

**ALASKA BOARD OF FISHERIES  
BRISTOL BAY FINFISH  
DECEMBER 2–8, 2015**

**PROPOSAL INDEX**

*Following is a list of proposals that will be considered at the above meeting sorted by general topic. A board committee roadmap will be developed and distributed prior to the meeting.*

**PROPOSAL NUMBER (70 proposals)      SUBJECT**

**Commercial Salmon District Boundaries, Registration, Permit Stacking (32 proposals)**

*Alaska Peninsula Area/Bristol Bay Area Boundary (3 proposals) This set of proposals will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*

- |    |   |
|----|---|
| 22 | Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area. |
| 23 | Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area. |
| 24 | Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area.                    |

***District Boundaries/Gear (6 proposals)***

- |     |  |
|-----|--|
| 25  | Expand district boundary lines.  |
| 26  | Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27.   |
| 27  | Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers. <i>(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)</i> |
| 28  | Change the character size requirements for set gillnet marking signs. <i>(This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.)</i>  |
| 29  | Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's setnet site.   |
| 30  | Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers.   |
| 220 | Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods.  |
| 221 | Prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites.   |

***Registration (14 proposals)***

- 31 Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay.
- 32 Change the area registration date requirement for the Bristol Bay commercial salmon fishery.
- 33 Change the area registration date requirement for the Bristol Bay commercial salmon fishery.
- 34 Reduce the required waiting period when registering for a new district from 48 hours to 12 hours.
- 35 Require drift gillnet operations to register the day of fishing during emergency order periods.
- 36 Change the registration requirement for commercial salmon fishing in the Egegik District.
- 37 Change the area registration date requirement from June 25 to June 1 for the Naknek-Kvichak, Egegik, and Ugashik districts for the drift gillnet fleet.
- 38 Change registration requirements for fisheries under emergency order conditions and change the registration date for the Naknek-Kvichak, Egegik, and Ugashik districts from June 25 to June 18.
- 39 For the Naknek-Kvichak District, eliminate the registration date of June 25, and require registration only before fishing in the district.
- 40 Change the drift gillnet registration date in the Naknek-Kvichak District from June 25 to June 17.
- 41 Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date.
- 42 Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement.
- 43 Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District.
- 44 Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel.

***Permit Stacking (9 proposals)***

- 45 Reauthorize Bristol Bay set gillnet permit stacking.
- 46 Allow permit stacking for set gillnet operations.
- 47 Allow permit stacking for set gillnet operations and up to one and one-half the current legal limit of gear for one permit to be operated when permit stacking.
- 48 Allow permit stacking for set gillnet operations in the Bristol Bay Area.
- 49 Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign.
- 50 Allow permit stacking for set gillnet operations in the Egegik District.
- 51 Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay.

- 52 Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay and the operation of 200 fathoms of drift gillnet gear from a vessel with an individual holding two drift gillnet permits.
- 53 Increase the amount of drift gillnet gear allowed when two permit holders are jointly operating.

### **Commercial Salmon Management Plans and District Provisions (24 proposals)**

#### ***Egegik/Ugashik (2 proposals)***

- 54 Close by the Egegik District Special Harvest Area to commercial salmon fishing for five days during times of high intercept fishing.
- 55 Modify set gillnet operations in the Ugashik District.

#### ***Naknek/Kvichak (5 proposals)***

- 56 Create an inriver Alagnak River Salmon Fishery Management Plan.
- 57 Create an inriver Kvichak River Salmon Fishery Management Plan.
- 58 Expand the boundaries of the Naknek Section of the Naknek-Kvichak District.
- 59 Revise boundaries of closed waters at Graveyard Point in the Naknek-Kvichak District.
- 60 Create a special harvest area in the Graveyard Creek area.

#### ***Nushagak (14 proposals)***

- 61 Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.
- 62 Increase the minimum distance drift gillnet operations must maintain from a set gillnet operation in the Nushagak District.
- 63 Change the seaward minimum distance between set gillnet gear in the Clark's Point area in the Nushagak District.
- 64 Increase fishing time for drift gillnet gear during incoming tides in the Nushagak District.
- 65 In the Nushagak District repeal emergency order authority to limit gillnet mesh to not exceed four and three-quarters inches.
- 66 Amend the Nushagak River Coho Salmon Management Plan to establish a fixed escapement goal, change the fishery start date, and repeal language pertaining to pink salmon escapement.
- 67 Change the Nushagak River Coho Salmon Management Plan to reflect changes in escapement goals that have previously been implemented.
- 219 Address allocation impacts that may come from potential changes in escapement goals and trigger points in the Nushagak River Coho Salmon Management Plan.
- 68 Repeal Wood River Sockeye Salmon Special Harvest Area Management Plan.
- 69 Amend the Wood River Sockeye Salmon Special Harvest Area

- Management Plan to eliminate management based on Nushagak District drift and set gillnet gear allocations.
- 70 Modify the Wood River Sockeye Salmon Special Harvest Area Management Plan to open separate drift and set gillnet fishing periods based on achievement of gear allocation instead of a fixed seasonal fishing period ratio.
- 71 Update the description of the Wood River Special Harvest Area by deleting references to regulatory markers.
- 72 Change the description of statistical areas in the Nushagak District by deleting references to department regulatory markers, and renaming the Nushagak Statistical Area.
- 73 Redefine the description of the Nushagak District and the Igushik Section in the Nushagak District by deleting references to department regulatory markers.
- 74 Redefine the description of closed waters for salmon in the Snake River in the Nushagak District by deleting a reference to department regulatory markers.

***Togiak (3 proposals)***

- 75 Reduce the amount of time that certain waters in the Togiak District are closed to commercial fishing for salmon with a drift gillnet.
- 76 Change the current description of the Osviak Section in the Togiak District by correcting a GPS coordinate in the description.
- 77 Change the Togiak District Salmon Management Plan to reflect recent department escapement goal changes, and remove coho and king salmon goals.

**Subsistence, Sport, Commercial Herring (14 proposals)**

***Bristol Bay Subsistence (5 proposals)***

- 78 Change the boundaries, methods of harvest, and seasons for subsistence harvests of sockeye salmon in the Naknek River drainage.
- 79 Eliminate subsistence fishing period for the Naknek, Egegik, and Ugashik Rivers to allow subsistence salmon fishery to occur any time.
- 80 Re-describe the subsistence fishing area in the Nushagak District that is restricted to three days per week by removing references to regulatory markers.
- 81 Define subsistence fishing boundaries so that the 10 fathom net restriction applies to Dillingham beaches and the 25 fathom net length restriction applies elsewhere, and remove reference to department regulatory markers.
- 82 Establish and adopt amounts reasonably necessary for subsistence uses for herring spawn on kelp in waters of the Togiak District.

***Bristol Bay Sport Fisheries (5 proposals)***

- 83 Allow the traditional harvest of whitefish and non-salmon subsistence fish in specific waters of the Newhalen River.
- 84 Establish non-retention king salmon sport fishing in the Big Creek drainage of the Naknek River drainage.
- 85 Redefine the sport fishing boundary description for non-retention of king salmon in the Big Creek drainage.
- 86 Implement a mail-in requirement for all king salmon harvest tickets in Bristol Bay sport fisheries.
- 87 Eliminate the use of egg-simulating lures in rainbow trout fishing.

