

Sport Salmon (8 proposals)

PROPOSAL 22

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

Close Big Creek to sport fishing for salmon, as follows:

We propose Big Creek to be closed from June 1 to July 31 for all salmon. This would eliminate the possibility of anglers catching kings while “targeting” other salmon species.

New regulation:

5 AAC 67.002 (11) in the Big Creek drainage, upstream of its confluence with the Naknek River, **shall be closed to sport fishing of all salmon June 1 though July 31** [KING SALMON MAY NOT BE RETAINED OR POSSESSED; KING SALMON MAY NOT BE REMOVED FROM THE WATER AND MUST BE RELEASED IMMEDIATELY]

What is the issue you would like the board to address and why? We would like the board to address the catch and release fishery of king salmon on Big Creek. Big creek is a vital tributary to the Naknek River drainage with king salmon numbers that are 30 to 40 percent of the total aggregate run of the Naknek River drainage. It is also one of two main tributaries of the Naknek River drainage that is significant to kings, along with King Salmon Creek. Current regulations call for a complete year round closure of fishing for king salmon in both Pauls Creek and King Salmon Creek in order to protect the species. However, Big Creek remains open to catch and release of Kings. Why are Pauls Creek and King Salmon Creek afforded more protection than Big creek? All three tributaries provide vital spawning habitat for king salmon. With the king runs at historic lows, all three should be protected.

Kings are easier to target in smaller water. Over the years as the king numbers declined, boat traffic and fishing pressure up Big Creek has significantly increased. The horsepower on jet boats has increased, causing more erosion and altering spawning habitat. All these factors put additional, unnecessary stress on already precarious survival rate. It is also important to note that the mortality rate for catch and release is approximately 6.5 – 10%. However, there are no current studies indicating what the mortality rate is when the fish are caught over and over again both commercially and on rod and reel. As is the case with big creek, fish move with the high tide and settle in holes for the low tide. In a small creek it is easy to target the school of fish as they move upriver with the tide, catching them multiple times. Additionally, these same kings have been stressed from commercial nets and run a gauntlet of sportfishing hooks before they even reach Big Creek. When these remaining kings miraculously make it to the final leg of their journey we should protect them just as we have done on the other tributaries of the Naknek.

PROPOSED BY: Naknek Kvichak Advisory Committee (EF-F22-038)

PROPOSAL 23

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

Allow retention of king salmon less than 20 inches in length in Big Creek, as follows:

I would propose that sport fisherman be allowed to retain any jack king salmon caught in Big Creek, any king salmon less than 20 inches. Jack salmon do not spawn so there would not be any risk to the salmon population to retain these fish up big creek.

What is the issue you would like the board to address and why? I would like the fishing regulations for the Naknek river drainage in Bristol Bay changed. specifically the regulations on Big creek and not being able to retain any king salmon on big creek.

PROPOSED BY: Andrew K. Christiansen (EF-F21-013)

PROPOSAL 24

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

Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage, as follows:

We recommend dropping the proposed bag limit down to two King Salmon per season, one King Salmon over 28 inches and one King Salmon under 28 inches. Only male fish may be retained. The current reg allows for an annual bag limit of 5 king salmon.

The new regulation should read as follows:

(1) king salmon: (A) in fresh waters, as follows: (i) 20 inches or greater in length; may be taken only from May 1 through July 31; bag and possession limit of two [THREE] fish, of which only one fish may be 28 inches or greater in length; annual limit of two [FIVE] fish 20 inches or greater in length taken in combination from fresh waters and salt waters; only male fish may be retained; a harvest record is required as specified in 5 AAC 75.006;

What is the issue you would like the board to address and why? Due to the urgent and continual decline of King Salmon in the Naknek River Drainage, we propose to adopt a reduced King Salmon bag limit. The current regulation allows for 5 kings to be taken annually; a number that is way too high considering our extremely low returns. Dropping the bag limit and allowing only males to be retained will help safeguard a species that is in dire need of protection.

PROPOSED BY: Naknek Kvichak Advisory Committee; Joey Klutsch (EF-F22-037)

PROPOSAL 25

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

Reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage, as follows:

I recommend dropping the bag limit down to two King Salmon per season, one King Salmon over 28 inches and one King Salmon under 28 inches, MALES ONLY. All females must be released. The current regulation allows for an annual bag limit of 5 king salmon.

