard (if they have one on their vessel). This proposal will provide clarity for

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Matt Marinkovich (EF-F26-181)

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PROPOSAL 92

5 AAC 06.310. Fishing Seasons.

Close the Naknek-Kvichak District to commercial fishing on July 25, as follows:

The commercial fishery in the Naknek/Kvichak district shall be closed July 25.

What is the issue you would like the board to address and why? Bristol Bay has seen a significant decrease in the number of silver salmon returning each year. This decline is most noticeable in the Naknek River, which has a remnant run of silvers from what it used to be. Fishermen in Bristol Bay can continue fishing as long as there are buyers to buy and process the fish, more or less. Sockeye runs have been large in recent years, and some buyers and fishermen stay later in the season to harvest the tail end of the sockeye runs. The problem with this is that there are other species which are dramatically affected that run laterin the season – silvers, chums, pinks late run kings and dolly varden. The negative impact of this late season commercial fishing is especially significant for silver salmon, which typically start running during the last week of July and continue into mid August. Silver runs have always been a fraction of the size of the sockeye runs, and it does not take many commercial nets in the water to have a significant impact on these returning silvers. Silvers also run in the same places that the sockeyes do, along the shore, and are similar in size to sockeye, making them more prone to getting caught in sockeye gill nets.

Commercial fisherman have ample opportunity throughout late June and all of July to harvest sockeye from the largest wild sockeye fishery in the world. Nearly every river in Bristol Bay has seen significant declines in number of kings, silvers, chums and pinks. To help with the conservation of silver salmon, it would be beneficial to have a closure date of July 25 to all commercial fishing of sockeye in the Naknek/Kvichak district. Historical data shows that he majority of sockeye salmon have already run up the rivers by then, and that commercial fishermen have caught on average 99% or more of the yearly sockeye catch by the 25th. The silvers are just starting to run at this time, and ending commercial fishing would help with their escapement of the river. There is no monitoring for escapement of king and silver salmon in the Naknek River, yet it is universally agreed upon that there have been significant declines. Due to “lack of information on escapement and strength of the runs” we recommend a conservative approach to management by ending the commercial season on July 25th.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We both have lived in King Salmon our entire lives. We have hunted, fished and trapped our whole lives and have seen the changes in the area. We grew up on the Naknek River and have guided sport fishermen since we were kids. In addition, we both have commercially fished sockeye for many years as well, Graham having done so since he was 7 years old. Joey has been apart of the Naknek/Kvichak AC for at least 12 or 15 years.

PROPOSED BY: Graham Morrison & Joey Klutsch (EF-F26-055)

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PROPOSAL 93

5 AAC 06.320. Fishing periods.

Increase commercial fishing time in the Togiak District, as follows:

Modify fishing periods in the Togiak District to allow more fishing time, as follows:

(2)in the Kulukak Section, from 9:00 a.m. Monday to 9:00 a.m. Friday [Wednesday]

What is the issue you would like the board to address and why? The current schedule in the Kulukak Section of the Togiak District oftentimes creates challenges for the local small boat fleet. Weather is especially challenging district as the bay does not provide as much protection as other districts in Bristol Bay. Also, it's roughly 40miles from the Village of Togiak to Kulukak Bay in mostly open ocean. The majority of drift gillnet vessels in the Togiak fleet are 25'-29' in length, and can not handle the weather as well as other more modern Bristol Bay vessels. Allowing more fishing time in the Kulukak Section will give the local fleet more flexibility when faced with bad weather, and more opportunity to harvest salmon during the season. The local Togiak fleet is concerned about the annual foregone harvest, and could use more time to harvest sockeye to ensure they are maximizing the economic value of their fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed with the help of the Togiak Fish and Game Advisory Committee.

PROPOSED BY: Togiak Fish and Game Advisory Committee (EF-F26-038)

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PROPOSAL 94

5 AAC 06.369. Togiak District Salmon Management Plan.

Remove the time limitation for fishing in the Togiak District, as follows:

Remove the language restricting the commissioner's emergency order ability as follows:

(3) the commissioner may increase, by emergency order, the fishing periods in the TogiakRiver Section of the Togiak District [by a maximum of 48 hours each week,] in addition to the normal weekly schedule if the commissioner determines that sockeye salmon run strength warrants additional fishing time.