***Bristol Bay Herring (4 proposals)***

- 88 Change the regulatory description for herring purse seine and hand purse seine.
- 89 Delete references to sac roe in the Bristol Bay Herring Management Plan.
- 90 Change the management plan to allow the department to waive the catch allocation requirement for gillnet and purse seine fleets.
- 91 Redefine the description of closed waters for the Togiak herring fishery by deleting references to department regulatory markers.

**BOARD OF FISHERIES  
BRISTOL BAY FINFISH  
DECEMBER 2–8, 2015**

**PROPOSAL 22 – 5 AAC 06.100. Description of area; 5 AAC 06.200. Fishing districts and sections; 5 AAC 09.100. Description of area; and 5 AAC 09.200. Description of districts and sections.** Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

We recommend that the BOF change the descriptions of the Bristol Bay area to include the Cinder River and Inner and Outer Port Heiden sections and remove the same sections from the Alaska Peninsula area. Suggested draft regulatory language follows:

**5 AAC 06.100. Description of area.** The Bristol Bay Area includes all waters of Alaska in Bristol Bay east of a line from Cape Newenham at 58° 38.88' N. lat., 162° 10.51' W. long. to Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long. [CAPE MENSHIKOF AT 57° 28.34' N. LAT., 157° 55.84' W. LONG.]

**5 AAC 09.100. Description of area.** The Alaska Peninsula Area includes the waters of Alaska on the north side of the Alaska Peninsula, southwest of a line from Strogonof Point (56° 53.50' N. lat., 158° 50.45' W. long. [CAPE MENSHIKOF AT 57° 28.34' N. LAT., 157° 55.84' W. LONG.] to...

Additionally, we recommend deleting 5 AAC 09.200 (1) and (2) (A) and (B) from Chapter 09. Alaska Peninsula Area and adding new fishing districts (e) and (f) to the Bristol Bay area. We recommend adding to 5 AAC 06.200 Fishing Districts and sections

(e) Cinder River District, waters of Bristol Bay between Cape Menshikof at 57° 28.34' N. lat., 157° 55.84' W. long. and 158° 20.00' W. long

(f) Port Heiden District:

(1) Outer Port Heiden Section: waters located between 158° 20.00' W. long. and the longitude of Strogonof Point at 56° 53.50' N. lat., 158°50.45' W. long., excluding the waters of the Inner Port Heiden Section;

(2) Inner Port Heiden Section: waters of Port Heiden Bay south and east of a line from Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long. to the mainland shore of the northeast entrance to the bay at 56° 56.50' N. lat., 158° 51.50' W. long.

**What is the issue you would like the board to address and why?** The residents of Port Heiden ask the Board of Fisheries to change the Alaska Administrative Code so that the boundaries of the Bristol Bay area include the village Port Heiden and the Cinder River and Port Heiden Districts for the following reason:

1. Port Heiden is a member community in the Bristol Bay Economic Development Corporation;

2. The community of Port Heiden is within the Bristol Bay Coastal Resource Service Area;
3. The residents of Port Heiden have strong family ties to other communities in the Bristol Bay Area;
4. Most of the commercial fishing permits that are owned by Port Heiden residents are Area T permits, or commercial Bristol Bay fishing permits;
5. Including Port Heiden in the Bristol Bay area would facilitate enforcement efforts in the Outer and Inner Port Heiden sections.

**PROPOSED BY:** Native Village of Port Heiden (EF-C15-039)

\*\*\*\*\*

**PROPOSAL 23 – 5 AAC 06.100. Description of area; and 5 AAC 09.100. Description of area.** Move the Cinder River, Inner Port Heiden, and Outer Port Heiden sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

We recommend that the BOF change the descriptions of the Bristol Bay area to include the Cinder River and Inner and Outer Port Heiden sections and remove the same sections from the Alaska Peninsula area. Suggested draft regulatory language follows:

**5 AAC 06.100. Description of area.** The Bristol Bay Area includes all waters of Alaska in Bristol Bay east of a line from Cape Newenham at 58° 38.88' N. lat., 162° 10.51' W. long. to **Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long.** [CAPE MENSHIKOF at 57° 28.34' N. lat., 157° 55.84' W. long.]

**5 AAC 09.100. Description of area.** The Alaska Peninsula Area includes the waters of Alaska on the north side of the Alaska Peninsula, southwest of a line from **Strogonof Point (56° 53.50' N. lat., 158° 50.45' W. long.** [CAPE MENSHIKOF (57° 28.34' N. lat., 157° 55.84' W. long.) to...

Additionally, we recommend deleting 5 AAC 09.200 (1) and (2) (A) and (B) from Chapter 09. Alaska Peninsula Area and adding new fishing districts (e) and (f) to the Bristol Bay area.

We recommend adding to 5 AAC 06.200 Fishing Districts and sections

**(e) Cinder River District, waters of Bristol Bay between Cape Menshikof at 57° 28.34' N. lat., 157° 55.84' W. long. and 158° 20.00' W. long**

**(f) Port Heiden District:**

**(1) Outer Port Heiden Section: waters located between 158° 20.00' W. long. and the longitude of Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long., excluding the waters of the Inner Port Heiden Section;**

**(2) Inner Port Heiden Section: waters of Port Heiden Bay south and east of a line from Strogonof Point at 56° 53.50' N. lat., 158° 50.45' W. long. to the mainland shore of the northeast entrance to the bay at 56° 56.50' N. lat., 158° 51.50' W. long.**

**What is the issue you would like the board to address and why?** The residents of Port Heiden ask the Board of Fisheries (BOF) to change the Alaska Administrative Code so that the

boundaries of the Bristol Bay area include the village Port Heiden and the Cinder River and Port Heiden Districts for the following reason:

1. Port Heiden is a member community in the Bristol Bay Economic Development Corporation;
2. The community of Port Heiden is within the Bristol Bay Coastal Resource Service Area;
3. The residents of Port Heiden have strong family ties to other communities in the Bristol Bay Area;
4. Most of the commercial fishing permits that are owned by Port Heiden residents are Area T permits, or commercial Bristol Bay fishing permits;
5. Including Port Heiden in the Bristol Bay area would facilitate enforcement efforts in the Outer and Inner Port Heiden sections.

**PROPOSED BY:** Gerda Kosbruk (EF-C15-112)  
\*\*\*\*\*

**PROPOSAL 24 – 5 AAC 06.100. Description of Area and 5 AAC 09.100. Description of Area.** Move all waters of the Northern District east of the latitude of Cape Seniavin from the Alaska Peninsula Area to the Bristol Bay Area, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Alaska Peninsula/Chignik/Aleutian Islands Finfish meeting.*):

I propose that Area T, Bristol Bay, be recognized as starting at Cape Seniavin, and managed as such. The genetics of WASSIP clearly show that the vast majority of salmon caught above Cape Seniavin are bound for Bristol Bay. Port Heiden is recognized as part of Area T. I suggest that the Entry Commission inadvertently misdrew the divide between Area T and Area M. If you want to catch Bristol Bay fish, buy a Bristol Bay permit.

Alternatively, Area M fishing opportunity and area could be gradually curtailed within this zone.

**What is the issue you would like the board to address and why?** I am addressing the indiscriminate interception of Bristol Bay bound salmon. Area M fishing openers are specifically targeting Bristol Bay salmon stocks without adequate regard to escapement requirements. Bristol Bay stocks are managed through small terminus fisheries with strict adherence to the state's constitutional directive of sustainable fisheries. This sustainability is only guaranteed through the use of intense scientific and management procedures and tools. Decades ago the ADF&G recognized interceptive fisheries as dangerous to the health of salmon stocks and set in motion actions to curtail such fisheries. Area M intercepting Bristol Bay salmon is in violation of such mandatory efforts. Bristol Bay salmon must be managed for OEG's, not by "windows".

