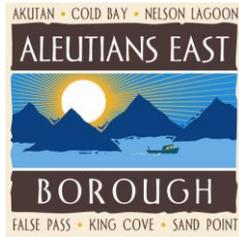


## Public Comment Index

Aleutians East Borough.....	PC1
Diego Castillo .....	PC2
Cordova District Fishermen United .....	PC3
Ben Dobrovoly .....	PC4
Eastern Interior Alaska Subsistence Regional Advisory Council.....	PC5
Kevin Fraley.....	PC6
Ludwig Gericke.....	PC7
Gerrid Greenwood .....	PC8
Kendrick Hautala.....	PC9
Travis Hoblet.....	PC10
Carlin Hoblet .....	PC11
Vincent Hoffman.....	PC12
Justin Johnson.....	PC13
Kenneth Jones.....	PC14
Kenneth Mack Sr.....	PC15
Kevin Midnight Sun Fly Casters.....	PC16
Native Village of Kwinhagak.....	PC17
Janessa Newman.....	PC18
Denise Newman.....	PC19
Office of Subsistence Management.....	PC20
Melissa Osborn .....	PC21
Erich Ott .....	PC22
Jim Simon .....	PC23
William Smallwood .....	PC24

## Public Comment Index

Connie Sommer.....	PC25
Western Interior Alaska Subsistence Regional Advisory Council .....	PC26
Yukon Delta Fisheries Development Association .....	PC27
Yukon River Drainage Fisheries Association .....	PC28
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council .....	PC29



December 28, 2022

Alaska Board of Fisheries  
Chair Märit Carlson-Van Dort  
Submitted via Board Comment Portal

RE: Support for Proposal 170 as Amended to Remove the Overall Fishery 10,000 Pot Cap

The Aleutians East Borough supports Proposal 170 as amended to remove the overall fishery 10,000 pot cap. Our support is based on local Fish & Game Advisory Committee (AC) and local fishermen support to establish a vessel 500-pot limit in the North Peninsula Dungeness crab fishery without the overall fishery pot cap, and make the North Peninsula fishery consistent with the South Peninsula fishery. The AEB appreciates the Board of Fisheries robust AC process and overall public process. We ask the Board consider the record of AC and public advice on this issue.

The Aleutians East Borough includes the majority of the State-waters of the North Peninsula Dungeness crab fishery. Fishermen from our Borough communities and other Alaska communities participate in this growing fishery. Recent years have seen a dramatic increase in vessels participating in Dungeness crab fisheries and landings of Dungeness crab in the Alaska Peninsula Management Area. The Borough receives a 2% fish tax on all crab and fish delivered to processors within the Borough and we are committed to the sustainability of all fish and crab stocks of the North Pacific.

Proposal 170 began as Agenda Change Request (ACR) 1 and would establish vessel and overall fishery pot limits for the North Peninsula District Dungeness fishery. ADF&G Staff Comments presented at the Board Work Session in October 2022 determined that ACR 1 met the Board's criteria for an ACR since it addresses the unforeseen effect of no pot limit leading to record North Peninsula Dungeness pot gear use in 2022. ACR 1 had support of 4 submitted written public comments at the 2022 Work Session from local fishermen (PCs 10, 21, 25, 26) and support of the Sand Point AC, all supporting the ACR without the overall 10,000 pot limit.

Proposal 170 as amended would make the North Pen Dungeness crab fishery consistent with the South pen Dungeness crab fishery. At the March 2022 Statewide Shellfish meeting the Board considered Proposal 267 to set South Peninsula Dungeness pot limits similar to those proposed in 170. Proposal 267 was supported by the King Cove AC, and supported as amended to remove the 10,000-pot overall cap by the Sand Point AC. The King Cove AC also questioned the overall cap according to comments in their minutes. The Board unanimously adopted substitute language found in RC 86 that set a 500-pot vessel limit but removed the overall cap.

The Board scheduled Proposal 170 to be considered at the AYK meeting in January. Many local fishermen that participate in the Dungeness crab fishery are also planning to fish in one of the



January 2023 Gulf of Alaska Tanner crab fisheries in Kodak, Chignik or South Peninsula. Because of this conflict, the local fishermen's group Area M Seiners requested that the Board move consideration of the Proposal to the Statewide finfish meeting, but were denied by the Board. The Aleutians East Borough is committed to attending the AYK meeting to advocate on behalf of local Dungeness crab fishermen in their absence. We also look forward to meeting with and learning from AYK stakeholders during this time.

The Aleutians East Borough requests the Board of Fisheries adopt Proposal 170 as amended, removing the overall fishery 10,000 pot cap, as supported by virtually all local North Peninsula Dungeness Crab fishery fishermen.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ernest Weiss".

Ernest Weiss, Natural Resources Director

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

### **Proposal 170: Support With Amendments**

---



PC2

**Name:** Diego Castillo

**Community of Residence:** UNALASKA, AK

**Comment:**Diego Castillo

Proposal 170

Hello members of the board and all attendees. I hope this letter with my comments finds you well during these sessions.

I cannot attend due to the fact that I will be participating in the south peninsula tanner crab fishery.

North peninsula Dungeness crab has been part of my life since the 90's. My father enjoyed the fishery for many years back when there was not much participation/Interest In it.

I have be fished it myself as captain for 6 seasons.

This increase of interest draws concern as far as over harvest of the species. I think there needs to be a pot limit now instead of later so that we avoid that concern. I've participated as captain for 6 seasons and now and I know that I can be successful with 500 pots. It's a sweet number. This species won't last, and eco systems do rely on these critters if there is no control on this now new popular fisheries. Change is real. We must adjust!!

Thank you for your time.

Diego Castillo

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 170: Support**

---

---



Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 999811

December 30, 2022

Re: 2022 Arctic/Yukon/Kuskokwim Finfish Meeting  
Comments for Proposals 171 (ACR 8) and 172 (ACR 9)

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region. As you deliberate on Proposals 171 and 172, we respectfully ask you to consider our comments:

**Proposal 171 (formerly ACR 8) - SUPPORT**

**5 AAC 28.230. Lawful gear for Prince William Sound Area.**

*Allow groundfish pots to be longlined in the Prince William Sound Area*

This proposal was first submitted as an ACR by Kenneth Jones because there has not been a call for in-cycle meeting proposals for Prince William Sound fisheries in four years due to the covid pandemic postponements. Since the last call for proposals for PWS in-cycle consideration, great new technology in alternative groundfish “slinky” pots has been invented, which has proven to reduce bycatch of non-target species.

We are strongly supportive of this proposal, as it addresses regulations that are now outdated due to improved gear technology of slinky pots. Allowing longlining of slinky pots would give an opportunity for the small boat fleet in Prince William Sound to better



participate in commercial groundfish harvests. Today, 15% of the allocated PWS Pacific cod quota goes unharvested because of the barriers of traditional single pot fishing. Using longline slinky pots will encourage existing fishermen and new entrants to participate in harvesting the pot allocation for our region - providing maximized transitional opportunities for our fleet and local economy after disappointing seasons in our other regional fisheries. In consideration of our wild resources, we are also inspired that slinky pots give an added advantage of reducing halibut and rockfish bycatch in the Pacific cod fishery.

**Proposal 172 (formerly ACR 9) - SUPPORT**

**5 AAC 28.230. Lawful gear for Prince William Sound Area.**

*Allow groundfish pots to be longlined in the Prince William Sound Area*

We are supportive of the amendment to include additional marking requirements specifically for longline pot gear. In PWS there is a fairly small fishing area clustered with different gear. Even with binoculars, participants can be confused whether another operation is using a longline pot, a traditional single pot, or hook and line gear. Marking requirements for longlined pots will prevent boats from entanglements, snagging gear lines and losing pots. We also like that this proposal will align state and federal management regulations to create a standard in both participant behavior and management enforcements.

Thank you for your time and consideration of our comments, and for approving these ACRs to become proposals ahead of the next PWS in-cycle meeting. We greatly appreciate the attention to the time-sensitive issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our proposal comments, please don't hesitate to contact me.

Sincerely,

Jess Rude  
Executive Director

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 171:** Support

**Proposal 172:** Support



PC4

**Name:** Ben Dobrovolny

**Community of Residence:** Fairbanks

**Comment:**

I oppose proposal 63 and support proposal 64.

I have participated in the pike fishery for over a decade and it is an important source of food for my family of four. Due to the cost of fuel and distance required to get to the fishery, we are generally only able to make this trip once a season. This trip is a major expenditure in addition to being challenging and arduous due to the frequently rough trail and cold temperatures. Our time on the river is limited so we would prefer to just keep the fish we catch and make it out before dark.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Oppose

---

**Eastern Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
RAC/EI.22132.BM

DEC 28 2022

Art Nelson, Executive Director  
Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on three Board of Fisheries proposals that will be discussed at upcoming 2023 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 5-6, 2022, in Fairbanks. Among the items discussed were various proposed changes to the State of Alaska fishing regulations. The proposals that the Council discussed and our positions on those proposal are listed below by regional meeting.

***Arctic / Yukon / Kuskokwim Finfish*****Proposal 80 - Restrict subsistence king salmon harvest in the middle and upper Yukon River.**

The Council voted to **unanimously oppose Proposal 80**. The Council does not support this proposal and feels that its intentions are divisive, aiming to pit lower river and upper river users against each other. Further, it seeks to place a priority on commercial fishing in the



lower river, while restricting subsistence fishing in the upper river. This goes against a subsistence priority. There is no evidence to support the proponent's claims that up to 100,000 Chinook Salmon are being illegally harvested by upper river fishers. The Council feels it is important for all users to work together to conserve salmon and to equally share the burden of doing so.

***Alaska Peninsula / Aleutian Island / Chignik Finfish***

Proposal 140 - Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time. The Council voted to **unanimously support Proposal 140**. The Council supports this proposal because there is a major conservation concern for Yukon River salmon that are intercepted caught in this fishery. As shown by previous genetic sampling projects, this fishery can intercept half of the Summer Chum Salmon bound for Western Alaska and the Yukon River. Interception of Yukon River salmon severely impacts the ability of people to meet subsistence needs on the Yukon River and other Western Alaska drainages. Summer Chum Salmon is a primary food source for Yukon River residents, especially for residents of the lower and middle Yukon River. The Yukon region has been closed to subsistence fishing for several years, while commercial fishers have been allowed to harvest the same stock of concern. This does not adhere to the subsistence priority nor sustainable management practices. Management needs to occur across the entire salmon ecosystem and should not ignore what happens in this fishery and its negative impacts on subsistence users in other regions.

***Statewide Finfish and Supplemental Issues***

Proposal 165 - Prohibit compensation for guide services in subsistence fisheries. The Council voted to **unanimously support Proposal 165**. The Council supports this proposal because using commercial guide services is contrary to what it means to practice subsistence. Subsistence by definition is noncommercial, and the Council does not feel guides should profit from it.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke\_mcdavid@fws.gov.

Sincerely,

A handwritten signature in cursive script that reads "Sue Entsminger".

Sue Entsminger  
Chair Regional Advisory Council  
Eastern Interior Region

cc: Federal Subsistence Board  
Eastern Interior Alaska Subsistence Regional Advisory Council Members



Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 80: Oppose



**Name:** Kevin Fraley

**Community of Residence:** Fairbanks, AK

**Comment:**

I am an avid fly and spin fisherman and fish biologist and have lived in Fairbanks since 2008. I have selected my preferences on the fishing regulation proposals for my area that I feel strongly about and have offered brief justifications. I hope my input is helpful for the Board of Fish when reviewing these proposals.

Proposal 63: I support this proposal. I first began fishing the Chatanika/Goldstream side of Minto Flats in 2010, and have fished this area at least once every summer since then. Personally, I have noticed size and abundance of pike decline since my first visit. Also, numbers of permits and harvest has increased for the winter subsistence pike fishery has increased noticeably since 2019, which is concerning.

Proposal 64: I oppose this proposal, because I do not believe increased convenience for an already very accessible fishery is justification for relaxing regulations that have been set for biological/population conservation reasons

Proposal 65: I support this proposal. As a sportfisherman, I want to minimize unintended stress and mortality on salmon when catching them, if population levels in interior AK allow fishing for them in the future.

Proposal 66: I support this proposal. If ADFG population surveys indicate the pike population is healthy enough to support a fishery, that is great. Catch and release will have little-minimal impact on individual pike or on the population.

Proposal 67: I support this proposal, it will make the regulations clearer to anglers.

Proposal 68: I don't have enough knowledge to have an opinion on this proposal.

Proposal 69: I oppose this proposal. I agree that there is some poor fish handling that occurs in the sloughs near Fairbanks, but it seems based on other proposals that the larger Chena River grayling population is healthy, and the sloughs and lower Chena in the spring are some of the few places that are easily accessible and affordable for people to fish (especially for kids and low-income folks).

Proposal 70: I oppose this proposal. If something isn't broken, no need to fix it. The grayling population on the Chena is doing well, lets not take actions that could harm it. If people want to keep a grayling, they can go to the Chatanika River. Personally, I don't find grayling to be a good food fish, so I don't see much of a draw or a call to open the lower Chena to grayling retention.

Proposal 71: No preference on this proposal. Fielding Lake is currently a fun, productive fishery. Is there a need to make harvest more liberal? Most people don't keep lake trout anyways, because of both a predominantly catch-and-release ethic among anglers that target the species, and the fact that large lake trout can bioaccumulate high levels of contaminants and be unhealthy to eat.



However, if the ADFG population survey indicates the population is healthy enough to support the removal of the size restriction, that is great.

Proposal 72: Support. And would recommend that signs be posted very clearly with these regulations to ensure that anglers are not harvesting and eating fish contaminated by PFAS.

Proposal 73: No preference

Proposal 74: No preference

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Support  
**Proposal 64:** Oppose  
**Proposal 65:** Support

**Proposal 66:** Support  
**Proposal 67:** Support  
**Proposal 69:** Oppose

**Proposal 70:** Oppose  
**Proposal 72:** Support

---



My name is Ludwig Carl Gericke. I am the managing partner of Aniak river lodge LLC in Aniak Alaska. Let it be known that the opinions below are shared by all members , staff and affiliates of Aniak river lodge.

#### OUR POSITION REAGARDING PROP 93

At the outset I would like to give a brief synopsis of where we stand as regards the proposal 93, specifically 5 AAC71-010 (A). We as a group practice the most ethical standards of sport fishing and are committed to acting as stewards of the drainage we get to fish in. Our commitment to preservation and conservation of the resource stands out, and are beyond dispute. Our effort to minimize the impact on the greater Aniak drainage and especially the Buckstock river are based on the highest scientific and moral standards as judged by the industry. We recognize that all fishing, be it sport fishing, subsistence fishing or casual harvesting has in impact, but we as a group have ( and especially on the Buckstock river ) done everything to preserve that crucial ecosystem. Our efforts have resulted in us having as minimal impact as possible. I find it ironic that the very group that has done more to promote the conservation efforts on the Buckstock are now being singled out and targeted without the merit of any specific scientific study or evidence regarding the impact of boating or, in this case a single boat, on Salmon and redds in the Buckstock river. Despite being the largest group of sport fishermen in the area we were NEVER invited, approached , consulted in any way or form to consider this proposal. Anecdotal evidence and subjective reasoning in the absence of scientific research are grounds for arbitrary decision making and opening the door to discrimination. We as a group OPPOSE the above proposal and will welcome any scientific investigation and or research in this regard. We would fully cooperate with any such research and or investigation. We would also appreciate being able to a participate by putting forward our ideas and input as seasoned professionals on this drainage.

While we have NEVER been approached to participate in any efforts to assist in Salmon conservation I have frequently been approached by my staff, commenting on areas that are systematically been damaged by indiscriminate use, not recognizing breeding areas with active redds, running over sized prop boats that move way to fast causing massive bow waves and carving up the bottom. Many boats are overloaded and occasionally run aground. We see this particularly on the upper Aniak, Salmon and Kipchuck rivers. Our guides are frequently involved in waving boats away from fish on redds and often simply ignored. It stands to reason that these guides have an intimate knowledge of the river. Each guide has a specific beat that he fishes for the season. He sees the season develop, as he fishes that water every day for 12 weeks. Other than the way we use the information gleaned from our guides experience, the knowledge goes to waste when we are not invited to share it.

#### OUR HISTORY AND MOTIVAATION

Aniak river lodge operates a catch and release flyfishing operation on the Aniak River drainage that includes the Aniak river , the Doestock river , The Buckstock river , the Salmon river , the Kipchuk river , Timber Creek , Bell creek , Chicken Creek and a host of unnamed sloughs , creeks and braids. We fish this drainage with 8 boats covering the entire area from the middle of June through the middle of September , a period of 12 weeks each year. As a group we are the largest user of the Aniak river by far. I have been operating on the Aniak for over 22 years starting as a guide, and for the last 5 years as an



owner of the lodge. The lodge has been in operation for over 30 years and is a major contributor to the local economy bringing in approximately 200 clients a year.

As a consequence, I am intimately familiar with the Aniak and the entire drainage where accessible. My philosophy in operating the lodge is one of serving as a steward of the river and doing anything in my power to help conserve this magnificent resource and the bounty it represents. I have instilled these ethics as the basis for hiring and training of my staff. We have a dedicated group of people that are equally committed to the goals set. We have employed 2 trained fish biologists as guides on our staff. The staff are highly educated in the fields of conservation and ethics, as well as in the practice of catch and release fishing, and we make sure our clients are equally well versed in this regard and that, it is done with the utmost care and respect to ensure effective survival of released fish.

While we are proponents of sustainable harvest and recognize the individuals right to do so, I made a fundamental change to the policies of the lodge when I took over the management some 5 years ago. Recognizing the dire situation with dwindling Salmon stocks I stopped the harvesting of any fish including all Salmon to be frozen and taken home with guests ( a tradition that has been followed for many years ) . If guests want to have a fish to eat during their stay they are welcome to harvest one and our guides will cook it for them. We harvested less than 15 fish last year, mostly Sheefish and Char. We did not kill a single Salmon.

We are by far largest group of sports fishermen on the Aniak, and have gathered significant experience of the drainage. We are constantly changing our management of the resource as things develop. These changes include closing off sections when water levels drop to levels that we consider detrimental to the fish. We also closed fishing to our clients in sections when we found the water temperature to be too high and fish would potentially be harmed due to stress and low oxygen levels. I will note that although we cannot force other sportfishermen to do so, we do however encourage similar behavior where we see it appropriate. We have had a good response from most of the individuals approached especially the float trips. My staff have always been ready to help educate anyone that is willing to hear us out. We have been instrumental in assisting with promotion of catch and release and the proper handling of fish that are not going to be harvested and will continue to do so.