What is the issue you would like the board to address and why? The Department is currently restricted in their ability to extend fishing time in the Togiak River Section of the Togiak District by 48 hours. Eliminating this restriction will give the Department the ability to extend fishing time in the Togiak River Section when sockeye abundance is high and extra fishing time is warranted. Oftentimes, weather is a challenge for the local Togiak Fleet as they fish smaller vessels than the average Bristol Bay commercial salmon fisher. The majority of drift gillnet vessels in the Togiak fleet are 25'-29' in length, and many set net operations still use 18' Lunds. Giving the Department the ability to extend fishing time by more than 48 hours will give the local fleet more opportunity and help with annual foregone harvest concerns.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed with the help of the Togiak Fish and Game Advisory Committee.

PROPOSED BY: Togiak Fish and Game Advisory Committee (EF-F26-039)

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PROPOSAL 95

5 AAC 06.370. Registration and reregistration.

Modify early season registration requirements, as follows:

Change 5 AAC 06.370 to read as follows:

(a) Before taking salmon in the Bristol Bay Area, a CFEC salmon drift gillnet permit holder shall register for a district described in 5 AAC 06.200. Before taking salmon in the Nushagak District, a CFEC salmon set gillnet permit holder shall register for a statistical area described in (l) of this section. A CFEC salmon drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. For the purposes of this section, a CFEC salmon drift gillnet permit holder and a drift gillnet vessel may be registered in only one district at a time and a CFEC salmon set gillnet permit holder in the Nushagak District may be registered in only one statistical area at a time. Initial district registration and statistical area registration is accomplished by completing a registration form provided by the department and returning the completed form to the department office in Dillingham or King Salmon or electronically on the department's website.

(b) Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district. Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration **or unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

06.37(b)(1): Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered, **or intending to unregister the permit**, shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district, **or before unregistration takes effect**.

06.37(b)(2): Prior to 9:00 a.m. June 25, the permit holder may elect to unregister their permit, by which they are not transferring to a new district, nor shall they remain eligible to fish in their existing district; rather the transfer shall unregister their permit from fishing in any district. Effective after the 48-hour district transfer notification period, the permitholder may again register their drift permit as described in 06.37(b).

06.37(b)(3): Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration/**unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

What is the issue you would like the board to address and why? There are a significant number of fishermen who begin their fishing season with their vessels not properly prepared. While the captain prepares the boat to the best of their ability, they currently do not have a "free and open" opportunity to "field test" their operations before the season.

The highly effective, real-time run forecasting provided by the Port Moller Test Fishery (PMTF) creates the common tendency for many fishermen to "hold their card," and not begin fishing until it is clear to them where the "best spot" to fish will be. By that time, the district fishery managers have the fleet on short-notice, or fishing daily or twice-daily openings. For the fishermen who "hold their card" and then "drop their card" any time after June 25, there is little time to address issues that inevitably show themselves after their boat has been actually put into service for the season.

This proposal addresses a safety concern for all fishermen and their vessels, but especially vessel operators who are new to the fishery, are operating a vessel that is new to them, or any operator who has "green" crew; either new to the SO3T fishery, and especially those crew who have never fished a day in their life. All of these people need "kid-glove" handling at the start of the season, and would benefit from an opportunity to "test fish" their boat, equipment, and crew.

The situation as it currently exists:
A fisherman's first opening of the season produces a list of repairs that weren't seen, noticed, or existed before the equipment and gear had been operated for the first time. Under the existing regulation, any fishermen's "first opening" must come after the permit holder's fishing registration card has been "dropped" (registered to fish in a district). This is often after the fishermen have left their home port, or at the start of heavy fishing. Due to this timing, both minor and major safety concerns often never get completed.

During a **non-fishing** "test run," (which is currently a fisherman's only option without "dropping" their registration card) very few of the vessel systems are tested. If a vessel goes out for a "test run" without deploying their fishing gear, the boat may be run hard to test the engine, the refrigeration system will be operated, and the anchor will be set. The nets will not be set, the deck hydraulics will not be stress-tested, nor will the boat tow the net or interact with the fishing gear in any way. Most concerning is the crew will have no direct understanding or practice of deploying or hauling the net. As it currently exists, the first time many "green" crew will see the

net go out will be during a period of high-stress and heavy fishing. This is NOT a good time to learn basic safety protocol.

In order to find faults that lurk within any vessel after the winter lay-over, **the systems need to be tested under full-stress of working the fishing gear in actual fishing conditions**. The net reel, stern roller, or tow bit are some of the components that need an actual full-stress test (with gear in the water) to fully realize if the equipment and vessel are fully functional.

