Fishing districts (5 proposals)

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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