

**PRINCE WILLIAM SOUND AND UPPER COPPER/UPPER
SUSITNA RIVERS FINFISH AND SHELLFISH (EXCEPT
SHRIMP) PROPOSAL INDEX**

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PRINCE WILLIAM SOUND (INCLUDING UPPER COPPER AND SUSITNA RIVERS) FINFISH AND SHELLFISH (EXCEPT SHRIMP) INDEX (102 PROPOSALS)

Groundfish (29 proposals)

Subsistence Groundfish (1 proposal)

PROPOSAL 1

5 AAC 01.620. Lawful gear and gear specifications; 5 AAC 55.022. General provisions for season, bag, possession, and size limits, and methods and means for the Prince William Sound Area; and 77.XXX. New Section.

Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries, as follows:

This proposal’s intent is to create a new addition in regulation for the PWS area that provides a legal means of fishing for Sablefish with pots. As far as regulation details, I suppose more information that I currently don’t have would need to be researched and considered, such as the possibility of a size limit, catch limit, also the mortality rate of fish released from a pot. Also included, no doubt, would be the number of pots allowed and legal pot design. I would call on the assistance of the proper adfg staff for research data and regulation authorship.

What is the issue you would like the board to address and why? Diverse methods (pot fishing in particular) for sport, personal use, and/or subsistence harvest of Sablefish in Prince William Sound. Currently, the only method available (sport fishing with line and pole) is arguably excessive in gear expense, relatively unpractical for more than one participant per boat due to extreme target depths when compared to other traditional sport fishing activities.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal has been drafted by myself only, but is based on discussions with many differed anglers that are interested in making this a possibility.

PROPOSED BY: Michael Phillips (EF-F24-024)

Commercial Groundfish (23 proposals)

PROPOSAL 2

5 AAC 5 AAC 28.250. Closed Waters in Prince William Sound Area.

Reopen waters closed to the harvest of groundfish in Prince William Sound, as follows:

5 AAC 28.250. Closed waters in Prince William Sound Area

~~(a) Groundfish may not be taken with pots in the waters enclosed by lines from Point Whitshed to Point Bentinck, from Cape Hinchinbrook Light to Seal Rocks Light to Zaikof Point at 60° 18.48' N. lat., 146° 55.10' W. long., and from a point at 60° 11' N. lat., 147° 20' W. long. on the northwest side of Montague Island, north to a point at 60° 30' N. lat., 147° 20' W. long., then east to a point at 60° 30' N. lat., 147° 00' W. long., then northeast to Knowles Head at 60° 41' N. lat., 146° 37.50' W. long., except that groundfish may be taken with pot. (1) within Orea Bay, east of 146° 37.50' W. long., excluding the waters of Port Gravina north of a line from Gravina Point to Red Head at 60° 40.25' N. lat., 146° 30.22' W. long.; (2) in waters not more than 75 fathoms deep within waters enclosed by a line from Johnstone Point Light to Montague Point at 60° 23' N. lat., 147° 06' W. long., to Middle Point at 60° 20.50' N. lat., 147° W. long. to Schooner Rock Light (Zaikof Point) to Cape Hinchinbrook Light.~~

What is the issue you would like the board to address and why? This will correct the action previously taken that closed one gear type out of waters of what is some of the most productive pcod grounds in Prince William Sound during some years. This regulation was passed under the guise of protecting juvenile tanner crab, however with new slinky pot technology crab bycatch is no longer a large issue. If anything, allowing pot harvest in this area will help the crab stocks by reducing predatory pcod biomass. This will also help to curb rockfish bycatch by incentivizing fisherman to fish with slinky pots opposed to hook and line. *Rev.*

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Kenneth B Jones (HQ-F24-008)

PROPOSAL 3

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

Modify Prince William Sound groundfish pot specifications, as follows:

(c) A groundfish pot may be attached to a line connected to another groundfish pot. Groundfish pots may be connected if each end of the buoy line is marked as specified in 5 AAC 28.050. **Groundfish pots as defined in 5 AAC 28.050 may have individual tunnel eye openings with a perimeter greater than 36 inches in the Prince William Sound regulatory area if unused Halibut IFQ is on board.**

What is the issue you would like the board to address and why? Fishermen in the halibut fishery in Prince William Sound fish in the area using IFQ quota from the federal 3A region of which PWS is a part. Those fishermen may wish to fish for halibut with pots to avoid whale depredation issues and reduce bycatch both of which are problems in PWS. The removal of the maximum perimeter size for groundfish pot openings for the PWS area will allow fishermen to better and more effectively fish for halibut with pots and will have an additional benefit of reduced bycatch.

This issue was considered at the federal level recently for the halibut IFQ fishery and regulations there were changed to allow for larger pot openings when fishing for halibut. This change would bring regulations in PWS state waters into coordination with the new federal regulations in the halibut fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I discussed this issue with other some other fishermen and mentioned it to the area Fish and Game groundfish manager but did not discuss in detail.

PROPOSED BY: Brett Roth (HQ-F24-129)

PROPOSAL 4

5 AAC 28.265. Prince William Sound Rockfish Management Plan

Restrict gear in Prince William Sound relative to the rockfish guideline harvest level, as follows:

- (a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days.
- (b) In the Prince William Sound Area, when fishing in a directed fishery, other than for rockfish, a CFEC permit holder must retain all rockfish, except that
 - (1) unless otherwise specified in this section, all rockfish in excess of 10 percent, round weight, of all directed species on board the vessel must be weighed and reported as bycatch overage on an ADF&G fish ticket; any proceeds from the sale of excess rockfish shall be surrendered to the state;
 - (2) during the sablefish fishery, all rockfish in excess of 20 percent, round weight, of all sablefish on board the vessel must be weighed and reported as bycatch overage on an ADF&G fish ticket; any proceeds from the sale of excess rockfish shall be surrendered to the state;
 - (3) during a season for Pacific cod, all rockfish in excess of five percent, round weight, of all Pacific cod on board the vessel must be weighed and reported as bycatch overage on an ADF&G fish ticket; any proceeds from the sale of excess rockfish shall be surrendered to the state;
 - (4) during the directed walleye pollock pelagic trawl fishery, all rockfish in excess of one-half percent, round weight, of all walleye pollock on board the vessel must be weighed and reported as

bycatch overage on an ADF&G fish ticket; any proceeds from the sale of excess rockfish shall be surrendered to the state.

(c) The guideline harvest level is 150,000 pounds (round weight) for all rockfish species combined.

(5) When the guideline harvest level has reached 80 percent of the 150,000-pound GHL auto-bait gear is prohibited within Prince William Sound

What is the issue you would like the board to address and why? In recent years the rockfish GHL has been approached or exceeded in the commercial fishery. Limiting the use of auto-bait gear in Prince William Sound when approaching the GHL would alleviate this and prove effective due to the sheer number of hooks an auto bait vessel can fish versus hand baited vessels.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Kalistrat Kuzmin (HQ-F24-132)

PROPOSAL 5

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

Adopt a provision to close waters to specific groundfish gear types for rockfish conservation, as follows:

5 AAC 28.230 is amended by adding a new subsection to read:

...

(x) To conserve groundfish species, the commissioner may close areas to commercial fishing with specific gear types by emergency order.

What is the issue you would like the board to address and why? The department has growing concerns about the status of rockfish stocks in Prince William Sound (PWS). Rockfish stock status is generally declining across most of the state and the department has restricted many directed rockfish fisheries to conserve these long-lived fish. In some areas of the state most of the rockfish harvest occurs as bycatch in fisheries targeting halibut or other groundfish species. The department has restricted state-managed commercial, sport, personal use, and subsistence fisheries for rockfish for conservation purposes. However, the department does not have authority to restrict the commercial halibut fishery to address rock fish bycatch concerns.

The *Prince William Sound Rockfish Management Plan* (5 AAC 28.265) establishes a rockfish guideline harvest level (GHL) of 150,000 lb and requires full retention of all rockfish caught when participating in a directed commercial groundfish or halibut fishery in the PWS Area. The plan also sets rockfish trip limits, by fishery, as a percentage of the round weight of the directed species on board the vessel. Any amount of rockfish that exceeds this bycatch limit is accounted for as overage and the proceeds from the rockfish overage sale are surrendered to the state.

To stay within the 2023 annual PWS rockfish GHL the department reduced rockfish bycatch limits and did not open the parallel Pacific cod season in PWS. The department further sought the assistance of participants in the halibut longline fishery to set gear away from aggregates of

rockfish. This proved ineffective and the GHL was exceeded when harvest in the halibut longline fishery was still expected to continue for another 2 months. In October 2023, the board adopted an emergency regulation to delegate authority to the department to close commercial fishing with specific gear types in areas of high rockfish bycatch. That emergency regulation has expired. The department has determined that the authority to close these areas is necessary for conservation of the resource and prevent overharvest of a bycatch rock fish species.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-138)

PROPOSAL 6

5 AAC 00.000. Regulation language goes here.5 AAC 28.265. Prince William Sound Rockfish Management Plan.

Allow for release of rockfish in mechanical jig and hand troll fisheries, as follows:

5 AAC 28.265. Prince William Sound Rockfish Management Plan

(b) In the Prince William Sound Area, when fishing in a directed fishery, other than for rockfish, a CFEC permit holder must retain all rockfish, except that

...

(5) In the directed Mechanical Jig and Hand Troll fisheries, rockfish may be released using an approved deepwater release mechanism.