#### OUR EFFORTS

The Buckstock river has seen has been a big part of our efforts in maintaining our conservation goals. When I first guided in 2001, the then owner of the lodge in conjunction with the guide staff including one of the local guides recognized the need to self regulate the programme on the Buckstock. After much consideration the following measures were adopted for all members of the lodge.

1. Only one boat was to operate on the Buckstock without exception
2. Only a smaller boat with a limited horsepower jet engine would be allowed on the Buckstock river to limit the effect of any possible hydraulic damage.
3. A single guide with the appropriate skill set would be assigned to the Buckstock river and in the absence of an emergency situation or, if help was required to move fallen logs, etc , he would be the only guide allowed.
4. The assigned guide would have the authority to stop running the Buckstock if the water levels were deemed to be detrimental to spawning fish or redds.



The lodge subsequently acquired a 16 foot tunnel hull with a 40 hp jet and named it the Cheese. The boat is much smaller than any other craft we have. The Cheese was put into dedicated service on the Buckstock in June of 2002 and is still in use, as we have found no other craft that has a lower hydraulic impact. The changes were well received by all and the health of the Buckstock has been maintained and is currently in in better shape than I have ever seen it. This beautiful river is a large part of the offering that Aniak river lodge has promoted. There is no other river in the area that allows our clients to experience the quintessential Alaska experience as on the Buckstock. It is a wild life haven that has provided for many lifelong memories and we intend to keep providing them but not at the cost of our fish.

In 2020 we recognized the dire situation of the Salmon returns and decided to revisit our efforts to assist in helping support the protection of the Salmon. On the Aniak we decided to limit any harvesting to only non Salmon species. On the Buckstock we decided to add a number of changes to the existing measures that included the following

- The boat would now run up the river once a day, to the furthest point and then be paddled/floated back down.
- The boat would still have 2 people aboard but only one rod would be fished at a time. The idea behind this was to enable the guide more than enough time to accurately negotiate the boat using oars. This change proved to be very effective and clients were satisfied with the decision despite the fact that they only fished half the time. It actually gave them an opportunity to fully enjoy the environment they were in.

#### OUR OBSERVATIONS

As far as usage of the Buckstock river is concerned we have noted the following observations over the years.

- In the years prior to the banning of harvesting Rainbow trout and the introduction of catch and release for that species we saw numerous boats harvesting fish in the Buckstock river. Most of the boats were too big, overpowered or prop boats. Many boats ran aground and a number had to be rescued. In one instance we had to conduct an emergency rescue on a boat that actually sank. The knowledge of our guides resulted in recovery of all persons safely after being in bad shape. The boat and all gear was recovered and a special effort was made to recover the boat without any oil or gas contamination. The main reasons for running aground on this technically challenging river are; lack of knowledge of the river topography and using vessels that are too large, and inappropriate for the task.
- Subsequent to the introduction of catch and release on Rainbows we have seen very little traffic on the Buckstock other than a few boats that fish at the mouth, and usually coinciding with Aniak Coho derby. We see no subsistence traffic on the Buckstock. The fact that subsistence fishing for Salmon is mainly netting on the Kuskokwin river is likely the reason for this.

To give an indication of the traffic on the Buckstock I contacted the 3 guides that were dedicated to the task over the last 6 years and, other than limited traffic at the mouth the only boats we saw were as follows



- 2018 4 vessels encountered, 2 of which got grounded and took hours to get out
- 2019 3 vessels encountered, 1 of which sunk and we managed to rescue . 1 other was grounded and could not get out until we had a flood in the later season.
- 2020. COVID. We only spent a few hours checking on the river and no boats encountered. We did see Fish and Game at the mouth one day
- 2021 3 vessels encountered, 1 of which was fish and Game.
- 2022 1 vessel encountered, which was Fish and Game
- 2023 2 vessels encountered, 1 of which was Fish and Game and the other may have been the State troopers

It is thus fair to approximate that, other than the odd boat we see, all traffic is sport fishing and we are responsible for almost all of it.

In summation we operate 1 boat that is appropriately sized for the water that it is operating in. The dedicated guide that operates that boat is a skilled jet boat operator with intimate knowledge of the river and knows every inch of it including where fish , redds and holds are situated . He runs this boat with no know detriment to fish or environment. If and when the water level drops to levels considered to be detrimental to the fish we do not run it. In times of high water and flooding the water runs dirty and we do not run the river either for fear of damaging redds or disturbing fish and habitat. The boat runs up the river once a day either 5 or 6 days a week for 12 weeks. The boat pushes a minimal bow wave due to its restricted size , tunnel hull and smaller jet, with a slower speed. The boat thus has a very low hydraulic pressure footprint. The guide knows every channel and every redd on the river and navigates around them ensuring no damage. He then floats the boat back to the first bend with no impact on Salmon or redds. At this point the boat has a zero hydraulic pressure footprint. The fishing is all sight fishing, in clear water, to specific trout or Char with no effect on Salmon or redds.

#### THE EFFECT OF PROP 93

Over that last 30 years of guiding on the Aniak the Buckstock river has become a legendary destination and the highlight of many. The beauty and charm of this destination is unequalled in the area. Despite the fact that we limit fishing to one person at a time resulting in the other client simply enjoying the environment we have seen very few clients opting out of doing the “ Buckstock day.” ( there will always be some clients that simply want to fish all day ). If we were to be denied access to the Buckstock I have no doubt that we will lose many clients especially our returning clients many of whom have fished the Buckstock for over 25 years. The Buckstock offers a fishing opportunity that is not replicated anywhere else in the drainage. This would have a dramatic affect on our business and in turn the local economy. We are already under massive financial pressure with insane gas/commodity prices and travel/freight in Aniak.

Our fishing programme on the Aniak has been designed to be enable us to control and manage the water we fish. If access to fishing on the Buckstock were to be denied we would now have to move that load onto the rest of the drainage which would no doubt result in higher pressures and traffic in the more localized areas of the river. We see this as a detrimental move on the fishery and environment which we would love to see remain as wild and remote a destination as it has been for us over the years.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

*Proposal 93: Oppose*



PC8

**Name:** Gerrid Greenwood

**Community of Residence:** Fairbanks, AK

**Comment:**

I support proposal 63 and oppose proposal 64

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Support

**Proposal 64:** Oppose

---



PC9

**Name:** Kendrick Hautala

**Community of Residence:** Fairbanks

**Comment:**

I am writing to support PROPOSAL 79

5AAC 01.220. Lawful gear and gear restrictions

-customary and traditional use as written in state law

-backed up by recent documented adfg that has been going on for thousands of years

-already legal under federal regulation and simplifies complexity of laws

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 79:** Support

---



PC10

**Name:** Travis Hoblet

**Community of Residence:** False Pass, Alaska

**Comment:**

Proposal 170

I support this proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:  
Proposal 170: Support*

---



PC11

**Name:** Carlin Hoblet

**Community of Residence:** False Pass, Alaska

**Comment:**

I support proposal 170 with the exception of the 10000 pot cap. The 500 pot limit will give vessels of different sizes a fair chance of competing successfully in the fishery. I believe that allowing the North Peninsula Dungeness fishery to go on without a cap runs a risk of decimating a cyclical and what seems to be a fickle biomass. I would like to see a cap imposed for sustainability purposes of the North Peninsula Dungeness fishery. Although, I believe more research and data collected would help to determine a suitable cap for the fleet and district.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 170:** Support With Amendments

---

---



PC12

**Name:** Vincent Hoffman

**Community of Residence:** North Pole

**Comment:**

Proposal 63 makes good sense to help sustain a productive pike fishery for years to come, prevent over harvesting, and by reducing the 30" limit to one will keep larger breeding fish for future growth.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Support

**Proposal 64:** Oppose



**Name:** Justin Johnson

**Community of Residence:** Fairbanks, AK

**Comment:**

Prop 63: I fully support proposal 63. I believe protecting the larger female fish supports a healthier and more sustainable fishery. Many states have recently gone to a trophy/ quality pike management strategy and releasing large breeding female fish is the first step. I personally tend to keep the smaller pike when fishing and I release the larger mostly female fish. Having an annual possession limit will keep users from abusing a good fishery and 20 pike is more than enough for any individual or household.

Prop 64: I am in full opposition to prop 64. I personally tend to keep the smaller pike when fishing and I release the larger mostly female fish. Prop 64 would make it so I couldn't release healthy reproductively beneficial females back to the water. If enacted fishers could catch nothing but 30" and above fish in their first 10 which could drastically undermine fishery productivity and future fishing. This is a poorly thought out proposal and should be rejected outright.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

- Proposal 63:** Support
- Proposal 64:** Oppose
- Proposal 65:** Support
- Proposal 66:** Support

- Proposal 67:** Oppose
- Proposal 68:** Oppose
- Proposal 69:** Support
- Proposal 70:** Oppose

- Proposal 71:** Oppose
  - Proposal 72:** Oppose
  - Proposal 73:** Support
  - Proposal 74:** Support
-



PC14

**Name:** Kenneth Jones

**Community of Residence:** Cordova

**Comment:**

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am a 3rd generation life along alaskan and commercial fisherman from Cordova. I participate in many different fisheries and have been an active advocate for commercial fisheries across the state. I have been extensively involved in PWS board of fish committee work for the last 4 cycles. I want to first address some of the concern that was brought up at the work session in regards to me submitting so many ACRs that could have been in cycle proposals. The slinky pot was invented and was just becoming tested in the federal sablefish fishery at the same time as the last call for in-cycle PWS proposals. It was not widely adopted by the fleet until after the in-cycle call for proposals was closed. Due to the covid pandemic our in-cycle meeting was postponed and the call for proposals was never re-opened for the delayed meeting, which took place in Cordova last December. On the record during a spring of 2020 meeting, the board stated that the ACR process was there for anything that came up during this postponement period. I submitted all of my ACRs timely the summer prior to the postponed in-cycle meeting and the boards director at the time rejected them without even placing on your agenda because the board has a policy against accepting "in cycle ACRs" - in direct contradiction to what the board told the public on the record during the spring 2020 meeting; when our meeting was postponed. This policy decision did not take into consideration the extenuating circumstances of the covid pandemic delay to our meeting, as the public was instructed it would. I would have much rather taken all of my submitted ACRs up as proposals at the in-cycle Cordova meeting last December. However the technology did not exist or become widely adopted by the fleet until after the call for proposal period. I do appreciate the opportunity to bring two of them up now, and will rework to submit my other failed ACRs as proposals for the next in cycle meeting. As you deliberate on Proposals 171 and 172, I respectfully ask you to consider these comments.

Proposal 171 (formerly ACR 8) - SUPPORT

5 AAC 28.230. Lawful gear for Prince William Sound Area.

Allow groundfish pots to be longlined in the Prince William Sound Area

This proposal was first submitted as an ACR because there has not been a call for in-cycle meeting proposals for Prince William Sound fisheries in nearly 4 years due to the covid pandemic postponements. Since the last call for proposals for PWS in-cycle consideration, great new technology in alternative groundfish "slinky" pots has been invented and adopted by the fleet in the sablefish fishery, which has proven to be an effective means of harvesting all while reducing bycatch of non-target species. These pots will work on pcod and there is a growing interest by fleet members wanting to participate using these new pots.

I am strongly supportive of this proposal, as it addresses regulations that are now outdated due to improved gear technology of slinky pots. Allowing longlining of slinky pots would give an

opportunity for the small boat fleet in Prince William Sound to better participate in commercial groundfish harvests. Today, the 15% of the allocated PWS Pacific cod quota goes unharvested because of the barriers and cost of traditional single large pot fishing. Using longline slinky pots will encourage existing fishermen and new entrants to participate in harvesting the pot allocation for our region - providing maximized transitional opportunities for our fleet and local economy after disappointing seasons in our other regional fisheries. In consideration of our wild resources, I am also inspired that allowing long-lined slinky pots would give an added advantage of reducing halibut and rockfish bycatch in the Pacific cod fishery.

Proposal 172 (formerly ACR 9) - SUPPORT

5 AAC 28.230. Lawful gear for Prince William Sound Area.

Allow groundfish pots to be longlined in the Prince William Sound Area

I am extremely supportive of the amendment to include additional marking requirements specifically for longline pot gear. As one of the participants in the sablefish longline pot fishery, I can say with certainty that this will help reduce gear entanglements. In PWS there is a fairly small fishing area clustered with different gear. Even with binoculars, participants can be confused whether another operation is using a longline pot, a traditional single pot, or hook and line gear. Marking requirements for longlined pots will prevent boats from entanglements, snagging gear lines and losing pots. I also like that this proposal will align state and federal management regulations to create a standard in both participant behavior and management enforcements. This proposal is a slam dunk, almost housekeeping in nature. It is good for the fisherman, good for enforcement, good for the resource, and good for the environment. There is minimal added cost for most fisherman because we all have to adhere to these requirements if we fish the gulf fishery which majority of the fleet does both.

Thank you for your time and consideration of my comments, and for approving these ACRs to become proposals ahead of the next PWS in-cycle meeting. I greatly appreciate the attention to the time-sensitive issues facing our fleet and fisheries. Should you have a need to clarify anything regarding my proposal comments, please don't hesitate to contact me.

Sincerely,

Kenneth B Jones

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 171:** Support

**Proposal 172:** Support

---



PC15

**Name:** Kenneth Mack Sr

**Community of Residence:** King Cove Alaska

**Comment:**

I support proposal number 170 this will put some control for the department on gear control and the number of boat since this is a very new fishery

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 170:** Support

---



**Name:** Midnight Sun Fly Casters

**Community of Residence:** Fairbanks, AK

**Comment:**

A comment in support of Arctic/Yukon/Kuskokwim Chatanika Northern Pike Subsistence Proposal 63: Establish annual bag limit and reduce harvest limit of pike >30 inches

The Midnight Sun Fly Casters, a non-profit group founded in 1976 that promotes opportunities for members to develop and refine skills, exchange pertinent information, and to share knowledge and experience related to the sport of fly fishing as well as encourage and advocate the conservation and increase of sport fish in waters of Interior Alaska, took a poll among our membership to support or oppose fishing regulation proposal changes that would affect anglers in our region. Club members voted overwhelmingly (100% of respondents) to support Chatanika Northern Pike Subsistence Proposal 63, which would establish an annual bag limit for the Chatanika winter subsistence pike fishery and reduce the harvest limit of pike >30 inches.

We believe this proposal is necessary to protect the Chatanika/Goldstream population of Minto Flats pike for several reasons:

1. Since 2009, multiple MSFC members have noticed a decline in both maximum pike size and catch numbers when fishing the Chatanika/Goldstream side of the flats, through both fly-in and boat-in access points.
2. Harvest of pike during the winter fishery targets large female pike, which are most important for begetting offspring to maintain population levels. A stark example of this: MSFC member Jim Brashear, a cabin owner on the lower Chatanika River, noted that when he participated in this fishery, even though he and his group attempted to keep smaller pike (<25 inches), when they returned home they found that 6 out of 7 of the fish they had retained were females. Thus, limiting the overall harvest (annual bag limit) and decreasing the harvest of the largest females (reduce harvest of 30-inch fish) is prudent and necessary to prevent harm to the fishery and allow for a more abundant, trophy-sized pike population on this side of the Minto Flats.
3. In the 2022 ADFG report "An overview of Minto Flats northern pike subsistence and sport fisheries," data shows that from 2019-2022, more subsistence harvest permits were issued and more pike were harvested in the Chatanika drainage than any other years since 1993. This increased harvest undoubtedly has had a negative effect on the pike population and on sport fishing quality. Also, since 2019, the high harvest during the winter subsistence fishery has triggered restrictions for the sport fishery.

One reason posited by some as justification that more protections aren't needed for the Chatanika/Goldstream Minto Flats pike population, is that pike are so numerous they are having a negative effect on whitefish populations through heavy predation. This does not jive with recent increases to the number of permits issued for the Chatanika whitefish spear fishery (increase from 225 to 300 permits from 2021 to 2022), nor with actual harvest from the spear fishery being well below set quotas (e.g., 603 fish harvested with quota of 1,000 in 2021). These



permit increases are presumably based on population surveys and harvest numbers that indicate whitefish populations are increasing, or are underharvested (leaving a surplus). Thus, increased pike predation on whitefish is not a valid justification for allowing more pike harvest/maintaining current harvest limits.

A comment in support of Arctic/Yukon/Kuskokwim Tanana Drainage Sport Fisheries Proposal 66: Harding Lake Pike fishery

The Midnight Sun Fly Casters, a non-profit group founded in 1976 that promotes opportunities for members to develop and refine skills, exchange pertinent information, and to share knowledge and experience related to the sport of fly fishing as well as encourage and advocate the conservation and increase of sport fish in waters of Interior Alaska, took a poll among our membership to support or oppose fishing regulation proposal changes that would affect anglers in our region. Club members voted overwhelmingly (88% of respondents) to support proposal 66, which would open a catch-and-release fishery for pike in Harding Lake. We are glad to hear that ADFG has conducted a population survey that indicates the pike population in Harding Lake is robust enough to allow for catch-and-release angling, which likely will not have a negative effect on pike in the lake.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Support

**Proposal 66:** Support

---



PC17

**Name:** Native Village of Kwinhagak

**Community of Residence:** Quinhagak

**Comment:**

Kuskokwim Sport Fisheries. Proposal 94. 5 AAC 71.010

The Native Village of Kwinhagak is in support of this proposal with an amendment.

The proposal was originally submitted with the dates of June 1 to July 15. The amendment is to change the dates from June 1 to June 30 to read as:

Close sport fishing for chum salmon to nonresidents in the Kanektok River from June 1 to June 30.

Sport fishing for chum salmon by nonresidents is closed from June 1 to June 30.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 94:** Support With Amendments

---

---



PC18

**Name:** Janessa Newman

**Community of Residence:** Rampart, ak

**Comment:**

I am writing to support PROPOSAL 79

5 AAC 01.220. Lawful gear and gear specifications

- It's a customary and traditional use
- In this region, we've been practicing this practice for thousands of years, as documented by recent ADF&G data
- This already legal under Federal subsistence regulation. It reduces regulatory complexity for subsistence users

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 79:** Support

---

---



**Name:** Denise Newman

**Community of Residence:** Rampart, Alaska

**Comment:**

Proposal 80

I am in opposition of this proposal unless it is amended to include the entire river, not just specifically the middle and upper river. The proposal is to help support the continued commercial fishery of the lower river at the expense of subsistence fisher persons on the rest of the river. If the intent is to give ADFG time to better provide factual data, the entire river, including the lower river, should be restricted. I don't understand why we are even allowing any level of commercial fishing to happen anywhere on the river when our salmon are in dire need of intervention. Why? Amend it to include the entire river and specifically restrict commercial fishing on any level and in any area. We should not be commercially fishing for salmon while restricting subsistence. If restrictions are necessary, commercial fishing should be restricted first.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 80: Support With Amendments**

---



United States Department of the Interior  
Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199



PC20

In Reply Refer:  
OSM.22126.CG

DEC 23 2022

Ms. Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Fisheries proposals and related issues during the 2023 Arctic / Yukon / Kuskokwim Finfish Meeting.