A full-stress test is even more crucial with deck and/or equipment modifications. The motions used on the deck by the crew while actually fishing are much different than the imagined use of the equipment by the fabricators installing the equipment on land in the pre-season. There is no substitute for a full-stress situation to chase out the unforeseen shortcomings of a newly installed system or deck configuration.

Any vessel, no matter how "rag-tag" or "top-notch" in its appearance, can be a death-trap if the basic foundations of safety are not addressed before the "crunch time" of the season. The time for vessel/equipment testing, and Introduction to Fishing 101 for "green" crew is when there is no pressure from boundary lines, heavy volumes of fish, or nasty weather. **Most importantly**, after the vessel is "test-fished," **there needs to be time to implement the changes and repairs** to bring the vessel up to the standards of a safe working platform.

Currently, the very common (yet not prudent) practice of "drop your card and go fishing" deters an early-season "test-fishing" opportunity. As a result, many vessels and crew begin their season with a laundry list of safety-related projects, which show themselves only after the vessel has been field-tested in the first fishing opening:

- Inoperable bilge pump/float switch (can lead to total vessel loss/loss of life).
- Inoperable high-water bilge alarm (can lead to total vessel loss/loss of life).
- Any inoperable alarm, including: C02 sensor; high-temp above the stove; high-temp in engine room; engine operation alarms; watch alarm, etc. (can lead to loss of life through asphyxiation, fire, drowning; and vessel mechanical damage and/or total vessel loss).
- Improperly operating diesel stove or heater (can lead to fire and/or loss of life).
- Leaky hydraulic valve or stove oil line, causing slippery surfaces from spilled petroleum products (can lead to injury/overboard/loss of life).
- Inoperable navigation lights (can lead to collision/loss of life).
- Deficiencies in the anchor/equipment (can lead to total vessel loss/loss of life).
- Poor deck lighting, due to inoperable deck lights (can lead to injury/overboard/loss of life).
- The list goes on…

For a boat to truly be considered "sea worthy," it should go to sea with NONE of the above deficiencies. But as our fishery exists, it is very common for many of these shortcomings to exist simultaneously throughout the season, because "there isn't time to fix them" **due to the fisherman's choice** to hold their permit registration until the last minute before they choose where they will start fishing for the season. This choice is not prudent (because "safety first" goes out the window); nonetheless there is a significant portion of the fleet who waits to drop their card,

sometimes into July (nearly the peak of the run). **At this late stage of the salmon run, preventative maintenance/repairs, or safety concerns will not be addressed**.

Situation if this proposal were enacted:
This proposal allows fisherman time to field test their boat and "break in" their crew before the fishing season. It will reduce the risk of injury or catastrophic incident by allowing "first opening" problems to be encountered and addressed in a stress-free state of mind, in good weather, and with no dramatic profit-driven variables in play.

Nothing changes in the regulation or implementation of the existing rules, other than adding the option, prior to 9:00 a.m. June 25, to "unregister" a SO3T drift permit that has previously been registered to allow a drift vessel to fish. When a permit-holder unregisters, they wait 48-hours of no fishing in any area (same as the existing regulation), and when the 48-hour (no-fishing) "transfer time" expires, they are once again no longer registered to fish in any area. A fisherman would say they "get their registration card back," meaning they can once again "drop their card" and register to fish immediately in any area they choose (besides Togiak, because of the super-exclusive rule).

The cost of this proposal should be minimal. There is already a permit-transfer tracking system in place, and it shouldn't take much programming to create the option to "unregister" a permit. If it is too complicated for the existing system, that may be a sign it is time to solicit some Federal funding to re-vamp the entire system and get something that works efficiently, or solicit the BBRSDA to fund the project, and our put our 1% landing tax to good use, as this would "provide a benefit to all SO3T fishermen," which is the goal described in the BBRSDA mission statement.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed in cooperation with ADFG biologists.

PROPOSED BY: Matt Marinkovich (EF-F26-015)
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PROPOSAL 96

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

Prohibit the use of multiple hooks in the Naknek River drainage, as follows:

I recommend using the same regulatory language as the Nushagak River drainage- "only unbaited, single-hook, artificial lures may be used year round". I recommend extending the existing regulation to the entire Naknek River Drainage, rather than just between the ADF&G regulatory markers between Rapids Camp and Lake Camp. The regulation would apply to all species and read as follows:

(2) In all flowing waters of the Naknek River drainage, [FROM MARCH 1 THROUGHNOVEMBER 14], only unbaited, single-hook, artificial lures may be used **year round**.

