

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 Ugashik 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 25th, 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)