The OSM staff, working with the other participating Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated fisheries. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or fisheries.

Our comments are limited to issues affecting the Federal Subsistence Management Program (FSMP). Other Federal agencies may wish to comment separately on issues outside of the FSMP that may impact Federal public lands that fall under their management jurisdiction.

Again, we appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Anee Howard  
Acting Assistant Regional Director,  
Office of Subsistence Management



Chair Carlson-Van Dort

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board  
Interagency Staff Committee  
Office of Subsistence Management, Anchorage  
Ben Mulligan, Alaska Department of Fish & Game, Juneau  
Mark Burch, Alaska Department of Fish & Game, Palmer  
Administrative Record



**PC20**

**RECOMMENDATIONS  
ALASKA BOARD OF FISH PROPOSALS**

**Arctic / Yukon / Kuskokwim Finfish**

**January 14–18, 2023**

**Anchorage, Alaska**

**Office of Subsistence Management**

**PROPOSAL 79****5 AAC 01.220. Lawful gear and gear specifications.**

Allow hook and line attached to a rod or pole when subsistence fishing upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and the subsistence permit area.

**Current Federal Regulations:****§100.27(e)(3) Yukon-Northern Area**

*(i) Unless otherwise restricted in this section, you may take fish in the Yukon-Northern Area at any time... You may subsistence fish for salmon with rod and reel in the Yukon River drainage 24 hours per day, 7 days per week, unless rod and reel are specifically otherwise restricted in this paragraph (e)(3).*

*(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060 [emergency orders]), unless superseded by a Federal special action.*

\*\*\*

*(xii) You may take salmon only by gillnet, beach seine, dip net, fish wheel, or rod and reel, subject to the restrictions set forth in this section.*

\*\*\*

*(xvi) Unless otherwise specified in this section, you may take fish other than salmon by set gillnet, drift gillnet, beach seine, fish wheel, long line, fyke net, dip net, jigging gear, spear, lead, or rod and reel...*

\*\*\*

**Is a similar issue being addressed by the Federal Subsistence Board? No**

**Impact to Federal subsistence users/fish:** Hook and line is a legal gear type for subsistence fishing in all waters of the Yukon drainage under Federal subsistence fisheries jurisdiction; however, Federal subsistence regulations do not authorize the use of rod and reel for snagging fish in this area. Adopting this proposal would align State and Federal regulations, reducing user confusion, regulatory complexity, and enforcement concerns. There is no conservation concern with this proposal as Federal and State managers have the authority to limit salmon and non-salmon harvest from all subsistence gear types whenever needed for conservation purposes. This proposal may provide additional harvest opportunity to Federally qualified subsistence users by providing an additional gear type.



**Federal Position/Recommended Action:** The Office of Subsistence Management (OSM) **supports** Proposal 79 **with modification** to prohibit the use of rod and reel to snag fish. This modification will align State and Federal regulations and protect species of concern from the non-selective nature of snagging.

**Rationale:** No conservation concerns are associated with this proposal if modified to prohibit snagging. If adopted, the modified proposal would align Federal and State regulations, reducing user confusion, regulatory complexity, and enforcement concerns.

### **PROPOSAL 81**

#### **5 AAC 01.220. Lawful gear and gear specifications.**

Implement a Yukon River drainage subsistence salmon permit to allow retention of king salmon less than 24 inches in length with an annual limit of ten fish during times of king salmon conservation.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/fish:** This proposal may increase harvest opportunity for federally qualified subsistence users, under State regulations, during times of Chinook Salmon conservation, when a small harvestable surplus exists, and would create a system for tracking that harvest. Adopting this proposal without modification may lead to conservation concerns during years of very low abundance if harvest is realized. Additionally, the impacts of harvesting the proposed size class of Chinook Salmon are unknown.

**Federal Position/Recommended Action:** OSM **supports** Proposal 81 **with modification:**

#### **5AAC 01.220 (n)(3)(4) Lawful gear and gear specifications**

*(1) Starting in the 2023 fishing season, during times when the commissioner determines it is necessary for the conservation of king salmon, the commissioner may, by emergency order, require that in the Yukon River drainage, king salmon may be taken only under the authority of a subsistence fishing permit with the following conditions:*

*(A) king salmon annual limit and fish size set by emergency order ~~annual limit of 10 king salmon under 24 inch in fork length (tip of nose to tail fork) caught in a dipnet or manned fishwheel only~~*

The proposed modification would provide managers the flexibility to set annual limits and harvest parameters using in-season run information. Managers should be authorized to modify annual limits based on the number of potential fishing households and estimated harvestable surplus as determined using in-season data. In addition, managers should be authorized to set the harvest parameters by size of fish annually, as the age, sex, and length composition of the run and the presence of small or young fish



varies over time. This would allow managers to be responsive to changes in run and body size among years and may be better for long term conservation.

**Rationale:** This proposal may increase harvest opportunity for federally qualified subsistence users under State regulations during times of Chinook Salmon conservation. There may be conservation concerns with this proposal if adopted as written because it does not allow managers to account for annual variation in run size or age, sex, and length of returns. The proposed modification will provide managers flexibility and allow annual limits and fish size to be set using in-season run information, which may reduce the likelihood of overharvest.

## **PROPOSAL 82**

### **5 AAC 39.250. Gillnet specifications and operations.**

Modify the dates sinking of gillnets is allowed in the Yukon Area from October 1 to April 30.

#### **Current Federal Regulations:**

##### **§100.27(e)(3) Yukon-Northern Area**

\*\*\*

*(xii) You may take salmon only by gillnet, beach seine, dip net, fish wheel, or rod and reel, subject to the restrictions set forth in this section.*

*(A) In the Yukon River drainage, you may not take salmon for subsistence fishing using gillnets with stretched mesh larger than 7.5 inches.*

\*\*\*

\*\*\*

*(xiv) In Districts 5 and 6, you may not take salmon for subsistence purposes by drift gillnets.*

*(xv) In District 4 salmon may be taken by drift gillnet not more than 150 feet in length unless restricted by special action or as modified by regulations in this section.*

*(xvi) Unless otherwise specified in this section, you may take fish other than salmon by set gillnet, drift gillnet, beach seine, fish wheel, long line, fyke net, dip net, jigging gear, spear, lead, or rod and reel, subject to the following restrictions, which also apply to subsistence salmon fishing:*

\*\*\*

*(B) You may not use an aggregate length of set gillnet in excess of 150 fathoms, and each drift gillnet may not exceed 50 fathoms in length.*

\*\*\*



*(D) During the State commercial salmon fishing season, within the Yukon River and the Tanana River below the confluence of the Wood River, you may use drift gillnets and fish wheels only during open subsistence salmon fishing periods.*

*(E) In Birch Creek, gillnet mesh size may not exceed 3-inches stretch-measure from June 15 through September 15.*

*(F) In Racetrack Slough on the Koyukuk River and in the sloughs of the Huslia River drainage, from when each river is free of ice through June 15, the offshore end of the set gillnet may not be closer than 20 feet from the opposite bank except that sloughs 40 feet or less in width may have 3/4 width coverage with set gillnet, unless closed by Federal special action.*

\*\*\*

**Is a similar issue being addressed by the Federal Subsistence Board? No**

**Impact to Federal subsistence users/fish:** This proposal is unlikely to decrease opportunity for federally qualified subsistence users because it will still allow for under ice fishing and gill net mesh depth is generally not restricted in Federal subsistence fisheries in the Yukon River drainage so deep waters can still be fished efficiently. Adopting this proposal would misalign Federal and State regulations, which may increase regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the 2025–2027 Fisheries Regulatory Cycle to re-align regulations if these changes are adopted.

**Federal Position/Recommended Action:** OSM supports Proposal 82.

**Rationale:** This proposal is unlikely to decrease opportunity for federally qualified subsistence users. However, sinking nets in open water can create navigation hazards and complicate enforcement during closures.

#### **PROPOSAL 84**

##### **5 AAC 01.220. Lawful gear and gear specifications.**

Repeal and readopt Yukon Area subsistence fishery lawful gear and gear specifications.

#### **Current Federal Regulations:**

##### **§100.27(e)(3) Yukon-Northern Area**

*(i) Unless otherwise restricted in this section, you may take fish in the Yukon-Northern Area at any time. In those locations where subsistence fishing permits are required, only one subsistence fishing permit will be issued to each household per year. You may subsistence fish for salmon with rod and reel in the Yukon River drainage 24 hours per day, 7 days per week, unless rod and reel are specifically otherwise restricted in this paragraph (e)(3).*



*(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal special action.*

*(iii) In the following locations, you may take salmon during the open weekly fishing periods of the State commercial salmon fishing season and may not take them for 24 hours before the opening of the State commercial salmon fishing season:*

*(A) In District 4, excluding the Koyukuk River drainage;*

*(B) In Subdistricts 4B and 4C from June 15 through September 30, salmon may be taken from 6 p.m. Sunday until 6 p.m. Tuesday and from 6 p.m. Wednesday until 6 p.m. Friday;*

*(C) In District 6, excluding the Kantishna River drainage, salmon may be taken from 6 p.m. Friday until 6 p.m. Wednesday.*

*(iv) During any State commercial salmon fishing season closure of greater than 5 days in duration, you may not take salmon during the following periods in the following districts:*

*(A) In District 4, excluding the Koyukuk River drainage, salmon may not be taken from 6 p.m. Friday until 6 p.m. Sunday;*

*(B) In District 5, excluding the Tozitna River drainage and Subdistrict 5D, salmon may not be taken from 6 p.m. Sunday until 6 p.m. Tuesday.*

*(v) Except as provided in this section, and except as may be provided by the terms of a subsistence fishing permit, you may take fish other than salmon at any time.*

*(vi) In Districts 1, 2, 3, and Subdistrict 4A, excluding the Koyukuk and Innoko River drainages, you may not take salmon for subsistence purposes during the 24 hours immediately before the opening of the State commercial salmon fishing season.*

*(vii) In Districts 1, 2, and 3:*

*(A) After the opening of the State commercial salmon fishing season through July 15, you may not take salmon for subsistence for 18 hours immediately before, during, and for 12 hours after each State commercial salmon fishing period;*

*(B) After July 15, you may not take salmon for subsistence for 12 hours immediately before, during, and for 12 hours after each State commercial salmon fishing period.*

*(viii) In Subdistrict 4A after the opening of the State commercial salmon fishing season, you may not take salmon for subsistence for 12 hours immediately before, during, and for 12 hours after each State commercial salmon fishing period; however, you may take Chinook salmon during the*



*State commercial fishing season, with drift gillnet gear only, from 6 p.m. Sunday until 6 p.m. Tuesday and from 6 p.m. Wednesday until 6 p.m. Friday.*

*(ix) You may not subsistence fish in the following drainages located north of the main Yukon River:*

*(A) Kanuti River upstream from a point 5 miles downstream of the State highway crossing;*

*(B) Bonanza Creek;*

*(C) Jim River including Prospect and Douglas Creeks.*

*(x) You may not subsistence fish in the Delta River.*

*(xi) In Beaver Creek downstream from the confluence of Moose Creek, a gillnet with mesh size not to exceed 3-inches stretch-measure may be used from June 15 through September 15. You may subsistence fish for all non-salmon species but may not target salmon during this time period (retention of salmon taken incidentally to non-salmon directed fisheries is allowed). From the mouth of Nome Creek downstream to the confluence of Moose Creek, only rod and reel may be used. From the mouth of Nome Creek downstream to the confluence of O'Brien Creek, the daily harvest and possession limit is 5 grayling; from the mouth of O'Brien Creek downstream to the confluence of Moose Creek, the daily harvest and possession limit is 10 grayling. The Nome Creek drainage of Beaver Creek is closed to subsistence fishing for grayling.*

*(xii) You may take salmon only by gillnet, beach seine, dip net, fish wheel, or rod and reel, subject to the restrictions set forth in this section.*

*(A) In the Yukon River drainage, you may not take salmon for subsistence fishing using gillnets with stretched mesh larger than 7.5 inches.*

*(B) In Subdistrict 5D you may take salmon once the mid-range of the Canadian interim management escapement goal and the total allowable catch goal are projected to be achieved.*

*(C) Salmon may be harvested by dip net at any time, except during times of conservation when the Federal in-season manager may announce restrictions on time, areas, and species.*

*(xiii) In District 4, if you are a commercial fisherman, you may not take salmon for subsistence purposes during the State commercial salmon fishing season using gillnets with stretched-mesh larger than 6 inches after a date specified by ADF&G emergency order issued between July 10 and July 31.*

*(xiv) In Districts 5 and 6, you may not take salmon for subsistence purposes by drift gillnets.*



*(xv) In District 4 salmon may be taken by drift gillnet not more than 150 feet in length unless restricted by special action or as modified by regulations in this section.*

*(xvi) Unless otherwise specified in this section, you may take fish other than salmon by set gillnet, drift gillnet, beach seine, fish wheel, long line, fyke net, dip net, jigging gear, spear, lead, or rod and reel, subject to the following restrictions, which also apply to subsistence salmon fishing:*

*(A) During the open weekly fishing periods of the State commercial salmon fishing season, if you are a commercial fisherman, you may not operate more than one type of gear at a time, for commercial, personal use, and subsistence purposes.*

*(B) You may not use an aggregate length of set gillnet in excess of 150 fathoms, and each drift gillnet may not exceed 50 fathoms in length.*

*(C) In Districts 4, 5, and 6, you may not set subsistence fishing gear within 200 feet of other fishing gear operating for commercial, personal, or subsistence use except that, at the site approximately 1 mile upstream from Ruby on the south bank of the Yukon River between ADF&G regulatory markers containing the area known locally as the "Slide," you may set subsistence fishing gear within 200 feet of other operating commercial or subsistence fishing gear, and in District 4, from Old Paradise Village upstream to a point 4 miles upstream from Anvik, there is no minimum distance requirement between fish wheels.*

*(D) During the State commercial salmon fishing season, within the Yukon River and the Tanana River below the confluence of the Wood River, you may use drift gillnets and fish wheels only during open subsistence salmon fishing periods.*

*(E) In Birch Creek, gillnet mesh size may not exceed 3-inches stretch-measure from June 15 through September 15.*

*(F) In Racetrack Slough on the Koyukuk River and in the sloughs of the Huslia River drainage, from when each river is free of ice through June 15, the offshore end of the set gillnet may not be closer than 20 feet from the opposite bank except that sloughs 40 feet or less in width may have 3/4 width coverage with set gillnet, unless closed by Federal special action.*

*(xvii) In District 4, from September 21 through May 15, you may use jigging gear from shore ice.*

*(xviii) You must possess a subsistence fishing permit for the following locations:*

*(A) For the Yukon River drainage from the mouth of Hess Creek to the mouth of the Dall River;*

*(B) For the Yukon River drainage from the upstream mouth of 22 Mile Slough to the U.S.-Canada border;*



*(C) Only for salmon in the Tanana River drainage above the mouth of the Wood River.*

*(xix) Only one subsistence fishing permit will be issued to each household per year.*

*(xx) In Districts 1, 2, and 3, from June 1 through July 15. If ADF&G has announced that Chinook salmon can be sold in the commercial fisheries, you may not possess Chinook salmon taken for subsistence purposes unless both tips (lobes) of the tail fin have been removed before the person conceals the salmon from plain view or transfers the salmon from the fishing site.*

*(xxi) In the Yukon River drainage, Chinook salmon must be used primarily for human consumption and may not be targeted for dog food. Dried Chinook salmon may not be used for dog food anywhere in the Yukon River drainage. Whole fish unfit for human consumption (due to disease, deterioration, and deformities), scraps, and small fish (16 inches or less) may be fed to dogs. Also, whole Chinook salmon caught incidentally during a subsistence chum salmon fishery in the following time periods and locations may be fed to dogs:*

*(A) After July 10 in the Koyukuk River drainage;*

*(B) After August 10, in Subdistrict 5D, upstream of Circle City.*

**Is a similar issue being addressed by the Federal Subsistence Board? No**

**Impact to Federal subsistence users/fish:** In general, this proposal cleans up existing regulations and increases management flexibility across all salmon species. Increased management flexibility may help conserve less abundant species while also providing harvest opportunity for federally qualified subsistence users on more abundant species. However, there are proposed changes that will misalign Federal and State regulations. For example, 5 AAC 01.220(b) adds eel stick as a legal fishing gear, 5 AAC 01.220(c)(10) changes the maximum gillnet mesh size in Birch Creek, and 5 AAC 01.220(c)(14) reduces the maximum gillnet mesh size that can be used in the fall season. These changes may increase harvest opportunity for federally qualified subsistence users, allow for conservation, and provide clarity for enforcement, but they may also increase regulatory complexity and user confusion. Proposals could be submitted to the Federal Subsistence Board during the 2025–2027 Fisheries Regulatory Cycle to re-align regulations if these changes are adopted.

**Federal Position/Recommended Action:** OSM supports Proposal 84.

**Rationale:** This proposal is largely administrative in nature and increases consistency in State regulations. While there are proposed changes that will misalign Federal and State regulations, this proposal may increase harvest opportunity when conservation is required for some species but harvestable surpluses are available for other species.

## **PROPOSAL 86**

**5 AAC 73.010. Seasons, bag, possession, and size limits, and methods and means for the Yukon River Area.**



Require retention of sport caught salmon, if removed from the water, in the Yukon River Area.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/fish:** None

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 86.

**Rationale:** The intent of this proposal has conservation merit. However, requiring retention of salmon that have been removed from the water may unintentionally increase salmon mortalities in the sport fishery when Federal and State subsistence fisheries are restricted or closed. A modification making it illegal to remove salmon from the water without the retention requirement may achieve the conservation purpose of the proposal without allowing harvest when subsistence salmon closures or restrictions are in place.

**PROPOSAL 91**

**5 AAC 01.270. Lawful gear and gear specifications and operation.**

Modify Kuskokwim Area lawful gear and gear specifications and operation to provide greater opportunity to harvest salmon other than king salmon, during times of salmon conservation.

