

PROPOSAL 112 – 5 AAC 01.220. Lawful gear and gear specifications. Allow all gear used in Yukon Area commercial fisheries to be allowed in Yukon Area subsistence fisheries, as follows:

5 AAC 01.220 is amended to read:

Fishing gear allowed in one section of the Yukon River for a commercial and/or subsistence fishery should be allowed for subsistence in the whole river unless a run sustainability issue is apparent. In the case of run sustainability being an issue, commercial restrictions shall be addressed first.

Tanana Rampart Manley Fish and Game Advisory Committee supported this unanimously.

What is the issue you would like the board to address and why? At issue here is that over the years, commercial fishing interests often get heard best because of more money and manpower to promote itself. This was seen long ago during the creation of unfair limited entry quotas and allowing commercial fishers in areas with the best fishing and biggest quotas to harvest fish with the highly efficient method of drift netting while some areas of very poor fishing are only allowed to setnet for their subsistence needs.

This issue continues today with commercial interests recently obtaining the right to beach seine and drift dipnet for commercial chum salmon in some areas not traditional, yet in our area which had pre-limited entry historical dip net fisheries, dipnet fishing for even subsistence is currently illegal.

Fairness aside, subsistence is supposed to have priority over commercial and we feel this has not been happening.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-024)

PROPOSAL 113 – 5 AAC 01.220. Lawful gear and gear specifications; and 5 AAC 05.330. Gear. Prohibit the use of drift gillnets in the Yukon Area subsistence fishery and in the Yukon Area commercial fishery, as follows:

Suggested language: **There will be no subsistence or commercial drift net fishing allowed on the Yukon River for Chinook salmon**

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supports the similar king salmon part of the Fairbanks AC’s anti-drift net proposal that they plan to be sending in to the board.

What is the issue you would like the board to address and why? At issue here we feel (unanimous TRM AC vote) is a non-sustainable, very unfair and extremely difficult to manage otherwise, drift net fishery in the Yukon River.

Our basic premise is that if the king runs ever recover to fishable numbers, a sustainable, fair fishery cannot exist with the current situation of allowing drifting in the areas easiest to catch kings and banning it in many of the hardest to catch king areas as is now the case. Drift net fishing also goes against the elders' principle of not targeting other peoples' fish. We believe that drift netting gives fishers way too much access to those kings going the farthest upriver (mid-river Canadian bound— the kings in most trouble) that would not otherwise be caught as frequently. Drift net use prior to the early 1970's was very minimal compared to today's vastly increased numbers we see during present day limited entry fish openings. There will never be a better, less painful time to remedy the unfairness and overfishing capabilities of the drift net fishery on the Yukon than now, while everyone grapples with how best to bring back and manage the fishery in the future.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee (EF-C15-016)

PROPOSAL 114 – 5 AAC 01.230. Subsistence fishing permits. Require subsistence salmon fishing permits in Yukon Area District 5 and set permit limits for king salmon during times of king salmon conservation, as follows:

The board will need to determine permit stipulations during times of king salmon conservation.
5 AAC 01.230. Subsistence fishing permits. (b)

(1) for the **taking of salmon in District 5** [YUKON RIVER DRAINAGE UPSTREAM FROM THE WESTERNMOST TIP OF GARNET ISLAND TO THE MOUTH OF THE DALL RIVER];

...

(3) Repealed

(f) In District 5, only during times of king salmon conservation, the department may set permit limits for king salmon by household or communities based upon the estimated surplus of king salmon.

What is the issue you would like the board to address and why? Allow opportunity for subsistence king salmon harvest in District 5 during low king salmon runs through use of household or community subsistence fishing permits. In Districts 1–4 and 6, the department may allow 6-inch mesh gillnets to direct harvest at summer chum salmon with some incidental harvest of king salmon during times of king salmon conservation. Fish wheels may also be allowed to harvest summer chum and other species with king salmon required to be released unharmed. In District 5 there are few summer chum salmon available and the majority of king salmon in this district are Canadian bound. While many Yukon River fishermen can harvest summer chum salmon for food, District 5 fishermen may have less opportunity for obtaining fish for subsistence uses. A permit system would allow for a controlled harvest of king salmon in District 5 to allow for a more equitable distribution of king salmon harvest in this portion of the drainage during low runs. A permit system could allow fishermen to fish earlier in the run rather than fishing late in the run when fish quality is not as good and female king salmon may be more prevalent. A community permit might allow more involvement by local fishermen in

determining when they can fish and how to distribute a limited harvest while still meeting escapement needs to Canada. Since subsistence fishing permits are already required in portions of District 5, it might be reasonable to extend this regulation to the remainder of the district. The permit system would provide subsistence salmon harvest reporting for this portion of the river.