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What is the issue you would like the board to address and why? Due to the urgent and continual decline of King Salmon in the Naknek River Drainage, I propose to adopt a reduced King Salmon bag limit, males only, all females must be released. The current regulation allows for 5 kings to be taken annually; a number that is way too high considering our extremely low returns. Dropping the bag limit and allowing only males to be retained will help safeguard a species that is in dire need of protection.

Background

I have lived in King Salmon my entire life, 36 years, and have spent nearly every summer on the Naknek River, personal fishing and guiding. I grew up guiding and have guided on the river for over 15 years. During that time, I have watched a drastic reduction in the King fishery, to the point that it is a mere remnant of what it was in the late 1990s and early 2000s. I feel that at this point the Kings on the Naknek River will probably never come back to levels they used to be. **Again, it is a remnant fishery, and I would go as far to say that Kings are endangered.** After nearly 15 years of guiding fishermen, primarily for Kings on the Naknek, I gave it up because I could no longer look a paying client in the eye and tell them that the King fishing was good, and promise them a good trip. The run is more or less gone. It is a very sad fate that Kings have suffered. At this point it is so bad that I don't even enjoy fishing with my family for Kings, because there is almost nothing to catch.

During the last two decades, there has been a complete and utter disregard for these amazing fish by both the Department and the Board of Fish. (The in-river commercial fishery in the mouth of the Naknek is a prime example). No efforts have been made to count their numbers, determine the health of the run, limit the level of effort, reduce bag limits, or anything management related what so ever. To me, this is nothing short of a dereliction of the Department's duties. It is a travesty of the highest order and represents a complete and utter failure in management, the likes of which I can think of no comparison. It is especially sad for me to see the river which I have grown up on, and which I have spend so many days of my life on, and more importantly, the river where so many locals once enjoyed sport fishing kings with their families or catching them for subsistence, to be reduced to this sorry and pathetic state. Will my son and daughter ever see kings the way I saw them when I was young? HIGHLY DOUBTFUL.

It must be at least acknowledged that the commercial fishery in Bristol Bay has not helped the King population. Again, the in-river fishery was a huge mistake in my opinion, but the fact of the matter is that our river is managed for the commercial fishing of red salmon, and red salmon alone. All other fish are an afterthought, or more accurately, not thought of at all. I can say this as a commercial fisherman myself, for the last 6 years. Commercial fishermen catch more than our fair share of kings, that is for sure, even with the in-river fishery days long over. The commercial red salmon fishery, takes a large number of kings each year, which on a river like the Naknek that does not get many kings for their overall run, ends up being a large percentage of the King run taken in nets. I think there are solutions to this that work for both the commercial fishery and for the kings, but I am not going to mention them now, as it is no doubt a much larger topic, and certainly a more controversial one. I simply want to point out that lack of kings is surely not just a sport fishing related cause. However, what I am offering with this proposal, is at the very least a simple and easy to implement “first start” to conserving kings on the Naknek River, one in which most of my fellow sport fishermen in this community would be happy to support. In fact, I have spoken with many people in our community who support this. I am not the only one who is upset about what has happened to our kings, and the lack of action.

Other rivers reduce bag limits on kings, such as the Nushagak. I realize that the Nush has a King management plan, and they count Kings. The Naknek does not. Again, I go back to my previous statement on complete disregard for the kings on the Naknek River by the department. I realize that you will say there is no data available, no surveys, etc etc etc. Whatever excuse you want. Well, that may be true, but who’s fault is that? Should the fish continue to suffer? Should we just ignore them further until there are none left, to the point where even subsistence no longer is an option? Because that is what is happening right before our eyes. Our community members who fish this river year after year know there is a major issue on the Naknek River king salmon run. You may not have the data, but the people who live here know. We see it with our own eyes, year after year steadily getting worse, to the point no one wants to even fish for Kings on this once world-famous king salmon fishing destination. It is sad.