**Current Federal Regulations:**

**§100.27(e)(4) Kuskokwim Area**

*(i) Unless otherwise restricted in this section, you may take fish in the Kuskokwim Area at any time without a subsistence fishing permit.*

*(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), except the use of gillnets with 6-inch or less mesh size is allowed before June 1 in the Kuskokwim River drainage, unless superseded by a Federal special action.*

\*\*\*

*(iv) In District 2, and anywhere in tributaries that flow into the Kuskokwim River within that district, you may subsistence fish for salmon with rod and reel 24 hours per day, 7 days per week, unless rod and reel are specifically restricted by this paragraph (e)(4).*

\*\*\*

*(viii) You may only take salmon by gillnet, beach seine, fish wheel, dip net, or rod and reel subject to the restrictions set out in this section, except that you may also take salmon by spear in the Kanektok, and Arolik River drainages, and in the drainage of Goodnews Bay.*



*(ix) You may not use an aggregate length of set gillnets or drift gillnets in excess of 50 fathoms for taking salmon.*

\*\*\*

*(xi) You must attach to the bank each subsistence set gillnet operated in tributaries of the Kuskokwim River and fish it substantially perpendicular to the bank and in a substantially straight line.*

*(xii) Within a tributary to the Kuskokwim River in that portion of the Kuskokwim River drainage from the north end of Eek Island upstream to the mouth of the Kolmakoff River, you may not set or operate any part of a set gillnet within 150 feet of any part of another set gillnet.*

*(xiii) The maximum depth of gillnets is as follows:*

*(A) Gillnets with 6-inch or smaller stretched-mesh may not be more than 45 meshes in depth;*

*(B) Gillnets with greater than 6-inch stretched-mesh may not be more than 35 meshes in depth.*

*(xiv) You may not use subsistence set and drift gillnets exceeding 15 fathoms in length in Whitefish Lake in the Ophir Creek drainage. You may not operate more than one subsistence set or drift gillnet at a time in Whitefish Lake in the Ophir Creek drainage. You must check the net at least once every 24 hours.*

\*\*\*

*(xvi) All tributaries not expressly closed by Federal special action, or as modified by regulations in this section, remain open to the use of gillnets more than 100 yards upstream from their confluence with the Kuskokwim River.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/fish:** This proposal may increase harvest opportunity for federally qualified subsistence users, under State regulations, during times of salmon conservation. If adopted, State managers will have greater flexibility to provide harvest opportunity on abundant, co-migrating salmon species while conservatively managing less abundant species.

**Federal Position/Recommended Action:** OSM supports Proposal 91.

**Rationale:** This proposal will increase the number of management actions available for salmon species other than Chinook Salmon, resulting in greater flexibility for State managers during times of salmon conservation. Subsistence users may benefit from this flexibility by being provided harvest opportunity for abundant salmon species.

**PROPOSAL 92****5 AAC 01.260. Fishing seasons and periods and 5 AAC 01.275. Waters closed to subsistence fishing.**

Increase subsistence opportunity before, during, and after commercial fishing periods set by emergency order.

**Current Federal Regulations:****§100.27(e)(4) Kuskokwim Area**

*(i) Unless otherwise restricted in this section, you may take fish in the Kuskokwim Area at any time without a subsistence fishing permit.*

*(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), except the use of gillnets with 6-inch or less mesh size is allowed before June 1 in the Kuskokwim River drainage, unless superseded by a Federal special action.*

*(iii) In Districts 4 and 5, from June 1 through September 8, you may not take salmon for 16 hours before or during and for 6 hours after each State open commercial salmon fishing period in each district.*

\*\*\*

*(v) You may not take subsistence fish by nets in the Goodnews River east of a line between ADF&G regulatory markers placed near the mouth of the Ufigag River and an ADF&G regulatory marker placed near the mouth of the Tunulik River 16 hours before or during and for 6 hours after each State open commercial salmon fishing period.*

*(vi) You may not take subsistence fish by nets in the Kanektok River upstream of ADF&G regulatory markers placed near the mouth 16 hours before or during and for 6 hours after each State open commercial salmon fishing period.*

*(vii) You may not take subsistence fish by nets in the Arolik River upstream of ADF&G regulatory markers placed near the mouth 16 hours before or during and for 6 hours after each State open commercial salmon fishing period.*

\*\*\*

**Is a similar issue being addressed by the Federal Subsistence Board? No**

**Impact to Federal subsistence users/fish:** Federal regulations mirror current State regulations and close subsistence fishing for 16 hours before, during, and six hours after each commercial salmon opener. Establishing closure times through emergency order would misalign State and Federal regulations and decrease the consistency in closure lengths, potentially causing user confusion. However, federally qualified subsistence users may benefit from increased harvest opportunity if closure length before and



after commercial openers is reduced. Any impacts to fish populations are likely to be negligible given that commercial opportunity will only be provided if there is a harvestable surplus. A proposal could be submitted to the Federal Subsistence Board during the 2025–2027 Fisheries Regulatory Cycle to re-align regulations if these changes are adopted.

**Federal Position/Recommended Action:** OSM supports Proposal 92.

**Rationale:** This proposal will provide managers greater flexibility in scheduling subsistence fishery closure times around commercial openers. Adopting this proposal will misalign State and Federal regulations, which may increase regulatory complexity and user confusion, but its adoption may reduce closure lengths before and after commercial openers and thereby increase harvest opportunities for federally qualified subsistence users.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 79:** Support With Amendments

**Proposal 81:** Support With Amendments

**Proposal 84:** Support

**Proposal 86:** Oppose

**Proposal 91:** Support

**Proposal 92:** Support



PC21

**Name:** Melissa Osborn

**Community of Residence:** Ester, AK

**Comment:**

I support proposal 64 for its simplicity. Easy to understand and follow. My family often spends days camping during the winter fishery and the possession limits limits set in proposal 63 would limit us to only one overnight.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Oppose

**Proposal 64:** Support

---



PC22

**Name:** Erich Ott

**Community of Residence:** Fairbanks, AK

**Comment:**

As a long term resident of Alaska, I am determined to see Alaska conserved to share it with my family for generations to come. I believe proposal 64 is going to lead to an increase in pike harvest and a deterioration of the overall fish population. I do not support proposal 64.

I do not support proposal 63. the proposal is suggested to reduce the winter subsistence harvest to allow for better sport fish harvest in the summer. As an avid sport fisherman, i almost always side with sport fish, but not for this specific proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Support With Amendments

**Proposal 64:** Oppose

---

December 30, 2022



PC23

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
PO Box 115525  
Juneau, Alaska 99811-5525

Re: AYK BOF Public Comments on Proposals

Dear Chairperson Carlson-Van Dort:

I offer these comments to the Alaska Board of Fisheries and ADF&G regarding two AYK BOF proposals.

**Proposal 84**, which repeals the state finfish subsistence fishing legal gear regulations and readopts them to update and revise the gear type allowances and restrictions incorporating additional subsistence salmon conservation measures. I appreciate the efforts of ADF&G Yukon staff in revising 5 AAC 01.220 as proposed. Through my consulting work for the Tanana Chiefs Conference’s Tribal Resources Stewardship Program, I reviewed this proposal in order to advise TCC and Member Tribal leaders on the likely impacts of proposed regulatory changes in ongoing efforts to protect Indigenous ways of life.

Having previously worked at ADF&G Subsistence, I appreciate the complexities of this re-write and offer the following comments and suggestions regarding **Proposal 84**:

- Replace the first “handline” gear type listed in proposed 01.220(b) to instead state “longline,” which appears to have been a typographical error in the proposal because, as written, Proposal 84 would eliminate longlines (including burbot sets) as legal subsistence fishing gear for non-salmon finfish.
- Also with respect to 01.220(b), both old language and new proposed language includes handline as legal subsistence fishing gear for fish other than salmon; however, the statewide regulatory gear definitions apparently incorrectly state in 5 AAC 39.105(d)(27) that handline is only legal to take smelt from Bristol Bay. In adopting Proposal 84, the BOF should consider deferring action to the March 2023 Statewide BOF meeting where 5 AAC 39.105(d)(27) could be corrected, or otherwise direct ADF&G at their AYK BOF meeting to correct this oversight through housekeeping delegation.
- Proposed language in 01.220(c)(3) states that “each drift gillnet in use by an individual may not exceed 50 fathoms in length;” however, proposed 01.220(a)(1) states “in District 4, salmon may be taken by drift gillnets that are not more than 25 fathoms in length, unless closed by emergency order;” so proposed (c)(3) should perhaps be amended to state, “each drift gillnet in use by an individual



may not exceed 50 fathoms in length, except as specified in 5 AAC 01.220(a)(1);”

- Relocate proposed 01.220(c)(6) “subsistence fishermen may operate one or more subsistence fishing gears at the same time” to another location in the regulation, as (c) represents subsistence fishing restrictions and this is an allowance, not a restriction.
- Proposed 01.220(d)(2) “a gillnet used to take fish” specifies gillnet mesh sizes for conservation purposes including either four-inch or less mesh, four and three-quarter inch or less mesh, six-inch or less mesh, or seven and one-half inch mesh. My request for clarification regards the following questions; (1) shouldn’t 01.220(d)(2)(A) state seven and one-half or less mesh? Similarly, shouldn’t 01.220(d)(2)(D) include seven and one-half inch or less mesh since ADF&G might allow up to a 7.5-inch mesh setnet to be used, a person would not be able to use a 6-inch mesh setnet during such an announced opportunity during times of conservation?
- Proposed 01.220(d)(3)-(5) each specifies selective gear types that can be used during times a conservation of a particular salmon species or stock; however, the proposed language in each of (3)-(5) states that “all salmon must be immediately release to the water...” Amend the language in each of (3)-(5) to state “all specified salmon must be immediately released...” to more accurately reflect the intent of such conservation measures associated with selective gear types.

**Proposal 79** would allow the use of “rod and reel” (i.e. hook and line attached to a rod or pole) as legal subsistence gear under state subsistence regulations upstream of the mouth of the Nulato River to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and including the subsistence permit area of the South Fork and Middle Fork Koyukuk.

I support this proposal because it would provide for regulatory consistency between state and federal subsistence fishing regulations given that rod and reel are recognized under federal subsistence regulations as legal subsistence gear in federal public waters of the Yukon River drainage (50 CFR Section 100.27(e)(3)(i), (xii), (xvi)).

For this reason, I **recommend the BOF amend this proposal** to apply throughout the state waters of the Yukon River drainage as numerous scientific publications and local and traditional indigenous knowledge document the customary and traditional uses of indigenous fish hooks fished with lines of bark and sinew.

ADF&G Subsistence and other academic and scientific research has documented longstanding and ongoing subsistence harvests of finfish with hook and line throughout the Yukon River drainage, not just the Koyukuk River drainage addressed in Proposal 79. For example, the late Traditional Chief, Dr. Rev. David Salmon made many of these types of traditional tools and gear and published several books detailing images and information about some of these traditional tribal technologies with Anthropology Thomas A. O’Brien, which serve to document the customary and traditional uses of hook and line attached to a rod or pole within the Yukon Flats of the Upper Yukon River.



Furthermore, ADF&G household survey research has documented widespread use of rod and reel gear to harvest salmon and non-salmon fishes throughout the Koyukuk River drainage communities, as well as throughout the upper reaches of the US Yukon River.

Regarding the Koyukuk River regions, for example, ADF&G’s Andersen et al. (2004) conducted household harvest surveys and key respondent interviews in 2002 concerning traditional ecological knowledge about non-salmon fishes in the communities of Koyukuk, Huslia, Hughes, Allakaket, Alatna, and Bettles/Evansville. Researchers documented use of rod and reel gear to harvest Arctic grayling, northern pike, sheefish, whitefishes, and lake trout (Andersen et al. 2004:50,74,86,105,111,116,123).

Similarly, in 2011, ADF&G research documented that rod and reel gear was used by households from Alatna, Evansville, Bettles, and Wiseman. For example, Alatna households in 2011 harvested 68 lb of northern pike, 45 lb of sheefish, 42 lb of broad whitefish, and 90 lb of humpback whitefish with rod and reel gear (Holen et al. 2012 Table 2-11; see Table Proposal 79.1).

More recently, ADF&G research in Hughes for the year 2014 demonstrated that Hughes households harvested an estimated total of 343.7 lb of non-salmon fish using rod and reel gear, including sheefish (80%), whitefish (14%), and northern pike (6%) (Wilson and Kostick 2016:Table 3-14).

Table 2-11. – Estimated percentages of nonsalmon fish harvested by gear type, resource, and total nonsalmon fish harvest, Alatna, 2011.

Resource	Percentage base	Removed from commercial catch		Subsistence methods									
		Number	Pounds	Gillnet or seine		Other		Subsistence gear, any		Rod and reel		Any method	
				Number	Pounds	Number	Pounds	Number	Pounds	Number	Pounds	Number	Pounds
Nonsalmon fish	Gear type			100.0%	100.0%			100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
	Resource			51.4%	56.5%			51.4%	56.5%	48.6%	43.5%	100.0%	100.0%
	Total			51.4%	56.5%			51.4%	56.5%	48.6%	43.5%	100.0%	100.0%
Arctic grayling	Gear type									46.1%	16.8%	22.4%	7.3%
	Resource									100.0%	100.0%	100.0%	100.0%
	Total									22.4%	7.3%	22.4%	7.3%
Northern pike	Gear type									9.8%	23.0%	4.8%	10.0%
	Resource									100.0%	100.0%	100.0%	100.0%
	Total									4.8%	10.0%	4.8%	10.0%
Sheefish	Gear type			13.9%	35.3%			13.9%	35.3%	4.9%	15.3%	9.5%	26.6%
	Resource			75.0%	75.0%			75.0%	75.0%	25.0%	25.0%	100.0%	100.0%
	Total			7.1%	20.0%			7.1%	20.0%	2.4%	6.7%	9.5%	26.6%
Longnose sucker	Gear type			2.8%	0.8%			2.8%	0.8%			1.4%	0.5%
	Resource			100.0%	100.0%			100.0%	100.0%			100.0%	100.0%
	Total			1.4%	0.5%			1.4%	0.5%			1.4%	0.5%
Broad whitefish	Gear type									19.6%	14.3%	9.5%	6.2%
	Resource									100.0%	100.0%	100.0%	100.0%
	Total									9.5%	6.2%	9.5%	6.2%
Least cisco	Gear type			32.4%	13.7%			32.4%	13.7%			16.7%	7.8%
	Resource			100.0%	100.0%			100.0%	100.0%			100.0%	100.0%
	Total			16.7%	7.8%			16.7%	7.8%			16.7%	7.8%
Humpback whitefish	Gear type			37.0%	47.1%			37.0%	47.1%	19.6%	30.6%	28.6%	40.0%
	Resource			66.7%	66.7%			66.7%	66.7%	33.3%	33.3%	100.0%	100.0%
	Total			19.0%	26.6%			19.0%	26.6%	9.5%	13.3%	28.6%	40.0%
Round whitefish	Gear type			13.9%	2.9%			13.9%	2.9%			7.1%	1.7%
	Resource			100.0%	100.0%			100.0%	100.0%			100.0%	100.0%
	Total			7.1%	1.7%			7.1%	1.7%			7.1%	1.7%

Source: ADF&G Division of Subsistence household surveys, 2012.

Table Proposal 79.1 Rod and reel harvests of nonsalmon fish, Alatna, 2011 (Holen et al. 2012:Table 2-11).



**References cited:**

Andersen, D.B., C.L. Brown, R.J. Walker, and K. Elkin. 2004. Traditional ecological knowledge and contemporary subsistence harvest of nonsalmon fish in the Koyukuk River drainage, Alaska. Research North, Tanana Chiefs Conference, and the Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 282, Fairbanks and Juneau.

Holen, D.L., S. Hazell, and D.S. Koster, editors. 2012. Subsistence harvests and uses of wild resources by communities in the eastern Interior of Alaska. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 372. Anchorage, Alaska.

Wilson, S.J. and M.L. Kostick. 2016. Harvest and use of wild resources in Hughes, Alaska, 2014. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 424, Fairbanks.

Thank you for considering these comments as you deliberate on Proposals 79 and 84.

Sincerely,

Jim Simon, PhD, Principal Anthropologist  
Jim Simon Consulting Group, LLC  
HC10 Box 56, Mile 309.3 Richardson Hwy  
Fairbanks, Alaska 99701  
(907) 687-9110  
jjksimon@yahoo.com

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

*Proposal 79: Support With Amendments*



PC24

**Name:** William Smallwood

**Community of Residence:** North Pole, Alaska

**Comment:**

Proposal 63: oppose

Proposal 64: support

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Oppose

**Proposal 64:** Support

---



**Name:** Connie Sommer

**Community of Residence:** Nenana, AK

**Comment:**

Proposal 80 As an Indigenous woman who was born and raised on the Yukon river in Tanana, AK, my widowed mother raising 10 children on her own, each Summer would pack us up and bring us to our ancestors traditional "fish camp", which is located down river from Tanana on a Island known as Grant Island. It is there where we spend entire Summers, setting up camp, fish nets, fish cutting table, gathering cotton wood, repairing 2 story smoke house as we patiently waited for retuning salmon to catch, cut, preserve for upcoming long winter months to sustain body, soul and remain healthy as we grew into adulthood. We NEVER ever nor would even consider SELLING subsistence food, why would we? We surely would parish after all it is proven via scientific fact, DNA our ancestors lived, thrived, respecting all living land and water creatures that feed us, to never take more then what is needed. This is and shall be how "Indigenous People" survive and will continue to survive. We do not have "commercial" in our vocabulary, we have no need for commercial we only want enough fish to sustain our selves our children and their children. Unlike what this proposal is attempting to convince policy makers to believe. Perhaps the person presenting in proposal should change location to "mouth of the Yukon" where commercial fishing is definitely way of life, profit making as we who live seasonal subsistence life style have not eating Chinook salmon going on to 3 years...so if now and then those blessed enough preserved enough Chinook salmon to "help" others in need be it due to hardship from illness and must remain away to receive treatment, death in family needed funds to transport loved ones to their given community, offer out of the kindness of their hearts NOT profiting a cent GIVING entire amount of so-called COMMERCIAL fishing trade to family in need has nothing to do with what this proposer insinuates there for I am strongly OPPOSED to proposal 80. Thank you for allowing me to voice my concern and please strongly consider opposing Proposition 80 and vote it down!

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 80: Oppose**

---

**Western Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: 907-786-3888 Fax: 1-907-786-3898  
Toll Free: 1-800-478-1456

In Reply Refer to  
OSM.22145.WI.NP

DEC 30 2022

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
c/o Alaska Department of Fish and Game  
Boards Support Section  
1255 West 8th Street  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

During the Western Interior Alaska Subsistence Regional Advisory Council's (Council) fall 2022 public meeting held on October 19-20, the Council developed the following positions and comments on Proposals 79, 91, and 140 that will be taken up by the Alaska Board of Fisheries (BOF) at upcoming BOF meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior Alaska Region. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

**Arctic Yukon Kuskokwim Finfish BOF meeting comments****Proposal 79**

**Allow hook and line attached to a rod or pole when subsistence fishing upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and the subsistence permit area.**

The Council **supports Proposal 79**. The Council supports the ability of subsistence users to be able to harvest subsistence foods using readily available gear types.

