

PROPOSAL 122 – 5 AAC 05.331. Gillnet specifications and operations. Modify Yukon Area commercial set gillnet length specification to an aggregate length standard, as follows:

5 AAC 05.331(a) is amended to read:

- (a) A [NO] person may **not** operate
 - (1)** set gillnet gear that exceeds 150 fathoms in **aggregate** length;
 - (2)** [NO PERSON MAY OPERATE] drift gillnet gear that exceeds 50 fathoms in length.

What is the issue you would like the board to address and why? Set gillnet gear is currently permitted with gear specifications on length for subsistence and commercial fishing. Subsistence regulations specify set gillnet gear as an aggregate length to allow for multiple nets to be fished, with the combined total length of nets limited to 150 fathoms. This proposal would provide clarification and align commercial regulations of set gillnet length to subsistence regulations.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-027)

PROPOSAL 123 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan. Further define commercial beach seine specifications for summer chum salmon in the Yukon Area, as follows:

5 AAC 05.362(k)(1)(B) is amended to read:

(1) a permit holder may fish with

...

(B) beach seine gear; **a beach seine may not exceed 150 fathoms in length or 100 meshes in depth** [,] with mesh size that does not exceed **three and one-half** [FOUR] inches stretched measure; and

What is the issue you would like the board to address and why? Beach seines are allowable gear under current commercial fishing regulations during times necessary for king salmon conservation. However, there are no specifications on length and depth for beach seines. Currently, any combination of net length and depth could be operated within the Yukon Area as a beach seine. Reducing the mesh size aligns with existing gear used in the fishery and may assist in conserving king salmon. The beach seine gear specifications proposed here would complement the proposed subsistence beach seine specifications.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-025)

PROPOSAL 124 – 5 AAC 05.331. Gillnet specifications and operations. Allow for six-inch or smaller mesh gillnets in the commercial salmon fishery in Yukon River District 6 by emergency order, as follows:

5 AAC 05.331(d) is amended to read:

(d) In **Districts 4 and 6** [DISTRICT 4], salmon may be taken only with gillnets of six-inch or smaller mesh **during periods established** [AFTER A DATE SPECIFIED] by emergency order.

What is the issue you would like the board to address and why? Current regulations allow commercial set gillnets and fish wheels to be operated in Yukon River Districts 4–6. In 2014, gillnets restricted to six-inch or smaller mesh were allowed in Districts 1–2 for the directed harvest of summer chum salmon while reducing incidental king salmon harvest. However, the department does not have authority to specify six-inch or smaller mesh size for commercial set gillnet gear in District 6. Allowing for six-inch or smaller mesh size gillnets in the salmon fishery in Yukon River District 6 by emergency order gives fishery managers the flexibility to open and close set gillnet fishing targeting summer chum salmon in District 6, while minimizing king salmon mortality. It is common management practice to establish gear specifications by periods rather than after a date specified by emergency order.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-026)

PROPOSAL 125 – 5 AAC 05.331. Gillnet specifications and operations. Establish gillnet gear provisions to allow a directed pink salmon commercial fishery in districts 1–3 of the Yukon Area, as follows:

Establish a directed pink salmon fishery in the Yukon River with the use of gillnets four inches or less and no deeper than 50 mesh. Draft language adds a new section (k) to 5 AAC 05.331

5 AAC 05.331. Gillnet specifications and operations

(k) Notwithstanding the other provisions of this section, in Districts 1 - 3, the commissioner may, by emergency order, close the fishing season and immediately reopen the season during which a person may take salmon only with a gillnet that has a mesh size of four inches or less and that is not more than 50 meshes in depth.

What is the issue you would like the board to address and why? Pink salmon runs are strong and a harvestable surplus is available, particularly in even numbered years. Accordingly, we seek to establish a directed pink salmon fishery within the open waters of the Yukon Area using gillnets of four inch or less mesh size and no greater than 50 meshes deep. We believe that favorable market conditions exist. Although small numbers of pink salmon have been sold in the past, these fish were incidentally caught in the directed summer chum salmon fishery. We now seek to establish a directed fishery for pink salmon in the Yukon River. Although there has not been assessment of the pink salmon stock, we believe that it is relatively strong and there are no concerns with escapement and subsistence, particularly during the large runs in even numbered years.

PROPOSED BY: Kwik’pak Fisheries (EF-C15-066)

PROPOSAL 126 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.

Add purse seine gear as an allowable commercial salmon fishing gear to target summer chum salmon in districts 1–3 of the Yukon River during times of king salmon conservation, as follows:

Specifically, we would like the BOF to approve the use of purse seines to harvest the abundant summer chum salmon during times of king salmon conservation 5 AAC 05.362 (k). We also seek that the BOF stipulate that all king salmon caught in a purse seine set must be released immediately and returned to the water unharmed.