PROPOSED BY: Gene J. Sandone (EF-C15-121)

PROPOSAL 115 – 5 AAC 01.220. Lawful gear and gear specifications. Allow for the retention of king salmon less than 25 inches in length in Yukon Area fish wheel subsistence fisheries, as follows:

- Yukon River subsistence fish wheels
- Subsistence fish wheels that qualify for fish friendly operations would be allowed to retain chinook salmon less than 25 inches in length.

What is the issue you would like the board to address and why? Retention of king salmon in the Yukon River.

There are age classifications of kings within those returning each year that are not needed for sustained yield. Studies in recent years have shown that over 90% of the four year old returning fish are males. The FAC proposal is for a gear restriction within the definition of fish friendly fish wheels that would allow subsistence fishermen to retain a select size of king salmon.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (HQ-F15-069)

PROPOSAL 116 – 5 AAC 01.220. Lawful gear and gear specifications; and 5 AAC 05.368. Anvik River Chum Salmon Fishery Management Plan. During times of salmon conservation in the Yukon Area, require fish wheels with live boxes to be manned and require immediate release of the specified salmon, as follows:

Suggested language:

Fish wheels must be manned at all times when any catch and release of king salmon or other species is required in an executed fishery. There is to be no livebox holding and release of species required to be not kept, river wide. (Note: This was written as to not interfere with more sound fish wheel release practices being considered at present by management such as live chute releasing of king salmon which does not use any live box holding methods.)

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supported this proposal submission unanimously.

What is the issue you would like the board to address and why? TRM AC is concerned about present regulations allowing and further attempts to increase fish wheels as a legal means

of targeting one species (such as chum salmon) while releasing another species (such as king salmon). Many of the methods of holding, release and equipment used are being portrayed as non-harmful ways of dealing with bycatch. TRM members come from an area of high fish wheel use and many are very familiar with the number of studies (mostly U.S. Fish and Wildlife Service in this area) done on fish wheel live box holding and general fish wheel operation and how it affects caught and released fish. We feel these issues have been sufficiently neglected in management and Board of Fish (BOF) actions in the past, despite the literature presented to them and concerns voiced to management, and at Yukon River Drainage Fisheries Association and BOF meetings, that a regulation against it needs to be clearly on the books.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee
(EF-C15-022)

PROPOSAL 117 – 5 AAC 01.220. Lawful gear and gear specifications; 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan; and 5 AAC 05.368. Anvik River Chum Salmon Fishery Management Plan. Prohibit the use of beach seines in the Yukon Area subsistence salmon fishery and in the Yukon River and Anvik River summer chum salmon commercial fisheries, as follows:

Suggested language:

There will be no subsistence or commercial beach seine fishing allowed on the Yukon River for Chinook salmon

Tanana Rampart Manley Fish and Game Advisory Committee (TRM AC) supported this proposal unanimously.

What is the issue you would like the board to address and why? The TRM AC feels that beach seines should not be allowed to target certain species (such as chum salmon) and release bycatch (such as king salmon) due to the lack of studies showing insignificant harm and multitude of studies showing significant harm to seined king and/or other species. Many of these studies showing harm are in situations where the migration after seining are extremely shorter than Yukon salmon and holding conditions are less severe.

Currently this condition exist under the guise of being not harmful to king salmon yet providing needed opportunity to commercial fishers of chum salmon. Because of the relentless efforts of some commercial interests to get different types of seining passed by the Board of Fisheries (some have passed) through numerous avenues we feel a regulation specifically banning seining in the Yukon is necessary and should be part of a larger effort to create and secure a healthy future for Yukon king salmon.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee
(EF-C15-017)

PROPOSAL 118 – 5 AAC 01.220. Lawful gear and gear specifications. Establish specifications for a beach seine used for subsistence fishing in the Yukon Area, as follows:

5 AAC 01.220(f) is amended by adding a new paragraph to read:

(10) 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 inches stretched measure.

What is the issue you would like the board to address and why? Beach seines are legal gear under current subsistence fishing regulations, though there are no specifications. Therefore, any combination of net length, depth, and mesh size could be operated within the Yukon Area as a beach seine. Under current regulations, a very large or very long beach seine could potentially capture king salmon. Because of king salmon conservation concerns, it is prudent to ensure beach seine gear will not cause king salmon mortality. The beach seine gear specifications proposed here would also align with proposed commercial beach seine specifications.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-016)

PROPOSAL 119 – 5 AAC 01.220. Lawful gear and gear specifications. Require live release of king salmon from subsistence beach seines during times of king salmon conservation in the Yukon Area, as follows:

5 AAC 01.220(n) is amended by adding a new paragraph to read:

(4) a beach seine may be used, however, all king salmon caught with a beach seine must be released to the water alive.