What is the issue you would like the board to address and why? Currently the retention of all rockfish is mandated in all commercial groundfish fisheries. This is due to the high prevalence of barotrauma and subsequent low survival rates in released rockfish. In recent years, the department has done a lot of work with deepwater release mechanisms to improve survivability of released rockfish in the sport fisheries, and those devices are now required for all participants in the saltwater sport fishery. In most commercial fisheries, these deepwater release mechanisms are not feasible, however I believe that in directed jig fisheries they could be incorporated fairly easily. Jig fisheries are not that different then the sport fishery in prosecution, each fish is handled individually, and it would be fairly straightforward to have release mechanisms in place on your jigging machines, which you could easily use to release rockfish on your next drop of your gear. Having the option to release rockfish in this manner would have all the same benefits that it does in the sport fishery. The ability to release long-lived but low-value non-pelagic rockfish, rockfish species that the department wanted to protect, or in the case of Prince William Sound all rockfish while jigging for other species; would have clear conservation and management benefits. I would like to see this put into regulation statewide, but I am aware that might not be possible during this Board cycle.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed this proposal conceptually with multiple ADFG staff members and all indicated that it seemed potentially workable.

PROPOSED BY: Joseph Person (EF-F24-068)

PROPOSAL 7

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

Establish gear specifications for directed lingcod fisheries in Prince William Sound, as follows:

5 AAC 28.230. Lawful gear for Prince William Sound Area

....

(l) in the directed fishery for lingcod, lingcod may be taken only by mechanical jigging machine or hand troll gear.

What is the issue you would like the board to address and why? I would like to see the directed fishery for lingcod in Prince William Sound be brought in line with similar fisheries in the rest of the state and restricted to Mechanical Jig or Hand Troll gear only. Currently Prince William Sound is one of the only directed Lingcod fisheries that allows for harvest using longline gear. In practice this just means that people longlining for other species (basically halibut) can also register for the lingcod fishery and deliver lingcod on their lingcod card without being subject to bycatch limits. This incentivizes fishing for halibut in areas and depths to maximize harvest of lingcod. The problem with this is that we have a significant issue with rockfish bycatch in the longline fishery in PWS whose preferred habitat coincides strongly with lingcod. I believe that bringing the directed lingcod fishery in line with regulations elsewhere in the state and restricting it to a jig fishery could help to reduce rockfish bycatch issues in PWS. Jig fisheries targeted on lingcod can avoid rockfish fairly well. By use of larger tackle used to target lingcod and the fact that in my experience one is highly incentivised to keep gear off the bottom rockfish impacts are very limited. Furthermore, in conjunction with this proposal, I have submitted another proposal requesting the usage of approved deepwater release mechanisms in directed jig fisheries in PWS. Unlike longlining, jig fisheries lend themselves very well to the release of rockfish via deepwater release mechanisms as part of the normal fishing process and the jig fishery has the potential to be almost perfectly clean in regards to rockfish bycatch.

It is likely that even in this case the majority of the lingcod GHL will be taken as longline bycatch, but I believe the removal of directed longline fishing for lingcod will produce some benefit in reducing rockfish bycatch. In both areas on either side of PWS (Lower Cook Inlet/SE Alaska) directed lingcod fisheries are restricted to jig gear types only.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed the issue of rockfish bycatch in PWS with several different ADFG staff. While they appropriately remained neutral on the allocative aspects of this proposal; there definitely seems to be a general consensus that rockfish bycatch in PWS is a problem that needs addressed; and management actions taken recently reflect that.

PROPOSED BY: Joseph Person

(EF-F24-070)

PROPOSAL 8

28.267. Prince William Sound Pacific Cod Management Plan.

Modify the Prince William Sound pacific cod fishery guideline harvest level, as follows:

Increase the pacific cod allocation from the Eastern gulf Federal TAC from 25% maximum now to 35% minimum 50% maximum. If the P.W.S. pacific cod state water harvest reaches 90% or

more increase 5% the following year if the harvest is less than 90% then it will decrease 5% the following year.

What is the issue you would like the board to address and why? The P.W.S. state waters pacific cod qouta is allocated 25% from the Eastern gulf Federal TAC. Most of the time the P.W.S. state water pacific cod qouta is harvested 90% or more but the Eastern gulf Federal pacific cod TAC has almost never been harvested more than 50% on average maybe 25% is being harvested.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Dia Kuzmin

(EF-F24-107)

PROPOSAL 9

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.

Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed, as follows:

Amend the PWS Cod management plan to:

1. Combine the allocation of longline and pot quota.
2. Eliminate longline fishing for pacific cod in state waters when the halibut IFQ fishery is not open

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan as written is difficult to read and interpret. If the board is to pass this regulation we hope the department will take this opportunity to rewrite the regulation to be more accessible and clear.

What is the issue you would like the board to address and why? Modify the Cod Management Plan to allow for the continued switch from longline gear to pot gear, which will result in reduced bycatch of rockfish and other non-target species. These regulatory changes will both incentivise pot use in the cod fishery while not disenfranchising current participants who catch cod alongside their IFQ halibut.

The regulatory change implemented by the Board of Fisheries in 2023 to allow the use of longlined slinky pots for cod was very successful and resulted in the pot allocation being fully harvested, for the first time in years, in 8 days. This success necessitates an adjustment to the allocation between pot and longline vessels. Because many of the boats participate in both the longline and pot fisheries, it makes little sense to split these quotas. We believe by simply combining the allocations for pots and longline, the fleet will switch to pot fishing on their own because it is less labor-intensive.

Additionally we propose an adjustment of the season for longline cod to coincide with the IFQ Halibut fishery. Many fishermen will combo fish both halibut and cod in the same trip and this should be encouraged. However, the current regulation opening the longline cod fishery when the halibut fishery is closed results in bycatch of halibut that must be released. This season date change will also further encourage the adoption of pots by cod fishermen who wish to fish for cod while the halibut fishery is closed.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU)

(EF-F24-136)

PROPOSAL 10

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.

Modify pot limit in the Prince William Sound Pacific cod fishery, as follows:

Amend 5 AAC 28.267 section (e) as follows:

(3) Pacific cod may be taken only with groundfish pots, mechanical jigging machines, hand troll gear, and longline gear, as follows:

(A) except as provided in (g) of this section, no more than 60 groundfish pots **heavier than 30lbs or 120 groundfish pots lighter than 30 lbs** may be operated from a vessel registered to fish for Pacific cod;

What is the issue you would like the board to address and why? Encourage the adoption of slinky pot gear in the Pacific cod fishery by increasing the pot limit for the new lightweight longlined pots.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-137)

PROPOSAL 11

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.

Reduce the Prince William Sound Pacific cod jig/hand troll allocation and create a new, larger allocation for pot and longline gear, as follows:

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan

(e) During a state-waters season,

(1) the guideline harvest level for Pacific cod in the Prince William Sound Area is 25 percent of the estimated total allowable harvest of Pacific cod for the federal Eastern Gulf of Alaska Area; mechanical jigging machine and hand troll gear [and groundfish pot gear] is allocated **5 percent** [15 percent] of the guideline harvest level; **ground fish pot gear** and longline gear is allocated **95 percent** [85 percent] of the guideline harvest level, except that if.

(A)the guideline harvest level allocated to the mechanical jigging machine and hand troll gear [and groundfish pot gear] is taken in any calendar year, the mechanical jigging machine and hand troll gear [and groundfish pot gear] allocation will increase by five percent beginning the following calendar year to a maximum of **15 percent** [30 percent] of the guideline harvest level and the longline **and ground fish pot gear** allocation will decrease by a corresponding five percent the following calendar year to a minimum of **85 percent** [70 percent] of the guideline harvest level; and

(B) the guideline harvest level allocated to the mechanical jigging machine and hand troll gear [and groundfish pot gear] is not taken in any calendar year, the mechanical jigging machine and hand troll gear [and groundfish pot gear] allocation will decrease by five percent beginning the following calendar year to a minimum of **5 percent** [15 percent] of the guideline harvest level and

the longline **and ground fish pot gear** allocation will increase by a corresponding five percent the following calendar year to a maximum of **95 percent** [85 percent] of the guideline harvest level

What is the issue you would like the board to address and why? The current regulation and allocation does not encourage use of pot gear for the majority of the GHL. Pot gear has been proven to reduce rockfish and halibut bycatch considerably. Recent out of cycle changes were passed at the 2023 AYK meeting, this change has allowed for long-lining of pots. This new change allowed for pot gear to harvest their allocation of the pacific cod GHL for the first time in over two decades, it has proven to be a very successful way to harvest pacific cod efficiently while also reducing bycatch of both halibut and rockfish. It is also a substantially more user friendly method of fishing.

Halibut and Rockfish bycatch in the pacific cod fishery can be greatly reduced if more of the fishery is conducted using slinky pots. Fisherman looking to fish a cleaner gear type and access more of the GHL should be celebrated and encouraged, unfortunately if left unchanged the current allocation plan greatly dis-incentivizes fisherman from pursuing a cleaner fishing gear type. This proposed change would not force anybody currently participating to switch from hook and line to pots, however it would allow pot fisherman to access more of the total GHL currently held exclusively for the hook and line fisherman.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have worked with multiple other permit holders and interested parties on this idea.

PROPOSED BY: Kenneth B. Jones (HQ-F24-045)

PROPOSAL 12

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.

Increase Pacific cod allocation for jig and pot gear to 50%, as follows:

Increase the PWS state water pot and jig pacific cod qouta to 50% from 20%.

What is the issue you would like the board to address and why? In P.W.S. state waters rock fish bycatch qouta has been exceeded last couple years. Currently the pacific cod hook and line allocation is 80% and pot and jig is 20%. Increase the pot and jig qouta to 50% from 20% that would reduce the rock fish bycatch. With recent opening of long lining slinky pots the cod qouta has been fully harvested and pots have less bycatch that would conserve more rock fish.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Dia Kuzmin (EF-F24-178)

PROPOSAL 13

5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.

Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery, as follows:

Allow 100% bycatch retention of long nose and big skate during the P.W.S. state water longline directed pacific cod and halibut fisheries until 25% of the Eastern gulf Federal TAC has been reached for skate. Before the federal pacific cod qouta reduction and with decreased skate bycatch

allowance from 20% to 5% now there is alot less skate being harvested. Most years the federal skate TAC is around 50% being harvested. With recent reduced pacific cod qoutas skate harvest is very minimal now. It would give more opportunities for the mostly small vessel boat fleet and the local economies a needed boost.

What is the issue you would like the board to address and why? Under current regulations there is very limited opportunity to harvest skate. Over the last several years some years large percentages of the Eastern gulf Federal TAC go unharvested. This is a very healthy resource that once supported a lucrative directed fishery. It currently is under utilized and could provide major economic benefits to coastal communities.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Dia Kuzmin (EF-F24-104)

PROPOSAL 14

5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.

Close the Prince William Sound walleye pollock pelagic trawl fishery, as follows:

Add a new section to 5 AAC 28.263. PWS Walleye Pollock Pelagic Trawl Fishery Management Plan.

- x) A direct Alaska pollock Pelagic trawl fishery in PWS is prohibited unless;
 - 1) No part or attachment to the Pelagic trawl gear makes contact with the seafloor habitat.
 - 2) There is no bycatch of Chinook salmon in the PWS Pollock Pelagic trawl fishery.

What is the issue you would like the board to address and why? Reduce the precipitous rise in Chinook salmon bycatch in PWS taken by the Pollock Pelagic Trawl fishery and reduce disturbances to the seafloor caused by trawling. Numerous Alaskans living in Interior and SouthCentral Alaska gather chinook salmon as part of their annual wildfood source from PWS, Protecting the habitat upon which our wildfood source depends has been the Alaska Outdoor Council's top purpose for decades.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The proposal was developed through the Alaska Outdoor Council member clubs who depend on wildfood stocks from PWS as part of their annual wildfood source.

PROPOSED BY: Alaska Outdoor Council (EF-F24-106)

PROPOSAL 15

5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

Modify bycatch limits in the Prince William Sound pelagic trawl fishery, as follows:

(d) During a directed walleye pollock pelagic trawl fishery, the total bycatch weight of all species combined may not exceed **an amount set by ADFG of xxx lbs** [FIVE PERCENT] **regardless** of the total round weight of the walleye pollock harvested.

What is the issue you would like the board to address and why? Current bycatch limits are set not to exceed five percent of the total round weight of the harvest. By putting a bycatch cap in regulations, it will make it so the bycatch amount doesn't increase if the GHL increases. This will help greatly in reducing bycatch. Additionally, it should be mandatory that bycatch is brought back to port and surrendered to ADFG.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: The Chenega IRA Council (HQ-F24-123)

PROPOSAL 16

5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

Close the Prince William Sound pelagic trawl fishery, as follows:

Closure of the Prince William Sound Walleye Pollock Pelagic Trawl Fishery to preserve PWS.

What is the issue you would like the board to address and why? It is our belief that the Prince William Sound (PWS) Walleye Pollock Trawl Fishery is causing significant damage to the ecosystem in PWS and should be closed.

There is sufficient evidence of this by looking at the bycatch species they are harvesting. After discussions with local ADFG staff, it's been determined that the rockfish bycatch is predominantly shortraker rockfish. Shortraker rockfish are a deepwater fish living in depths typically greater than 800' and are considered bottomfish. While the PWS Walleye Pollock Trawl Fishery is supposed to be a midwater trawl fishery, evidence suggests they are dragging the bottom based on their bycatch. Repeated years of dragging the bottom causes serious damage by destroying the natural seafloor habitat and disrupting the ecosystem.

PWS holds many resources utilized by several user groups and it is in the best interest of all user groups to preserve the waters for current and future generations.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed in conjunction with The Chenega Corporation, Raymond Nix, and information obtained from ADFG.

PROPOSED BY: The Chenega IRA Council (HQ-F24-124)

PROPOSAL 17

5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

Establish observer requirements in the Prince William Sound pelagic trawl fishery, as follows:

(h) The commissioner **shall** [MAY] require **100% onboard electronic observation and 50% physical** onboard observers on a vessel during fishing operations.

What is the issue you would like the board to address and why? Prince William Sound Walleye Pollock Trawl fishery is the only trawl fishery in the state with 0% observer coverage and is relying solely on the user group for accurate reporting. By requiring electronic and physical observation, this will allow verification of bycatch amounts and prevent over-fishing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed in conjunction with The Chenega Corporation and ADFG for information.

PROPOSED BY: The Chenega IRA Council (HQ-F24-125)

PROPOSAL 18

5 AAC 28.210. Fishing seasons for Prince William Sound Area.

Extend the season dates in the Prince William Sound sablefish fishery, as follows:

Extend the fishery closer from August 31st through the end of October.

What is the issue you would like the board to address and why? Would like the board to consider extending the fishing period for the Prince William Sound Sablefish fishery through October.

This would enable permit holders more opportunity to fish their quota and potentially afford greater market flexibility.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I consulted with the current ADFG management biologist.

PROPOSED BY: Brad von Wichman (EF-F24-086)

PROPOSAL 19

5 AAC 28.210. Fishing seasons for Prince William Sound Area. 5 AAC 28.206. Prince William Sound Area registration. 5 AAC 28.272. Sablefish harvest, possession, and landing requirements for Prince William Sound Area.

Modify the commercial fishing season for sablefish in Prince William Sound, as follows:

Amend 5 AAC 28.210 to read:

(b) Sablefish may be taken in the Inside District **during the “A” Season** from april 15 through august 31 **and during the “B” season from September 15th - December 31st**. There is no open season for commercial sablefish fishing in the Outside District.

Amend 5 AAC 28.206 to read:

(c) In the Inside District, a Prince William Sound CFEC sablefish permit holder, or

The permit holder's agent must register for the commercial sablefish fishery before 5:00 p.m. April 1st. **Registration for “B” season will open September 1st and close September 7th at 5:00 pm.** Amend 5 AAC 28.272 to read

(c) In the Prince William Sound Area, the holder of a CFEC limited entry permit or interim-use permit to take sablefish may not take more than the [ANNUAL] **seasonal** amount specified by the department. The department will determine the [ANNUAL] **seasonal** amount as follows:

(1) the [ANNUAL] **“A” season** amount will be the sum of one-half of the annual harvest objective divided by the number of permit holders registered to fish in the commercial sablefish **“A” Season** fishery and one-half of the annual harvest objective multiplied by the average percentage of the harvest taken by the vessel category for which the CFEC permit was issued, as specified in 20 AAC 05.779, and divided by the number of permit holders registered to fish sablefish with the permits of that vessel category;

(2) the “B” Season amount will be the sum of one-half of the remaining annual harvest objective unharvested during the “A” Season divided by the number of permit holders registered to fish in the commercial sablefish “B” Season fishery and one-half of the annual harvest objective multiplied by the average percentage of the harvest taken by the vessel category for which the CFEC permit was issued, as specified in 20 AAC 05.779, and divided by the number of permit holders registered to fish sablefish with the permits of that vessel category;

(3)[(2)] the average percentages of harvest for the vessel categories described in (1) and (2) of this subsection are as follows:

What is the issue you would like the board to address and why? Sablefish in PWS are managed under an individual quota system with each registered permit holder given a share of the GHL each year. In recent years, this system has resulted in much of the GHL being unharvested due to either registered permits not actually participating in the fishery, or not catching their allocated share. In 2023 only 50% of the GHL was harvested.

We propose creating a fall "B" season that occurs every year after the close of the traditional fishery. Any share of the GHL unharvested during the traditional "A" Season would be redistributed and could be harvested by active permit holders during the "B" season. This change will not take anything away from existing permit holders, or change the existing allocation between permit types; it is simply giving more opportunity to fully utilize the resource. During the most recent 10 year period from 2014-2023, only 55% of the total GHL was harvested.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-130)

PROPOSAL 20

5 AAC 28.210. Fishing seasons for Prince William Sound Area. 5 AAC 28.206. Prince William Sound Area registration.

Modify the commercial fishing season for sablefish in Prince William Sound, as follows:
Amend 5 AAC 28.210 to read:

(b) Sablefish may be taken in the Inside District **beginning concurrent with the opening of the federal sablefish IFQ fishery** [FROM APRIL 15] through August 31 There is no open season for commercial sablefish fishing in the Outside District.

Amend 5 AAC 28.206 to read:

(c) In the Inside District, a Prince William Sound CFEC sablefish permit holder, or the permit holder's agent, must register for the commercial sablefish fishery before 5:00 p.m. [APRIL 1] **February 15th**

What is the issue you would like the board to address and why? Current season timing excludes many participants in PWS Salmon fisheries from participating in the PWS sablefish fishery. These expanded dates will better align with the federal fishery in the Gulf and will allow fishermen to get the most value from their catch. The GHL for Sablefish has not been fully harvested in recent years in part due to the overlap of the season with other fisheries.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-131)

PROPOSAL 21

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

Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound, as follows:

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

(j) Except as provided in k **& 1** of this section, in a groundfish fishery, a person may have only one type of legal gear on board the vessel.

(k) In a groundfish fishery, mechanical jigging machines and hand troll gear may be used at the same time. If mechanical jigging machines and hand troll gear are being used under this subsection, only that gear may be on board the vessel.

(l) In the Prince William Sound Sablefish and IFQ Halibut fisheries, longlines and pots may be used at the same time. If longlines and pots are being used under this subsection, only longline and pot gear may be on board the vessel.

What is the issue you would like the board to address and why? Fishermen in the Prince William Sound Sablefish fishery, as well as sometimes in the IFQ Halibut fishery in PWS, encounter issues with whale depredation. Pots have shown themselves to be an effective method of avoiding whale depredation and many fishermen currently use them for this reason.

This change, or one similar, if adopted by the board would give important flexibility to operators seeking to harvest their quota and reduce costs and save time for those operators as well. Firstly, if a boat encountered whale depredation, they could still have a viable method of harvest on that trip with their pot gear until the quota is filled or the whale depredations conditions improve.

