

PROPOSAL 256 (formerly ACR 9) – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area. Repeal the no bait regulation and allow the use of non-roe bait for salmon, other than king salmon.

l) In the Togiak River Drainage

(1) Only unbaited, single hook, artificial lures or flies may be used to target King Salmon. The use of any roe is prohibited for any species of salmon, trout or char.

(2) Bait use – The use of any kind of roe, as bait is prohibited for all species. Non-roe bait may be used to wrap or tip artificial lures, or flies when targeting any species besides King Salmon. 28

(3) King salmon limits *20 inches or longer: no retention allowed. Any king salmon 20 inches or longer must not be removed from the water and must be released immediately.* • *Less than 20 inches: 10 per day, 10 in possession*

(4) Upstream of the confluence of Gechiak Creek and the Togiak River: • Closed year-round to fishing for king salmon.

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

In December of 2022, the Board of Fisheries adopted proposal 29 at the Bristol Bay Finfish meeting, which prohibits the retention of king salmon 20 inches or longer and prohibits the use of all bait when sport fishing for any species on the Togiak River. While this established a framework to conserve and protect adult king salmon, the action taken by the board on this proposal has severely limited the unique sport fishing opportunity that has been developed and implemented for sockeye specifically, but also chum, pink and silver salmon. The all-out bait ban that is currently in effect, largely ignores the fact that 95 percent of the bait traditionally used on the Togiak for king salmon has been cured salmon roe on a single hook, which is also the method with the highest mortality rate, and subsequently the method that has most negatively affected adult king salmon escapement in river over the last 20 years. Non-roe bait has been successfully used in previous seasons to safely and responsibly target not only sockeye, but chum, pink, and silver salmon as well, with no higher mortality than artificial lures on their own.

The Togiak River is not fed by glaciers but rather by a large lake like most Bristol Bay drainages. The difference being that the Togiak River has a different set of limitations when it comes to targeting sockeye by the most traditional Alaskan method – flossing or lining. With the river being fed by Togiak Lake, the water in the river has unbelievable clarity. This prevents the Togiak from having a traditional Kenai, Kasilof, or Russian River sockeye sport fishery in where flossing is the primary method of sport fisherman, because the water in the Togiak is not glacially stained like the aforementioned rivers. With the clear water, and inconsistent number of sockeyes moving along gravel bars due to commercial net schedules, you get very weary and hyper sensitive sockeye that will get spooked, and swim out around sport fishermen attempting to floss, making it a very difficult method to target sockeye, especially with inexperienced fishermen. The solution to this issue has taken many years to develop and is very effective at targeting sockeye in a way where flossing or snagging is not needed, and allows the sockeye to willingly bite.

Before Alaska Administrative Code Number 5 AAC: 67.022 was implemented, Togiak sockeye were targeted in areas where they had begun to stage or slow down before spawning. They could be caught

by fishing a maribou jig or fly, tipped with a small piece of prawn (shrimp) under a bobber. It turns out that sockeye will bite and will bite consistently with this combination. With the development of this method for sockeye during the 2020, 2021, and 2022 seasons – sport fishermen were able to target sockeye intentionally, harvest fish that were willing biters, and not have to hook them against their will by means of flossing, which is really just glorified snagging.

With king numbers down on the Togiak, just like other systems in Bristol Bay, more focus was put on targeting sockeye with this method because they are abundant, willing biters with jig and prawns, and are amazing fighters. This as you might imagine, was a huge hit for Togiak River Lodge guests and many people rebooked trips just to target sockeye with this new method. Here were the benefits to this fishery –

- Sport fishermen could target an abundant species in an ethical and unique manner
- Most of our guests did not want to target king salmon with this sockeye fishery available to them, thus reducing the overall pressure on king salmon and promoting more escapement on down years
- Togiak king salmon do not generally hold in the same water as the sockeye that are being targeted with jig and prawns, thus creating nearly zero by-catch
- If a king salmon was hooked as bycatch when targeting sockeye with jig and prawns, the chance of mortality was extremely low because jigs are almost always hooked right in the mouth and not swallowed like roe is.
- Togiak king salmon are not aggressive towards prawns like Togiak sockeye are.

With the passing of Alaska Administrative Code Number 5 AAC: 67.022, our sport fishery for sockeye has been very negatively affected, and thus has severely reduced our business in late June and July. On the Togiak River, salmon roe as bait is the real issue with regard to king salmon conservation. Like most places in Alaska, Togiak king salmon will ingest salmon roe on single hooks when used as bait all the way into their stomachs 99% of the time, which in turn usually proves fatal to the fish. Allowing the use of non-roe bait, such as prawns, to target sockeye would allow ample sportfishing opportunity, all the while not increasing the chances of king salmon bycatch or mortality, which was the original goal of Alaska Administrative Code Number 5 AAC: 67.022.

Lastly, There is almost zero overlap of Togiak king salmon and silver salmon (ADFG, Area sport fishing reports Bristol Bay) so a bait ban on non-roe bait during August and September when the silvers are in the river, does not accomplish conservation for king salmon but does limit sport fishing opportunity for Togiak silvers in mid-August and September .

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