**Proposal 91**

**Modify Kuskokwim Area lawful gear and gear specifications and operations to provide greater opportunity to harvest salmon other than king salmon during times of salmon conservation.**

The Council **supports Proposal 91**. During the unprecedented collapse of the Coho Salmon run during the 2022 season, subsistence users on the Kuskokwim River were unable to fish with any gear type during a complete closure instituted by the Alaska Department of Fish and Game (ADF&G). This closure was instituted after the salmon were already instream after the run strength was determined to be too weak for continued subsistence fishing opportunities. While this closure was to protect Coho Salmon, the lack of flexibility in current state regulations made it so that no gear types were allowed to target other healthy stocks of fish, leaving the entire river unable to subsistence fish for any species. Prior to the Coho Salmon collapse, severely depressed returns of Chinook and Chum salmon resulted in very limited subsistence opportunity. The inability for subsistence users to be able to deploy whitefish nets in the fall to supplement their diets with fresh fish or put up non-salmonid fish for the winter resulted in severe food insecurity for subsistence users. The Council fully supports giving ADF&G Kuskokwim River fisheries managers more options to allow selective harvest of other fish during times of any salmon species conservation.

**Alaska Peninsula/Aleutian Island/Chignik Finfish BOF meeting comments****Proposal 140**

**Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time.**

The Council **supports Proposal 140**. The Continued severe in-river subsistence restrictions and closures for multiple salmon species in both the Yukon and Kuskokwim rivers drainages, the failure of multiple salmon species to meet escapement goals in many tributaries in both drainages are of great concern. Genetics testing done on salmon caught in South Alaska commercial fishery demonstrate that a portion of the salmon harvested in this fishery are of Yukon or Kuskokwim origin. The State's constitution mandates sustained yield fishery management for all salmon stocks, with a statutory subsistence allocation priority over commercial harvest. Large by-catch of Chum salmon in the mixed stock South Peninsula commercial needs to be addressed. The current management plan is not working to adequately protect future salmon runs in the suppressed drainages stocks of origin, and should be changed to curtail the interception of Yukon and Kuskokwim bound salmon stocks.

The Council shares this letter with the BOF and the Federal Subsistence Board, emphasizing these issues are of vital importance to the subsistence needs of the people of Western Interior Alaska. Thank you for your consideration of our positions and comments. Any questions regarding this letter can be addressed directly to me or through our Subsistence Council Coordinator Nissa Pilcher at (907) 455-8147 or [nissa\\_batespilcher@fws.gov](mailto:nissa_batespilcher@fws.gov).



Sincerely,

A handwritten signature in cursive script that reads "Jack Reakoff".

Jack L. Reakoff  
Chair, Regional Advisory Council  
Yukon-Kuskokwim Region

cc: Federal Subsistence Board  
Office of Subsistence Management  
Interagency Staff Committee  
Western Interior Alaska Subsistence Regional Advisory Council  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 79:** Support

**Proposal 91:** Support



PC27

**ALASKA BOARD OF FISHERIES  
ARTIC-YUKON-KUSKOKWIM  
JANUARY 2023  
ANCHORAGE, AK**

**PROPOSAL SYNOPSIS, COMMENTS AND RECOMMENDATION**

**SUBMITTED BY**

**YUKON DELTA FISHERIES DEVELOPMENT ASSOCIATION (YDFDA)**

**December 2022**



## Arctic/Yukon/Kuskokwim Finfish

[View PDF of all proposals for Arctic/Yukon/Kuskokwim Finfish](#)

### YUKON RIVER PROPOSALS

- Chatanika Northern Pike Subsistence  
View PDF of all proposals for Chatanika Northern Pike Subsistence
  - [All proposals for Chatanika Northern Pike Subsistence \(PDF 149 kB\)](#)
  - [Proposal 63 \(PDF 97 kB\)](#)
  - [Proposal 64 \(PDF 89 kB\)](#)
  
- Tanana Drainage Sport Fisheries — [View PDF of all proposals for Tanana Drainage Sport Fisheries](#) | Hide Proposalsfor Tanana Drainage Sport Fisheries
  - [All proposals for Tanana Drainage Sport Fisheries \(PDF 186 kB\)](#)
  - [Proposal 65 \(PDF 93 kB\)](#)
  - [Proposal 66 \(PDF 91 kB\)](#)
  - [Proposal 67 \(PDF 92 kB\)](#)
  - [Proposal 68 \(PDF 94 kB\)](#)
  - [Proposal 69 \(PDF 96 kB\)](#)
  - [Proposal 70 \(PDF 100 kB\)](#)
  - [Proposal 71 \(PDF 98 kB\)](#)
  - [Proposal 72 \(PDF 98 kB\)](#)
  - [Proposal 73 \(PDF 104 kB\)](#)
  - [Proposal 74 \(PDF 93 kB\)](#)
  
- Yukon Subsistence and Personal Use Fisheries — [View PDF of all proposals for Yukon Subsistence and Personal Use Fisheries](#) | Hide Proposalsfor Yukon Subsistence and Personal Use Fisheries
  - [All proposals for Yukon Subsistence and Personal Use Fisheries \(PDF 213 kB\)](#)
  - [Proposal 79 \(PDF 87 kB\)](#)
  - [Proposal 80 \(PDF 93 kB\)](#)
  - [Proposal 81 \(PDF 96 kB\)](#)
  - [Proposal 82 \(PDF 90 kB\)](#)
  - [Proposal 83 \(PDF 95 kB\)](#)
  - [Proposal 84 \(PDF 135 kB\)](#)
  - [Proposal 85 \(PDF 103 kB\)](#)
  
- Yukon Sport Fisheries — [View PDF of all proposals for Yukon Sport Fisheries](#) | Hide Proposalsfor Yukon Sport Fisheries
  - [Proposal 86 \(PDF 93 kB\)](#)
  
- Yukon Commercial Fisheries — [View PDF of all proposals for Yukon Commercial Fisheries](#) | Hide Proposalsfor Yukon Commercial Fisheries
  - [All proposals for Yukon Commercial Fisheries \(PDF 187 kB\)](#)
  - [Proposal 87 \(PDF 92 kB\)](#)
  - [Proposal 88 \(PDF 110 kB\)](#)
  - [Proposal 89 \(PDF 106 kB\)](#)



# Table of Contents

**YUKON RIVER PROPOSALS** ..... 2

**CHATANIKA NORTHERN PIKE SUBSISTENCE** ..... 8

**PROPOSAL 63** ..... 8

**5 AAC 01.244. Minto Flats Northern Pike Management Plan**..... 8

**Proposed by:** Will Samuel ..... 8

**ADF&G RECOMMENDATION: OPPOSE**..... 8

**YDFDA RECOMMENDATION: OPPOSE**..... 9

**PROPOSAL 64** ..... 10

**5 AAC 01.244. Minto Flats Northern Pike Management Plan**..... 10

**Proposed by:** Ben Dobrovolny..... 10

**ADF&G RECOMMENDATION: OPPOSE**..... 10

**YDFDA RECOMMENDATION: OPPOSE** ..... 10

**TANANA DRAINAGE SPORT FISHERIES**..... 11

**PROPOSAL 65** ..... 11

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 11

**PROPOSED BY:** Midnight Sun Fly Casters ..... 11

**ADF&G RECOMMENDATION: OPPOSE**..... 11

**YDFDA RECOMMENDATION: SUPPORT** ..... 11

**PROPOSAL 66** ..... 12

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 12

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee..... 12

**ADF&G RECOMMENDATION: OPPOSE**..... 12

**YDFDA RECOMMENDATION: SUPPORT**..... 12

**PROPOSAL 67** ..... 13

**5 AAC 74.030. Methods, means, and general provisions \_ Finfish.**..... 13

**PROPOSED BY:** Midnight Sun Fly Casters..... 13

**ADF&G RECOMMENDATION: NO ACTION**..... 13

**YDFDA RECOMMENDATION: OPPOSE**..... 13



## Table of Contents (continued)

**PROPOSAL 68** ..... 14

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 14

**PROPOSED BY:** Upper Tanana Fortymile Advisory Committee ..... 14

**ADF&G RECOMMENDATION: OPPOSE**..... 14

**YDFDA RECOMMENDATION: SUPPORT THE INTENT**..... 14

**PROPOSAL 69** ..... 15

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 15

**PROPOSED BY:** Shann Paul Jones..... 15

**ADF&G RECOMMENDATION: OPPOSE**..... 15

**YDFDA RECOMMENDATION: OPPOSE** ..... 15

**PROPOSAL 70** ..... 17

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 17

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee ..... 17

**ADF&G RECOMMENDATION: SUPPPORT WITH MODIFICAITONS**..... 17

**YDFDA RECOMMENDATION: SUPPORT WITH ADFG MODIFICATIONS**..... 17

**PROPOSAL 71** ..... 19

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 19

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee ..... 19

**ADF&G RECOMMENDATION: SUPPPORT**..... 19

**YDFDA RECOMMENDATION: SUPPORT**..... 19

**PROPASAL 72**..... 20

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 20

**PROPOSED BY:** Alaska Department of Fish and Game ..... 20

**ADF&G RECOMMENDATION: SUPPPORT**..... 20

**YDFDA RECOMMENDATION: SUPPORT**..... 20



## Table of Contents (continued)

**PROPOSAL 73** ..... 20

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.** ..... 20

**PROPOSED BY: Alaska Department of Fish and Game** ..... 20

**ADF&G RECOMMENDATION: SUPPPORT**..... 21

**YDFDA RECOMMENDATION: SUPPORT**..... 21

**PROPOSAL 74** ..... 22

**5 AAC 74.065. Tanana River Area Stocked Waters Management Plan.**..... 22

**PROPOSED BY: Alaska Department of Fish and Game** ..... 22

**ADF&G RECOMMENDATION: SUPPPORT**..... 22

**YDFDA RECOMMENDATION: SUPPORT**..... 22

**YUKON SUBSISTENCE AND PERSONAL USE FISHERIES**..... 23

**PROPOSAL 79**..... 23

**5 AAC 01.220. Lawful gear and gear specifications.** ..... 23

**PROPOSED BY: Koyukuk River Fish & Game Advisory Committee** ..... 23

**ADF&G RECOMMENDATION: SUPPPORT**..... 23

**YDFDA RECOMMENDATION: SUPPORT**..... 23

**PROPOSAL 80**..... 24

**5 AAC 01.220. Lawful gear and gear specifications.** ..... 24

**PROPOSED BY: John H. Lamont** ..... 24

**ADF&G RECOMMENDATION: OPPOSE and is NEUTRAL on the allocative aspects.** ..... 25

**YDFDA RECOMMENDATION: OPPOSE** ..... 25

**PROPOSAL 81** ..... 26

**5 AAC 39.250. Gillnet specifications and operations.**..... 26

**PROPOSED BY: Fairbanks Advisory Committee Fisheries Sub-Committee** ..... 26

**ADF&G RECOMMENDATION: OPPOSE and is NEUTRAL on the allocative aspects.** ..... 26

**YDFDA RECOMMENDATION: OPPOSE** ..... 27

**PROPOSAL 82** ..... 28

**5 AAC 39.250. Gillnet specifications and operations.**..... 28

**PROPOSED BY: Alaska Department of Fish and Game** ..... 28

**ADF&G RECOMMENDATION: SUPPORT.**..... 28

**YDFDA RECOMMENDATION: SUPPORT**..... 28



# Table of Contents (continued)

**Proposal 83** ..... 29

**5 AAC 77.171. Lawful gear for personal use finfish fishing**..... 29

**PROPOSED BY:** Alaska Department of Fish and Game ..... 29

**ADF&G RECOMMENDATION: SUPPORT**..... 29

**YDFDA RECOMMENDATION: OPPOSE** ..... 29

**PROPOSAL 84** ..... 30

**5 AAC 77.171. Lawful gear for personal use finfish fishing**..... 30

**PROPOSED BY:** Alaska Department of Fish and Game ..... 30

**ADF&G RECOMMENDATION: SUPPORT**..... 31

**YDFDA RECOMMENDATION: SUPPORT with minimal opposition to part of this proposal.**  
    ..... 32

**PROPOSAL 85** ..... 33

**5 AAC 77.171. Lawful gear for personal use finfish fishing**..... 33

**PROPOSED BY:** Alaska Department of Fish and Game ..... 33

**ADF&G RECOMMENDATION: SUPPORT**..... 33

**YDFDA RECOMMENDATION: SUPPORT**..... 33

**YUKON SPORT FISHERIES** ..... 34

**PROPOSAL 86** ..... 34

**5 AAC 73.010. Seasons, bag, possession, and size limits, and methods and means for the Yukon River Area.** ..... 34

**PROPOSED BY:** Midnight Sun Flycasters ..... 34

**ADF&G RECOMMENDATION: OPPOSE**..... 34

**YDFDA RECOMMENDATION: SUPPORT**..... 35

**YUKON COMMERCIAL FISHERIES**..... 36

**PROPOSAL 87** ..... 36

**5 AAC 39.105. Types of legal gear.** ..... 36

**PROPOSED BY:** Alaska Department of Fish and Game ..... 36

**ADF&G RECOMMENDATION: SUPPORT** ..... 36

**YDFDA RECOMMENDATION: SUPPORT**..... 36



## Table of Contents (continued)

**PROPOSAL 88** ..... 37

**5 AAC 05.331. Gillnet specifications and operations**..... 37

**PROPOSED BY: Alaska Department of Fish and Game** ..... 37

**ADF&G RECOMMENDATION: SUPPORT** ..... 37

**YDFDA RECOMMENDATION: SUPPORT**..... 37

**PROPOSAL 89**..... 39

**5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan**..... 39

**PROPOSED BY: Alaska Department of Fish and Game** ..... 39

**ADF&G RECOMMENDATION: SUPPORT** ..... 39

**YDFDA RECOMMENDATION: SUPPORT**..... 39



# CHATANIKA NORTHERN PIKE SUBSISTENCE

2 Proposals: Proposals 63 and 64  
[All proposals for Chatanika Northern Pike Subsistence](#)

## PROPOSAL 63

### **5 AAC 01.244. Minto Flats Northern Pike Management Plan.**

**Proposed by:** Will Samuel

**Purpose:** Establish an annual bag limit of 20 northern pike and modify daily bag limit of fish greater than 30 inches in the Chatanika Harvest Area (CHA) subsistence fishery.

**What would be the effect if this proposal were adopted?** *Subsistence fishers would be allowed to keep fewer northern pike over 30 inches and 20 fish annually.*

#### **Rationale by Proponent:**

- The Chatanika River Winter subsistence Northern Pike fishery (CHA) harvests a significant number of Northern Pike from the Minto Flats complex.
- Fish harvest is biased heavily towards large females (fish > 30 inches), which provide a disproportionate contribution of eggs to the population.
- Because of the subsistence harvest, the Sport fishery has been restricted during 2007, 2008, 2016, and 2021.
- Anecdotal reports from local cabin-owners suggests that fishing pressure has increased during the winter subsistence fisheries due to greater accessibility via snowmachine.
- The likelihood of catching large pike has decreased in recent years.
- Increased selective harvest in the CHA has reduced the quality of sport fishing in the Minto Flats complex, yet sport fisheries pay the price for this selective harvest in the form of fishery restrictions and reduced likelihood of trophy fish.
- Excessive selective harvest can reduce the long-term resilience of a fishery, and the current harvest levels may not remain sustainable under future conditions (e.g., different water levels).

#### **ADF&G RECOMMENDATION: OPPOSE**

*Under the current management plan, harvests have been sustainable. An annual limit is unnecessary because most permit holders only fish once per season and this fishery is closed when the 1,500-harvest cap is reached in the CHA subsistence fishery during the period from January 1 until spring ice-out. Implementing an annual limit and reducing the bag and possession limits for fish 30 inches or greater in length would result in unnecessary restrictions to the subsistence fishery at current northern pike abundance. The board adopted changes to the CHA fishery in 2016, 2017, and 2019 relative to closed areas and size limits, and time is required to evaluate the impacts. The board should consider whether adoption of this proposal still provides a meaningful priority for subsistence fishing and a reasonable opportunity for success in taking northern pike for subsistence uses.*



**YDFDA RECOMMENDATION: OPPOSE**

The northern pike population that contributes to this fishery is abundant and stable. The age class composition shows a good population of large fish over 30 inches. There is no need for additional restrictive regulations on this fishery at this time. Additionally, it is currently unknown how recent regulatory changes to this fishery have and will affect this northern pike population. Therefore, YDFDA currently opposes any regulatory changes for this fishery.

\*\*\*\*\*



**PROPOSAL 64**  
**5 AAC 01.244. Minto Flats Northern Pike Management Plan.**

**Proposed by:** Ben Dobrovolny

**Purpose:** Modify the bag limit to require retention of the first 10 fish caught over 24 inches for northern pike in the Chatanika Harvest Area (CHA) subsistence fishery.

**What would be the effect if this proposal were adopted?** *Participation would decrease from the fishers who only catch-and-release northern pike greater than 24 inches. Eliminating the size restriction of fish 30 inches or greater, which are mostly female, may increase the subsistence harvest of larger fish.*

**Rationale by Proponent:**

- I would like the board to address the size restriction of only keeping 2 pike over 30 inches for the Tolovana River drainage pike subsistence fishery.
- Having to release fish because they exceed 30" after we already have two of this size is burdensome and restricts my family's ability to harvest this important source of food.

**ADF&G RECOMMENDATION: OPPOSE**

*Under the current management plan, harvests have been sustainable. The board adopted changes to the CHA subsistence fishery in 2016, 2017, and 2019 relative to closed areas and size limits, and time is required to evaluate the impacts. Based on the information provided, there have not been any studies since the last regulation change in 2019. Lifting the size restriction of fish 30 inches or greater in length may result in higher harvest rates of female northern pike.*

**YDFDA RECOMMENDATION: OPPOSE**

See comments on Proposal 63. Additionally, current regulations tend to protect the largest norther pike in this fishery from overharvest. Although the target northern pike population is abundant and while the age class composition data indicates an adequate number of fish over 24 and 30 inches, the effects of previous, recent, restrictive regulations need to be assessed. Therefore, YDFDA currently opposes any regulatory changes for this fishery at this time.

