

## *North Alaska Peninsula Salmon Northern District (10 proposals)*

### **PROPOSAL 120**

#### **5 AAC 09.320. Fishing periods.**

Modify fishing periods in the Northern District, as follows:

Caribou Flats section to remain as is, closed indefinitely.

All areas southwest of Franks Point, i.e. Black Hills, Swanson's Lagoon and others will remain as is.

June 1st to June 19th only Nelson River, Bear River, and Port Moller sections will be harvested, not to exceed 3 days per week. No less than 4 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River and Port Moller sections. Harvest can only occur if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

June 20th to June 25th only Nelson River, Bear River, and Port Moller sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River and Nelson River, Port Moller. Harvest can only occur if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

June 26th to June 30th only Ilnik River, Nelson River, Bear River and Port Moller (no harvest in Three Hills) sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River, and Port Moller sections. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

July 1st to July 5th only Ilnik River, Nelson River, Bear River, and Port Moller, sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River and Nelson River. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

July 6th to July 15th only OPH, Ilnik River, Three Hills, Nelson River, Bear River and Port Moller sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River, and Port Moller. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

Emergency orders by ADF&G will be allowed in the June North Alaska Peninsula harvest. Only Nelson River, Bear River, and Port Moller sections will be allowed harvest. No less than 2 day complete closure each week in these North Alaska Peninsula sections. Harvest can be considered only if both Nelson River and Bear River has achieved their minimum periodic escapement goals.

Emergency orders by ADF&G will be allowed in the July North Alaska Peninsula harvest. Only Nelson River, Bear River, and Port Moller sections will be allowed harvest. Harvest can be

considered only if both Nelson River and Bear River has achieved their minimum periodic escapement goals.

**What is the issue you would like the board to address and why?** Preservation for the Native Village of Nelson Lagoon, Nelson River sockeye escapement and harvest.

I have lived in Nelson Lagoon and fished Area M north and south since the mid 1970's, all what I state is true to the best of my recollection and what I have learned from ADF&G reports.

Many fisherman fishing Area M today have not been here so long to have witness what I have. I have much to explain, please take a moment to read, and bear with me.

The Native Village of Nelson Lagoon was founded because of fish returning to Nelson River.

In the recent years, the Native Village of Nelson Lagoon has suffered like never before.

Salmon returns to Nelson River are a matter of survival for the indigenous Aleut native peoples of Nelson Lagoon.

What many fail to grasp, is subsistence for Nelson Lagoon residents translates into fishing income. Without a substantial annual salmon harvest in Nelson River, the Native Village of Nelson Lagoon will cease to exist.

When annual harvests fail, Nelson River fisherman are forced move from the community to search for income, and in some instances, forced to sell the only known livelihood, their Limited Entry Permits. People in Nelson Lagoon know of nothing else but to harvest salmon in Nelson River to survive.

Nelson Lagoon has suffered 1 economic disaster in the past due to poor fish returns and many near disasters since. Currently returns are so dire that a typical Nelson River fisherman goes fishing each year to pay off cannery debts from the previous year or years operating and cost of living expenses.

If not for Peter Pan Seafoods carrying these debts (loans) year after year, Nelson Lagoon would have long been uninhabited.

Current ADF&G North Alaska Peninsula management routinely struggle to achieve minimum escapement goals during the June and late June fishery, only to finally achieve these minimum goals later in late July with a trickle of salmon, barely achieving minimum escapement season goals.

Critical to Nelson Lagoon's survival is the pre July harvest. Most sockeye salmon travel thru the Nelson River system in this narrow time window. Any fishing outside of Nelson River has a direct impact on Nelson River. The farther away harvests occur in the North Alaska Peninsula, the longer direct impact is realized in Nelson River seasonal harvests. It takes 3-4 days for impacts to be

realized by Nelson River. The majority of fish returning to Nelson River must navigate 100 miles thru harvests of Alaska North Peninsula sections OPH, Ilnik, Three Hills and Bear River.

If sockeye weir counts are not achieving their minimum escapement goals, sockeye harvests in Nelson River are curtailed or terminated, yet fishing harvests continue in OPH, Ilnik and Three Hills sections. Nelson River has been shut down due to the lack of minimum periodic escapement for as many as 20 consecutive days during the traditional harvest period for Nelson River.

Over the years, North Alaska Peninsula has seen increases in vessel sizes and vessel productivity. Changes to ADG&G fishing regulations pursuing \$\$\$ over preservation of sustainable harvests and escapements for Nelson River. Changes made to allow earlier fishing time in areas normally closed to fishing before Nelson River salmon peak (traditionally 4th of July). Changes allowing smaller rivers with minor escapements in comparison, dictating harvests for the entire North Alaska Peninsula. Changes made to allow for longer fishing harvests in North Alaska Peninsula. Changes to allow gear depth increases from well-established 45md to 70md, translating into 36% of added net in the water. Changes to minimum mesh size ensuring catch of even smaller salmon, increasing salmon harvests. All of these changes have impacted Nelson River harvests and escapements to diminish Nelson River's capacity to achieve modest periodic June escapement goals year after year.