**PROPOSED BY:** Larry K. Christensen (EF-C15-134)  
\*\*\*\*\*



**PROPOSAL 25 – 5 AAC 06.100. Description of area.** Expand district boundary lines, as follows:

I propose that when area managers recognize the need and opportunity to create a more valuable and orderly fishery, they have a set of additional boundary lines to utilize at their discretion. I envision these new lines to be in addition to the existing north/south lines primarily on the east side districts.

The offshore distance of the new sets of corners would remain relatively the same as the existing corner of each specific district. The subsequent lines perpendicular to the shore would have tentatively three optional distances further up or down the shoreline at potentially 3 mile intervals. The obvious candidates for these shoreward line extension options would be the Naknek Johnston hill line, North and South Egegik lines, and the North Ugashik line.

These new set of lines could be managed per EO.

Details and GPS coordinates to be determined.

**What is the issue you would like the board to address and why?** The issue that I am addressing is the inherent degradation of salmon quality, and the disorderly line fisheries created through the application of compacted terminus fisheries. The ADF&G does not have adequate flexibility in designating district specific openings in order to maximize the value of the fishery and conduct orderly fisheries once harvestable numbers are recognized. With the genetic study results of WASSIP, we know the relatively marginal interception rates of adjacent river systems and we can now better manage for optimum escapement goals, quality, and a much more orderly fishery. The current situations of concentrated combat line fishing are unnecessarily producing poor quality salmon, decreasing ex-vessel and tax values, gear damage, and injuries.

**PROPOSED BY:** Larry K. Christensen (EF-C15-130)  
\*\*\*\*\*

**PROPOSAL 26 – 5 AAC 06.200. Fishing districts and sections.** Create new general fishing sections that are in effect following achievement of escapement goals, or July 17, until July 27, as follows:

At the end of the season when the escapement goals are met for the Naknek/Kvichak, Egegik and Ugashik Districts, or the 48-hour transfer is no longer required (July 17), fishing will be allowed in two new general district sections. The first would connect the Naknek Section-Johnston Hill Line and the North Line of Egegik running approximately three miles off shore. The second would connect the South Line of Egegik to the North Line of Ugashik running approximately three miles offshore. These new sections would remain open until July 27.

**What is the issue you would like the board to address and why?** At the end of the season, the fishery becomes very competitive at the northern and southern boundaries and only a few boats share the harvest.

**PROPOSED BY:** Kurt Johnson (EF-C15-118)

\*\*\*\*\*

**PROPOSAL 27 – 5 AAC 39.280. Identification of stationary fishing gear.** Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.*):

Setnet markings signs shall include the name of the permit holder in letters at least 6" high and 1" wide, the same as the vessel name for drift vessels. The permit holder may include a phone number for contact.

**What is the issue you would like the board to address and why?** Currently drift boats and set net skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, drift vessels are required to have the vessel name in 6" letters. Normally a vessel or skiff can be contacted by physically approaching or by VHF using the vessel name. The regulations require the name of the fishermen operating a set gillnet to display the name of the fisherman operating it but there are no requirements for the size of the display of the fisherman's name. They could legally be 1" or less high and marking pen size thin. Set net identification signs can be a great distance, especially at low tide. In an emergency or other concern, the fisherman's name allows other to contact the fisherman by phone, VHF, or other means, and do so directly, especially when resources to track by Commercial Fisheries Entry Commission are closed. Require the set net fisherman's name to be in letters at least 6" high and at least 1" wide.

**PROPOSED BY:** Dan Barr (EF-C15-084)

\*\*\*\*\*

**PROPOSAL 28 – 5 AAC 39.280. Identification of stationary fishing gear.** Change the character size requirements for set gillnet marking signs, as follows (*This proposal will be heard at the Bristol Bay Finfish meeting, and heard and deliberated on at the Statewide Finfish meeting.*):

Insert "twelve inches" where now says "six inches" and add "with lines at least one inch wide."

**What is the issue you would like the board to address and why?** Currently drift boats and setnet skiffs are required to have their Alaska Department of Fish and Game numbers displayed with 12" letters, but shore side set net markings are only required to be six inches. With 20/20 vision, the maximum readable distance is only 200'. Regulations are now inconsistent, and

whereas driftnet vessels and set net skiffs can be easily approached for identification, a set net sign for contacting the permit holder for safety or resource issues can be at a distance of up to 1,200'.

**PROPOSED BY:** Dan Barr (EF-C15-086)

\*\*\*\*\*

**PROPOSAL 29 – 5 AAC 06.335. Minimum distance between units of gear.** Allow a set gillnet permit holder to operate and deploy gillnet gear seaward of the permit holder's own set gillnet, and within the permit holder's setnet site, as follows:

5 AAC 06.335 Minimum distance between units of gear needs to include the wording "Except that a CFEC permit holder may operate seaward of their own set gillnet."

5 AAC 06.335. Minimum distance between units of gear. is amended to read:

(a) In the Naknek-Kvichak, Egegik, Ugashik, and Togiak Districts, no part of a set gillnet may be set or operated within 300 feet of any part of another set gillnet. **Except that a CFEC permit holder may operate seaward of their own set gillnet.**

**What is the issue you would like the board to address and why?** In the Egegik District it has been common practice for individual permit holders to have a gap between their 50 fathom set gillnet that is operated on a single site. This allows for easier and safer maneuvering under the running line. It has recently been pointed out that this practice is in conflict with 5 AAC 06.335 Minimum distance between units of gear.

**PROPOSED BY:** Laura Zimin (EF-C15-064)

\*\*\*\*\*

**PROPOSAL 30 – 5 AAC 06.331. Gillnet specifications and operations.** Change the description of set gillnet exemptions that allow operations where beaches at mean low tide are not connected to either exposed land or land not covered at high tide, by deleting references to regulatory markers, as follows:

5 AAC 06.331(i) is amended to read:

(i) A set gillnet must be set on an area of beach that, at mean low tide, is connected by exposed land to the shore or to land not covered at high tide, except that in the Togiak District between **a point on the southernmost mouth of the Kulukak River at 58° 54.94' N. lat., 159° 43.81' W. long. to a point at the eastern entrance to Metervik Bay at 58° 54.94' N. lat., 159° 43.81' W. long.** [THE SOUTHERNMOST ADF&G REGULATORY MARKER LOCATED AT THE MOUTH OF THE KULUKAK RIVER AND THE ADF&G REGULATORY MARKER LOCATED AT THE EASTERN ENTRANCE TO METERVIK BAY], between Rocky Point and 160° 20' W. long., and between Togiak Reef and **a point near Mt. Aeolus at 58° 54.82' N. lat., 160° 44.06' W. long.** [THE ADF&G REGULATORY MARKER AT MT.

AEOLUS], no part of a set gillnet may be more than 500 feet from the mean high tide mark and the set gillnet must be substantially perpendicular to the shoreline.

5 AAC 06.331(n) is amended to read:

(n) In the Nushagak District, .....

...