\*\*\*\*\*



# TANANA DRAINAGE SPORT FISHERIES

10 Proposals; Proposals 65-74

[View PDF of all proposals for Tanana Drainage Sport Fisheries](#)

## PROPOSAL 65

### 5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.

**PROPOSED BY:** [Midnight Sun Fly Casters](#)

**Purpose:** Require retention of sport caught salmon, if removed from the water, in the Tanana River Area

**What would be the effect if this proposal were adopted?** *This would increase regulatory complexity and unnecessarily impact sport fishing opportunity in the absence of a measurable biological benefit. The department encourages anglers to use best practices when handling and releasing all sport caught fish.*

#### **Rationale by Proponent:**

- Runs of Chinook, coho, and chum salmon throughout the Yukon and Tanana drainages have not met escapement goals, resulting in subsistence and sport fishing closures.
- The sport fishing community wishes to contribute towards minimizing stress and mortality of salmon species that can be caused through catch-and-release angling.
- Scientific studies have shown that removing fish from the water, thereby depriving them of oxygen, is the main cause of catch-and-release stress and mortality.
- Therefore, it is proposed that regulations be adopted throughout the Tanana drainage in which anglers may not remove a salmon from the water if they are not retaining it as part of their bag limit.
- Similar regulations are in place in the Susitna River drainage of Southcentral Alaska for Chinook and coho salmon,

#### **ADF&G RECOMMENDATION: OPPOSE**

*This would increase regulatory complexity and unnecessarily impact sport fishing opportunity in the absence of a measurable biological benefit. The department encourages anglers to use best practices when handling and releasing all sport caught fish.*

#### **YDFDA RECOMMENDATION: SUPPORT**

YDFDA SUPPORTS this proposal because it aligns regulations with other areas and this proposal supports good management practices for these fish species.

\*\*\*\*\*



**PROPOSAL 66**

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee

**Purpose:** Allow a catch-and-release fishery for northern pike in Harding Lake,

**What would be the effect if this proposal were adopted?** *This would provide catch-and-release sport fishing opportunity for northern pike in Harding Lake. A small level (<5%) of hooking mortality would be incurred on a rebuilding northern pike population. This may delay the recovery of the northern pike population to historical levels.*

**Rationale by Proponent:**

- Sportfishing for northern pike has been closed to fishing since 2000 in Harding Lake because of declining abundance during the 1990s.
- These restrictions did not lead to an increase in abundance of northern pike.
- Northern pike abundance in Harding Lake is a function of available spawning and rearing habitat.
- The water level in Harding Lake is nearly 4 feet higher than in 2012 and there have been substantial increases in spawning and rearing habitat.
- Recent surveys of northern pike population indicate recruitment of young northern pike has increased.
- A catch-and-release fishery for northern pike is sustainable at all lake levels

**ADF&G RECOMMENDATION: OPPOSE**

*The department prefers to see the Harding Lake northern pike population recover prior to opening the fishery to catch-and-release or harvest. Although the lake water level in Harding Lake has risen and there is an apparent increase in recruitment of northern pike, the recovery of the northern pike population 25 is still ongoing. Any additional fishing mortality due to catch-and-release fishing may impair recovery of the population to a level that can support harvest or a catch-and-release fishery.*

**YDFDA RECOMMENDATION: SUPPORT.**

The northern pike population in Harding Lake is currently rebounding after years of drought that effectively eliminated adult northern pike from accessing the spawning area of Harding Lake. Current lake levels over the past few years have allowed pike access to these spawning areas and subsequently recruitment to the population has been observed. Additionally, mortality of fish caught and released is relatively low (<5%), especially for Northern pike and especially when unbaited hooks are mandated. The population is probably at a point where a catch-and-release fishery should be allowed. The cost to the population of less than 5% should not preclude providing this opportunity to sport fish for northern pike in Harding Lake. Therefore, YDFDA is in support of this proposal with the recommendation that only unbaited hoods are mandated.

\*\*\*\*\*



**PROPOSAL 67**

**5 AAC 74.030. Methods, means, and general provisions Finfish.**

**PROPOSED BY: Midnight Sun Fly Casters**

**Purpose:** Prohibit retention of northern pike caught on set lines in the Tanana River drainage.

**What would be the effect if this proposal were adopted?** *There would be no effect because retention of northern pike on set lines is already prohibited in regulation.*

**Rationale by Proponent:**

- The current regulation does not clearly state whether pike caught on burbot setlines may be retained.
- When members of the Midnight Sun Fly Casters have discussed the specifics and the intent of regulations for set lines with officials, Alaska State Troopers and Fisheries Management Biologists have indicated that pike cannot be targeted and retained, as this gear type is intended only for capture of burbot.
- The ambiguity in the regulations has led to multiple observations of anglers retaining pike caught on set lines.
- We propose a clearer statement be included in the regulations that will minimize angler confusion and honor the intent of set line regulations, so that northern pike are not targeted/retained, and their populations are not depleted to the detriment of other sport anglers.

**ADF&G RECOMMENDATION: NO ACTION**

*The current regulations already prohibit retention of northern pike caught on set lines. To reduce public confusion, the department will provide better clarity in future versions of regulation summaries and other media content.*

**YDFDA RECOMMENDATION: OPPOSE**

Mortality of fish released from a set line set with bait is much greater than those caught on hook and line. Additionally, when set lines are set according to regulation with the bait on the bottom of the waterway, the incidence of catching non-target fish is low. If adopted, this proposal will mandate that any northern pike and other non-target fish, whether alive or dead, must be released when caught using a set line within the Tanana River drainage. Since bait is used on set line hooks, there is a great probability that the fish will swallow the hook, resulting in mortally wounding the fish when the hook is removed. Therefore, YDFDA opposes this proposal primarily because of waste of a wild resource. However, YDFDA recommends that the BOARD clarify the regulation if need be. YDFDA also recommends that the intent of the regulation be clearly stated so that norther pike and other non-target fish are not targeted by the fisherman. The Department should address hooking mortality of northern pike caught in set lines in their comments.

\*\*\*\*\*



**PROPOSAL 68**

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY:** Upper Tanana Fortymile Advisory Committee

**Purpose:** Repeal setline prohibition and bag and possession limit for burbot in T Lake.

**What would be the effect if this proposal were adopted?** *This would repeal the set line prohibition and bag and possession limit for burbot in T Lake.*

**Rationale by Proponent:**

- The current regulation for burbot in T lake is two fish with no size limit and is unnecessarily restrictive compared to the more accessible lakes for burbot that receive higher pressure and are less restrictive.
- Changing the regulations to the general regulations of 5 fish per day, no size limit, and use of setlines would reduce regulatory complexity.
- T Lake is a remote lake only accessible by light aircraft and fishing generally occurs for northern pike.

**ADF&G RECOMMENDATION: OPPOSE**

*T Lake has a small population of burbot that could be easily overexploited with even a small level of fishing effort if set lines were allowed and the bag and possession limit were increased. Incidental fishing mortality of northern pike caught would also increase because they may not be retained on set lines.*

**YDFDA RECOMMENDATION: SUPPORT THE INTENT**

Access is currently limited to float planes. The trail to the lake has not been maintained and is currently not used because of a large number of trees that have fallen that resulted from recent fires. At this time, because of the limited access and participation in this fishery, YDFDA believes that less restrictive regulations are warranted. Therefore, YDFDA supports the intent of this proposal. YDFDA recommends that the BOARD accepts recommendations on bag limits and size restrictions from ADF&G.

\*\*\*\*\*



## **PROPOSAL 69**

### **5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY:** Shann Paul Jones

**Purpose:** Restrict the sport fishing season for Arctic grayling in the lower Chena River. Close sport fishing for Arctic grayling in the Chena River and its tributaries, including Chena Slough (Badger Slough), downstream from an ADF&G regulatory marker located 300 feet downstream from the Chena River flood control structure, from April 1 through May 15.

**What would be the effect if this proposal were adopted?** *This would eliminate sport fishing opportunity for Arctic grayling downstream of the Moose Creek Dam during April and a portion of May.*

#### **Rationale by Proponent:**

- There has been increase and pronounced early season sportfishing pressure on Arctic Grayling in the lower Chena River and its tributaries, including Chena Slough (Badger Slough) .
- This is due to increasing population and these waters being the first and only ice-free waters in the regions during this time of year.
- Over the past 25 years of fishing these waters, I have notice more anglers using treble hooks (although illegal), and increasingly poor landing and releasing technique with arctic grayling.
- I have witnessing scores of injured, mangled and dead arctic grayling while fishing on the lower Chena River and its tributaries, including Chena Slough (Badger Slough) during late-April and early-May each year.
- Although these waters are regulated as Catch-and-Release for arctic grayling, if a limited closure is not instituted during the time the arctic grayling are preparing to spawn, and until other Interior waters are ice-free, this population will be at high risk for future sustainability.

#### **ADF&G RECOMMENDATION: OPPOSE**

*The fishery is sustainable because abundance estimates of Arctic grayling in the Chena River indicate an increasing spawning population and fishing effort and catches have decreased over the last 30 years. The mainstem Chena River is high and turbid after breakup, which greatly limits catch rates, but Badger Slough is spring-fed and remains clear.*

#### **YDFDA RECOMMENDATION: OPPOSE**

Within the Tanana River drainage, the population of Arctic grayling has rebounded from the previous low populations observed in the 1980's and 1990's. This was the direct result from very restrictive fishing regulations. Currently, there is an abundant Arctic grayling population with good age-class structure. YDFDA believes that there is no need for more restrictive regulations at this time. YDFDA also believes that a regulation closing a fishery when anglers are frantic for some open-water fishing after a long winter because a few anglers are not



following regulations is poor management. Further, catch-and-release mortality on Arctic grayling is low and inconsequential to the population. If adopted, this proposal will restrict sport fishing opportunity for no good biological reason.

\*\*\*\*\*



## PROPOSAL 70

### 5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee

**Purpose:** Allow retention of one Arctic grayling on the lower Chena River, downstream of Moose Creek Dam (300' downstream of Chena Food control project) June 1 – March 31.

**What would be the effect if this proposal were adopted?** *The harvest of Arctic grayling downstream of the Moose Creek Dam would increase and anglers of all ages would have the opportunity to harvest an Arctic grayling in the Chena River. Opportunity for youth to fish free of competition from anglers 16 years or older would be lost when the youth fishery regulations are repealed*

#### **Rationale by Proponent:**

- The current regulations deny adult anglers the opportunity to harvest Arctic grayling in the Chena River. There is a youth fishery where one Arctic grayling can be retained from the Chena River during a youth fishery.
- A limited harvest fishery (1 fish daily bag limit, June 1 – March 31) in the lower river (below Moose Creek dam) would allow harvest on the younger (3-6 years old), smaller grayling.
- Larger, older (7-25 years old) Arctic grayling will be in the upper river where catch and-release fishing will continue to be allowed.
- This proposal would protect larger, older fish while allowing some harvest opportunity in the lower river.
- A current study will describe the spring spawner abundance and their migrations upstream after spawning. The data from the study is expected to show that A) the Chena River has a healthy population of Arctic grayling and B) the older, larger fish move upstream beyond the proposed limited harvest fishery.
- This proposal will allow a sustainable harvest in the lower river from June 1 through March 31 below the dam, and still preserve the current population characteristics in the upper river.

#### **ADF&G RECOMMENDATION: SUPPPORT WITH MODIFICAITONS**

*The department supports maintaining youth-only fishing opportunity by providing youth-only fishery weekends at the same or some lesser level than what is currently established in regulation. Allowing a 1-fish bag limit during summer in the lower river is likely sustainable because the spring spawning population of Arctic grayling in the Chena River drainage remains protected in the upper section during summer.*

#### **YDFDA RECOMMENDATION: SUPPORT WITH ADFG MODIFICATIONS**

The items or facts presented in this proposal are correct. If adopted, this proposal will allow the retention of smaller Arctic grayling that inhabit this area after the larger Arctic grayling have left for the upper portion of the drainage. This proposal would allow some harvest opportunity in the



lower river while protecting the larger, older Arctic grayling. Therefore, YDFDA supports this proposal and also supports the modifications proposed by the Department.

\*\*\*\*\*



## **PROPOSAL 71**

### **5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee

**Purpose:** Remove the size limit for lake trout in Fielding Lake. In Fielding Lake, allow retention of one lake trout of any size.

**What would be the effect if this proposal were adopted?** *The total harvest of lake trout in Fielding Lake would increase. Anglers who want to retain a lake trout would not be required to measure their fish.*

#### **Rationale by Proponent:**

- In Fielding Lake, the current regulation allows harvest of 1 lake trout over 26 inches in total length.
- This regulation denies anglers opportunity to harvest lake trout less than 26 inches.
- The length limit concentrates fishing on the oldest and largest fish, which reduces the number of bigger fish available to anglers, prevents anglers from retaining a “foul-hooked” fish, and denies anglers the opportunity to choose the size of lake trout to harvest.
- Many anglers have stated that they would like to keep a dinner sized lake trout (14-20 inches), rather than a lake trout >26 inches.
- Based on staff comments presented in 2019, ADF&G stated that the 26-in length limit results in a sustainable yield of 78 fish. Based on the department’s angler surveys, harvest have been well below this level.
- Removal of the length limit would allow a total annual harvest or yield of 202 lake trout. The length limit is unnecessarily restrictive. Similar removals of the length limit did not increased harvests in the Copper River lakes such as Paxson, Summit, Louise, Crosswind, and Susitna Lake.

#### **ADF&G RECOMMENDATION: SUPPPORT**

*Removal of the length limit may increase overall harvest; however, annual fishing mortality would likely remain below 10% of the current abundance of lake trout at Fielding Lake. The proposed regulation is consistent with the Tanana River Area Wild Lake Trout Management Plan.*

#### **YDFDA RECOMMENDATION: SUPPORT**

The population of lake trout in Fielding Lake is good with a good age-structure. Removing the size limit for lake trout in Fielding Lake may provide protection from overharvest of the larger lake trout by allowing fishermen to harvest smaller fish.

\*\*\*\*\*



**PROPOSAL 72**

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY: Alaska Department of Fish and Game**

**PURPOSE:** Allow for catch-and-release fishing in Bathing Beauty Pond, Bear Lake, Moose Lake, Polaris Lake, Piledriver Slough, and Moose Creek,

**What would be the effect if this proposal were adopted?** *Sport fish regulations for these waters would be more easily accessed by anglers because the regulations currently implemented by emergency order would be established in regulation and be included in the annual regulation summary. The department would no longer issue annual emergency orders prohibiting retention of potentially contaminated fish.*

**Rationale by Proponent:**

- In 2019, the board provided the department emergency order authority to restrict stocked waters to catch-and-release fishing when potentially unsafe levels of per- and polyfluoroalkyl substances (PFAS) were detected in the water or fish tissue.
- Bathing Beauty Pond, Bear Lake, Moose Lake, Polaris Lake, Piledriver Slough, and Moose Creek are within or immediately adjacent to ground water plumes contaminated with PFAS, and this contamination will likely persist for an extended period.
- This proposal modifies the bag and possession limits for these lakes to catch-and-release only out of an abundance of caution.

**ADF&G RECOMMENDATION: SUPPORT**

*The department submitted and SUPPORTS this proposal. Adopting this proposal would prevent the consumption of potentially contaminated fish but still provide for fishing opportunity in these waters.*

**YDFDA RECOMMENDATION: SUPPORT**

YDFDA supports this proposal because this proposal would protect the public from toxins potentially within the fish flesh from these waters.

\*\*\*\*\*

**PROPOSAL 73**

**5 AAC 74.010. Seasons, bag, possession, and size limits, and methods and means for the Tanana River Area.**

**PROPOSED BY: Alaska Department of Fish and Game**

**Purpose:** Update the Tanana River Area stocked waters regulations,



**What would be the effect if this proposal were adopted?** *This would make regulations consistent with waters and species currently stocked.*

**Rationale by Proponent:**

- In conjunction with the Alaska Board of Fisheries cycle, the department reviews the stocked waters in each management area.
- Stocked waters are removed from the stocking plan and corresponding regulations due to a loss of public access, poor fish growth or survival, insufficient fishing effort, or contamination.
- In 2020 lake trout were added back into the stocking plan and this proposal includes that species in the bag, possession, and size limit.
- As new waters are identified, and stocked fish species are added and included in the stocking plan they are added to the regulations.
- The proposed language will update the Tanana River Area stocked waters regulations.

**ADF&G RECOMMENDATION: SUPPPORT**

*It will eliminate confusion and apply the correct regulations for species stocked, both to newly stocked waters and to waters no longer stocked.*

**YDFDA RECOMMENDATION: SUPPORT**

YDFDA supports this proposal because it is a housekeeping proposal that keeps the stocking plan current.

\*\*\*\*\*



**PROPOSAL 74**

**5 AAC 74.065. Tanana River Area Stocked Waters Management Plan.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Update the Tanana River Area Stocked Waters Management Plan.

**What would be the effect if this proposal were adopted?** *This would make regulations consistent for all stocked species and waters and would provide consistency for lake trout between general regulations and stocked waters in the Tanana Management Area.*

**Rationale by Proponent:**

- In 2020 the department added lake trout into the stocking program. Under current regulations for stocked waters lake trout are not included.
- Under the Regional management approach, which is the least restrictive of the management approaches, the regulations are 10 fish in combination of all stocked species only one of which may be 18 inches or greater in length.
- The Conservative management approach is the moderately restrictive management approach, and the regulations are five fish in combination of all stocked species only one of which may be 18 inches or greater in length.
- To remain consistent with general regulations for lake trout in the Tanana Management Area, it is recommended that the stocked lake trout be added to the “stocked species” designation and have a bag and possession limit of two fish.

**ADF&G RECOMMENDATION: SUPPPORT**

**YDFDA RECOMMENDATION: SUPPORT**

YDFDA supports this proposal because it is primarily a housekeeping proposal that adds lake trout to the Tanana River Area Stocked Waters Management Plan with an appropriate bag limit.

\*\*\*\*\*



# YUKON SUBSISTENCE AND PERSONAL USE FISHERIES

7 Proposals; Proposals 79-85

[View All proposals for Yukon Subsistence and Personal Use Fisheries](#)

## **PROPOSAL 79**

### **5 AAC 01.220. Lawful gear and gear specifications.**

**PROPOSED BY:** Koyukuk River Fish & Game Advisory Committee

**PURPOSE:** Allow hook and line attached to a rod or pole when subsistence fishing upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and the subsistence permit area.

**What would be the effect if this proposal were adopted?** *This would make regulations consistent for all stocked species and waters and would provide consistency for lake trout between general regulations and stocked waters in the Tanana Management Area.*

**Rationale by Proponent:**

- The Koyukuk River Advisory Committee would like to include hook and line gear to the waters of the Yukon River upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk, and the subsistence permit area of the South Fork and Middle Fork Koyukuk.

**ADF&G RECOMMENDATION: SUPPPORT**

*The department SUPPORTS this proposal to be consistent with current fishery practices and to support social and economic benefits. This proposal would add options to legal subsistence gear in a portion of District 4. Currently state and federal regulations are inconsistent: in federal public waters of the Yukon River drainage, rod and reel is legal gear for subsistence harvest of salmon and nonsalmon species by federally qualified users.*

**YDFDA RECOMMENDATION: SUPPORT**

This proposal coordinates state and federal regulations and aligns with current fishery practices.