Without this change, vessels targeting sablefish and halibut with hooks can try fishing with pots but to do so not only do they have the expense of purchasing and setting up for the gear they also must return to port to switch gear types. This results in significant monetary and time costs to the fishermen and is a deterrent to trying to newer (to most) pot gear.

This change could result in additional benefits with fishermen such as being allowed to “try out” smaller sets of pot gear while longlining to see how it works for their vessel before committing to the substantial expense of buying a new gear type that they may not be familiar with. Pot gear will have additional benefits to the resource beyond avoidance of whale depredation, most notably reduced bycatch. Lastly, having and fishing both gear is currently legal in these fisheries in federal waters.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I discussed a similar and broader proposal with the Whittier AC, of which I am a member, who were in support of it and willing to submit it as an AC. This narrower proposal is modified from what they saw to be more specific to the Sablefish and Halibut fisheries due to my subsequent realization that PWS has separate longline and pot P. cod quotas and therefore the simple change to “groundfish” gear I had presented to them could create confusion in those fisheries. I also consulted the Alaska Department of Fish and Game Commercial Fish Manager for PWS Groundfish who was very helpful.

PROPOSED BY: Brett Roth (HQ-F24-120)

PROPOSAL 22

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

Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound, as follows:

Amend the legislation to read:

(j) Except as provided in sections (k) **and (l)**, in a groundfish fishery, a person may have only one type of legal gear on board the vessel.

(l) When participating in PWS sablefish fishery or Halibut IFQ, longline gear and sablefish pot gear (as defined in subsection c) may be used at the same time. If longline gear and sablefish pot gear are being used under this subsection, only that gear may be on board the vessel.

What is the issue you would like the board to address and why? Allow the combined use of pot gear and longline gear by fishermen participating in the PWS sablefish fisheries and the halibut IFQ fisheries. Currently a fisherman is not allowed to use both hooks and pots during the same trip in state waters. This needs to be changed to account for the recent adoption of black cod pots by the fleet. There isn't a restriction like this in the federal fishery, and because of this the fleet has been able to experiment with using pots to target black cod and halibut. Using pots reduces bycatch of non-target species like rockfish and also eliminates whale depredation. These are two things that should be encouraged in state waters.

Allowing both gear types to be used simultaneously in state waters will benefit fishermen and the resource in numerous ways: small boats could begin to use some pots, when normally they can only fish a limited number of sablefish pots and would fish hooks for combo black cod and halibut

trips; fishermen could to continue to experiment with using pots to harvest halibut, which will result in lowered bycatch of rockfish and whale depredation; and it will eliminate a legal gray area for fishermen transiting state waters with pots and hooks aboard after fishing federal waters.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-132)

PROPOSAL 23

5 AAC 28.272. Sablefish harvest, possession, and landing requirements for Prince William Sound Area.

Prohibit the retention of sablefish from state waters, as follows:

Modify subsection (g) of 5 AAC 28.272. Sablefish harvest, possession, and landing requirements for Prince William Sound Area.

(g) An operator of a vessel retaining sablefish in federal waters may not [OPERATE GEAR] **retain sablefish** in state waters of the Prince William Sound Area during the same trip.

What is the issue you would like the board to address and why? Current regulations make it impossible for an operator who owns federal sablefish quota to move between federal and state waters during a halibut trip. This is because when fishing in federal waters, a fisherman is required to retain sablefish if they have quota shares aboard whether or not they are target sablefish. This creates a situation where once a trip is started halibut fishing in PWS, the operator is not able to move to federal waters if they find poor fishing or unacceptable amounts of bycatch without first making an expensive run back to port to deliver. We believe the intent of this regulation was to prevent sablefish caught in federal or state waters being sold as one or the other. However, that is not a realistic scenario and will still be prevented under our proposed language and under standwide regulation 5AAC 28.070. This simple change in regulatory language will increase efficiency for fishermen and also has the potential to lower rockfish bycatch in PWS.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-133)

PROPOSAL 24

5 AAC 28.210. Fishing Seasons for Prince William Sound Area

Lengthen the commercial fishing season for sablefish in Prince William Sound, as follows:

5 AAC 28.210. Fishing seasons for Prince William Sound Area

(b) Sablefish may be taken in the Inside District from **April 1 through October 31**. There is no open season for commercial sablefish fishing in the Outside District.

What is the issue you would like the board to address and why? Changes to the PWS Sablefish season dates. The Season dates were originally kept short in an effort to avoid whale depredation

during spring and fall time when salmon were not running, however this regulation is now outdated with the invention of slinky pots and their effective reduction in the whale depredation. Adopting an expanded season will allow for fisherman to harvest earlier and later and participate in both the black cod and salmon fisheries. Further encouraging slinky pot adoption will reduce bycatch in the hook and line harvest methods. This idea came to the board in 2014 however that proposal only extended dates for pot fisherman, it was rejected at that time only because it did not include all gear types. While an expanded season will certainly incentivize pot fishing, this proposal if adopted would not prohibit somebody from fishing one gear type or another. During the COVID years ADFG expanded the season with little or no negative effects on the resource or participants.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have worked with multiple other permit holders on this idea, these dates represent a compromise between multiple viewpoints.

PROPOSED BY: Kenneth B Jones (HQ-F24-007)

Personal Use Groundfish (2 proposals)

PROPOSAL 25

5 AAC 77.XXX. New section.

Establish a personal use sablefish fishery in Prince William Sound, as follows:

Adapt current regulations from the SE personal use sablefish fishery into a new personal use permit program or adapt the existing permit to include PWS.

(Adapted from regulations for the Southeast Personal Use Groudfish Fishery)

Regulations Specific to Personal Use Sablefish Fishery

In the PWS Area, personal use sablefish may be taken as follows:

- A personal use fishing permit issued by the department is required to take sablefish; only one permit will be issued per household per year.
- Permit holder or a household member listed on the permit must have permit in possession when fishing.
- Pot gear may not exceed two pots per permit holder or eight pots per vessel when four or more permit holders are present.
- Personal use sablefish pots may not be longlined and a buoy is required for each pot.
- Pots must comply with escape mechanism requirements in 5 AAC 39.145.
- The personal use annual limit is 50 sablefish per household permit.
- No more than 200 personal use sablefish may be retained on board a vessel when four or more sablefish permit holders are present on board that vessel.
- A permit holder shall record fishing activity on the permit Fishing Report prior to leaving the fishing site.
- A vessel or person on board a vessel commercial fishing for sablefish in the PWS may not operate subsistence or personal use longline gear for bottomfish from that vessel until all commercial sablefish are offloaded from the vessel.

Note: Longline gear was excluded to address potential bycatch issues with sensitive non-pelagic rockfish species such as: shortraker, roughey and yelloweye rockfishes.

What is the issue you would like the board to address and why? Current personal use finfish regulations for Prince William Sound do not address opportunity for a personal use sablefish fishery similar to that in the Yakutat/SE Alaska areas. Data I was able to find from the ADF&G website indicate a 2023 GHF for PWS sablefish of 269000 lbs. with a harvest of 136000 lbs. This leaves a surplus of 133000 lbs. to support a personal use sablefish fishery in PWS. Sablefish are not split out from other groundfish in the PWS for personal and/or sport utilization. Current regulations for PWS personal and sport groundfish fisheries, for practical reasons, restrict the targeting of sablefish to hand rods and electric reels to reach sablefish in the depths they inhabit of 1000+ feet. With the limited number of hooks and the depth to be fished this becomes a very inefficient means of harvest. Allowing the use of slinky pots would give residents a more efficient means of harvest to access this under utilized resource. Overall harvest for this fishery is likely to be of minimal impact to commercial interests due to the amount and cost of specialized gear required.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was not developed in coordination with the local Fish and Game Advisory Committee.

PROPOSED BY: Robert Swanson (EF-F24-016)

PROPOSAL 26

5 AAC 77.XXX. New Section.

Establish a Prince William Sound groundfish personal use fishery, as follows:

I would like to increase the ability of sport fisherman to target sablefish in Prince William Sound by designating pot fishing as a legal means of targeting this species. This could be under sport fish regulations or a personal use fishery. I would suggest a system like the current shrimp or tanner crab systems, allowing for two pots per person/two pots per vessel, with the same buoy marking requirements as the shrimp and tanner fisheries. Pot dimensions and escape mechanism requirements would have to be determined and include the use of slinky pots. Currently there is no bag limit or season restriction for sablefish in Prince William Sound. Due to the gear requirements of fishing these depths it is likely an increase in participation in this fishery would be limited and not require the introduction of a bag or possession limit. In any case a permit could be required like the shrimp and tanner fisheries, and catch could be limited and recorded on this permit as well. I would suggest it be open year-round as I specifically would like to be able to target these fish in the early spring and late fall when the sound isn't so busy.

Due to the depth required to fish sablefish and the unlikeliness of a deep-water release mechanism working at these depths, it would be best to allow for take of rockfish and octopus in this pot system, pursuant to the current bag limits already in place. The take of octopus is already allowed in the shrimp pot fishery. Incidental rockfish take would likely be minimal. Halibut could be released unharmed if captured.

Here is a possible change to the AAC:

(a)(13-new section) sablefish may be taken as follows:

(A) may be taken from January 1 - December 31; no bag and possession limit; no size limit;

(B) no more than 2 pots per person, with no more than 2 pots per vessel, may be used to take blackcod;

(C) all sablefish pots will follow standards determined by the department and include the use of slinky pots.

What is the issue you would like the board to address and why? According to current regulations in Prince William Sound, rod and reel are the only means sport fishermen have of targeting sablefish. In the sound most mature sablefish are found below 1400 feet water depth, making them very difficult to target with traditional rod and reel, and nearly impossible if the weather conditions are not perfect.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. ADF&G staff were contacted for guidance on how to structure this proposal.