(2) from the cannery dock at Clark's Point to [AN ADF&G REGULATORY MARKER AT] First Creek at XX' N. lat. XX' W. long., 500 feet from the mean high tide mark, or to the minus three foot low tide mark, whichever location is closer to the mean high tide mark;

(3) from First Creek at XX' N. lat., XX' W. long. to [AN ADF&G REGULATORY MARKER AT FIRST CREEK TO AN ADF&G REGULATORY MARKER AT] Third Creek at XX' N. lat., XX' W. long., 700 feet from the mean high tide mark;

(4) from [AN ADF&G REGULATORY MARKER AT] Third Creek at XX' N. lat., XX' W. long. to [AN ADF&G REGULATORY MARKER AT] Etolin Point at 58° 39.37' N. lat., 158° 19.31' W. long., 1,000 feet from the mean high tide mark.

**What is the issue you would like the board to address and why?** Remove reference to department regulatory markers from the regulations describing gillnet specifications and operations. The department has switched to latitude and longitude coordinates to define open and closed areas and no longer maintains regulatory markers. Removing references to regulatory markers that are no longer maintained will help clarify the regulations.

(Editor note: Complete coordinates were not available at the deadline for proposals and will be available prior to the meeting.)

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F15-007)

\*\*\*\*\*

**PROPOSAL 220 - 5 AAC 06.XXX. Vessel specifications and operations.** Prohibit net barges, floating processors, tenders, and hard fixed buoys in waters of the Egegik District during open drift gillnet fishing periods, as follows:

All net barges, floating processors, tenders and hard fixed buoys to be removed in open water fishing for the drift fleet, 30 min before the opener to 1 hour after high water.

All net barges, floating processors, tenders and hard fixed buoys to be anchored outside the west line. Only to come into the district if the Egegik district is closed to the drift fleet.

Any fixed net barges or not-in-rotation tenders being used on standby outside the Egegik district. To ease the constriction of the Egegik district.

The area behind Goose Point will be the new Tender Alley, or the area for tenders and net barges. This area typically over the years is not a heavily fished area and is also protected during bad weather.

As in the Naknek district all tenders and net barges are anchored outside the district. Egegik needs to follow suit to allow more fishing grounds, so as to ease the tensions of a constricted fishing area and for safety concerns to crew and vessels that get wrapped around the buoys and anchored vessels while the district is open for drift fisherman.

**What is the issue you would like the board to address and why?** Tenders and net barges anchored in/on the open fishing grounds of the Egegik district from inside Coffee Point or around Coffee Point to the outside west line of district. (known as Tender Alley) There should not be fixed or fully anchored buoys (net barges, processors and derelict vessels) or vessels anchored in open fishing waters during drift net district openers.

It is a dangerous situation of wrapping nets and gear around anchor buoys, tenders and non-useable floating hazards.

**PROPOSED BY:** Marc Vance (EF-C15-019)  
\*\*\*\*\*

**PROPOSAL 221 - 5 AAC 06.341. Vessel specifications and operations.** Prohibit tenders, fish buyers, and fish transport vessels from anchoring within 1,500 feet of set gillnet sites, as follows: Additional subparagraph in 5 AAC 06.341 Vessel Specs and Operation to address tender to set net distance.

**5 AAC 06.341 Vessel specifications and operations.**

....

**(c) No tender, buyer or fish transport vessel shall willfully or intentionally interfere with commercial fishing operations, sites and gear. No tender, buyer or fish transport vessel shall not take mooring, anchor or remain stationary for an extended period within 1,500 feet of an operational set net site.**

**What is the issue you would like the board to address and why?** The issue is tenders encroaching upon set net sites to impede drifters from drifting legal distances from set net sites. In Togiak there is a tender owner that also operates multiple set net sites and he uses his tender to block drifters from fishing legally outside of his sites.

Alaska Statue Sec. 16.10.055 Interference with commercial fishing gear. A person who willfully or with reckless disregard of the consequences, interferes with or damages the commercial fishing gear of another person is guilty of a misdemeanor. For the purposes of this section “interference” means the physical disturbance of gear which results in economic loss of fishing time, the “reckless disregard of consequences” means a lack of consideration for the consequences of one’s acts in a manner that is reasonably likely to damage the property of another.

**PROPOSED BY:** Togiak Fish and Game Advisory Committee (EF-C15-056)  
\*\*\*\*\*

**PROPOSAL 31 – 5 AAC 06.370. Registration and reregistration.** Change the area registration requirements to require district registration prior to fishing in a district in Bristol Bay, as follows:

In all Bristol Bay commercial salmon fishing districts no fishing is allowed until registered blue card are filled out with area to be fished and submitted to Alaska Department of Fish and Game staff.

The transfer time of 48 hours will be in effect in Ugashik, Egegik, Naknek, Kvichak and Nushagak.

**What is the issue you would like the board to address and why?** In the Bristol Bay commercial salmon fishery no transfer restrictions have affected management and created a large mobile fleet that brings fish from one district to another which affects the genetic studies being done in Bristol Bay. It also affects all early openings with a cautious management approach, Quality of fish are being sacrificed.

**PROPOSED BY:** Lower Bristol Bay Fish and Game Advisory Committee (EF-C15-101)  
\*\*\*\*\*

**PROPOSAL 32 – 5 AAC 06.370. Registration and reregistration.** Change the area registration date requirement for the Bristol Bay commercial salmon fishery, as follows:

Return to regulation prior to 2010— "5 AAC 06.370. Registration and reregistration. (a) Before taking salmon in Bristol Bay, each commercial salmon set gillnet or drift gillnet CFEC permit holder shall register for a district described in 5 AAC 06.200. Each drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. Initial district 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. For the purposes of this section, a CFEC permit holder and a drift gillnet vessel may be registered in only one district at a time." And this means no waiting until June 25 to register for a specific fishing district.

**What is the issue you would like the board to address and why?** The issue is the unrestricted mobility of the drift fleet until June 25. We propose to go back to the district registration of drift permits as it was prior to 2010. The Egegik District has earlier run timing than the rest of the Bay so the entire Bristol Bay fleet can potentially fish in Egegik District when we are under regulations starting June 16 and they are on free week. With all of those extra boats it makes it extremely difficult for our biologist to distribute fish inside the district and achieve early escapement which should be our top priority.

**PROPOSED BY:** Tom Huffer Sr., Egegik Setnetters Association (EF-C15-009)  
\*\*\*\*\*

**PROPOSAL 33 – 5 AAC 06.370. Registration and reregistration.** Change the area registration date requirement for the Bristol Bay commercial salmon fishery, as follows:

5 AAC 06.370 is amended to read:

(a) All Bristol Bay permit holders must declare what district they wish to fish in on or before the third Friday of June of every year, which will then require permit holders to adhere to the present 48 hour wait time for transferring to another district.

(b) For the permit holders who wish to not fish until a later date can do so, but when they do wish to fish, must declare which district they wish to fish in.

**What is the issue you would like the board to address and why?** Current law allows Bristol Bay drift permit holder to fish in any district without what declaring what district they wish to fish until June 25 +/- a day. Currently, fish biologists are unable to accurately manage given districts run strengths based on the ever change fleet strength. Secondly, canneries are struggling with adapting to the ever changing fleet jumping from one district to another without any wait time. Third, the catch quota between the setnet and drift fleet is skewed so greatly at the beginning of the season, which leads to unneeded challenges during heavy fishing periods. Fourth, it has become apparent vessels are catching fish in one district and then running to another district, fishing then selling their catch from more than one district at one time. This provides issues with run strength from one district to another. Finally, the river drainages for the various districts are seeing their front end of the escapement numbers are being reduced due to the current law.