Throughout history (ADF&G records from 1962 to present) accurately state that Nelson River section and Bear River sections combined (including Sandy River) make up, sometimes more than 90% of total escapement achieved in the entire North Alaska Peninsula. Nelson River at times making up near 40% of total escapement for the entire North Alaska Peninsula. OPH (IPH Meshik River), Ilnik River, Three Hills (Three Hills does not have a salmon return) sections combined have been as high as 30% escapement, but are consistent through-out history as being less than 20% of total North Alaska Peninsula escapements achieved. These systems are not lake spawning salmon returns, but river spawning salmon returns. OPH (IPH Meshik River), Ilnik River, and Sandy River will never have the capacity to achieve high escapements as Bear River (over 1,000,000 sockeye) and Nelson River (over 500,000 sockeye).

By July 15th of any given season, sockeye salmon returning to Nelson River have declined to where most Nelson River fisherman have either stopped fishing, or reduced effort to only making mean low water tides to ensure a better harvest for their efforts.

ADF&G North Peninsula management sockeye cumulative escapement goals for July 15th are Bear River minimum 130000 (48%) to 230000 (44%). Sandy River min 29000 (11%) to 67000 (13%), Ilnik min 28000 (10%) to 40000 (8%), Nelson River min 95000 (32%) to 185000 (35%).

ADF&G North Peninsula management sockeye cumulative escapement goals for July 20th are Bear River minimum 140000 (47%) to 250000 (48%). Sandy River min 32000 (11%) to 71000 (12%), Ilnik min 30400 (10%) to 45600 (8%), Nelson River min 85000 (31%) to 210000 (36%).

By these calculations, escapements do not warrant fish harvests in OPH, Ilnik and Three Hills (combined) achieving 90% of total fish harvested in a single season in North Alaska Peninsula.

When Nelson River and Bear River combined harvest sadly achieved 16% (5 year average) for total season harvest of the entire North Alaska Peninsula. 2021 resulted in Nelson River achieving a meager 3% of the near 2,800,000 total salmon harvested in the North Alaska Peninsula.

Current ADF&G management typically will open OPH, and or Ilnik, Three Hills sections on June 20th, close OPH a couple days later, while Ilnik, Three Hills and possibly Bear River remain harvesting for a duration of the rest of the week, insuring harvest of southbound salmon, then opening OPH again, repeating the harvest week after week until fishing has diminished thru July. Often Bear River has not achieved its minimum periodic escapement goals, and is shut down completely while fishing North of Bear River remains harvesting. Harvests in the North Alaska Peninsula have reached near 4,000,000 sockeye in a single season.

The problem with all this is that there are rarely any rest periods (windows) between harvests, certainly not long enough for salmon to return to Nelson River and Bear River untouched.

Nelson River and Bear River sections have always had a 3 day a week, to 4 day week after the 15th of June. Only after escapement levels are achieved, are additional days considered during any given week.

It takes 3-4 days for fish to travel from OPH to Nelson River, therefore I propose...

Windows be mandatory each week in the June and July North Alaska Peninsula.

**PROPOSED BY:** Mark McNeley (EF-F22-056)  
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**PROPOSAL 121**

**5 AAC 09.310. Fishing seasons.**

Amend the fishing season in the Three Hills Section to increase potential fishing time and aligning sections to similar fishing periods, as follows:

Management actions that are already specified in 5 AAC 09.369 (i) for the Three Hills Section will remain the same but the earliest date that these actions can occur will begin on June 20 and not June 25.

**What is the issue you would like the board to address and why?** Move the season opening date in the Three Hills Section from June 25 to June 20 to make it the same as the Ilnik and Outer Port Heiden Sections.

**PROPOSED BY:** Concerned Area M Fishermen (EF-F22-033)  
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**PROPOSAL 122**

**5 AAC 09.310. Fishing seasons.**

Amend fishing seasons to allow more commercial fishing time by allowing fishing periods in the Cinder River Section, as follows:

Open Cinder River for 36 hours from June 20 to July 31 as long as no conservation concern for sockeye salmon in the Ugashik or Cinder River systems.

**What is the issue you would like the board to address and why?** To allow opportunity for Area M fishermen to harvest sockeye salmon in the Cinder River Section from June 20 to July 31. Presently the section is currently closed to commercial salmon fishing in the salt water by regulation. In most years there has been surplus sockeye salmon escapement into the Cinder River above the escapement goal and current regulations do not allow effort to target these fish except inside the Lagoon which has not been logistically feasible.