Adopting the above regulatory change would eliminate the need for the regulation below:

[(3) IN ALL FLOWING WATERS OF THE NAKNEK RIVER DRAINAGE UPSTREAM FROM AN ADF&G REGULATORY MARKER LOCATED AT RAPIDS CAMP (RIVER MILE 24.25), INCLUDING ALL WATERS WITHIN A ONE-QUARTER MILE RADIUS OF ALL INLET AND OUTLET STREAMS INTO ALL LAKES AND PONDS IN THIS AREA, ONLY UNBAITED, SINGLE-HOOK, ARTIFICIAL LURES MAY BE USED;]

What is the issue you would like the board to address and why? I'd like the board to address the issue of allowing multiple hooks on the Naknek River. The use of multiple hooks, often treble hooks and often two sets of treble hooks, is an outdated regulation that was suited for days in the past when there was an abundance of salmon. Today, we are seeing consistent and concerning trends showing declines in both King Salmon and Silver Salmon. In an effort to foster conservation and better stewardship of these declining species, I believe we should change the regulation from allowing multiple hooks to single-hook for all species, year round. Anglers can just as effectively catch salmon using single hooks as opposed to multiple hooks, but single hooks are FAR more effective at successfully releasing fish. This will help prevent unintended mortality of targeted species, as well as help protect others species such as Rainbow Trout and Dolly Varden frequently caught while salmon fishing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed this with other anglers, local guides, business owners and one other member of the Naknek – Kvichak AC in addition to myself.

PROPOSED BY: Patricia Edel (EF-F26-068)

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PROPOSAL 97

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

Prohibit the use of bait and multiple hooks while sport fishing for rainbow trout and char and prohibit fish from being removed from the water prior to release in the Naknek River drainage, as follows:

I would recommend: While fishing for trout or char species on the Naknek, only a single, unbaited and barbless hook may be used, with no fish being removed from the water that is going to be released.

What is the issue you would like the board to address and why? Rainbow trout in the Naknek River are getting heavily fished with numbers that appear to be declining, with many fish now showing multiple hook scars.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. My proposal has been developed based on observation while angling there over the last 9 years.

PROPOSED BY: Ladd Nolin (EF-F26-016)

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PROPOSAL 98

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

Modify the king salmon annual limit in the Naknek River, as follows:

The new regulation should read:

Annual bag limit of king Salmon on the Naknek river

(12) the daily bag and possession limit for king salmon is three fish 20 inches or greater inlength, of which only one fish may be over 28 inches or greater in length; the annual limit forking salmon 20 inches or greater in length is five fish, only **one** [three] of which may be 28inches or greater in length

What is the issue you would like the board to address and why? I would like to address the decline in king salmon on the Naknek River. During the last BOF cycle, the bag limit for kings over 28" on the Naknek River was reduced from 5 to 3 (over 28inches). Despite sport fishing making a sacrifice in bag limits, there were still over 700 king salmon retained and reported caught by sport fishermen in 2024, to say nothing of those caught commercially. There have been no noticeable increases in the king run, and ADF&G does not have a management plan, or any data on king escapement. Despite this, it is widely known that kings on the Naknek River are a remnant of what they used to be in past years and that they trend with the states declining numbers. Due to lack of official data, we recommend taking a conservative approach to managing kings. We suggest while the annual bag limit remains at 5 kings, but only one fish over 28" inches may be retained.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Text

PROPOSED BY: Joey Klutsch, Patricia Edel (EF-F26-056)

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PROPOSAL 99

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

Prohibit sport fishing for king salmon in a portion of the Naknek River, as follows:

We propose moving the ADF&G marker located ½ miles above Rapids Camp to the public access road located 1.64 miles below the Rapids Camp road (58° 37.101'N, 156° 34.533' W). In waters from this marker upstream, king salmon may not be targeted at all, and if they are accidentally hooked while targeting other species, must NOT be removed from the water and will be released immediately.

Naknek River Drainage:

- Naknek River main stem

- King Salmon: Closed year round to all king salmon fishing from ADF&G Marker (new location58° 37.101'N, 156° 34.533' W) upstream to the ADF&G marker at "Trefon's Cabin" near the mouth of Naknek Lake.