PROPOSED BY: Garrett McLean

(EF-F24-035)

Sport Groundfish (3 proposals)

PROPOSAL 27

5 AAC 55.022. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Prince William Sound Area.

Modify rockfish bag and possession limits, as follows:

5 AAC 55.022(a)(9)(A) is amended to read:

...

(9) rockfish:

(A) may be taken from January 1 – December 31; bag limit of **three** [FOUR] fish; possession limit of **six** [EIGHT] fish, of which only one per day and in possession may be nonpelagic rockfish; no size limit; **yelloweye rockfish may only be retained from July 1 – December 31;**

What is the issue you would like the board to address and why? The harvest of rockfish in many areas of Alaska has been increasing and is assumed to be associated with a shifting of effort from Pacific halibut to other species by charter (guided) anglers due to reduced sport fishing opportunities associated with the Halibut Catch Sharing Plan. The anticipated continued shifting of effort and the late-maturing life history strategy of rockfish requires a precautionary management approach until better information is available.

Recognizing the increasing statewide harvest trends in rockfish, the department formed the Statewide Rockfish Initiative in September 2017 with a goal of developing strategies that will support long-term adaptive management for rockfish. Work towards stock assessments that include data from all fisheries has been ongoing. Most recently, stock assessments on yelloweye rockfish for Prince William Sound Inside waters have neared completion and management staff are working towards final development of sustainable harvest levels and are considering additional management tools to help manage these fish at a sustainable level.

In addition, sport fish rockfish bag and possession limits are not aligned between Prince William Sound (PWS) and Cook Inlet–Resurrection Bay saltwater areas due to changes that took place at the November 2023 Lower Cook Inlet Board of Fisheries meeting. During the Lower Cook Inlet Board of Fisheries meeting the board took up multiple proposals to address the increasing rockfish harvest trends and declines in biological compositions, with a focus on pelagic species such as black rockfish. The board adopted Proposal 19 and reduced bag limits to three fish and possession limits to six fish, of which only one per day and two in possession could be a nonpelagic rockfish.

To maintain continuity between areas and taking proactive conservation measures, the department has determined that a bag limit of three and possession limit of six rockfish is necessary in Prince William Sound as well. Currently the possession limit for nonpelagic rockfish is only one, which should stay the same considering the higher harvest of nonpelagic rockfish, mainly yelloweye rockfish, in the PWS area. However, the Cook Inlet–Resurrection Bay saltwaters do not have a seasonal closure for yelloweye rockfish due to lower harvest and no stock assessment information available. By adding a seasonal retention period for yelloweye rockfish that aligns with the lingcod open season in PWS, there will not only be an overall reduction of harvest of yelloweye rockfish, but also the timeframe would be considered a spawning closure. This closure time period is when yelloweye rockfish copulate, gestate, and majority release their larvae, based on studies conducted by the department for yelloweye rockfish in PWS. These proposed regulatory changes were put in place by emergency order during the 2022 and 2023 seasons.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F24-165)

PROPOSAL 28

5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Modify the rockfish area, bag and possession limit, as follows:

Bag and possession limits for inside PWS waters should follow what the Department has recommended by emergency order in 2023 and 2024. However, outside waters should be 4 per daily bag limit and 8 in possession. In addition, outside waters nonpelagic possession should be the same as North Gulf Coast and allow for a double bag limit of 2.

(9) rockfish:

(A) Inside PWS Waters may be taken from January 1-December 31; bag limit of [FOUR] **three** fish; possession limit of [EIGHT] **six** fish, of which only one per day and in possession may be nonpelagic rockfish; no size limit **(B) Outside PWS Waters:** may be taken from January 1-December 31; bag limit of four fish; possession limit of eight fish, of which only one per day and **two** in possession may be nonpelagic rockfish; no size limit; **only one nonpelagic in possession may be a yelloweye rockfish**

What is the issue you would like the board to address and why? Current PWS rockfish regulation:

(9) rockfish:

(A) may be taken from January 1 - December 31; bag limit of four fish; possession limit of eight fish, of which only one per day and in possession may be nonpelagic rockfish; no size limit; -In 2023 and 2024, ADFG has reduced the bag and possession limit by one fish and also closed the retention of yelloweye for 2-3 months.

My previous proposal was to break out the Prince William Sound sport fish management area. This proposal is to allow different bag limits for the inside and outside PWS areas for rockfish. As stated in the previous proposal, the area is so vast that regulatory and management requirements could be different in these different waters. The Department is already examining some rockfish species by inside and outside waters. I believe this will allow more effective management of PWS

inside waters and relaxed management of PWS outside waters. I believe it to be necessary to further regulate PWS inside rockfish regulations however PWS outside waters have far less effort and I believe populations are stronger outside therefore bag and possession limits could be higher without causing further damage to the inside waters.

In my experience as a charter operator for 13 years, I have noticed a decline in size and number of rockfish on inside waters and a more constant number and size on outside waters.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Consulted ADFG for information.

PROPOSED BY: Raymond Nix (HQ-F24-083)

PROPOSAL 29

5 AAC 55.xxx. Yelloweye rockfish delegation of authority and provisions for management for the Prince William Sound Area.

Create additional provisions for yelloweye rockfish management, as follows:

5 AAC 55.xxx is to create new language to read:

...

(a) The purpose of this delegation of authority is to stabilize the harvest of yelloweye rockfish in the waters of the Prince William Sound Area. Yelloweye rockfish will be managed for long-term sustainability of the stock. If the commissioner determines that the yelloweye rockfish sport fishing regulations must be modified to keep the sport fishery within a sustainable harvest level, the commissioner may, by emergency order, require one or more of the following management measures:

- (1) modify bag and possession limits for nonresident anglers;**
- (2) implement an annual limit for nonresidents;**
- (3) charter vessel operators and crewmembers may not retain rockfish while clients are on board the vessel;**
- (4) implement an annual limit for resident anglers;**
- (5) implement a size restriction.**

What is the issue you would like the board to address and why? The Statewide Rockfish Initiative was established in September 2017 with a goal of developing strategies that will support long-term adaptive management for rockfish. Work towards stock assessments that include data from all fisheries have been ongoing, most recently for yelloweye rockfish in Prince William Sound Inside waters (PWSI). Department staff are working towards determining sustainable harvest levels and the Division of Sport Fish will need additional tools to manage yelloweye rockfish at a sustainable level and prioritize harvest opportunity for Alaska residents.

There are limited provisions for management of the yelloweye rockfish sport fishery in Prince William Sound, outside of existing emergency order authority. With the increases in the harvest of yelloweye rockfish and stock assessment data for PWSI yelloweye rockfish indicating that current harvest levels are not sustainable in the long-term, additional tools are needed to allow harvest opportunity while managing for sustainability in the sport fishery.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-166)

Shellfish (14 proposals)

Subsistence Shellfish

PROPOSAL 30

5 AAC 02.207. Lawful gear for subsistence king and Tanner crab fisheries.

Increase subsistence Tanner crab pot limit in portions of Prince William Sound, as follows:

Increase current subsistence pot limits from two pots per vessel to eight pots per vessel in zones 466033, 466032, 466003, 466005, 466002, 466031, 456031, 456032, 456002, 4566003, 466001, 456001, 456004, and 446001.

What is the issue you would like the board to address and why? The Subsistence Tanner crab fishery’s two pot limits across the sound does not allow a reasonably diligent person to acquire an adequate number of crab to meet their needs due to lower densities and longer distances to travel. Because crab densities are lower, but still harvestable is southeast PWS we do not believe a vessel pot limit is necessary in this area.

We propose to modify and increase Tanner Crab subsistence pot limits in southeast Prince William Sound. Currently, a vessel may only use two pots, even when multiple permit holders fish together. Allowing each permit holder their own two pot limit, up to eight total pots per vessel, would provide the opportunity to economically harvest crab whereas it is cost-prohibitive and impractical now. We do not believe individuals from northern and western PWS communities would travel to the southeastern crab fisheries to take advantage of this larger pot limit because they would be passing better crabbing grounds enroute where they could efficiently harvest their limits with only two pots per vessel.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Cultural Department in collaboration with the Department of the Environment and Natural Resources. It was vetted through the Tribe’s Natural Resources Advisory Council and recommended it to Tribal Council who unanimously approved this submission.

PROPOSED BY: Native Village of Eyak

(HQ-F24-097)

PROPOSAL 31

5 AAC 02.236. Closed waters and 5 AAC 35.312. Closed waters in Registration Area E.

Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries, as follows:

Remove the closed waters regulation for both the subsistence and commercial fishery.

5 AAC 02.236. Closed waters.

(a) Shellfish may not be taken in the nonsubsistence area of Prince William Sound as described in 5 AAC 99.015(a)(5).

[(B) THE FOLLOWING WATERS ARE CLOSED TO THE TAKING OF KING AND TANNER CRAB FOR SUBSISTENCE PURPOSES:

(1) PORT VALDEZ: NORTH OF 61° 01.00' N. LAT.;

(2) GALENA BAY: EAST OF A LINE FROM 60° 57.63' N. LAT., 146° 45.17' W. LONG. TO 60° 58.41' N. LAT., 146° 43.34' W. LONG;

(3) PORT FIDALGO: NORTH OF A LINE FROM PORCUPINE POINT AT 60° 44.62' N. LAT., 146° 42.08' W. LONG. TO BIDARKA POINT AT 60° 49.14' N. LAT., 146° 38.45' W. LONG.;

(4) PORT GRAVINA: NORTH OF A LINE FROM GRAVINA POINT AT 60° 37.37' N. LAT., 146° 15.22' W. LONG. TO RED HEAD AT 60° 40.25' N. LAT., 146° 30.22' W. LONG.]