\*\*\*\*\*



## **PROPOSAL 80**

### **5 AAC 01.220. Lawful gear and gear specifications.**

**PROPOSED BY: John H. Lamont**

**Purpose:** Restrict subsistence king salmon harvest in the middle and upper Yukon River. Regulate the number of Chinook Salmon that may be harvested under the definition of subsistence on the middle and upper Yukon River in Alaska until such time the Alaska Department of Fish and Game and the US Fish and Wildlife Service can provide factual data on the numbers of Chinook Salmon that make it to spawning grounds, are harvested under subsistence and listen to the people who know and witness others harvesting Chinook Salmon for sales under “Customary Trade.”

**What would be the effect if this proposal were adopted?** *Households in Districts 4, 5, and 6 would harvest a limited number of king salmon. This would likely require an expansion of the current subsistence permit system.*

#### **Rationale by Proponent:**

- Stakeholders on the mouth of the Yukon River (Y-1, Y-2 and Y-3) in Alaska have depended on Chinook Salmon commercial sales during the months of June and July to maintain their subsistence way of life since the early 1900’s.
- Regulations on the harvesting season and limiting the number of salmon that can be harvested began in the 1960s and are currently extremely severe. The subsistence fishery as well as the commercial fisheries are now closed.
- This began the downward trend of our traditional commercial fishery also known as our subsistence utilization for our food security (using our commercial trade with canneries to live throughout the winters by buying needed supplies to gather, harvest and create/trade items such as arts and crafts, fur pelts, and other sought after items to maintain our healthy way of life).
- The issue now is that the harvesting of Chinook Salmon has been moved by regulation to the Middle and Upper Yukon River under the definition of “Subsistence.”
- Presently, there are many Chinook Salmon unaccounted for (60 to 100 thousand in some years) and the Alaska Department of Fish and Game collaborating with the United States Fish and Wildlife Service fail to identify where these salmon are going.
- Yet, in social media one sees many Chinook Salmon drying on racks and in smoke houses on the banks of the middle and upper Yukon River. I also know and have seen sales of this finished product throughout the winters.
- When addressed at the Federal level, I am continually told that this is allowed under “Customary Trade.” All my years as a Traditional Commercial Salmon Fisherman on the mouth of the mighty Yukon River and those before me know for a fact that “Customary Trade” meant trading ones product for other products and not for money. This definition needs to be corrected.
- Under ANILCA the Secretary of Interior wanted to include the commercial Chinook Salmon Fishery as subsistence since it was 100% utilized by local indigenous Peoples and strictly for maintaining their subsistence way of life.



**ADF&G RECOMMENDATION: OPPOSE and is NEUTRAL on the allocative aspects.**

*The department OPPOSES this proposal and is NEUTRAL on the allocative aspects. Existing regulations already provide the department with management discretion by emergency order to limit the time and gear by district for the harvest of king salmon in the subsistence fishery.*

**YDFDA RECOMMENDATION: OPPOSE**

The proposer seems to be identifying a perceived enforcement issue and proposes to solve this issue through restricting harvest. Although the proposer wants the BOARD to restrict king salmon subsistence harvest in the middle and upper Yukon River, the proposer does not propose a method to restrict harvest. Currently, in areas of the Yukon River drainage in Alaska where a permit is not required, there is not a daily or annual limit on the number of salmon that a subsistence fisherman could harvest. A permit system could be initiated with the intent to restrict harvest, but YDFDA does not believe a permit system restricting harvest will solve the perceived issue of regulation noncompliance associated with the sale of subsistence-caught salmon. YDFDA believes that any noncompliance of regulations should be addressed through enforcement of current regulations and not through adopting more restrictive regulations.

Under state regulations, it is generally illegal to sell subsistence-caught fish. However, sale of subsistence-caught fish is allowed for small amounts of cash but the subsistence fisher would need to sell the fish under a regulation as through a permit system, as in Norton Sound. There is no regulatory method to sell subsistence caught fish under state regulations within the Yukon Area. Under no circumstances processed fish could be sold under state and federal regulations without a permit from the Alaska Department of Environmental Conservation. Under federal regulations, the sale of subsistence-caught fish is legal under the customary trade regulations. However, the fish must be caught within waters where the federal government claim a federal water reserve right and must be sold to other federally qualified subsistence users. Fish sold other than in the round would necessitate a permit from The Alaska Department of Environmental Conservation. Lacking such a permit would necessitate the federally-qualified subsistence user to only sell the legally caught fish in the round.

ADF&G and USFWS recognize that there may be “missing fish” between the mainstem sonar at Pilot Station and the U.S./Canada border passage and escapements throughout the Yukon River drainage above the sonar site. A tagging study will commence in 2023 to investigate what maybe happening to these “missing fish”. Note also that ichthyophonous has been documented in Yukon River Chinook salmon and may be contributing to the perceived problem.

\*\*\*\*\*



## **PROPOSAL 81**

### **5 AAC 39.250. Gillnet specifications and operations.**

**PROPOSED BY:** Fairbanks Advisory Committee Fisheries Sub-Committee

**Purpose:** Implement a Yukon River drainage subsistence salmon permit to allow retention of king salmon less than 24 inches in length with an annual limit 10 fish during times of king salmon conservation

**What would be the effect if this proposal were adopted?** *During times of king salmon conservation, subsistence fishermen may be able to retain up to 10 king salmon 24 inches or less in length during openings with dip nets and closely attended fish wheels when the permit system is implemented. Yukon Area households would be required to obtain a subsistence permit, record king salmon harvest daily, and return permits by October 31.*

#### **Rationale by Proponent:**

- Retention of Chinook (king) salmon is normally not permitted during summer chum subsistence openers when Chinook salmon conservation management is applied on the Yukon River.
- Under 5 AAC 01.220 (n) (3) (4) Lawful gear and gear specifications, the ADF&G commissioner may allow, by emergency order, Chinook retention utilizing specific gear types.
- Adding a section (n) (5) to allow retention of Chinook salmon 24 inches and under while utilizing only dipnets or manned fishwheels will focus on the retention of small king salmon only.
- There are multiple needs for subsistence fishermen as well as fish in years of extreme low abundance. With the continued downward trajectory of Chinook salmon in size and run strength and the periodic crashes of summer and fall chum salmon, the pressure for food security is immense.
- When there is an allowable chum opener for subsistence with a gear type restriction to dipnets and manned fishwheels, the retention of small Chinook salmon under 24 inches (60.9cm / approximately 6 pounds) caught in a dipnet or manned fishwheel should be allowed.
- The theory is that these undersized kings do not substantively contribute to ASL (age-sex-length) spawning aggregate in a time when focus is on increasing size genetics.
- Further, a very limited harvest of undersized kings utilizing only dipnets and manned fishwheels as a gear type will allow easy measurement of a fish from nose to fork in tail, allowing bigger fish to be released unharmed from a net or fishwheel live box.
- However, recognizing that small (jack) male salmon can contribute to increased abundance, this recommendation should be tied to estimated spawning abundance in both Alaskan and Canadian Chinook stocks.

#### **ADF&G RECOMMENDATION: OPPOSE and is NEUTRAL on the allocative aspects.**

*The department OPPOSES this proposal and is NEUTRAL on the allocative aspects. Implementation of the proposed permit system is inconsistent with current subsistence fishing regulations because the stock assessment, harvest, and abundance data are based on the total number of king salmon of all sizes*



*inseason, and preseason outlooks are highly uncertain. Additionally, it is unclear what the criteria for implementation of this permit system would be based on.*

**YDFDA RECOMMENDATION: OPPOSE**

Within the Yukon Area, king salmon escapement is measured in number of fish and not in large fish. Therefore, when conservation management is applied on the Yukon River, all king salmon that arrive on the spawning grounds contribute to the escapement. Harvesting any king salmon, whether small, 24 inches or less, or large, female or male, when the river is under conservation management and a harvestable surplus is not identified, removes king salmon from the escapement and affects the achievement of the escapement goal. The current management strategy for time and area openings only when there is a harvestable surplus is identified is appropriate and enforceable. If adopted, this regulation most likely could not be enforced. Therefore, YDFDA opposes this proposal.

\*\*\*\*\*



**PROPOSAL 82**  
**5 AAC 39.250. Gillnet specifications and operations.**

**PROPOSED BY:** Alaska Department of Fish and Game

**PURPOSE:** Modify the dates sinking of gillnets is allowed in the Yukon Area from October 1 to April 30

**What would be the effect if this proposal were adopted?** *This would require gillnets to have visible float line and floats on the surface of the water in the Yukon Area between May 1 and September 30 for subsistence, personal use, and commercial fishing.*

**Rationale by Proponent:**

- This proposal would modify the dates when gillnets are allowed to be fished without the float line on the surface of the water in the Yukon Area.
- During salmon seasons, from May 1 to September 30, the float line and floats must be floating on the surface.
- Submerged gillnets are less visible and may be difficult to observe if fishing illegally during closed periods.
- Allowing a gillnet to be in a fishing condition with floats not visible on the surface of the water is a navigation hazard.

**ADF&G RECOMMENDATION: SUPPORT.**

*In the Yukon Area, float lines and floats that are visible on the water surface between May 1 and September 30 are beneficial for boater safety, salmon stock management, and enforcement. Fully submerged gillnets will still be allowed during winter fisheries*

**YDFDA RECOMMENDATION: SUPPORT**

\*\*\*\*\*



## **Proposal 83**

### **5 AAC 77.171. Lawful gear for personal use finfish fishing.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** After August 15, a person may not take salmon with a gillnet that has a mesh size greater than six inches in the Yukon Area Personal Use Salmon Fishery.

**What would be the effect if this proposal were adopted?** *This would make the use of 6-inch or less mesh size gillnets uniform between commercial, subsistence, and personal use fisheries for fall chum and coho salmon. The 6-inch or less mesh sizes are already commonly used and would reduce directed harvest on larger, older fall chum salmon that make up a smaller portion of the population and allow for greater protection of late-arriving king salmon when conservation is warranted. The department submitted a similar proposal (84) for subsistence fishing during the fall season within the Yukon River drainage.*

#### **Rationale by Proponent:**

- This proposal would require gillnet mesh to be six inches or less in the personal use salmon fishery during the fall season in Subdistrict 6-C of the Tanana River drainage.
- This would make the use of gillnets six inch or less mesh size uniform between commercial, subsistence, and personal use fisheries.
- The department submitted a similar proposal for subsistence fishing during fall season within the Yukon Area.
- The smaller mesh sizes are already commonly used and would allow for greater protections for late arriving king salmon and reduce directed harvest on larger, older fall chum salmon that make up a smaller portion of the population.

#### **ADF&G RECOMMENDATION: SUPPORT.**

*This would make the use of 6-inch or less mesh size gillnets uniform between commercial, subsistence, and personal use fisheries for fall chum and coho salmon. The 6-inch or less mesh sizes are already commonly used and would reduce directed harvest on larger, older fall chum salmon that make up a smaller portion of the population and allow for greater protection of late-arriving king salmon when conservation is warranted. The department submitted a similar proposal (84) for subsistence fishing during the fall season within the Yukon River drainage.*

#### **YDFDA RECOMMENDATION: OPPOSE**

YDFDA recognizes that during king salmon conservation, the use of gillnets greater than six inches should be prohibited throughout the fishing season. However, this could be, and currently is, achieved through Emergency Order Authority. It need not be in regulation. YDFDA opposes this proposal because we believe that the king salmon population will rebound and that harvestable surpluses for all fisheries will be available. This proposal, if adopted, would restrict opportunity for personal-use fishermen to harvest a late-arriving king salmon when there is a harvestable surplus available and no need for restriction. Additionally, YDFDA believes that six-inch mesh and smaller mesh are much more efficient at catching fall run fish. When targeting Fall Chum and/or Coho salmon, very few people would use gillnets with mesh size



greater than six inches. Therefore, the over harvest of the larger, older fall chum salmon should not be a concern. Additionally, windows in the fisheries would ameliorate the impact of the harvest of the larger and older fall fish using mesh size greater than six inches. YDFDA opposes this proposal in the personal use fishery as well as the proposal for the subsistence fishery and fall season commercial fishing regulation. Additionally, when king salmon are abundant and Fall Chum salmon and/or Coho salmon runs are low, the use of mesh size larger than 6.0 in may be warranted. If this proposal is adopted, then the use of any mesh size greater than 6.0 would be eliminated from use in this fishery. It removes a tool from the ADF&G management toolbox that could be used to provide opportunities for harvest of the more abundant salmon species.

\*\*\*\*\*

## **PROPOSAL 84**

### **5 AAC 77.171. Lawful gear for personal use finfish fishing.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Repeal and readopt Yukon Area subsistence fishery lawful gear and gear specifications,

**What would be the effect if this proposal were adopted?** *During times of king, chum, or coho salmon conservation, this proposal would allow for more flexibility in the management of overlapping king, chum, and coho salmon runs. It would provide additional management tools that could allow better targeting of abundant salmon species while minimizing or eliminating the harvest of less abundant salmon species to achieve escapement goals. References to 8-inch mesh would be removed. Operation of 4-inch or smaller mesh for nonsalmon would be made uniform throughout the drainage. During times of conservation gillnets may be required to be operated as a set net and could be limited in distance from the shore.*

#### **Rationale by Proponent:**

- Regulations for lawful gear and gear specifications in the Yukon Area have been modified many times in the past and need to be revised for clarity and to reflect current practices.
- Proposed changes address the updated restriction on the maximum mesh size allowed in the Yukon Area (gillnets of seven and one-half inches) and remove outdated instances of eight-inch or larger mesh gillnets.
- Additions align with current or longstanding fishing practices or are necessary for sustainability of salmon populations and an orderly fishery.
  - adding eel stick to legal subsistence fishing gear;
  - clarifying dip net operation;
  - relaxing minimum distance between subsistence gear with low harvest potential and maintaining 200 feet between set gillnets and fish wheels;



- applying seven and one-half mesh size to all gillnet fishing during the year, not just for salmon fishing;
- reducing the maximum mesh size to six-inch or less gillnets for the fall chum and coho salmon season;
- relaxing the maximum mesh size to four-inch or less gillnets portions of Beaver and Birch Creek; and
- specifying four inch or less mesh size gillnet operation during times of conservation.
- New additions to regulations include:
  - The Yukon Area currently has several management actions available for the protection of king or chum salmon, while still being able to provide harvest opportunity on more abundant salmon species that have overlapping run timings.
  - The department needs greater flexibility to be able to provide subsistence harvest opportunity on abundant salmon species while providing protections to less abundant salmon species.
  - This proposal also establishes alternative and aligned gears during times of salmon conservation and allows the department to specify which species may be retained from selective gear types.
  - This will allow for a more adaptive management strategy benefitting subsistence users.

#### **ADF&G RECOMMENDATION: SUPPORT.**

*The department is NEUTRAL on the allocative aspects of this proposal. The department submitted and SUPPORTS this proposal containing modifications to Yukon Area regulations that provide subsistence fishing opportunity while conserving salmon to meet escapement goals and to clarify existing regulations. The Yukon Area currently has several gear options available for the protection of king and chum salmon, while still being able to provide harvest opportunity on more abundant salmon species that have overlapping run timings. Conservation gear options available for chum salmon are inadequate and nonexistent for coho salmon or other salmon species (sockeye or pink salmon). Furthermore, current regulations are not aligned with specific gear operations for chum and king salmon when concurrent conservation measures are needed for both species (beach seines). Under conservation gear regulations, additional options were added for specifying mesh size, net length, and distance from shore by emergency order. Gillnets of 4.75-in or less mesh are already allowed in the Lower Yukon during the pink salmon commercial fishery. Adding this mesh size to conservation gear will provide management flexibility to allow harvest opportunity for pink salmon while conserving chum and king salmon. In general subsistence regulations, the proposed changes are aligning with current subsistence fishing practices in the Yukon Area (distance of gear, eel sticks, dip net operations, etc.) or aligning maximum gillnet mesh size with commercial fishing regulations for fall chum and coho salmon. Other portions of the proposed changes simplify management and align a maximum mesh size of 4-inch or less gillnets in Birch Creek and portions of Beaver Creek with nonsalmon gear in the rest of the drainage. Proposals 83, 85, 87, 88, and 89 provide additional detail on subsistence gear regulations and align personal use and commercial regulations with proposed subsistence regulations.*



**YDFDA RECOMMENDATION: SUPPORT with minimal opposition to part of this proposal.**

YDFDA generally supports this proposal but is in opposition to “*reducing the maximum mesh size to six-inch or less gillnets for the fall chum and coho salmon season*” for reasons stated under proposal 83 (above). YDFDA is in opposition to the elimination of gillnets greater than six inches during the fall season. Restricting gillnets to six inches or less during any season can be and should be done through Emergency Order Authority. If adopted, the portion which restricts gillnets to a maximum of six inches reduces the flexibility of the department to manage harvestable surpluses of salmon during the fall season. We anticipate that harvestable surpluses of king salmon will eventually return to the Yukon River and at that time, the use of gillnet mesh would be warranted. The portion of this proposal would essentially eliminate the opportunity to harvest late-arriving king salmon during the fall season. Although the use of gillnets greater than 6.0 in will not be used in the foreseeable future, it does not make sense to remove this tool from the ADF&G toolbox because YDFDA believes that the king salmon will return to the Yukon River in the future.

Most of this proposal is beneficial to the fishers of the Yukon Area. Most notably, it adds eel stick to legal subsistence fishing gear, it clarifies regulations regarding dip net operation to allow for current practices and allows selective gear to be used during the fall season.

Therefore, YDFDA is in support of this proposal with the exception of the six-inch maximum mesh size portion.

\*\*\*\*\*



## **PROPOSAL 85**

### **5 AAC 77.171. Lawful gear for personal use finfish fishing.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Modify Yukon Area Personal Use Salmon Fishery specifications for selective gear types and gillnet mesh size during times of salmon conservation.

**What would be the effect if this proposal were adopted?** *These gear changes will likely reduce incidental salmon harvest during poor salmon runs and allow conservation gear to apply to all salmon species as needed.*

#### **Rationale by Proponent:**

- The Yukon Area currently has several management options available for the protection of king or chum salmon, while still being able to provide harvest opportunity on more abundant salmon species that have overlapping run timings.
- The department needs greater flexibility to be able to provide harvest opportunity in the personal use fishery on abundant salmon species while providing protections to less abundant salmon species.
- This proposal would establish alternative options and aligned gears during times of salmon conservation and allow the department to specify which species may be retained from selective gear types.
- This will allow for a more adaptive management strategy benefitting participants in the personal use fishery.
- Additionally, this proposal removes the option for gillnets with eight-inch or greater mesh and amends the maximum mesh size to seven and one-half or inch less mesh size.