What is the issue you would like the board to address and why? Over the years the Naknek River has seen a notable decrease in the numbers of king salmon. Recognizing this decrease, ADF&G has already closed all fishing of king salmon in key spawning areas, including King Salmon Creek and Paul's Creek, and all waters above the first ADF&G marker located half mile upstream above Rapids Camp. There is no retention of king salmon allowed up the Big Creek drainage where fishing remains open. Yearly bag limits of king salmon on the Naknek have been lowered from 5 to 3. These measures have not been enough to bring about any appreciable increase in what are dismal king runs. Further, there is nothing to stop anglers from fishing the portion of the Naknek River immediately below the ADF&G Rapids Camp marker later in the season which are critical king salmon spawning grounds, and which have seen drastic reductions of the numbers of kings over the last decade while at the same time seen increased pressure from anglers.

As pointed out, all waters of the Naknek River upstream of the ADF&G marker are closed to king salmon fishing. These waters are key spawning habitat. However, significant amounts of spawning grounds exist BELOW this marker, which are wide open to the retention of king salmon. These areas are fished very hard in the latter weeks of the season towards the end of July, and it takes a significant toll on the kings when they are most vulnerable, preparing their nests for spawning. Most of this pressure comes from the many sport fishing lodges in the area. Fishing in these locations is popular with the lodges because it is relatively easy to catch kings on their spawning beds, and unlike the spawning beds on the Naknek tributaries (Big Creek, Paul's Creek and King Salmon Creek) these main stem Naknek River spawning beds are open to the retention of kings and are close and easily accessible to the lodges. It is not uncommon to see many boats in these areas at all hours of the day. We propose moving the ADF&G marker located ½ miles above Rapids Camp to the public access road located 1.64 miles below the Rapids Camp road (58° 37.101'N, 156° 34.533' W). This would protect spawning kings as well as spawning trout below the current regulatory marker.

What will happen if nothing is done?

If nothing is done, we risk the health of the world famous Naknek River king run. Future generations will not be able to enjoy our salmon for which the area is world famous for. The Naknek River will cease to be a premier destination for sport fishermen. Local subsistence users who depend on king salmon for an important food source may also suffer. IF THESE CHANGES ARE NOT IMPLEMENTED, WE WILL CONTINUE TO SEE A DECLINE IN OUR OVERALL KING SALMON RETURNS. The added pressure of sport fishermen catching king salmon on their spawning grounds will in no way help the future of the Naknek River's once great king run.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Joey Klutsch (EF-F26-054)

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PROPOSAL 100

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

Prohibit sport fishing for king salmon in a portion of the Naknek River, as follows:

Move the marker from its current location [(River Mile 24.25)] downstream to 58°37'04" North, 156°34'31" West.

This location also coincides with a Borough access road and recreational use area referred to as Rainbow Bend, allowing for it to have a prominent placement and easy to see from the river.

Replace all text throughout 5 AAC 67.022 that refer to the rapids camp marker as [(River Mile 24.25)] with 58°37'04" North, 156°34'31" West or using the appropriate river milage such as (River Mile 23)

What is the issue you would like the board to address and why? I would like the board to consider moving the current regulatory marker located on the Naknek River at Rapids Camp (River Mile 24.25) downriver approximately 1.2 miles. Historically, kings have used this area to spawn. Currently open to sport fishing, it is a heavily fished area and the last spot kings can be caught before they reach the protected spawning area designated by the current marker. By moving current ADF&G marker downriver, it would add a layer of protection to kings staging to spawn.

The benefits of moving the marker are twofold. Moving this marker downstream will also protect trout that spawn below the marker. The river is closed to sportfishing from April 10ththrough June 7th to protect spawning trout between the ADF&G river mile 24.25 marker and the ADF&G marker located at Trefon's Cabin (outlet of Naknek Lake). Moving the Rapids camp marker downriver will allow for the trout spawning below the current regulatory maker to have the same protection.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, I have worked with one other AC member to write this and recieved feedback and support for this proposal from other operators and local anglers.

PROPOSED BY: Patricia Edel (EF-F26-069)

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PROPOSAL 101

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

Prohibit the use of bait and multiple hooks in the Egegik and Ugashik drainages, as follows:

Egegik River Drainage, add; Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of 1⁄2 inch or less are allowed year around.