**PROPOSED BY:** Chad Sorenson

(EF-C15-012)

\*\*\*\*\*

**PROPOSAL 34 – 5 AAC 06.370. Registration and reregistration.** Reduce the required waiting period when registering for a new district from 48 hours to 12 hours, as follows:

Modify the language in the regulation to reflect a waiting period of 12 hours instead of 48 hours.

Draft language. Substitute 12 hours in the place of 48 hours in all language referencing transfer waiting period for drift gillnet vessels and permit holders in 5 AAC 06.370.

**What is the issue you would like the board to address and why?** When transferring from one district to another during the Bristol Bay salmon fishery a vessel and its' permit holder(s) must wait 48 hours from the time of notification of transfer to begin fishing again. This regulation is a relic of management regimes long ago. The current regulation penalizes fishermen that simply want the opportunity to harvest available surpluses in a district other than where they are fishing at the present time. In the past processors have been adamant that they need district registration to be able to know where their fleet is and will be fishing in order that they can plan for tender placement and proper service. Leaving the notification requirement in place and reducing the waiting period to 12 hours provides the tracking that processors need while allowing the fishing fleet to operate under a management regime similar to that of every other salmon fishery in the state. The present regulation is difficult and costly to enforce and often results in significant abuse resulting in significant illegal fishing activities.

**PROPOSED BY:** Matthew Luck

(EF-C15-020)

\*\*\*\*\*

**PROPOSAL 35 – 5 AAC 06.370. Registration and reregistration.** Require drift gillnet operations to register the day of fishing during emergency order periods, as follows:

All drift fishers shall drop district registration cards on day they start to fish during emergency order period

**What is the issue you would like the board to address and why?** Repeal district registration date of June 25. New language to read; all drift vessels shall drop district registration cards on the day they start fishing during emergency order period. It is unfair on local fleets in Egegik and Ugasik to have large groups of boat racing between districts. Most boats are from Naknek and Nushagak. All districts should have same set of rules.

**PROPOSED BY:** Kim Rice

(EF-C15-076)

\*\*\*\*\*

**PROPOSAL 36 – 5 AAC 06.370. Registration and reregistration.** Change the registration requirement for commercial salmon fishing in the Egegik District, as follows:

5 AAC 06.370 is amended to read:

(2) In the Nushagak District **and Egegik District**, a

(A) commercial salmon drift gillnet CFEC permit holder shall register for that district...

**What is the issue you would like the board to address and why?** Early registration in Egegik District. With Egegik starting emergency order regulations having open transfer puts undue hardship on Egegik fishermen. This creates a regulatory nightmare due to potential illegal fishing in closed waters and illegal deliveries with boats leaving one district for another without delivering their fish causing inaccuracies in district fishing results.

**PROPOSED BY:** Stanley O. Johnson

(EF-C15-015)

\*\*\*\*\*

**PROPOSAL 37 – 5 AAC 06.370. Registration and reregistration.** Change the area registration date requirement from June 25 to June 1 for the Naknek-Kvichak, Egegik, and Ugasik districts for the drift gillnet fleet, as follows:

Require boats to register June 1 by district, before fishing in these areas to restore a more ordered and methodical process to the start of the fishery. This process was used successfully in the past and will make it much easier to manage and lower cost for fishermen, processors, and the Department.

5 AAC 06.370(a)(4) is amended to read:



(4) beginning **June 1** [JUNE 25], before taking salmon in the Naknek, Kvichak, Egegik, and Ugashik Districts, a commercial salmon drift gillnet CFEC permit holder shall register for one of these districts;

**What is the issue you would like the board to address and why?** Change area registration in Naknek, Kvichak, Egegik, and Ugashik to June 1 instead of June 25. Late June registration in these three districts makes it difficult to manage for fishermen, processors and the Department, and adds unneeded costs.

The fleet arrives early and runs from area to area in a “mob” regardless of any accumulations of harvestable fish, running up unneeded boat and fuel cost. Early registration eliminates the mob. Fishermen enter the districts as fish develop, spreads out catching effort and improves cost for fishermen.

Department area managers have to guess as to how many boats will be in a district because of no early registration and free roaming of boats between districts. Not knowing how many boats will participate in an opening makes it difficult to guess how much time should be allowed for that particular opening and matching boat numbers with fishing time. Oftentimes too little, or worse, too much fish is taken based on a guess. Early registration better allows the manager to know before an opening how many boats to expect.

Fish is often sold illegally out of the district it is caught in as boats travel from district to district. The Department therefore has no real way of knowing what districts early fish are actually caught in. Early registration eliminates out of district selling.

Early unregistered fishing in these districts, by a large fleet, is for the most part not managed by enforcement as they are not typically deployed at that time. Early registration reduces a large fleet in one area and would cut down on line violations and instigating a line fishery right at the front end of the fishery.

Not knowing where the majority of the fleet will be from opening to opening makes it difficult for a processor to guess where to position tenders and hard to manage. Having boats register for a particular area early eliminates the need for guessing and provides better tender service for the fishermen.

Late area registration requires the processor to start tender contracts early to provide coverage for all areas in anticipation of a large early fleet, and not necessarily for any early fish. This runs up unneeded tender costs. Early area registration allows the processor to start tenders by area, as fish and fleet develop, lowering tender contract days and fuel cost.

Polling of fleet indicates that the vast majority of fishermen would like to eliminate late area registration and go back to the previous method of having to drop the blue card and register before fishing any district. Fishermen can still fish early, just register for a district and go fishing. However, with early registration they can start the season on their own schedule and not the mobs.

**PROPOSED BY:** Spencer Fuentes

(EF-C15-010)

\*\*\*\*\*

**PROPOSAL 38 – 5 AAC 06.370. Registration and reregistration.** Change registration requirements for fisheries under emergency order conditions and change the registration date for the Naknek-Kvichak, Egegik, and Ugashik districts from June 25 to June 18, as follows:

Blue card registration needs to be dropped in a district that is in emergency order (EO) fishing conditions.

1. To alleviate the going back and forth from district to district in the early season, a vessel needs to declare a district if the area goes to EO openings. Making the 48-hour transfer to get out of that area mandatory to fish a free and open area that has not gone on Emergency Order.
2. To change the drop date of the blue card to June 18th (moved up 7 days). The salmon season is under full swing as of that date and ADF&G should be under full control of the districts earlier than the current date of June 25th. Making the EO to all rivers systems on June 18th.

**What is the issue you would like the board to address and why?** District Blue card registration for district fishing

**PROPOSED BY:** Marc Vance

(EF-C15-018)

\*\*\*\*\*

**PROPOSAL 39 – 5 AAC 06.370. Registration and reregistration.** For the Naknek-Kvichak District, eliminate the registration date of June 25, and require registration only before fishing in the district, as follows:

Register to fish as soon as you start fishing, as it used to be.

**What is the issue you would like the board to address and why?** Change the drift registration, register or (drop blue cards) in the Naknek/Kvichak District when you start fishing instead of June 25th.

This is how it used to be. When it was changed to June 25th, the run timing was different. The last few years the fish have been returning earlier. Lately by the 25<sup>th</sup>, the run of fish is starting to come in more than had been anticipated. The fishing fleet is getting more and more mobile and because of these circumstances the Naknek/Kvichak has been getting quite overcrowded.

**PROPOSED BY:** Randolph Alvarez

(EF-C15-025)

\*\*\*\*\*

**PROPOSAL 40 – 5 AAC 06.370. Registration and reregistration.** Change the drift gillnet registration date in the Naknek-Kvichak District from June 25 to June 17, as follows:

Change drift registration in the Naknek/Kvichak District to June 17th from its present date of June 25th.

