PROPOSAL 189 – 5 AAC 09.332. Seine specifications and operations. Allow for dual permit vessels and increased gear limits for dual permit vessels in the Alaska Peninsula Area commercial salmon purse seine fishery, as follows:

The maximum seine length is 250 fathoms, or 300 fathoms with a "lock 2" permit. Prior to the fishing season an individual with two permits locked together must register with ADF&G their intent to fish that season with a "lock 2" permit.

What is the issue you would like the board to address and why? Too many latent permits

Allow seine salmon permit holders to operate additional gear under a dual permit lock together.

being added to the Area M salmon fishery.

What we would like to call a "lock 2". Excessive activation of latent permits will result in too many fishing operations in the South Peninsula area to sustain reasonable livelihoods for the historic and current participants. In the past 10 years, an average of 49% of the available permits have been used in the fishery. We are asking for 20% gear increase in exchange for 100% of permit usage. With added permits to the current fishery we would be harmed by processor limits and loss in revenue to both the state and local economy tax base. Once the permits are locked together they cannot become unlocked or sold individually. Area M is currently in a rebuilding phase for salmon fishing. Our returns have been poor at best. This would also give relief to management, keeping track of less catcher vessels in the short seasons we have would be beneficial for rebuilding salmon stocks.

If nothing is done, more fishing operations will continue to be added to the current level and our escapement goals will continue to be low in local streams.

<u>PROPOSAL 190</u> – 5 AAC 09.332. Seine specifications and operations. Change purse seine depth measurement standard from number of meshes deep to an equivalent depth measurement in feet and inches, as follows:

Prefer the department regulation to describe the seine depth in equivalent terms using feet and inches.

What is the issue you would like the board to address and why? Current regulation describes the allowable depth of a purse seine for the South Alaska Peninsula salmon fishery as 350 each 3.5 inch meshes plus 25 each seven inch meshes. Fishermen who recently purchased nets that were built with Indian web have experienced shrinkage that traditional American web does not exhibit. These fishermen are not allowed to modify their nets to equal depths of other fishermen's nets by simply adding a strip of web, because the seine depth regulation is based on number of meshes. This regulation assumes all nets will retain same hanging depths over time, thereby disadvantaging fisherman who have purchased these new Indian web nets.

<u>PROPOSAL 191</u> – **5 AAC 09.331. Gillnet specifications and operations.** Repeal minimum mesh size standards for drift gillnet gear, as follows:

5 AAC 09.331(a)(2) is amended to read:

(2) a drift gillnet has no minimum mesh size.

What is the issue you would like the board to address and why? Driftnet mesh size. There is no minimum mesh size in any of the Area M Fisheries except in the post-June South Peninsula fishery in the Unimak District and a western portion of the SW District. This area is fished by

the entire fleet in June, without mesh size limits, which means that the drift gillnetters who fish in June have to purchase an additional net for Post-June. This imposes a substantial financial burden on drift netters, particularly local drifters that prefer fishing the South Peninsula over the North Peninsula in July. We also feel that it is a housekeeping proposal that would allow a more orderly driftnet fishery.

<u>PROPOSAL 192</u> – 5 AAC 09.330. Gear. Allow commercial fishing for salmon with set gillnets in the area between Popof Head and Dark Cliffs any time the area is closed to commercial salmon fishing with purse seine gear, as follows:

5 AAC 09.330 is amended to read:

5 AAC 09.330

..

(f) ...

(1) Salmon may be taken only with purse seines and hand purse seines in the area between Popof Head and Dark Cliffs (Popof Head) from June 1 through August 31 however, salmon may be taken by set gillnet gear during periods when the seine fishery is closed, and if by emergency order due to the presence of immature salmon.

What is the issue you would like the board to address and why? This proposal addresses that salmon may be taken only with purse seine and hand purse seine in the area between Popof Head and Dark Cliffs (Popof Head) from June 1 through August 31. However, salmon may be taken by set gillnet gear during periods when the seine fishery is closed by emergency order due to the presence of immature salmon. I would like to change the regulation so that the set net gear would be allowed to fish this area (Popof Head) when the seine fleet is not there and are closed to fishing this area whether it be due to immature salmon or that it is closed to seining while set net is open in the Shumigin Island section. If the regulation is not changed the set net fleet is losing an opportunity to utilize a portion of this open area.

PROPOSED BY: Jim Smith (EF-C15-097)

<u>PROPOSAL 193</u> – **5 AAC 09.301. Seaward boundary of districts.** Change the Southwestern and Unimak District seaward boundary, as follows:

5 AAC 09.301 is amended to read:

5 AAC 09.301. Seaward boundary of districts. For the purpose of managing the historical salmon net fishery in the vicinity of False Pass and Unimak Bight, the outer boundary of the Southwestern and Unimak Districts is a line drawn along 54° 22.5'N. lat. from 163° 01.2'W. long. near the western end of Sanak Island to 164° 27.1' W. long., south of Cape Lutke on Unimak Island [THREE MILES SEAWARD FROM A LINE COMMENCING AT 54° 26.70'

N. LAT., 162° 53.00' W. LONG.] The seaward boundary of all other districts is a line three miles seaward of the baseline, as described in 5 AAC 39.975(13).

What is the issue you would like the board to address and why? The 2012 amendment to the Federal Salmon Fishery Management Plan (FMP) redefined the plan's boundaries to exclude from its West Area three historical net fisheries managed by the State of Alaska, including the Alaska Peninsula fishery (50 C.F.R. 679.2, Definition of Salmon Management Area, Subsection (2)(iii)). The current seaward boundary of the state's Southwestern and Unimak Districts does not match up with the shoreward boundary of the federal FMP, leaving a gap of unregulated waters between the state and federal management areas. The state boundary should be revised so it is coterminous with the federal line, to avoid confusion and potential enforcement problems from having two different management boundaries.

PROPOSED BY: Concerned Area M Fishermen	(EF-C15-043)