[5 AAC 35.312. CLOSED WATERS IN REGISTRATION AREA E. THE FOLLOWING WATERS ARE CLOSED TO THE TAKING OF TANNER CRAB:

(1) PORT VALDEZ: NORTH OF 61° 01.00' N. LAT.;

(2) GALENA BAY: EAST OF A LINE FROM 60° 57.63' N. LAT., 146° 45.17' W. LONG., TO 60°

58.41' N. LAT., 146° 43.34' W. LONG.;

(3) PORT FIDALGO: NORTH OF A LINE FROM PORCUPINE POINT AT 60° 44.62' N. LAT., 146°

42.08' W. LONG., TO BIDARKA POINT AT 60° 49.14' N. LAT., 146° 38.45' W. LONG.;

(4) PORT GRAVINA: NORTH OF A LINE FROM GRAVINA POINT AT 60° 37.37' N. LAT., 146° 15.22'

W. LONG., TO RED HEAD AT 60° 40.25' N. LAT., 146° 30.22' W. LONG.]

What is the issue you would like the board to address and why? Current closed water regulations were passed at the 2017 and 2021 board cycles and were not properly vetted at that time. A large amount of changes occurred in the Tanner Crab fishery during those board meetings. CDFU does not feel the public had ample time to digest and comment on the proposals.

Closed waters for Tanner Crab fisheries do not exist elsewhere in the state and should not exist here. In Kodiak and Southeast, both highly productive Tanner Crab fisheries, there are no closed waters for Tanner Crab fishing.

The department's justification for these closure areas was that they are "Tanner Crab nursery grounds". For many reasons, it does not make sense to close areas based on where juvenile crab might live. Tanner Crab populations do not stay in the same geographic location from month to month, or year to year. Areas where the department identifies as having high concentrations of female or juvenile crab during their summer trawl survey may look completely different by the time the winter fishery occurs. Additionally, where PWS juvenile crabs congregate can change from one board cycle to the next. It does not make sense for the department to examine and close PWS areas every time a new biomass of juveniles is found. It also does not make sense to reassess nursery closures each board cycle.

Finally, we should not create nursery closures because there is minimal potential harm to juveniles and females by crab pots. Undersized crab either escape out of the escape rings or are returned to the water unharmed. The department also does trawl surveys through these "nursery areas" and uses their catch to develop the GHL for the eastern district. This mismatch of using survey data to set a GHL from an area closed to harvest the GHL could be part of the reason the GHL was unattained in 2022.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-126)

PROPOSAL 32

5 AAC 02.215. Subsistence Dungeness Crab fishery, 5 AAC 32.210. Fishing seasons for Registration Area, and 5 AAC 32.290. Prince William Sound Dungeness Crab Fishery Management Plan.

Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound, as follows:

In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

1. **Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31**
2. **the daily bag and possession limit is 5 crab per person**
3. **only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;**
4. **a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot**
5. **no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.**

What is the issue you would like the board to address and why? The Dungeness fishery in Area E closed in 1992 for reasons stated by the department as "low crab abundance". However, no other Dungeness Crab fishery in Alaska is managed based on abundance. Dungeness Crab fisheries from California to the Aleutian islands are managed by regulating size, sex, and season (3-S management) with no crab abundance estimates or GHs. 3-S management has proven to be extremely effective as it restricts harvest to large Dungeness males that have already had a chance to reproduce.

Incidental capture on the Copper River and by subsistence Tanner crabbers in Orca Inlet shows evidence of growing Dungeness populations in Area E; which is consistent with the recent statewide boom from Southeast to Area M. ADFG has not shared data to support their assertion of

low crab abundance. The last survey conducted by ADFG was in 2013 with only 13 pot lifts - not enough data to draw population conclusions.

We ask the board to open the commercial and subsistence Dungeness fisheries using the successful 3-S management employed elsewhere in Alaska.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-127)

PROPOSAL 33

5 AAC 02.XXX. New Section.

Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area, as follows:

- (a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species AND SHELLFISH IN PRINCE WILLIAM SOUND ZONES in zones 466033, 466032, 466003, 466005, 466002, 466031, 456031, 456032, 456002, 4566003, 466001, 456001, 456004, and 446001 where the Board of Game (board) has established a community harvest hunt area under
- (b) of this section and 5 AAC 92.074

What is the issue you would like the board to address and why? Community Subsistence Harvest Permit to Include Shellfish

- (a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Cultural Dept. and Dept. of the Environment & Natural Resources, recommended by the Tribe's Natural Resources Advisory Council and unanimously approved by its Tribal Council.

PROPOSED BY: Native Village of Eyak (HQ-F24-096)

Tanner Crab (5 proposals)

PROPOSAL 34

5 AAC 35.308. Registration Area E Tanner crab harvest strategy.

Repeal the Registration Area E Tanner crab harvest strategy, as follows:

When the board adopted this harvest strategy in 2021 it chose to leave 5 AAC 35.311 "Commissioner's permits for Tanner Crab in Registration Area E" in regulation in case this new harvest strategy was not effective. We ask you to repeal 5 AAC 35.308 Registration Area E Tanner Crab harvest strategy in its entirety. A separate proposal we are submitting lays out a new harvest

strategy that we hope the board will adopt, or otherwise simply revert this fishery back to a Commissioner's permit fishery.

What is the issue you would like the board to address and why? The Area E Tanner Crab management plan adopted in 2021 does not follow the Board's "Policy on King and Tanner Crab resource management" and should be repealed. Specifically management measure #5 which states: "A preseason estimate of the level of allowable King and Tanner Crab harvest is established for each fishery. In those fisheries with accurate population estimates the appropriate harvest rate is applied to the best point estimate to determine the GHL. For those fisheries without surveys or historical catch information adequate for estimating the population size, the GHL will be set based on historical fishery performance, catch, and population trend."

The adopted plan removes historic crab districts and instead splits Prince William Sound into five (5) non-traditional districts. Three of these non-traditional districts, according to the Department "...were aligned with historical statistical areas to develop a more accurate time series of statistical area-specific historical harvest and closely aligned to current statistical areas for management purposes". These areas are drawn with disregard to crab habitat. Currently they are arbitrary boundaries applied to a north-south and east-west grid that do not account for crab population, depth, migration or habitats.

Separate districts with distinct GHLs should be created only for distinct populations of crab. Instead, said plan creates a baseline estimate of abundance from 1983-1988 using imprecise and ill reported harvest data, by stat area, from the 1980's. It then extrapolates from those estimates for the next 25 years using trawl surveys, which do not occur in the newly drawn southwestern district. From these incomplete abundance estimates the GHLs are created for three of the new districts.

Unlike Kodiak or the Bering Sea, trawl surveys are ineffective for much of PWS. PWS more closely resembles Southeast Alaska, where said methods are not employed for Tanner crab population estimates. The variability of PWS seabed composition and geography, including glacial moraines, cause inaccuracy and inaccessibility via trawl. During the Commissioner's Permit Fishery of 2018-2021, as well as test fisheries conducted in 2016 and 2020-2022, biomass was discovered throughout PWS that was previously undetected by trawl surveys, including areas that were once devoid of crab. The densest crab populations were found in northwest PWS. The adopted plan closes that area indefinitely, claiming to "...not have sufficient trawlable habitat to develop an assessment". Furthermore, the adopted plan expanded the scope of these surveys creating unrealistic cost and management goals for the department. As it stands, ADFG can survey only one area per year.

Current harvest data clearly shows the crab population of this era bears little resemblance to the fishery of the 1980's. However, this data was not considered in the creation of the current management plan. It was instead built on trawl surveys of inadequate proportion, and fishery performance of more than 35 years ago. Because it was the only option for a tanner fishery, CDFU supported this plan, albeit modified, at the 2021 board cycle. After further evaluation it is deemed an unworkable model. We contend that this fishery is without an accurate population estimate, and therefore the GHL should be set based on fishery performance, catch, and population trend.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSAL 35

5 AAC 35.308. Registration Area E Tanner crab harvest strategy.

Modify the harvest strategy for Prince William Sound Tanner crab, as follows:

5 AAC 35.308 Registration Area E Tanner Crab harvest strategy

(a) Fishery performance based on logbook and inseason reported CPUE of legal male crab will be used to manage fishery area in season and postseason to set GHL. The following reference points will be used to make these management decisions

1. Target CPUE of 15.25 legal male Tanner Crab
Trigger CPUE of 11.5 legal male Tanner Crab
Limit CPUE of 7.5 legal male Tanner Crab

(b) In Registration Area E, the GHL will be set at 100,000 lbs but will be adjusted based on fishery performance determined from commercial fishermen logbook CPUE of legal male crab as follows:

1. The GHL will be increased for the following season for any of the following reasons:
 1. If the most recent season CPUE is $>$ than the most recent previous season and is $>$ Target CPUE the GHL will increase by 20% the following season.
 2. If the most recent logbook CPUE is $>$ than the most recent previous season and \leq Target CPUE legal male crab and $>$ Trigger the GHL will increase by 10% the following season.
 3. If the most recent logbook CPUE is $>$ than the most recent previous season and is \leq Trigger and $>$ Limit the GHL may increase up to a maximum of 5% the following season
2. The GHL will be decreased for the following season for any of the following reasons:
 1. If CPUE is $<$ than the most recent previous season and is $>$ Limit CPUE and \leq Trigger CPUE GHL may be reduced up to a maximum of 40% the following season
 2. If CPUE is $<$ than the most recent previous season and is $>$ Trigger Cpue and \leq Target CPUE the GHL may be reduced up to a maximum of 20% the following season

(c) Fishery performance by statistical area will be assessed inseason with a minimum requirement of 300 pot lifts per statistical area before taking management action under the following guidelines:

1. If logbook CPUE is \geq Target manage to GHL.
2. If logbook CPUE is \geq Trigger but $<$ Target manage to GHL and monitor closely
3. If logbook CPUE is \geq Limit and $<$ Trigger close statistical area for remainder of season.