This is a small sacrifice, an easy first step, which will no doubt help. Bag limit reductions will be extremely beneficial. Once in the river, a higher percentage of fish will be able to spawn. Let those fish that manage to run the gauntlet of commercial fishing nets, miraculously making through the web, be free to spawn. Further, by making sport fishermen release all females, more females will be on the spawning beds, which is crucial. I have heard from the department at our AC meeting say that this regulation is “unenforceable, because you can’t distinguish between females and males all the time.” I have heard them actually say that in a study, “40% (or some percentage in this range) of department staff could not tell, so how can the average person tell the difference?” This is an utter joke to me. First off, I have been able to tell a male from a female king since I was a kid. You don’t need a PHD to do so. Second, if you are not sure, let it go. I will point to the many hunting regulations with size restrictions in place, that are certainly much more difficult to judge than the sex of an adult King. For example, have you ever tried to determine legality of a dall sheep? There are numerous ways for a sheep to be legal, none of which are obvious or easy to tell, all of which are open to interpretation even by biologists, and in fact I would say, as a dall sheep hunting guide myself, are extremely difficult. Yet they are regulations. I would point to the wonderful publication the ADF&G put out on Judging sheep. The same argument can be made for moose, determining spread (50” minimum), or brown tine count. Do not tell me it is hard to tell

the difference between male and female kings. Further, they always say when sheep hunting – if you are not sure it is full curl, 8 years old, or broken past the lamb tip on both sides, (the 3 primary ways to determine legality), then DO NOT SHOOT. The same can be said for kings – if you are not sure if it’s a male, throw it back. Simple as that. **This is sport fishing. Not subsistence fishing. The idea behind sport fishing is that we are ok releasing fish. It is not done as a way to fill the freezer.**

The enforceability of something should never be the determining factor on whether or not it is put into regulation!

You can tell from my comments that I am very upset by the lack of any action on trying to preserve what remains of our Kings, and I am. I hope the department takes my comments seriously. It is sad what has happened here. You have the power to help make it better. .

PROPOSED BY: Joey Klutsch (EF-F22-043)

PROPOSAL 26

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

Close tributaries and upper section of the Naknek River to sport fishing for king salmon, as follows:

King salmon fishing is closed on the Naknek River from “Painter Bob’s Cabin” upstream to the ADF&G marker at “Trefon’s Cabin” near the mouth of Naknek Lake and on all major creek tributaries draining into the Naknek River, including Big Creek, King Salmon Creek, and Pauls Creek. (These are all areas where king salmon actively spawn). In these closed areas, king salmon may not be targeted at all, and if they are accidentally hooked while targeting other species, must NOT be removed from the water and will be released immediately.

Nakenk River Drainage:

Naknek River main stem

King Salmon: Closed year round to all king salmon fishing from Painter Bob’s Cabin” upstream to the ADF&G marker at “Trefon’s Cabin” near the mouth of Naknek Lake.

Big Creek – upstream of its confluence with the Naknek River to its headwaters.

King Salmon: Closed year round to all king salmon fishing

King Salmon Creek – upstream from the ADF&G markers at the confluence of the Naknek River to its headwaters

King Salmon: Closed year round to all king salmon fishing

Pauls Creek - upstream of its confluence with the Naknek River to its headwaters.

King Salmon: Closed year round to all king salmon fishing

What is the issue you would like the board to address and why? Over the years the Naknek River has seen a drastic increase in the number of guided sport fisherman. At the same time, we have seen a notable decrease in the numbers of king salmon in our river. Recognizing this decrease, ADF&G has already closed fishing of king salmon in certain areas, including the mouth of King Salmon Creek to the King Salmon Creek Bridge, and the mouth of Pauls Creek up past the Pauls Creek Bridge. However, this does not stop anglers from fishing the remaining portions of the tributaries king salmon actively spawn.

Currently the upper Naknek River, above the first ADF&G marker located half mile upstream above Rapids Camp, is open to catch and release king fishing. These areas are fished very hard, and it takes a significant toll on the kings when they are most vulnerable. Even catch and release fishing while kings are near or at their spawning stage results in high mortality rates. Anglers end up removing the fish from the water to release them, which is in violation of the law, either because of the difficulty of releasing one of these big powerful fish, or to take pictures. This can easily result in the death of the fish. We are not able to enforce catch and release king fishing and evidence of this is shown on numerous lodge social media sites, web sites, brochures, tv shows and promotional material

It can be argued that the Naknek River is no longer a premier destination for king fishing, as it once was. Once king salmon reach the spawning grounds, the point at which they are most exhausted from their long journey home and therefor the most vulnerable, they should be left alone to spawn, and ensure a viable fishery in future years

What will happen if nothing is done?