**What is the issue you would like the board to address and why?** Registration or dropping of blue cards in the Naknek/Kvichak District. Last cycle the Board of Fish changed the drift registration. It was moved to June 25th from June 17th. I propose to move it back to June 17th. Since it was changed, the run timing has changed resulting in the run starting to be quite significant by June 25. Because of that and the mobile fleet, the Naknek/Kvichak has been overcrowded before June 25.

**PROPOSED BY:** Randolph Alvarez (EF-C15-026)

\*\*\*\*\*

**PROPOSAL 41 – 5 AAC 06.370. Registration and reregistration.** Change the area registration requirement for the Naknek-Kvichak, Egegik, and Ugashik districts by removing the June 25 start date, as follows:

In 5 AAC 06.370 I would delete the words "Beginning June 25" and begin the paragraph "Before taking .....".

**What is the issue you would like the board to address and why?** Although fishing begins June 1 and although the allocation period begins June 1 (5 AAC 06.365), district registration does not begin until June 25. That means a drift fisher can fish, for example, a period in Egegik on June 20 and in Naknek on June 21 and back to Egegik for June 22. The law may require a fisher to land the catch in the district taken but we all know that during this non-regulated time, fishers catch in one district and deliver in another according to their convenience. ADF&G cannot manage the district allocation nor escapement properly. It is simple for a fisher to work one district and travel a few short hours to another district with fish on board, and fish the second district before delivering. It's my opinion that this practice corrupts the allocation in the Egegik and Naknek districts where it would seem fish are caught and leave Egegik unreported and deliver in Naknek, thus under reporting the catch and drift allocation in Egegik and over reporting in Naknek. The ADF&G cannot look at a boat and know which district it is registered for, and management is therefore made more difficult. District registration should begin when fishing begins, consistent with the allocation regulation period.

**PROPOSED BY:** Tony Neal (EF-C15-031)

\*\*\*\*\*

**PROPOSAL 42 – 5 AAC 06.370. Registration and reregistration.** Allow set gillnet operators to transfer within the Nushagak statistical areas without the 48-hour time requirement, as follows:

5 AAC 06.370(a)(2)(B) is amended to read:

(B) commercial salmon set gillnet CFEC permit holder shall register for [A STATISTICAL AREA IN] that district;

Repeal the sections in 5 AAC 06.370 that require setnet permit holders to transfer between statistical subdistricts in the Nushagak. Specifically 5 AAC 06.370 (I)

**What is the issue you would like the board to address and why?** The statistical areas of the Nushagak District which commercial set gill CFEC permit holders must register in addition to district registration is a cumbersome and restrictive process. It creates confusion without benefiting set net permit holders. Not only does it create additional paperwork for Tenders, Fish and Game, Processors, and Fishers but it restricts where permit holders may fish in the Bay causing loss in catch and revenue by requiring a 48 hour time that nets must be out of the water when transferring between sub districts. It restricts commercial set gill CFEC permit holders from responding to changing conditions in the Bay leaving many people on the sidelines while the fish pass them by. There is no other district in Bristol Bay that has these statistical sub districts or the 48-hour transfer time associated with them.

**PROPOSED BY:** Gregg James Marxmiller (EF-C15-116)  
\*\*\*\*\*

**PROPOSAL 43 – 5 AAC 06.370. Registration and reregistration.** Repeal set gillnet reregistration requirement for statistical areas within the Nushagak District as follows:

**5 AAC 06.370 (a) Registration and reregistration is amended to read:**

(2) in the Nushagak District, a

...

(B) commercial salmon set gillnet CFEC permit holder shall register for a statistical area in that district;

**(I)** In the Nushagak District a CFEC salmon set gillnet permit holder intending to fish in a statistical area for which the permit holder is not registered, shall register for the new statistical area; **if transferring into the Nushagak District from any other fishing district, the permit holder must register** at least 48 hours before fishing in the new statistical area **(in accordance with 5 AAC 06.370 (b))**. [A SET GILLNET PERMIT HOLDER SHALL ALSO REGISTER THE SET GILLNET FOR THE NEW STATISTICAL AREA. REREGISTRATION 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 AN AUTHORIZED REPRESENTATIVE OF THE DEPARTMENT. THE 48-HOUR NOTIFICATION PERIOD BEGINS WHEN THE REREGISTRATION FORM IS SIGNED BY THE AUTHORIZED REPRESENTATIVE OF THE DEPARTMENT. THE SET GILLNET PERMIT HOLDER MAY NOT FISH IN THE ORIGINAL STATISTICAL AREA DURING THE 48-HOUR NOTIFICATION PERIOD. THE NOTIFICATION PERIOD MAY BE REDUCED BY COMMISSIONER'S ANNOUNCEMENT.] Reregistration is not required to fish **different statistical areas within the Nushagak so long as you accurately record the fishing district and statistical area at the point of sale in accordance with 5 AAC 39.130(c)(7).** [AFTER 9:00 A.M. JULY 17.]

**What is the issue you would like the board to address and why?** The Nushagak District is currently the only fishing district within the Bristol Bay Area that requires set net permit holders to wait a 48-hour transfer period before fishing at a different location (known as a statistical area) within the same fishing district. Some less established, or new entrants into the fishery do not hold a shore fishery lease at a productive site; this would allow that person to find a more productive sight without being forced to miss out on the opportunity to fish their gear due to ADF&G office hours. Missing out on a single tide while waiting for the transfer period to be completed or rescinded could result in the substantial loss of opportunity.

Other solutions considered: Keep the 48-hour transfer period into and out of the Igushik River section. The Igushik River section is generally managed separately from the rest of the Nushagak District, allow fisherman to move from all one statistical area to another without having to reregister unless moving into/out of the Igushik section.

**PROPOSED BY:** Kevin McCambly and Kayla Miller (EF-C15-127)  
\*\*\*\*\*

**PROPOSAL 44 – 5 AAC 06.370. Registration and reregistration.** Modify Togiak District registration restriction requirements that apply until July 27 to include a fishing vessel, as follows:

Addition of language in the existing regulation to tie the vessel transfer requirements to permit transfer requirements that are already in place.

5 AAC 06.370. Registration and reregistration is amended to read:

(k) Notwithstanding (b) of this section, a CFEC permit holder **and fishing vessel** registered before 9:00 a.m. July 17 in the

(1)Togiak District may not take salmon in the Nushagak, Naknek-Kvichak, Egegik or Ugashik District from 9:00 a.m. June 1 to 9:00 a.m. July 27

(2)Nushagak, Naknek-Kvichak, Egegik or Ugashik District may not take salmon in the Togiak District from 9:00 a.m. June 1 to 9:00 a.m. July 27

**What is the issue you would like the board to address and why?** Togiak is a late run fishery and has regulations restricting when you can transfer in and out of the district. Permits that fish in other districts cannot transfer to Togiak until a set date and likewise permits that fish in Togiak cannot transfer to other districts until the same set date. The regulations for the rest of Bristol Bay concerning transferring in and out of districts restrict both the permit and the vessel and Togiak’s transfer period should reflect the same restrictions on the vessel and permits. A permit holder who fishes another district can get another permit holder to drop their registration in Togiak and fish the same vessel that has already capitalized on the salmon run in another district.