4. If logbook CPUE is < Limit close fishery statistical area remainder of season and subsequent closure of statistical area of 1 year for commercial fisheries the following season, depending upon a postseason review.

What is the issue you would like the board to address and why? Create an Area E Tanner Crab harvest strategy with a conservative GHLL that incorporates fishery performance to allow a fishery for the coming years much like the Commissioner's permit fisheries that occurred from 2018-2021. This harvest strategy is very similar to the one presented by the department for Southeast Golden King Crab in "Recommended Harvest Strategy for Southeast Alaska Golden King Crab". The Commissioner's permit fisheries in southwest PWS conducted from 2018-2021 and the test fisheries in 2020, 2021 and 2022 were successful in discovering new Tanner Crab populations and a much needed winter fishery for the boats of Prince William Sound. Those fisheries, although limited in area and harvest allowance, resulted in an average harvest of 103,234 lbs per year with an average CPUE of 13 for the Commissioner's permit fishery and 15.25 for the test fisheries. These CPUE's compare well with the historic fisheries' catch rates. For the 1987 and 1988 years, the CPUE for the commercial fleet was 16 and 17 respectively for the western district and 11 and 17 for the northern district. With the larger 75 pot limit that was being fished in the 1980's, we can assume longer soak time is most of the contributing factor to the slightly higher CPUE seen then. These are also very similar to the CPUE seen in the southeast Tanner Crab fishery which over the last 10 years has had an average CPUE range of 12-16.

We believe that CPUE is the only consistent data point the department has at this time to estimate population size and therefore must incorporate it into the harvest strategy. This proposed harvest strategy recommends a very conservative GHLL of 100,000 lbs based on the average harvest during the Commissioner's permit fishery and test fisheries. It also incorporates a CPUE target level based on the average CPUE for the PWS test fisheries that occurred in 2020, 2021, and 2022 of 15.25 and the Trigger and limit levels were set at 75% and 50% of the target rounded to the nearest quarter.

This low GHLL combined with the CPUE trigger results in extremely low risk of harm to the stock but will allow a fishery to continue to be executed to the coming years and grow or shrink as we develop a better understanding of Tanner Crab populations in PWS.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-121)

PROPOSAL 36

5 AAC 35.325. Lawful gear for Registration Area E.

Increase the pot limit in the Prince William Sound Tanner crab fishery, as follows:

Reinstate the historic pot limit of 75. This pot limit is reasonable for the size of area and density of crab found in PWS and comparable to southeast Alaska's pot limit of 80.

5 AAC 35.325(d) is amended to read:

(d) The number of Tanner Crab pots that may be operated from a vessel will be

established by emergency order before the opening of each commercial Tanner Crab season, not to exceed [30] 75 Tanner Crab pots per vessel

What is the issue you would like the board to address and why? The current pot limit was put into place in 2017 as part of the department's new Tanner Crab harvest strategy. In 2017 the department also created regulation allowing a Commissioner's permit fishery with a limit of 50 pots. The historic pot limit for this fishery before 2017 was 75 pots. A larger pot limit combined with reduced hauling hours will result in less handling of female and undersized crab because each pot is hauled less in any given time period. These longer soak times give small crab time to escape out of the pots on their own. When the department reopened this fishery, it did not enforce the daylight hauling hours regulation and drastically lowered the pot limit. This lower pot limit resulted in participants running their pots 2-3 times a day, which increased the handling of juvenile and female crab and lowered the economic viability of the fishery. The biomass of Tanner Crab in PWS is very spread out. It requires a lot of prospecting, which is extremely costly and time consuming with a small pot limit. In the 2022 commercial fishery the fleet was unable to harvest the GHF because it was not economically viable to prospect large areas in central PWS during small weather windows with only 25 pots.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-122)

PROPOSAL 37

5 AAC 35.325. Lawful gear for Registration Area E.

Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery, as follows:

5 AAC 35.325(d) is amended to read:

d) The number of Tanner Crab pots that may be operated from a vessel will be [ESTABLISHED BY EMERGENCY ORDER BEFORE THE OPENING OF EACH COMMERCIAL TANNER CRAB SEASON, NOT TO EXCEED] 30 Tanner Crab pots per vessel. [IN DETERMINING THE ANNUAL POT LIMIT, THE DEPARTMENT WILL CONSIDER THE

- (1) TOTAL NUMBER OF REGISTERED VESSELS;
- (2) ESTIMATED CATCH PER UNIT EFFORT; AND
- (3) THE GUIDELINE HARVEST LEVEL.]

What is the issue you would like the board to address and why? Remove language allowing for an annual adjustment to pot limits that was put into place in 2017.

Adjusting gear limits based on registered participants is not a common practice in other Alaska commercial fisheries and there is no reason to do so in Area E. A known number of pots gives some consistency to the daily harvest a fisherman can expect to achieve each year they participate in the fishery. By lowering pot limits, the department decreases the daily harvest potential of participants, therefore increasing the cost to participate in the fishery. Pots are also expensive and sold in matching sets. If the pot limit increases from one year to the next, it can be extremely

difficult to find more pots that stack well with the ones a operator already owns. This results in an unsafe and inefficient load. We do not believe that changing pot limits on an annual basis is a necessary tool for the department because it currently manages all other Alaska crab fisheries without this regulation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-123)

PROPOSAL 38

5 AAC 35.XXX. New section. Tenders for Tanner Crab.

Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab, as follows:

Create new regulatory language to allow boats to act as tenders while also participating in the fishery. That way at the end of the season, fishermen could put all of their catch on one boat to take to a processor. Regulation like this is currently in place for the Kodiak District Dungeness fishery.

New text as follows:

Notwithstanding 5 AAC 35.033, in the Prince William Sound Area, a vessel registered to fish for Tanner Crab may tender Tanner Crab from other registered Tanner Crab vessels. A tender operator must be an authorized agent of a processor. Before using a vessel as a tender under this section, the tender operator shall register as a tender with the department at the department office. A tender operator shall complete an ADF&G fish ticket at the first point of delivery from the catcher vessel.

What is the issue you would like the board to address and why? Finding a market for a small-scale fishery such as Area E’s can be difficult and may require the crab be run far from the fishing grounds to Kodiak, Seward, or elsewhere. On a small quota year with a low price, it may not be economically viable for the few participants to hire a separate tender or for each participant to individually run a small load of crab across the Gulf of Alaska in the winter.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-125)

King Crab (4 proposals)

PROPOSAL 39

5 AAC 34.210 Fishing seasons for Registration Area E.

Establish season dates for a commercial golden king crab fishery in Prince William Sound, as follows:

Reinstate the historic season dates for Golden King Crab in PWS and instate gear limits.
5 AAC 34.210 Fishing seasons for Registration Area E.

(a) The commercial taking of **red king crab and blue king crab** in Registration Area E is closed until the king crab stocks have recovered enough for a harvest strategy to be developed by the department and adopted by the Board of Fisheries.

(b) **Golden King Crab may be taken from 12:00 Noon November 1 to December 20th and from 12:00 noon January 15 through March 31 between the hours of 8:00 a.m. to 6:00 p.m**
5 AAC 34.225. Lawful gear for Registration Area E

(a) King crab may be taken only with king crab pots. **Except that Golden King Crab taken in Tanner Crab pots as described in 5 AAC 35.125(f) may be retained if the CFEC permit holder fishing for Tanner Crab is also registered to fish for Golden King Crab and both crab fisheries are open at the same time.** King crab taken by other means must be returned to the water without further harm.

(c) **The following king crab pot limits are in effect in Registration Area E:**

(1) when the commercial Golden King Crab season is open in Registration Area E, and the commercial Tanner Crab season is closed, no more than 30 king crab pots may be operated from a vessel registered to fish for king crab; (2) when the commercial Golden King Crab and Tanner Crab seasons are open in Registration Area E at the same time, an aggregate of no more than 75 king and Tanner crab pots may be operated from a vessel registered to fish for both king crab and Tanner Crab

What is the issue you would like the board to address and why? End the continued closure of the Golden King Crab (GKC) fishery in Prince William Sound. The GKC fishery has been closed since the 1994–1995 season, despite evidence of a small but healthy stock. ADFG has little ability to assess GKC populations as they live on cliffs in deep water, which makes targeting them difficult - even to experienced fishermen. Widespread evidence of GKC throughout western Prince William Sound was seen in the recent Tanner Crab commercial and test fisheries, as well as ADFG’s own pot survey in 2005-2007 and the recent 2020 test fishery.

The GKC fisheries in the state of Alaska that remain open are in Southeast Alaska and the Aleutian Islands. Management in those areas relies heavily on commercial fisherman's catch rates and knowledge of the stock to inform the GHL. A management strategy such as the one outlined for Southeast Alaska by Andrew Olson and Katie Palof in 2023, “Recommended Harvest Strategy for Southeast Alaska Golden King Crab”, is the only path forward for a fishery in Prince William Sound. This is because it uses commercial fishermen’s CPUE to develop GHLs and collect data on stock health. ADFG in Southeast also partners with commercial fishermen to take size and sex data on undersize GKC to assist management. This kind of collaborative management is possible in PWS, but it requires the ability to open the fishery to be changed in regulation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-128)

PROPOSAL 40

5 AAC 34.215. Guideline harvest levels

Adopt a harvest strategy for golden king crab in Prince William Sound, as follows:

5 AAC 34.215. Guideline harvest levels

[REPEALED 6/30/83]

(a) Fishery performance based on logbook and inseason reported CPUE of legal male crab will be used to manage the fishery area in season and postseason to set GH. The following reference points will be used to make these management decisions

Target CPUE of 2 legal male Golden King Crab

Trigger CPUE of 1.5 legal male Golden King Crab

Limit CPUE of 1 legal male Golden King Crab

(b) In Registration Area E, the GH will be set at 10,000lbs but will be adjusted based on fishery performance determined from commercial fishermen logbook CPUE of legal male crab as follows:

The GH will be increased for the following season for any of the following reasons:

If the most recent season CPUE is > than the most recent previous season and is > Target CPUE the GH will increase by 20% the following season.