#### **ADF&G RECOMMENDATION: SUPPORT.**

*The department submitted and SUPPORTS this proposal. The options of selective gear will benefit Tanana River personal use permit holders. The proposed changes allow more flexibility to conserve coho salmon while providing harvest opportunity for fall chum salmon when the fishery might have been closed. The modifications to the conservation gear type and operation provide more flexibility to offer harvest opportunity instead of fishery closures. These changes would align with subsistence conservation gear regulations in Proposal 84.*

#### **YDFDA RECOMMENDATION: SUPPORT**

\*\*\*\*\*



# YUKON SPORT FISHERIES

1 proposal; Proposal 86

[View PDF of all proposals for Yukon Sport Fisheries](#)

## **PROPOSAL 86**

### **5 AAC 73.010. Seasons, bag, possession, and size limits, and methods and means for the Yukon River Area.**

**PROPOSED BY:** Midnight Sun Flycasters

**Purpose:** Require retention of sport caught salmon, if removed from the water, in the Yukon River Area,

**What would be the effect if this proposal were adopted?** *This would change angling habits in ways that are difficult to anticipate. Anglers may choose to harvest fish that would have otherwise been photographed and released for the sake of obtaining a photo. For many anglers, the trophy is the photo, and this may increase retention in situations that would have otherwise resulted in a catch-and-release event. This may also reduce catch-and-release mortality by an unknown, but likely minimal amount and may increase harvest by an unknown amount. This would increase regulatory complexity.*

#### **Rationale by Proponent:**

- During the past several years, runs of Chinook, coho, and chum salmon throughout the Yukon drainage have not met escapement goals, resulting in subsistence and sport fishing closures.
- The proponent wishes to contribute towards minimizing stress and mortality of salmon species that can be caused through catch-and-release angling.
- Scientific studies have shown that removing fish from the water, thereby depriving them of oxygen, is the main cause of catch-and-release stress and mortality.
- Therefore, it is proposed that regulations be adopted throughout the Yukon drainage in which anglers may not remove a salmon from the water if they are not retaining it as part of their bag limit.
- Similar regulations are in place in the Susitna River drainage of Southcentral Alaska for Chinook and coho salmon, with the goal to minimize catch-and-release stress on these popular and important food fishes.
- If this regulation is adopted, sport fishermen can do their part to facilitate the rehabilitation of salmon stocks in the Yukon River drainage.
- This will help ensure that subsistence fishers regain food security associated with catching salmon, and will enhance opportunities for sport fishers to catch salmon into the future, for sustenance and for recreation.

#### **ADF&G RECOMMENDATION: OPPOSE**

*The department OPPOSES this proposal. This would increase regulatory complexity and unnecessarily impact sport fishing opportunity in the absence of a measurable biological benefit. The department encourages anglers to use best practices when handling and releasing all sport caught fish.*



**YDFDA RECOMMENDATION: SUPPORT**

\*\*\*\*\*



# YUKON COMMERCIAL FISHERIES

3 Proposals: Proposals 87-89

[View PDF of all proposals for Yukon Commercial Fisheries](#)

## **PROPOSAL 87**

### **5 AAC 39.105. Types of legal gear.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Define eel stick

**What would be the effect if this proposal were adopted?** *Eel sticks would become allowable legal fishing gear for subsistence and would be recognized as a commercial fishing gear type for lamprey. It is unlikely that eel sticks will substantially change the quantity of lamprey harvested.*

**Rationale by Proponent:**

- This would add eel sticks as a legal gear for commercial and subsistence fishing.
- An additional department proposal was submitted to add this as a legal gear type for subsistence fishing.
- The commercial fishery for Arctic lamprey (eels) operates under a commissioner's permit that allows commercial permit holders to use dip nets and eel sticks; however the eel stick is not included in regulations.
- Statewide provisions (5 AAC 01.010 (1)) for subsistence gear would refer to and include this addition.
- Eel sticks are traditionally used in Districts 2, 3 and 4 for harvesting Arctic lamprey for commercial and subsistence purposes through the ice.
- Eel sticks are described in Subsistence Division Technical Paper No. 289 (<http://www.adfg.alaska.gov/techpap/tp289.pdf>)
- on management plans for chum and king salmon; however, the department would like the ability to use these live-release gears for all salmon species to harvest abundant salmon species that have overlapping run timings.
- Stating conservation gear regulations in this commercial section simplifies the regulations and will allow for a more adaptive management strategy benefitting commercial users.

**ADF&G RECOMMENDATION: SUPPORT**

*The department submitted and SUPPORTS this proposal to be consistent with current and traditional fishery practices and to provide for social and economic benefits that might otherwise be forgone.*

**YDFDA RECOMMENDATION: SUPPORT**

\*\*\*\*\*



## **PROPOSAL 88**

### **5 AAC 05.331. Gillnet specifications and operations.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Repeal and replace Yukon Area commercial salmon fishing gear specifications.

**What would be the effect if this proposal were adopted?** *This would simplify and align Yukon Area commercial salmon regulations, remove an outdated maximum mesh size, and apply selective gear for conservation to all salmon species.*

#### **Rationale by Proponent:**

- Current commercial gillnet specifications and operation requirements in the Yukon Area contain inconsistencies and do not provide for selective gear options that allows for the harvest or live release of all salmon species.
- These changes include aligning District 5 with all other Yukon districts to include a maximum mesh size of six-inch gillnets and removes outdated instances of eight-inch or larger mesh gillnets in the Yukon Area.
- Additionally, selective gear used during times of conservation of salmon species is stated in the individual salmon management plans for chum and king salmon; however, the department would like the ability to use these live-release gears for all salmon species to harvest abundant salmon species that have overlapping run timings.
- Stating conservation gear regulations in this commercial section simplifies the regulations and will allow for a more adaptive management strategy benefitting commercial users.

#### **ADF&G RECOMMENDATION: SUPPORT**

*The department submitted and SUPPORTS this proposal to be consistent with current and traditional fishery practices and to provide for social and economic benefits that might otherwise be forgone.*

#### **YDFDA RECOMMENDATION: SUPPORT WITH MODIFICATIONS**

This is generally a housekeeping proposal that benefits the fishermen of the Yukon Area. Notably, the portion on selective gear use during times of conservation for all salmon will allow greater opportunity for the fishers of the Yukon Area. YDFDA also agrees with the alignment of mesh size for District 5 but insists that the mesh sizes of 7.5 in mesh or smaller remain as an option in directed king salmon fisheries.

YDFDA **OPPOSES** the elimination of gillnets with a maximum mesh size of 7.5 inches throughout the Yukon Area for reasons expressed in Proposals 86 and 87. Additionally there appears that proposal 88, as written, precludes the use of a maximum of 7.5-inch mesh gillnets for directed commercial and subsistence king salmon fisheries. It appears that Proposal 88 omits a section in gillnet specifications section that pertain to the customary and traditional use of mesh sizes used in directed king salmon subsistence and commercial fisheries.

YDFDA suggests the following modifications to Proposal 88:



**(new) Notwithstanding any other provision of this section and in accordance with 5 AAC 05.360, during times when the commissioner determines that a harvestable surplus of king salmon is projected that is in excess of escapement and subsistence requirements, the commissioner, by emergency order, may close the fishing season in Districts 1 - 6 and immediately reopen the season during which a person may take salmon with a gillnet that has a mesh size of seven and one-half inches or smaller.**

OR

(c) Salmon may be taken only with gillnets of {SIX} **seven and one half**-inch or smaller mesh during periods established by emergency order.

**(new) salmon may be taken only with gillnets of seven and one half-inch or smaller mesh during directed king salmon subsistence and commercial fishing periods established by emergency order.**

Note the Yukon Area has a King Salmon Management Plan in regulation: **5 AAC 05.360. Yukon River King Salmon Management Plan.** Directed king salmon subsistence and commercial fisheries have been routinely allowed every year from the early 1900s through statehood and through 2000 on the Yukon River. Since 2000, there have been some subsistence fishing periods allowed with unrestricted gillnet mesh size and starting in 2011 a maximum gillnet mesh size of 7.5 in the Yukon Area. However, because of declines in king salmon run sizes and harvestable surpluses since then, the last directed king salmon commercial fishery occurred in 2007. Note that mesh size during those 2007 period was unrestricted.

At the 2010 Board meeting the Yukon River king salmon management plan, 5 AAC 05.360, was updated (Proposal 87) and the 2010 Proposal 90 that sought to limit the gillnet mesh size on the Yukon River to 6 in. was used by the BOARD to instead limit the maximum mesh size to 7.5 in mesh to harvest king salmon in both subsistence and commercial directed king salmon fisheries. Note that the Department opposed the 2010 original Proposal 90, which sought to limit the maximum mesh size used on the Yukon River to 6 in because it would “... *limit the flexibility of the managers to address inseason conditions, which is necessary to meet escapement goals and the potential for wastage of fishery resources.*”

YDFDA concludes that Proposal 88 omits a necessary portion that would allow the use of 7.5 in mesh gillnets or smaller to harvest king salmon in directed king salmon commercial and subsistence fisheries. Although recent king salmon runs have been so poor that a directed king salmon fisheries have not been allowed, YDFDA believes that the king salmon will eventually return to the Yukon River in numbers great enough to satisfy escapement and subsistence needs along with a king salmon directed fisheries. We believe that suggested changes to this proposal are necessary for management flexibility.

\*\*\*\*\*



**PROPOSAL 89**

**5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan.**

**PROPOSED BY: Alaska Department of Fish and Game**

**Purpose:** Modify Yukon Area commercial dip net gear operations in the commercial fishery to include a single rigid handle with a single line attached

**What would be the effect if this proposal were adopted?** *This would simplify and align Yukon Area commercial salmon regulations, remove an outdated maximum mesh size, and apply selective gear for conservation to all salmon species.*

**Rationale by Proponent:**

- This proposal would specify that dip nets must be operated by a handle, and that a single line may be attached to the handle.
- The current definition of dip net operation does not reflect the practice of attaching a single line to a dip net handle.
- This method of dip net operation has created confusion and difficulty for enforcement personnel.
- Clarifying dip net operation would provide enforcement and local fishers with a clear definition of gear type operation.

**ADF&G RECOMMENDATION: SUPPORT**

*The department submitted and SUPPORTS this proposal to be consistent with current and traditional fishery practices and to provide for social and economic benefits that might otherwise be forgone.*

*The department submitted and SUPPORTS this proposal to be consistent with current fishery practices and to provide for social and economic benefits that might otherwise be foregone. The department worked with enforcement staff on this proposal, and they have supported this definition. There is a similar proposal for the Kuskokwim River (Proposal 97).*

**YDFDA RECOMMENDATION: SUPPORT**

This proposal clarifies the use of the commercial dip net operations in the commercial fishery and allows the operation of the dip net as currently practiced in this fishery.

\*\*\*\*\*

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Oppose  
**Proposal 64:** Oppose  
**Proposal 65:** Support  
**Proposal 66:** Support  
**Proposal 67:** Oppose

**Proposal 71:** Support  
**Proposal 72:** Support  
**Proposal 73:** Support  
**Proposal 74:** Support  
**Proposal 79:** Support  
**Proposal 80:** Oppose

**Proposal 81:** Oppose  
**Proposal 82:** Oppose  
**Proposal 84:** Support With Amendments  
**Proposal 85:** Support  
**Proposal 86:** Support  
**Proposal 87:** Support  
**Proposal 88:** Support With Amendments



**YUKON RIVER DRAINAGE FISHERIES ASSOCIATION**

PO Box 2898, Palmer, Alaska 99645 ♦ Tel: 907-272-3141 Fax: 907-272-3142 ♦ Toll-Free 877-999-8566  
 www.yukonsalmon.org ♦ serena@yukonsalmon.org

*“Protect and Promote All Wild Fisheries and Traditional Cultures within the Yukon River Drainage”*

<p align="center"><b>Alaska Board of Fisheries: Arctic/Yukon/Kuskokwim</b>            January 14-18, 2023   Anchorage, AK</p>	
<a href="#"><u>63</u></a>	Establish an annual bag limit of 20 northern pike and modify daily bag limit of fish greater than 30 inches in the Chatanika Harvest Area subsistence fishery.
<b>Oppose</b>	Need to know more about it, if there is overfishing in this area.
<a href="#"><u>64</u></a>	Modify the daily bag limit to require retention of the first 10 fish caught and length limit for northern pike in the Chatanika Harvest Area subsistence fishery.
<b>Oppose</b>	Families can afford the 60 mile round trip once a year, but having to release fish or keep fish they don't want will affect the family's ability to get food. This should stay the same.
<a href="#"><u>79</u></a>	Allow hook and line attached to a rod or pole when subsistence fishing upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and the subsistence permit area.
<b>Support</b>	
<a href="#"><u>80</u></a>	Restrict subsistence king salmon harvest in the middle and upper Yukon River.
<b>Oppose</b>	Number system is terrible for subsistence. This looks like a move to pit upriver and downriver against another. The reasoning behind middle/upper Yukon is that where the harm is taking place. Limit the amount of dog food being taken out, when things are done by household, some households consist of one person, some have 3 dog teams, fish wheel can support 23+ people at fish camps. Yukon putting a number on something can never be fair in subsistence. Fish would be split, important subsistence, staying away from numbering.
<a href="#"><u>81</u></a>	Implement a Yukon River drainage subsistence salmon permit to allow retention of king salmon less than 24 inches in length with an annual limit 10 fish during times of king salmon conservation.



<b>Oppose</b>	There was a lot of conflict over it. Every fish counts right now. Chinook may not come back for a while, we should assume that in the future. Didn't support in the conservation crisis in other ACs AC meeting in Tanana had the same take, biological advantage that taking out the small males could help drive back the population, but it is the wrong message to be sending to people.
<a href="#">82</a>	Modify the dates sinking of gillnets is allowed in the Yukon Area from October 1 to April 30.
<b>Support as Amended:</b>	Record Copy: Buoy on each end, and one in the middle depending on length.
<a href="#">83</a>	After August 15, a person may not take salmon with a gillnet that has a mesh size greater than six inches in the Yukon Area Personal Use Salmon Fishery.
<b>Support</b>	
<a href="#">84</a>	Repeal and readopt Yukon Area subsistence fishery lawful gear and gear specifications.
<b>Support</b>	5 1/2" mesh, salmon don't go where we are fishing. Hamilton river that runs to 5 finger lake. Those are traditional, mid september to freeze up, 5 1/2 to 6 inch mesh fishing, we could up until now use 4" mesh, the answer we got in the past, they were going to do this river wide instead of region specific, this can be a waste in cutting off whitefish and sheefish fishing if it isn't done by district rather than river wide.
<a href="#">86</a>	Require retention of sport caught salmon, if removed from the water, in the Yukon River Area.
<b>Oppose</b>	This is confusing that there is one for the Tanana River and one for the entire Yukon. The Division of Sport Fish management recognizes Tanana as a separate management area.
<a href="#">87</a>	Define eel stick.
<b>Support</b>	
<a href="#">88</a>	Repeal and replace Yukon Area commercial salmon fishing gear specifications.
<b>Support</b>	There is a lot of ADF&G regulations and not a lot coming from the RACS, ACs, where there should be more local. There aren't any restrictions on the Bering sea, they are all on the Yukon River. We have worked hard to protect salmon but haven't gotten answers from the State, BOF, or OSM. It feels like going backwards. Looking at partial opening in federal waters, we could work with this but ADFG needs to work with other regions. We need to talk with NPFMC.
<a href="#">89</a>	Modify Yukon Area commercial dip net gear operations in the commercial fishery to include a single rigid handle with a single line attached.

**Support**

It is a common practice to tie your dipnet to your boat, if you get snagged it helps to not pull you in. It helps if you have multiple people.

**PC28**

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 63:** Oppose  
**Proposal 64:** Oppose  
**Proposal 79:** Support  
**Proposal 80:** Oppose

**Proposal 81:** Oppose  
**Proposal 82:** Support  
**Proposal 84:** Support  
**Proposal 86:** Oppose

**Proposal 87:** Support  
**Proposal 88:** Support  
**Proposal 89:** Support

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
RAC/YK.22142.BM

DEC 28 2022

Art Nelson, Executive Director  
Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide the Council's comments on four Alaska Board of Fisheries proposals that will be discussed at upcoming 2023 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 27-28, 2022, in Bethel. Among the items discussed were various proposed changes to State of Alaska fishing regulations. The proposals that the Council discussed, and our positions and comments, are listed below by regional meeting.

***Arctic / Yukon / Kuskokwim Finfish***

Proposal 80 - Restrict subsistence king salmon harvest in the middle and upper Yukon River.  
The Council **supported Proposal 91 with a vote of 7-0, with one member abstaining.** The Council supported this proposal because they feel that lower Yukon River fishing districts have been unfairly restricted in the past while upper river districts were allowed more



Mr. Nelson

2

opportunity.

Proposal 90 - Create a Tier II subsistence king salmon fishery in the Kuskokwim River.

**The Council voted to unanimously oppose Proposal 90.** The Council does not support this proposal because subsistence fishers should not be more heavily regulated under a Tier II system while commercial fishers in the Alaska Peninsula continue to intercept our salmon stocks for profit. This is unjust and does not adhere to the subsistence priority. By law, restrictions should be put on commercial fisheries before subsistence fisheries.

Proposal 91 - Modify Kuskokwim Area lawful gear and gear specifications and operation to provide greater opportunity to harvest salmon other than king salmon, during times of salmon conservation. The Council **supported Proposal 91 with a vote of 7-0, with one member abstaining.** The Council supports this proposal because it would give managers the tools needed to allow targeted fishing opportunities for other species of salmon during times of Chinook Salmon conservation. It will potentially increase subsistence harvest opportunity and help people better meet their subsistence needs while still protecting Chinook Salmon stocks.

### *Alaska Peninsula / Aleutian Island / Chignik Finfish*

Proposal 140 - Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time. The Council voted to **unanimously support Proposal 140 with a modification that commercial fishing is prohibited beyond a distance of three miles from shore.** The Council supported this proposal with modification because there is a major conservation concern for Western Alaska salmon that are intercepted in these commercial fisheries. Subsistence fishing has been closed for several years on the Yukon and Kuskokwim rivers, while commercial fishers have been allowed to harvest the same stock of concern. This does not adhere to the subsistence priority nor sustainable management practices. By law, restrictions should be put on commercial fisheries before subsistence fisheries. In supporting the modification, the Council seeks to limit the commercial fishers in the South Unimak and Shumagin Islands to the same geographical restrictions faced by commercial and subsistence fishers in the Yukon-Kuskokwim Delta region, that is, limited to fishing within three miles from shore.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or [brooke\\_mcdavid@fws.gov](mailto:brooke_mcdavid@fws.gov).

Mr. Nelson



PC29

3

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Oney", on a light gray rectangular background.

Raymond Oney  
Chair Regional Advisory Council  
Yukon/Kuskokwim Region

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Members  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 80:** Support

**Proposal 90:** Oppose

**Proposal 91:** Support