**PROPOSED BY:** Togiak Fish and Game Advisory Committee (EF-C15-057)  
\*\*\*\*\*

**PROPOSAL 45 – 5 AAC 06.331. Gillnet specifications and operations.** Reauthorize Bristol Bay set gillnet permit stacking, as follows:

5 AAC 06.331 (f) Gillnet specifications and operations. Allow multiple permit use as follows:

...

(f) **Except as provided in (u) of this section,** a person may not operate more than two set gillnets, and the aggregate length of set gillnets operated by that person may not exceed 50 fathoms in length. Notwithstanding 5AAC 39.240 (a), a person may assist in operation or transportation of additional set gillnet gear when the CFEC interim-use or entry permit card holder of the additional gear is present in compliance with 5 AAC 39.107.

...

**(u) A CFEC permit holder who holds two Bristol Bay set gillnet CFEC permits may operate no more than four set gillnets, with no more than 100 fathoms of set gillnet gear in the aggregate. No single set gillnet may be more than 50 fathoms in length and no more than 50 fathoms of net may be fished on an individual set net site. Both of the permit holder's five-digit CFEC permit serial numbers followed by the letter "D" to identify the gillnet as a dual permit set gillnet must be located on the identification buoys required by 5 AAC 39.280 and 5 AAC 06.334. At least one cork every 10 fathoms along the cork line must be plainly and legibly marked with both CFEC permit numbers of the CFEC permit holder. All identifiers must be displayed in a manner that are plainly visible and unobscured and have permanent symbols in a color that contrasts with the background.**

**What is the issue you would like the board to address and why?** To address the continued decrease in the ability for commercial set net fishermen to make a viable living off of fishing only one set net permit, SO4T, in Bristol Bay. It has become increasingly difficult for anyone to make a living off of one set net permit, even with multiply sites.

**PROPOSED BY:** Rose Beach (EF-C15-088)

\*\*\*\*\*

**PROPOSAL 46 – 5 AAC 06.331. Gillnet specifications and operations.** Allow permit stacking for set gillnet operations, as follows:

I apologize that I cannot offer draft language, this is not an existing regulation that needs revising.

I would offer the language used in the time that S04T stacking was allowed. I would ask a restriction that prevented a dual permit holder from fishing both permits on one site.

**What is the issue you would like the board to address and why?** I ask the Board of Fisheries to approve permit stacking for S04T set net permit holders, so that one individual cannot only own two permits but can also fish two permits. I would prefer to see a tail on that regulation that prohibited a dual permit holder from fishing both permits on one site, say by alternately fishing one net while simultaneously picking another on the shore.

My primary reason for asking for permit stacking is defensive, we need to be able to fish our permits enough to make money and not be driven from the fishery by costs and restrictions.

We live in Homer and set net in Egegik. There are presently seven of us in one family, fishing three sites with three permits. With employment, school, disability, and other time constraints, it is impossible for us to have the same three permit holding persons there for the season from start to finish. Set netting is not a particularly profitable business and a family has to have other primary employment. Primary employment and school schedules drives who can be there and who can't. Although we are capable of fishing three sites for the full season, we cannot have the same three persons as permit holders for the full season. Given transfer restrictions and inefficiency during the season, we cannot transfer at will. Permit stacking allows our family to fish the full season and maximize our investment.

I was reading a report done by CFEC during the last board meeting for the permit stacking proposals. CFEC concluded that permit stacking was utilized by non-locals, like us, and non-residents, but not locals to Bristol Bay and that was presented as a detriment to the locals. I think the conclusion was wrong. A local Bristol Bay family does not need to stack permits because a non-fishing permit holder can more or less legally go down to the beach and hang out while others fish, thus no need to find an active permit holder. A permit holding grandmother can go to the beach near her home, sit in a camp chair, and watch her grandchildren fish her site. That's wonderful, I support that. That family can fish the whole season. But my wife, a permit holding grandmother who loves to watch her grandchildren fish, cannot do that. We have to travel out to Bristol Bay from Homer; she can't go home after the fishing period and take care of other family or employment needs. The grandchildren cannot always come to the Bay in time, they have school, college, sports. In another example, a local permit holder who was, say 17 and a senior in high school could play sports and attend school and fish, because the site was close to home. Our kids cannot do that. If we could stack our permits, we could fish more periods with all our permits and be able to make set netting economically viable.

I was told that permit stacking raised the price of the permits, making them less available locally. We wouldn't know because we don't buy or sell, we only stacked within our family when it was allowed. Among the 8 or so families in our area that did stack when it was allowed, none bought permits. The reason was always the same, family convenience allowing the family group to more efficiently fish what they already have. I suppose stacking could cause some rise in cost of a permit because it allows more efficiency in set netting and thus more income to a permit holder.

There was a lot of previous opposition to stacking among local Bristol Bay permit holders because it was said that the price of permits would go up. In my view, local people can take advantage of having permit-holding family members nearby, so they don't need stacking. In my view, that is an allocation to locals at the expense of non-local Alaska residents like our family.

In my view, locals will benefit the most of the three groups by permit stacking. It's my understanding BBEDC will finance permits for Watershed residents. That is a wonderful advantage not available to us in Homer. By stacking, locals could in theory double the number of permits owned locally, using financing from BBEDC. I believe the greatest beneficiaries to set net permit stacking are the local residents.

But we all will benefit and we need the help.

Thank you.

**PROPOSED BY:** Tony Neal (EF-C15-033)

\*\*\*\*\*

**PROPOSAL 47 – 5 AAC 06.331. Gillnet specifications and operations.** Allow permit stacking for set gillnet operations and up to one and one-half the current legal limit of gear for one permit to be operated when permit stacking, as follows:

Bristol Bay set net permit holders would be able to hold and actively operate two setnet permits at the same time. However, the total aggregate of gear in the water (fishing) would be equal to 1–1/2 times the legal limit of gear for a single permit in the area fished. (i.e.; if the legal about of gear is 50 fathoms, then the dual permit holder would be able to operate 75 fathoms.)

Reasoning is that this may enable and encourage a non-transferable permit holder to obtain another permit as a hedge against potential future loss of the income source for his/her family and also allow them to hold the family fishing site. By limiting gear, the extra permit may not be enough incentive to encourage others to buy in to the fishery.

**What is the issue you would like the board to address and why?** The issue this proposal would address is the continuing migration of Bristol Bay set net permits away from Alaskan residents and local Bristol Bay residents in particular. Presently there are about 100 non-transferable Bristol Bay set gillnet permits on the books. At one time there were 155. All but 18 of these permits were issued to Alaska residents, the vast majority of whom resided in Bristol Bay. When the holder of a non-transferable permit dies, his permit is gone— no longer available to the family. Most of these permit holders have no other permit in the family.

The following proposal would help Alaska residents make their set gillnet operations more viable. Presently, entry permit holders may hold two entry permits for the same fishery, but they may only actively fish one of them. (In the Bristol Bay set gillnet fishery) This proposal, while potentially affecting all of Bristol Bay set gillnet permit holders, is designed to specifically protect the non-transferable permit holder and their families.

**PROPOSED BY:** John Schandelmeier (EF-C15-034)

\*\*\*\*\*

**PROPOSAL 48 – 5 AAC 06.331. Gillnet specifications and operations.** Allow permit stacking for set gillnet operations in the Bristol Bay Area, as follows:

Allow Bristol Bay set net fishermen to have dual permits.

Fisherman in the Bristol Bay salmon fishery are allowed to hold and legally fish two set net permits per person.