Ugashik River Drainage, add; Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of 1⁄2 inch or less are allowed year around.

What is the issue you would like the board to address and why? Ban the use of bait for sport fishing, in the Egegik River and Ugashik River Drainage system. The Egegik River and Ugashik Narrows are experiencing increasing fishing pressure from local and fly out lodges. The use of cured eggs has a higher mortality rate on sport caught fish than artificial lures or flies. Arctic Grayling, on the upper reaches of the Egegik River, Ugashik Narrows and Ugashik River is either catch and release or closed. Fishing any of these drainages with bait counters the idea of protecting the Grayling population.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have been guiding sportfishermen on the Becharof and Ugashik River systems every year since 1978. The last 15 years there has been a dramatic increase in fishing pressure, especially on Silver Salmon. With declining run strength of King and Silver Salmon I believe it's time to start protecting these fisheries.

PROPOSED BY: Tracy Vrem (EF-F26-065)

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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:**
  - Only **2%** spawned in **Gechiak Creek.**
  - No significant spawning activity was documented in the stretch between the **Geciak and Pungokepuk Rivers,** contrary to the 2022 claim during the BOF meeting.
  - Most tributary spawners were found above the Pungokepuk River, primarily in Nayorurun, Kemuk, and Ongivinuk Rivers (20+ miles above the Pungokepuk)
- **Run Timing:**
  - 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

PROPOSED BY: Togiak River Lodge/ Jordan Larsen, Zackery Larsen (EF-F26-086)
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PROPOSAL 103

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

Prohibit the placing of any substance in the water for the purpose of attracting fish by scent (chumming), as follows:

Current Regulation:

Chumming:

In waters closed to the use of bait, sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

Proposed new regulation:

Sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

What is the issue you would like the board to address and why? We would like to see chumming (throwing in bait to attract fish) by guides and guided anglers prohibited in Bristol Bay waters. It is currently legal in areas where bait is allowed. We've seen that it disrupts the fish's natural feeding habits and also makes them much more susceptible to being caught. We've often witnessed guides use chum to attract fish to their location and their angler's flies, while the rest of us struggle to produce good fishing. We feel takes away the "fair chase" aspect of fishing and also contributes to fish mortality because the fish are caught and released more than usual.

***This proposal is not intended to stop the use of bait or bait fishing in areas where it is currently allowed, it is only intended to prohibit chumming by sport fishing guides and guided anglers.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Pat Vermillion and Scott Schumacher of Royal Coachman Lodge

(EF-F26-094)

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PROPOSAL 104

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

Modify gear to barbless hooks in Morine, Kulik, American, and Brooks drainages, as follows:

Create seasonal barbless fishing requirements for Moraine creek, Kulik River, American Creek, and Brooks River.

Barbless can be defined as "Hook with no pointed barb at end through manufacture or the crushing of manufactured barbed hook so that point is no longer present or bent closed."

- Moraine Creek (all flowing waters):
  - June 8-October 31: Only unbaited, ***barbless,*** single-hook, artificial flies may be used.
- Kulik River (all flowing waters):
  - June 8-October 31: Only unbaited, ***barbless,*** single-hook, artificial lures or flies may be used
- American Creek (all flowing waters):
  - June 8-October 31: Only unbaited, ***barbless,*** single-hook, artificial flies may be used
- Brooks River (all flowing waters):
  - June 8-October 31: Only unbaited, ***barbless,*** single-hook, artificial flies may be used

The potential alternative considered was to make barbless requirement year round. However, it was felt that it was unnecessary due to potential winter subsistence fishing needs with barbed hooks in some locations as well as lack of overall winter sportfishing presence in these locations.

What is the issue you would like the board to address and why? The issue we would like to address is the poor care and treatment of fish in seasonally intensified catch and release fisheries in Bristol Bay from the use of barbed hooks. Research suggests the use of barbed hooks amplifies a variety of causes of fish mortality and decreased health.

Primary rivers of note would be Moraine Creek, Kulik River, American Creek, and Brooks River. These rivers see high levels of summer seasonal catch-and-release angler pressure which causes fish to be caught multiple times over the course of the season. With elevated pressure on these rivers for catch and release purposes, it is important that fish are treated in the best possible manner to ensure continued fishery success and visitor satisfaction.

In contrast to many other rivers in the Bristol Bay region, these rivers are not customarily catch-and-keep fisheries during the summer season. Thus, as a predominantly catch a release fishery, the ability to consistently catch healthy fish with as little impact as possible should be expected.