5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan

Add a new section (C)

(k)

...

(B) beach seine gear, with mesh size that does not exceed four inches stretched measure; [AND]

(C) **purse seine gear, with a mesh size that does not exceed three and one-half inches stretched measure and a total length not more than 150 fathoms; and**

...

(2) all king salmon caught in dip net, [AND] beach seine gear **and purse seine gear** must be released immediately and returned to the water unharmed.

What is the issue you would like the board to address and why? A huge commercially available harvestable surplus of summer chum salmon in the Yukon River cannot be harvested with the few gill net opening allowed during the extreme end of the summer chum salmon run (non-selective gear) because of the concern for the very low king salmon runs. Note that the kings and summer chum salmon runs tend to enter the mouth of the river together and migrate upriver concurrently. Previous regulations allowing dipnet and beach seine gear (selective gear) to be used in the Yukon River has allowed only a portion of the huge surplus to be harvested.

Declines in Yukon River king salmon runs have been noted in the Yukon River since 1998. However, the Yukon River king salmon runs have declined to a point that during 2014, ADF&G requested that subsistence fishers reduce their normal king salmon subsistence harvest dramatically and also took action to effectively eliminate the king salmon subsistence harvests within the Alaskan portion of the drainage. During the 2014 season, extremely severe subsistence restrictions were employed throughout the drainage to bolster king salmon escapements and to attempt to meet the agreed upon the minimum escapement of 42,500 king salmon in Canada plus the Canadian share of the TAC. The king salmon subsistence harvest in 2014 was approximately only 4,000 fish in the Alaskan portion of the drainage. The historic average subsistence harvest before the decline in Yukon River king salmon was approximately 45,000 fish.

In contrast, recent Yukon River summer chum salmon runs have been above average in run size. During the past few years, millions of commercially-harvestable summer chum salmon have passed through the Lower Yukon Area with very few being harvested because of the concern for the king salmon escapement. This foregone summer chum salmon harvest has been substantial in recent years, more than 1.0M fish in both 2011 and 2012. Despite new selective commercial fishing gear allowed in the lower Yukon River in 2013 and 2014 by the BOF, which included the use of dipnets, beach seines and shallower and smaller mesh size gillnets (5.5 stretch measure, 30 meshes deep), preliminary estimates indicate that more than 1.8M and 800,000 commercially-available summer chum were passed onto the spawning grounds in 2013 and 2014, respectively. Foregone harvest have translated into a possible loss to the fishermen of over \$22M during the past four years. The actual value of the Yukon Area summer chum salmon harvest was approximately \$6M for the same 4-year period. In contrast, the value of the commercial harvests in the mid-1990s, when king salmon were commercially harvested, was approximately \$15M annually.

The Lower Yukon Area is one of the most impoverished areas in the state of Alaska and the country. Off the road system and located in remote Alaska, fuel can often cost over \$6 a gallon. With little economic opportunity available in the region, fishermen's income has been severely reduced with the closure of the Chinook salmon commercial fishery and we are now struggling against restrictions and conservation concerns to make the commercial summer chum salmon fishery viable. There is an urgent need to find new and innovative ways to commercially harvest the surplus of summer chum salmon in the river while minimizing the impact to king salmon. We believe that the use of purse seines in the Lower Yukon Area would serve that dual purpose.

We believe that the lower Yukon River commercial fishers will benefit because they will be able to harvest more of the available summer chum salmon without any harm to any king salmon caught and released.

We also believe that all Yukon River summer chum salmon subsistence and commercial users will benefit because the summer chum salmon escapements will be reduced below the level that may be detrimental to the stock. Drainage-wide summer chum salmon escapements above 2.0M have reduced productivity and may result in smaller runs.

We foresee no harm to any fishers upriver. This is not an allocative issue.

PROPOSED BY: Kwik'pak Fisheries (EF-C15-053)

PROPOSAL 127 – 5 AAC 05.200. Fishing districts and subdistricts; and 5 AAC 05.350. Closed waters. Expand the commercial fishing area of Yukon Area District 1, as follows:

We recommend that the area open to commercial fishing be expanded to include the area between latitudes of Point Romanof and Apoon Pass. Draft regulatory language follows:

5 AAC 05.200. Fishing districts and subdistricts. (a) District 1 consists of that portion of the Yukon River drainage from **Point Romanof [ITS TERMINUS AT APOON PASS]** extending **south and** west [AND SOUTH] along the coast of the delta to the terminus of Black River upstream to the northern edge of the mouth of the Anuk River and all waters of the Black River.

