

PROPOSAL 53

5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

Establish guide permits in a section of the Naknek River drainage, as follows:

Commercial operations that provide guides and/or boats to trout fishermen from ADF&G markers located ½ mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake must register with ADF&G to prove their acknowledgment of the need to conserve this resource and enjoy it responsibly. This registration should result in a permit to qualified entities and shall apply to Dolly Varden, Arctic Char and Arctic Grayling, in addition to Rainbow Trout. This permit shall apply year round excluding the spring closure, which should remain in effect. See more detail below:

This permit should contain language stating that all clients shall be briefed on the proper techniques for catching and handling the trout, respecting the river banks/waters and observing river etiquette. For guided operations, the permit shall acknowledge that businesses will not send clients out without licensed/certified guides (including coast guard licensure). For unguided boat rentals, the proprietor will be required to issue operators' certificates to individual clients who prove their boatmanship. Liability for any infraction or accident will be borne by both the business and the individual operating the boat. (Really, I don't think commercial boat rentals should be allowed for this section of the river at all!!)

Between June 8- December 31, this permit shall stipulate that commercial entities will only allow four guests at any time to fish for trout within the aforementioned section of the Naknek River. Each successfully permitted commercial operator will have 4 certificates issued by Fish and Game that will be carried by the persons fishing for trout in this section of the river. Certificates can be transferred to other guests of the same operation during the day but only 4 people total can fish at a time. Between January 1-April 8, only 2 certificates may be used at any one time. Non-compliance will result in a fine for both the angler and the commercial entity. Certificates are not transferrable to other operations. Certificates shall be issued to a "parent company" and subsidiaries will not be issued additional certificates.

This overall permit and the individual certificates must be applied for each calendar year.

What is the issue you would like the board to address and why? I'm an Alaska resident and I've been fishing the Naknek River for rainbow trout for over 17 years. During that time the sport fishing pressure on the trout fishery has absolutely exploded, especially since 2010. On this remote river where locals and lodge-goers alike could historically expect to enjoy epic fishing in September and October in relative solitude, it is now nearly impossible to find even a speck of space on the riverbank to pull over and fish. I used to fish the river in September with ease and no feeling of over crowding, now I've been pushing my short trips back later and later every year to avoid the massive increase in guided trips that are now extending deep into October. The river is only approximately 5 miles long, and offers about 12-15 legitimate spots for trout fishing. These spots are now stacked with people during all daylight hours for nearly 2 months. That's simply too much fishing pressure on this fragile resource. Anglers are primarily targeting the large trophy class rainbow trout for which the river is famous, but the use of relatively large hooks and heavy

gear will likely result in higher mortality rate for the smaller fish that are considered "bycatch" by most fishermen. This fact coupled with the unavoidable mortality of large fish due to long fights and picture taking is a double-edged sword that will likely result in an overall decrease in the numbers of large fish and the quality of the fishery overall. Fish with hooking scars were once rare and now it's common.

A major factor in this over fishing is the lodges' ever increasing focus on volume and money. First, this leads to a high percentage of inexperienced and often unlicensed guides, as well as, do-it-yourself operations that put people and fish in great danger. These do-it-yourself operations are the worst offenders. This river is dangerous and unguided fishermen likely don't understand the true power of the river or the fragility of these large trout. Second, many of the new outfitters are out of state commercial businesses who don't understand or have lost sight of the sustainability of this fishery. Now that fly fishing has become a fad and social media and reality tv has put us on the map in a big way, the world has become smaller and people are flocking to Alaska. The number of hungry anglers wanting to notch a trophy rainbow will continue to increase exponentially and these businesspeople will cash in as quickly as possible until the resource is depleted. It's human nature. One need only look to the rivers on the road system, such as the Kenai, to see what can happen when fishing pressure is allowed to explode, unchecked. I've all but quit fishing the Kenai for trout, as it's become combat fishing in every way.... even worse than the famous combat sockeye fishery. This Naknek resource is NOT limitless.

The other effect of this sad exploitation is that the small, sustainable local guides are being pushed out of the market to some extent. I've personally know perennial guests, who have been fishing the Naknek for years, that have given up due to the rodeo that this fishery has become. Likewise, locals can't really go out and find a reasonable spot to fish in peace until late October.

Luckily the fishing on the Naknek is still fantastic and we are fortunate to have the opportunity to save it. Preservation will rely on combining the full might of the local stewards and regulatory agencies to implement a meaningful management plan NOW. It has to happen now.

PROPOSED BY: Dan Kirsch

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