**PROPOSED BY:** Concerned Area M Fishermen (EF-F22-034)  
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**PROPOSAL 123**

**5 AAC 09.310. Fishing seasons.**

Amend fishing seasons to allow more fishing time and area for set net gear in the Cinder River Section, as follows:

If the outside district does open in July there could potentially be some effort to target the under utilized Cinder River sockeye run. I hope the board considers opening the Cinder River outside section on July 1st up to 1/2 mile off the beach for set net gear which is allowed for area T Bristol Bay permits and area M setnet permits in the over lap salmon fishery. By current regulations the outside Cinder River section only opens after August 1st for the over lap fishery. By then the sockeye run is pretty much over. Thank you for your consideration.

**What is the issue you would like the board to address and why?** Hello chairman and board of fish. My name is Dia Kuzmin 3rd generation fisherman born and raised in Alaska. I fished in area M on the north side for 6 seasons and the last year tried setnetting. I would like the board to consider possibly opening the Cinder River outside section up to 1/2 mile for set net fishing in July. I checked the area last season inside the Cinder River lagoon section where it's open to fish during July. The area is too shallow to fish inside the lagoon. Even at high tide it was still very shallow. I was touching bottom even at full high tide couldn't find any suitable area to set my set net. There is almost zero fishing effort in Cinder River most years. It's one of the only sockeye salmon runs in the state that the salmon run is not utilized and most years it exceeds the high end escapement goals.

**PROPOSED BY:** Dia Kuzmin (EF-F22-036)  
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**PROPOSAL 124**

**5 AAC 09.310 (a)(1)(B). Fishing seasons – Northern District, Cinder River Section, 5 AAC 09.320. Fishing periods, and 5 AAC 09.330. Gear.**

Amend fishing seasons, fishing periods and gear to allow more commercial fishing time to all Registration Area M gear types in the Cinder River Section, as follows:

Open Cinder River for 36 hours from June 20 to July 31 as long as no conservation concern for sockeye salmon in the Ugashik or Cinder River systems.

**What is the issue you would like the board to address and why?** To allow opportunity for Area M fishermen to harvest sockeye salmon in the Cinder River Section from June 20 to July 31. Presently the section is currently closed to commercial salmon fishing in the salt water by regulation. In most years there has been surplus sockeye salmon escapement into the Cinder River above the escapement goal and current regulations do not allow effort to target these fish except inside the Lagoon which has not been logistically feasible.

**PROPOSED BY:** Concerned Area M Fishermen (EF-F22-045)

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**PROPOSAL 125**

**5 AAC 09.350. Closed waters.**

Amend closed waters to change the boundary line in the Outer Port Heiden Section, as follows:

**5 AAC 09.350(3)(B) East of a line from 57 05.97; 158 34.03W to 57 08.39N; 158 37.88W**

We propose pivoting the existing boundary line around the midpoint of the line so that the overall area of the change is "neutral", so no overall fishing area is gained or lost. This would "swing" the inshore end of the line approximately 1/2 mile up the coast to the NE, and move the offshore end of the line 1/2 mile to the SW, in the opposite direction.

**What is the issue you would like the board to address and why?** The existing line is at a fairly steep angle to the beach, and we would like to modify it slightly to make it more perpendicular to the beach, and thus make for a more orderly line fishery on the ebb tides.

**PROPOSED BY:** Concerned Area M Fishermen (EF-F22-054)

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**PROPOSAL 126**

**5 AAC 09.350 Closed waters and 5 AAC 09.369 Northern District Salmon Fisheries Management Plan**

Amend closed waters and *Northern District Salmon Fisheries Management Plan* to reduce commercial salmon fishing time and area in the Outer Port Heiden Section, as follows:

This proposal seeks to restrict fishing in the northern portion of the Outer Port Heiden Section. The purpose of this area restriction is to direct more commercial fishing on local Northern Peninsula sockeye salmon stocks, particularly the Meshik River and Ilnik River stocks, that migrate within known channels. This closure will also improve fish quality because of a shorter transport from fishery to processor and also provide for the harvest of Meshik and Ilnik River sockeye salmon stocks.

The proposed line is about 1 statute mile North of North River (Reindeer Creek). The North River (Reindeer Creek) mouth can move as much as 3/8-1/2 statute mile from one year to the next and

so the line proposed if adopted by the board will always have North River (Reindeer Creek) in the open area.