What is the issue you would like the board to address and why? Beach seines are permitted under current regulations as subsistence gear. In 2014, subsistence fishing in Yukon River Districts 1–2 was restricted to dip nets and beach seines to target summer chum salmon while minimizing the impact to a low king salmon run. During times of king salmon conservation, current regulations require live release of king salmon caught in dip nets but do not specify that king salmon caught in beach seine gear must be released alive to the water. Fishermen could retain any king salmon caught using beach seine gear for subsistence fishing. Requiring live release of king salmon from beach seine gear aligns with regulations for other selective gear types, such as dip nets, and also aligns with commercial beach seine regulations during times of king salmon conservation.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-024)

PROPOSAL 120 – 5 AAC 01.210. Fishing seasons and periods. Allow subsistence fall chum salmon fishing seven days per week in District 5 of the Yukon Area once a fall chum salmon commercial fishery is opened, as follows:

Suggested language:

In District 5 once a fall chum fishery is determined healthy enough to have commercial openings on it then no subsistence restrictions on days open should be placed on that fishery. It is to be open 7 days a week.

Tanana Rampart Manley Fish and Game Advisory Committee (TRM) supported this proposal submission unanimously.

What is the issue you would like the board to address and why? Fall chum salmon fishing in this area comes late in summer. The weather is cooling and often the rains start making drying of fish difficult if not impossible on many days. Over the years we have tried to point out to management that the current reduced subsistence schedules of 4 days or 5 days a week that we find ourselves in, often do not coincide with days able to put up fish. This is especially true at the beginning of the run where the best quality fish for human consumption are found. For example in the last two years we have documented times where fishers have waited almost an entire open period of fishing only to have the sun come out on the closed days. Fall season is too short and lately, because of the king crisis, it has become too important to lose this opportunity. Admittedly, it is the king crisis that has pushed this issue to the forefront.

Issues of subsistence and commercial opening conflicts have never been a problem in this area but sometimes are a problem for others, so for that reason we ask for this in District 5 only and will let others propose as they choose. Also we are only trying to increase opportunity in situations where it would not be detrimental to any species, so any concerns that the Board of Fisheries or management would have over this proposal, TRM would be happy to adjust the proposal to meet those concerns. TRM has contacted the ADF&G Yukon fall chum manager on this proposal's acceptability and the language reflects those initial and preliminary talks.

TRM would like to thank the present fall manager for being very helpful in this matter, but we would like to see this in regulation so it would be easier to institute each year and future managers would not have to be educated and convinced of the need in order to execute as proposed. It would happen automatically.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee
(EF-C15-021)

PROPOSAL 121 – 5 AAC 01.220. Lawful gear and gear specifications. Expand the area of allowable subsistence drift gillnet fishing for chum salmon in Subdistrict 4-A of the Yukon Area, as follows:

5 AAC 01.220(e)(2) is amended to read:

(e) In Districts 4, 5, and 6, salmon may not be taken for subsistence purposes by drift gillnets, except as follows:

...

(2) in Subdistrict 4-A downstream from the mouth of Stink Creek,

(A) king salmon may be taken by drift gillnets from June 10 through July 14, unless closed by emergency order;

(B) from June 10 through August 2, the commissioner may open, by emergency order, fishing periods during which chum salmon may be taken by drift gillnets;

What is the issue you would like the board to address and why? In March 2015, the Alaska Board of Fisheries adopted regulations allowing subsistence drift gillnet fishing, by emergency order, for chum salmon in the upper portion of the Yukon Area Subdistrict 4-A from June 10 through August 2. The intent was to allow subsistence opportunity to target abundant summer chum salmon with drift gillnets during times of king salmon conservation, as there are few set net sites in the area and river conditions can be dangerous for set net fishing during high water events. Fishermen had noted that there was missed opportunity to catch summer chum salmon for subsistence purposes. In 2014, fishermen in the lower portion of Subdistrict 4-A stated that they also experienced difficulty in meeting their subsistence needs for summer chum salmon using set nets. This proposal would extend the drift gillnet opportunity to harvest summer chum salmon for subsistence purposes from the upper portion of Subdistrict 4-A to all of Subdistrict 4-A. It would provide fishery managers emergency order authority to open and close drift gillnet subsistence fishing targeting summer chum salmon during times of king salmon conservation in all of Subdistrict 4-A, not just in the upper portion of the subdistrict.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F15-017)