5 AAC 05.350. Closed waters. Salmon may not be taken in the following waters:

(2) waters farther than one nautical mile seaward from any grassland bank in District 1 from **Point Romanof** [APOON PASS] extending **south and** west [AND SOUTH] to a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical miles south from the mouth of Black River, except that in Acharon Channel of the south mouth of the Yukon River the closed waters are those waters farther than two and one-half nautical miles from a line bearing 285_ extending from an ADF&G regulatory marker located below Chris Point to the opposite side of the channel;

(new number) Pastolik River.

What is the issue you would like the board to address and why? We seek the Alaska Board of Fisheries to expand the area open to commercial fishing at the mouth of the Yukon River to include that portion from Apoon Pass to Point Romanof. Opening this area to fishing will alleviate crowding in the traditional set net area near the North Mouth of the Yukon River, caused by changes in the river mouth environment.

Because of a buildup of silted in areas of the coast, set net fishermen have less opportunity than they have had in the past. This has been an ongoing problem due to shifting channels. Extending the area open to commercial fishery will help to alleviate this problem.

In addition, we ask that the Pastolik River be closed to commercial salmon fishing because it is a small stock and the quality of those fish would be poor for commercial sale.

PROPOSED BY: Kwik'pak Fisheries (EF-C15-074)

PROPOSAL 128 – 5 AAC 05.200. Fishing districts and subdistricts; and 5 AAC 05.350. Closed waters. Extend commercial fishing three miles offshore and north to Point Romanof in District 1 of the Yukon Area, as follows:

We recommend that the area open to commercial fishing be expanded to the 3 mile limit around the delta. Draft regulatory language follows:

5 AAC 05.200(a) Fishing districts and subdistricts is amended to read:

(a) District 1 consists of that portion of the Yukon River drainage from **the latitude of Point Romanof [ITS TERMINUS AT APOON PASS]** extending **south and** west [AND SOUTH] along the coast of the delta to the terminus of Black River upstream to the northern edge of the mouth of the Anuk River and all waters of the Black River.

5 AAC 05.350. Closed waters is amended to read:

Salmon may not be taken in the following waters:

(1) repealed 4/13/2013;

(2) waters farther than **three** [ONE] nautical mile seaward from any grassland bank in District 1 from Apoon Pass extending west and south to a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical miles south from the mouth of Black River[, EXCEPT THAT IN ACHARON CHANNEL OF THE SOUTH MOUTH OF THE YUKON RIVER THE CLOSED WATERS ARE THOSE WATERS FARTHER THAN TWO AND ONE-HALF NAUTICAL MILES FROM A LINE BEARING 285_ EXTENDING FROM AN ADF&G REGULATORY MARKER LOCATED BELOW CHRIS POINT TO THE OPPOSITE SIDE OF THE CHANNEL];

(3) all waters south and west of a line extending seaward from an ADF&G regulatory marker located on the beach approximately one nautical mile south of the mouth of Black River, in a northwestern direction to an ADF&G regulatory marker located **three** [ONE] nautical mile offshore;

What is the issue you would like the board to address and why? We seek the Alaska Board of Fisheries to expand the area open to commercial fishing at the mouth of the Yukon River to include all State of Alaska waters, extending three nautical miles seaward, around the delta. Opening this area to fishing will provide better quality salmon for harvest, it will alleviate crowding in the traditional set net area caused by changes in the river mouth environment, and it

will provide state managers options when/if the federal government prohibits commercial fisheries on abundant salmon species.

Please note that Kwik'pak Fisheries is also submitting a proposal to establish a directed commercial pink salmon fishery using four inch mesh gillnets. Because Yukon River pink salmon mature rapidly once they enter into the river, harvesting them in the ocean will ensure much better quality than harvesting in the river.

Secondarily, we would like to be able to harvest chum salmon in the ocean, also for better quality.

Thirdly, because of a buildup of silted in areas of the coast, set net fishermen have less opportunity than they have had in the past. This has been an ongoing problem due to shifting channels. Extending the area open to commercial fishery will help to alleviate this problem.

Other reasons for allowing commercial fishing out to the 3-mile limit surrounding the Yukon Delta are:

- It was the traditional legal boundary in the past;
- It would provide more room for set net fishermen, which has always been a traditional fishery;
- It would allow drift fishermen to fish in less concentrated areas during the compressed gillnet fishery openings; and
- It would provide more opportunity to subsistence fish.

PROPOSED BY: Kwik'pak Fisheries

(EF-C15-073)