Substitute Language

**5 AAC 09.350. Closed Waters.** Salmon may not be taken in the following locations:

(3)Outer Port Heiden: waters of the Outer Port Heiden Section

(A) repealed 6/5/2016;

(B) east of a line from 57° 02.90' N. lat., 158° 37.66' W. long. to 57° 06.08' N. lat., 158°40.57' W. long.;

**5 AAC 09.369. Northern District Salmon Fisheries Management Plan**

(1)The Outer Port Heiden Section is open from June 20 through July 31 to commercial salmonfishing in those waters west of a line from 57° 02.90' N. lat., 158° 37.66' W. long. to 57°06.08' N. lat., 158° 40.57' W. long.; based on the abundance of Meshik River sockeye salmon.

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**What is the issue you would like the board to address and why?**

**Overescapement of sockeye salmon into the Meshik and Ilnik Rivers.**

Escapements into the Meshik River have exceeded the high end of the current escapement goal (86,000) 4 out of the last 5 years (2017-191,000, 2018-134,000, 2019-107,000, 2020-64,000, 2021-117,000). In the Ilnik River, sockeye salmon escapements have exceeded the high end of the current escapement goal (60,000) 4 out of the last 5 years (2017-238,000, 2018-81,000, 2019-75,000, 2020-41,000, 2021-69,000). The total escapement in 2017 was a record 238,000 sockeye salmon escaped to spawn. This escapement is nearly 4 times the upper end of the current escapement goal.

This proposal seeks to adjust the Section so that more local Northern Peninsula salmon stocks are harvested, resulting in more appropriate escapement to the Meshik and Ilnik Rivers.

Note also that WAS SIP indicated that Northern Peninsula sockeye salmon stocks contributed and average of 48% to the SW Ilnik harvest (3 years); 30% to the NE Ilnik harvest (3 years); and 21% to the Outer Port Heiden Section harvest (2 years).

**Quality of delivered fish that are harvested in the Outer Port Heiden Section.**

Most fishers are fishing very near the northern boundary of the Outer Port Heiden district. Delivery of these fish is delayed by the long travel distance from the point of harvest to the processor, resulting in degraded quality salmon.

Additionally, frequent very rough seas within the Outer Port Heiden Section makes it very difficult to fish and to transport fish to processor, resulting in fish being delivered that are poor quality. If nothing is done, escapements to the Meshik and Ilnik Rivers will continue to exceed the upper end of their respective escapement goals. Additionally, poor quality fish will continue to be delivered to processors because of the long travel distance and time.

**PROPOSED BY:** Lower Bristol Bay Advisory Committee

(HQ-F22-029)

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**PROPOSAL 127**

**5 AAC 09.310. Fishing seasons.**

Amend fishing seasons to increase fishing time in the Caribou Flats Section, as follows:

- (a) (9) Caribou Flats Section

Only if the season ending escapement goal is met between June 20 and July 31 will the Caribou Flats Section open to drift gillnet gear.

**What is the issue you would like the board to address and why?** Help control the sockeye salmon escapement into the Nelson River during years when the season ending escapement goal is met.

**PROPOSED BY:** Joe Hinton

(EF-F22-064)

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**PROPOSAL 128**

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

Amend Gillnet specifications and operations to reduce commercial salmon harvest in the North Peninsula using gillnet depth reductions, as follows:

Please consider reducing the max mesh depth for Area M North Peninsula from 70 meshes deep to a maximum of 45 meshes deep.

Deeper nets drag the bottom farther off the beach, fish don't have a chance to go under the net to return to their rivers and lakes.

Nets dragging the bottom slow when drifting. Nets have a greater chance to snag the bottom resulting in a 200ft set net.

Who would it effect: all Area M North Peninsula fishermen that choose to fish a 70 mesh net..

Who would benefit: all Area M North Peninsula salmon trying to return through 100 miles of deep net.

**What is the issue you would like the board to address and why?** Nelson Lagoon River has been struggling to meet minimum escapement and seasonal harvests are dismal. There is a large fleet who fish above Nelson River and we are witnessing the negative effects it is causing our fishery. I am a generational fisherman and have lived in Nelson Lagoon my entire life. I was brought up fishing in Nelson River and have been observing the changes over the years. Things aren't like they were before and I think maybe if there was less net in the water it might make a difference.



I propose to lessen the amount of net in the water in Area M North peninsula to the way it was before.

**PROPOSED BY:** Angela Johnson (EF-F22-092)

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**PROPOSAL 129**

**5 AAC 09.331. Gillnet specifications and operations.**

Allow use of monofilament gillnet web in the Northern District, as follows:

Notwithstanding 5 AA C 39.250 (C) In the Northern District single filament gill net web may be used by set net gear.

**What is the issue you would like the board to address and why?** With recent ocean temperature changes, algae has been more prevalent and is stuck easily in knots of monofilament gill net web. Other areas have adopted monofilament gear combat algae and other vegetative debris and allowing the use of monofilament will give a option as a solution to this problem.

**PROPOSED BY:** Connor Murphy (EF-F22-024)

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