If nothing is done we risk the health of the world famous Naknek River king run. Future generations will not be able to enjoy our salmon for which the area is world famous for. The Naknek River will cease to be a premier destination for sport fishermen. Local subsistence users who depend on king salmon for an important food source may also suffer. IF THESE CHANGES ARE NOT IMPLEMENTED WE WILL CONTINUE TO SEE A DECLINE IN OUR OVERALL KING SALMON RETURNS. The pressure from the commercial fishing industry on king salmon entering our tributaries is very high. The added pressure of sport fishermen catching king salmon on their spawning grounds will in no way help the future of the Naknek River's once great king run.

PROPOSED BY: Karl Anderson (EF-F22-073)

PROPOSAL 27

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

Create a nonresident annual limit for coho salmon in the Naknek River drainage, as follows:

We recommend adding an annual bag limit of 15 Silvers for nonresident anglers in the Naknek River Drainage.

New Regulation:

(C) Annual bag limit of 15 Silver Salmon for nonresidents.

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What is the issue you would like the board to address and why? This proposal is to add an annual bag limit of 15 silvers for nonresident anglers in the Naknek River Drainage. Low silver salmon returns, have negatively impacted the silver run the past few years. As we have no fish and game data on the size of the silver salmon run on the Naknek River drainage, we are left to gather our information from fellow guides and local sports fisherman. It is our general consensus that prior to a few years ago our silver salmon run was very strong. Silver salmon bag limits throughout Alaska river drainages average a daily bag limit of two or three silver salmon. Adopting a reduced bag limit or an annual limit will help ensure a sustainable silver salmon run for future generations in the Naknek River Drainage.

PROPOSED BY: Naknek Kvichak Advisory Committee (EF-F22-039)

PROPOSAL 28

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

Close the Nushagak, Mulchatna, and Nuyakuk river drainages to sport fishing for king salmon, as follows:

Sport fishing for chinook salmon in the Mulchatna river drainage, the Nuyakuk river drainage and the Nushagak river drainage upstream of the confluence with the Nuyakuk river will be closed to the fishing of chinook year round. Chinook salmon will not be targeted during fishing in these waters.

What is the issue you would like the board to address and why? Declining numbers of Chinook salmon area wide and the excess amounts of pressure on the spawning areas for Chinook salmon.

PROPOSED BY: Nancy Morris Lyon (HQ-F22-023)

PROPOSAL 29

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

Restrict the Togiak River king salmon sport fishery until a minimum king salmon commercial harvest is achieved, as follows:

Section 5 AAC 67.022 (L)

(l) In the Togiak River Drainage, until the annual commercial catch in the Togiak River section has harvested 2000 king salmon, the following special provisions apply:

1. only barbless, unbaited, single-hook artificial lures or flies may be used; and
2. the bag and possession limit for king salmon less than 20 inches in length (jack salmon) is five fish and;
3. any king salmon caught that are 20 inches or greater in length must be immediately released.

What is the issue you would like the board to address and why? The number of king salmon returning to the Togiak River is at an all-time low. This is reflected in the commercial, sport, and subsistence harvest assessments. Attempts to monitor king salmon escapement have been unsuccessful to date. There is not an escapement monitoring program in place, nor is there a management plan specific to King Salmon in the Togiak River drainage.

Without the ability for managers to monitor escapement of king salmon on the Togiak River, and continual reports of low abundance, additional conservation actions are needed.

The escapement goal of king salmon on the Togiak River was recommended to be discontinued by the ADF&G and was repealed by the BOF in 2012. (Fair et al, 2012)

The oldest continuous documentation on the presence and abundance of king salmon is in the form of traditional knowledge held by subsistence users, which has indicated that the abundance has been relatively low, and returning smaller in recent history. (Jones et al 2019)

Another long-running collection of abundance information are the incidental catch of king salmon in the Togiak River Section of the Togiak District of Bristol Bay's commercial fishery. These catch numbers indicate that the returns of king salmon to the Togiak River are the lowest on record. (Tiernan et al., 2021) (Sands et al., 2021)

In addition to not having the ability to monitor the population, reportedly in decline, there is no daily or annual limit to the number of anglers fishing for king salmon on the Togiak River. Therefore, there is no total annual harvest limit, leaving the king salmon population susceptible to over exploitation..

PROPOSED BY: Jimmy Coopchiak

(EF-F22-027)
