<u>PROPOSAL 37</u> – 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.

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