ADFG switching to a barbless regulation might be considered insignificant by some, but it would be very simple to implement and enforce as a regulation.

It is understood that there are many variables that may have an impact on fish mortality and health. It is also understood that some of these variables may have a greater impact on fish mortality than the use of barbed hooks. However, all variables that negatively affect healthy fish populations are additive. Thus, we feel each should be given attention, especially as fish are targeted and caught multiple times.

The objective of this regulation change is not only to solve for the portion of fish mortality directly related to the use of barbed hooks, but to extend to other factors of mortality that can be amplified by barbed hooks. The term "death by a thousand cuts" illustrates what we are hoping to solve with this regulation change via a clear and actionable topic that will positively affect multiple sources of mortality.

Justification and Details:

Fish Mortality:

- A study reported that barbed hooks related to 7% of fish mortality over 2% de-barbed hooks when hooked superficially. Additionally, 29% fish mortality when fish were deeply hooked with barbed hooks over 6% mortality when fish were deeply hooked without barbed hooks.
    - *Robert B. DuBois, Kurt E. Kuklinski, Effect of Hook Type on Mortality, Trauma, and Capture Efficiency of Wild, Stream-Resident Trout Caught by Active Baitfishing, North American Journal of Fisheries Management, Volume 24, Issue 2, May 2004, Pages 617–623, https://doi.org/10.1577/M02-172.1*

- Another study, though not determined statistically significant (>5%), showed every sample where barbed hooks were used resulted in greater catch and release mortality.
    - *Ian I. Courter, Thomas Buehrens, Mark Roes, Tara E. Blackman, Benjamin Briscoe, Sean Gibbs,Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington,Fisheries Research,Volume 268,2023,106848,ISSN 0165-7836,https://doi.org/10.1016/j.fishres.2023.106848.*

Increased Fish Handling Time:

- Study Reported barbed hooks were associated with a three second median increase in fish handling time.
    - *Ian I. Courter, Thomas Buehrens, Mark Roes, Tara E. Blackman, Benjamin Briscoe, Sean Gibbs,Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington,Fisheries Research,Volume 268,2023,106848,ISSN 0165-7836,https://doi.org/10.1016/j.fishres.2023.106848.*

- According to another study, beyond superficially hooked fish, deeply hooked fish take significantly more effort to unhook safely. With that, deeply hooked fish with barbed

hooks required extended time with the fish's mouth out of the water. Study found that extended air exposure after fish exhaustion resulted in a survival rate as low as 28%.

- *Fergussn, R. A., and B. b. Tufts. 1992. Physiological effects of brief air exposure in exhaustively exercised rainbow trout (Oncorhywehus mykiss): implications for "catch and release" fisheries. Can. 1. Fish. Aquat. Sci. 49: 11 57-1 162.*

Bear and Wildlife Safety:

- In addition to fish mortality, these rivers play host to some of the highest density of Brown Bears in Alaska. When dealing with safety around bears, three seconds can mean a lot of time to avoid a potential negative situation or a bear taking a fish from an Angler. Using barbless hooks for the purpose of quicker fish releases can greatly aid in overall safety and experience around bears.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Bristol Adventures, Operator of Brooks, Grosvenor, Kulik, and Mission Lodges (EF-F26-126)

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PROPOSAL 105

5 AAC 06.XXX. New Section.

Adopt a Bristol Bay King Salmon Management Plan, as follows:

Establish King Salmon Management Plans for Bristol Bay drainages, as follows:

Adopt a King Salmon Management plan for streams located in the Bristol Bay watershed that do not currently have a plan in place and have an active sports or subsistence or personal use fishery associated with them, such as Kvichak/Alagnak, Naknek Igushik, Ugashik, Sandy and the Meshik.

What is the issue you would like the board to address and why? We are experiencing severe declines in our king salmon populations all over Alaska. These declines can be attributed to numerous causes, some that are beyond our ability to control and others that we can take measures to insure we can offer additional protection to a specie that is struggling. This proposal is intended to help us get a handle on managing the runs that we have and put tools in a tool box to use if or when runs become jeopardized or if they are flourishing and healthy, where we can consider liberalizing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Other sports fishing resource users were consulted and I received positive feedback on the concept of this proposal.

PROPOSED BY: Nanci Morris Lyon (EF-F26-046)

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