**What is the issue you would like the board to address and why?** I would like the board to once again allow set net fishermen to have two set net permits in their names. This was allowed from 2009–2012 in Bristol Bay. During that time, my family purchased a set net operation from a family for whom I worked as a deckhand for eight years. Our long term goal is to raise our family fishing in the Bay every summer and pass it on to them the way it was passed on to me. Right now my kids are young, but are finally at the point where they can come out for part of the fishing season. However, it is a challenge to have them out there for the whole season. Additionally, I would like to be able to come out earlier and stay later to take full advantage of all the fishery has to offer. So, while I could simply not fish her permit during those times, that option is not financially viable for our family. The only other option is to have the permit in a deckhand's name since they are there for the whole fishing season. This is not a great option either for obvious reasons.

While it's easy to dismiss my request, I feel the board has a responsibility to give it more consideration. I am not asking for something that has not been done. To the contrary, I entered the fishery as a permit holder when they did allow permit stacking. What I have been unable to understand is why the board would have allowed the stacking of set net permits for a short three year period. That decision should have been a long term decision as I reasoned it had to be. Why would you allow people to legally purchase a \$40,000 asset and then require them to sell it 3 years later? This is a logistical nightmare that is unwarranted. All the arguments for letting the regulation sunset were weak; less new people entering the fishery, less local and native fishermen did not mandate reversing the decision. They were obvious outcomes of the experimental regulation period. Nothing happened in that time that was a surprise and certainly nothing that should lead everyone in the fishery to revert back to the way it was before.

Everyone knows fishing is a feast and famine industry to be in. But allowing stacking of two permits was a great way to help fishermen make fishing a more reliable source of their livelihood. Some year's the return are low or we go through valleys where the price drops. Having two permits helps weather those storms. It helped us. It didn't hurt anyone (that's my argument of course), and it certainly didn't impact the health of the fishery. If you were to reinstate set net permit stacking it would make our family grateful. We would have less to juggle in paperwork, I would be able to maximize the use of the permits we fish and would probably be able to stay out longer to make Bristol Bay a larger part of how my family supports and sustains itself.

**PROPOSED BY:** Corey Lockbeam (EF-C15-080)

\*\*\*\*\*

**PROPOSAL 49 – 5 AAC 06.331. Gillnet specifications and operations.** Allow two set gillnet permit holders to jointly operate with up to 75 fathoms of set gillnet gear and require both permit numbers on identification sign, as follows:

I recommend the board allow: Two setnet permit holders can register as a Dual and fish 75 fathoms of gear on one site. If the two permit holders opt to fish as a dual they would not be able to fish the extra 25 fathoms on another site at the same time. This would remove 25 fathoms of

gear from the water and help consolidate operations and limit costs and delivery and picking time. Setnet signs would list both permit numbers and dual to signify this.

**What is the issue you would like the board to address and why?** I would like the board to address the lack of setnet permit holders not having a dual permit option to fish additional gear on one site as the drift permit owners do on one boat. Setnet permit holders should have the option as drifters do to consolidate operations, limit costs and better manage their business. It will help save fuel costs due to long travel time between sites and faster delivery time for higher quality fish. For example a fishing family with two permits and two sites far from each other could consolidate and fish both on one site. Two permits registered as dual would be allowed to fish 75 fathoms of gear on one site. The other 25 fathoms would not be allowed to fish at the same time. This removes 25 fathoms from the water.

**PROPOSED BY:** Jim Reynolds (EF-C15-082)  
\*\*\*\*\*

**PROPOSAL 50 – 5 AAC 06.331. Gillnet specifications and operations.** Allow permit stacking for set gillnet operations in the Egegik District, as follows:

Allow set gillnet dual permit stacking in the Egegik District of Bristol Bay. Allow other districts to opt into the dual permit program if the set gillnet stakeholders in each district choose to.

**What is the issue you would like the board to address and why?** The issue is setnet permit stacking in Bristol Bay. We had setnet permit stacking for three years before the Board of Fisheries took it away. The program worked like it was supposed to. There were no problems. We had over 82% positive comments at the last board cycle for Bristol Bay. It was a sound program that allowed setnet fishers to not have to transfer between family members all the time. It added some stability to many setnet families allowing some flexibility in what family member could be present. It allowed a family member to take a summer off to go to special training that they couldn't get any other time than fishing season. Permit stacking also allowed a person to grow their fishing operation. Many young people are not looking at setnet fishing as a future because the upside is not there. By being limited to one permit they can see most single setnet operation just break even. Most all of the dual permit holders were family groups. Those permits were transferred back to family members not sold, nothing changed. Setnet permit prices didn't change by repealing dual permit program the board made it more difficult to juggle permits with in the family. Setnet permit stacking helped keep fishing families together. This program helped Alaska families

**PROPOSED BY:** Kim Rice (EF-C15-078)  
\*\*\*\*\*

**PROPOSAL 51 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.** Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay, as follows:

Under the current regulation 5 AAC 06.333, the option of "permit stacking" is only allowed for two separate permit holders. I recommend the Alaska Board of Fisheries amend the current regulation under 5 AAC 06.333 to include individuals owning two Bristol Bay Salmon drift permits the same access of "permit stacking" as two separate permit holders.

**What is the issue you would like the board to address and why?** Under the current regulation, two Bristol Bay drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate 200 fathoms of drift gillnet gear. In 2002, the Alaska Legislature passed House Bill 286, amending Alaska Statute 16.43.140 (c). This law allows individuals the ability to concurrently hold two salmon limited entry permits in the same permit fishery. House Bill 251 provided the Alaska Board of Fisheries the authority to grant fishing privileges to the second permit held by an individual, otherwise known as permit stacking.

**PROPOSED BY:** Abe Williams (EF-C15-096)  
\*\*\*\*\*

**PROPOSAL 52 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.** Allow drift gillnet permit stacking for an individual who owns two drift gillnet permits in Bristol Bay and the operation of 200 fathoms of drift gillnet gear from a vessel with an individual holding two drift gillnet permits, as follows:

This proposal would allow an owner of two Bristol Bay drift gillnet permits to fish and operate 200 fathoms of drift gillnet gear from a single vessel.

**What is the issue you would like the board to address and why?** Currently, the full benefit of permit stacking ("D" Permits) is not being realized. We are falling short of the potential improvement in fish quality and reduction of fishing vessels (Optimum Number Study).

**PROPOSED BY:** Kurt Johnson (EF-C15-122)  
\*\*\*\*\*

**PROPOSAL 53 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.** Increase the amount of drift gillnet gear allowed when two permit holders are jointly operating, as follows:

5 AAC 06.333 Requirements and specifications to use 300 fathoms of drift gillnet gear is amended to read:

(a) Two Bristol Bay drift gillnet CFEC permit holders may currently fish from the same vessel and jointly operate up to 300 fathoms of drift gillnet gear under this section

**What is the issue you would like the board to address and why?** Section 333 Requirements and Specifications for use of 200 fathoms of drift gill net gear in Bristol Bay."

"Laws and regulations governing the use or disposal of natural resources shall apply equally to all persons similarly situated with reference to the subject matter and purpose to be served by the law or regulation."

See also; Committee B report RC 81. Board of Fisheries (2009) Passed 5-1, 2009, for setnet permit stacking 5 AAC 06.333(f) with no optimum number study.  
1858 Limited Entry Permits divided by two, is the optimum number.  
No Optimum Number Study is required.

**PROPOSED BY:** Todd Granger

(EF-C15-032)

\*\*\*\*\*