If the most recent logbook CPUE is > than the most recent previous season and \leq Target CPUE legal male crab and > Trigger the GH will increase by 10% the following season.

If the most recent logbook CPUE is > than the most recent previous season and is \leq Trigger and > Limit the GH may increase up to a maximum of 5% the following season

The GH will be decreased for the following season for any of the following reasons:

If CPUE is < than the most recent previous season and is > Limit CPUE and \leq Trigger CPUE GH may be reduced up to a maximum of 40% the following season

If CPUE is < than the most recent previous season and is > Trigger Cpue and \leq Target CPUE the GH may be reduced up to a maximum of 20% the following season

(c) Fishery performance by statistical area will be assessed inseason with a minimum requirement of 200 pot lifts per statistical area before taking management action under the following guidelines:

If logbook CPUE is \geq Target manage to GH.

If logbook CPUE is \geq Trigger but < Target manage to GH and monitor closely

If logbook CPUE is \geq Limit and < Trigger close statistical area for remainder of season.

If logbook CPUE is < Limit close fishery statistical area remainder of season and subsequent closure of statistical area of 1 year for commercial fisheries the following season, depending upon a postseason review.

What is the issue you would like the board to address and why? Establish a GH and Harvest strategy for Golden King Crab in PWS that uses commercial CPUE to trigger closures much like the strategy proposed for Southeast GKC by Andrew Olson and Katie Palof in 2023 "Recommended Harvest Strategy for Southeast Alaska Golden King Crab".

We set CPUE target levels based on input from crab fishermen with experience targeting Golden King Crab in PWS. These reference points compare well those in the Southeast fishery, which sets target CPUE at 1.6 - 4.1 legal males depending on the area. The Trigger and limit levels were set at 75% and 50% of the target. These CPUE ranges correspond well with what limited information we have about the CPUE in PWS in the 1980s and the recent test fishery for Golden King Crab.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-129)

PROPOSAL 41

5 AAC 34.XXX. New Section and 5 AAC 35.308. Registration Area E Tanner crab harvest strategy.

Adopt new Prince William Sound king and Tanner crab harvest strategies, as follows:

Establish harvest strategy for king and tanner consistent w/B.O.F. policy. See supporting document.

[A note from Boards Support: nine additional pages accompanied this faxed proposal and this was deemed too much to include in the proposal book. The authors of this proposal are encouraged to submit that as written comments for the Prince William Sound and Upper Copper/Upper Susitna finfish and shellfish meeting.]

What is the issue you would like the board to address and why? ADF&G King & Tanner Crab harvest strategies are wildly inconsistent w/established policy.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. Since 1988 have tried to reestablish fisheries.

PROPOSED BY: Robert A Smith and Warren Chappell (HQ-F24-137)

PROPOSAL 42

5 AAC 77.557. Personal use king crab fishery, 5 AAC 77. 558. Personal use Tanner crab fishery, and 5 AAC 55.022. General provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound, as follows:

A person may fish for Tanner and Golden King Crab from April 15-September 15. People opting to fish during this season are ineligible to fish during the season from October 1-March 31. During this season, from April 15-September 15 a vessel may only have two pots of any kind on board. These can be two shrimp pots, two crab pots, or one crab and one shrimp pot. A crab pot can not be placed on the same long line as a shrimp pot. Additionally, only one permit can be fished from a vessel at a given time.

There will be an annual limit of:

- 50 male Tanner Crab
- 2 male Golden King Crab

And a daily limit of 10 male Tanner Crab.

What is the issue you would like the board to address and why? Open an additional sport/personal use fishery for tanner and golden king crab in Prince William Sound from April 15-September 15. Currently a season is open from October 1-March 31 during the stormiest and

coldest portion of the year. This severely limits the opportunity to participate in the fishery. Having an additional season corresponding to the sport/personal use shrimp fishery would provide more people the opportunity to fish for crab. If a season as proposed below is adopted it would have the effect of reducing the effort in the shrimp fishery with limited to no effect on the health of the crab populations. There has been a commercial fishery for Tanner crab in the Prince William Sound for a number of years now. There is no reason a more viable sport/personal use fishery can not be implemented.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Discussed with friends who boat in Prince William Sound.

PROPOSED BY: Brian West (HQ-F24-056)

Miscellaneous Shellfish (1 proposal)

PROPOSAL 43

5 AAC 38.217. Registration Area E Octopus Management Plan.

Establish a directed octopus fishery in Prince Willilam Sound, as follows:

- (a) In Registration Area E, octopus may [ONLY] be taken as bycatch in pot, trawl, and longline gear fisheries as described in this section.
- (b) The guideline harvest range for octopus in Registration Area E is 0 - 35,000 pounds; when the guideline harvest level has been reached, the commissioner shall close, by emergency order, Registration Area E to the retention of octopus.
- (c) Octopus may be retained as bycatch only in an amount not to exceed 20 percent, by weight, of the directed harvest on board the vessel, except that in a directed fishery for shrimp, octopus may be retained in an amount not to exceed 35 percent, by weight, of the shrimp on board the vessel.
- (d) Octopus may be harvested under a commissioner permit as a longline lair pot fishery to allow the guideline harvest of the 0-35,000 pounds; when the guideline harvest level has been reached, the commissioner shall close, by emergency order, Registration Area E to retention of Octopus. Bycatch retention is prohibited in the Octopus longline lair pot fishery.**
- (e) Octopus retained for sale or for personal use shall be reported on a fish ticket as described in 5 AAC 39.130.

What is the issue you would like the board to address and why? Allow guideline harvest of octopus in Area E under a commissioner permit.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-050)

Copper River Salmon (29 proposals)

Subsistence (7 proposals)

PROPOSAL 44

5 AAC 01.620. Lawful gear and gear specifications.

Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery, as follows:

- (j)
- (4) A vessel engaged in subsistence gillnet may have extra gillnet gear on board the vessel.

What is the issue you would like the board to address and why? Interpretation that any vessel legally engaged in subsistence fishing cannot have extra gear on board to promote efficiency of harvest if the legal amount of gear being used is damaged during the subsistence activity . Being able to continue harvest having a spare amount on board does not harm anyone and is acknowledged by Subsistence regulations. further codifying this will more clearly define any misunderstanding by the public and ADFG to alleviate confusion and stress for subsistence participants.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Coordination with other subsistence users.

PROPOSED BY: Shawn Gilman (EF-F24-027)

PROPOSAL 45

5 AAC 01.625. Waters closed to subsistence fishing.

Allow subsistence fishing for salmon in the Copper River inside closure area, as follows:

We recommend opening inside closure waters to subsistence fishing by adding new subsection 5 AAC 01.648 (c):

5 AAC 01.648(c). Prince William Sound Subsistence Salmon Fisheries Management Plans

(c) Salmon may be taken for subsistence purposes in the inside closure area described in 5 AAC 24.350(1)(B) unless all other Copper River Chinook fisheries have first been restricted.

What is the issue you would like the board to address and why? The regulations set forth in 5 AAC 24.361 that restrict fishing in the regulatory closed waters specified in 5 AAC 24.350(1) (B) for the conservation of king salmon should only be applied to Commercial and Sport fisheries (5AAC 24.361 (b)-(c)). This area restriction has been applied to the subsistence fishery. Because the subsistence fishery is catch-limited (5 king salmon per household limit), an area restriction provides no conservation benefit; however, it places an unnecessary burden on subsistence users to fish farther out, especially those in river skiffs coming down rivers who are more suited to fishing more protected waters.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Native Village of Eyak Department of the Environment and Natural Resources staff, recommended by the Native Village of Eyak’s Natural Resource Advisory Council and approved unanimously by Tribal Council.

PROPOSED BY: Native Village of Eyak

(HQ-F24-099)

PROPOSAL 46

5 AAC 01.630. Subsistence fishing permits.

Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery, as follows:

5 AAC 01.6xx new section

Subsistence harvest from the Copper River district must be reported within 7 days of harvest.

What is the issue you would like the board to address and why? Subsistence fishing in the lower Copper River District, which occurs at the mouth of the Copper River, can provide valuable in season run strength information as it is open every Saturday and on Mondays and Thursdays when the commercial fishery is closed. However, the reporting requirements for subsistence permits do not require reporting harvest until October 31. We believe that weekly reporting will not place an undue burden on participants in this fishery as it can be easily done at the local ADF&G office in Cordova, where all subsistence trips for the lower copper are based out of, or online. Additionally weekly reporting will increase the accuracy of reports and reduce the likelihood of participants harvesting more fish than their bag limit.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and submitted by the Copper River/Prince William Sound AC

PROPOSED BY: Copper River/PWS Advisory Committee

(HQ-F24-069)

PROPOSAL 47

5 AAC 01.630. Subsistence fishing permits and 5 AAC 77.5XX Personal use fishing permits.

Require inseason reporting in subsistence and personal use fisheries, as follows:

(6) subsistence fishing reports must be completed on forms provided by the department, **or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

(6) personal use fishing permits must be completed on forms provided by the department, **or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

What is the issue you would like the board to address and why? Require In-Season reporting of Subsistence and Personal Use Salmon within 5 days of harvest using an online app or phone call to the department.

Currently, participants in both fisheries are not required to report their harvest until well after the close of the season. Both fisheries take a substantial number of salmon, especially in low abundance runs. It is imperative that managers have real time data to use their EO authority to close fisheries when the security of the resource demands it. It is time for all users of these valuable resources to be accountable.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and developed by the Copper River/Prince William Sound Advisory Committee.

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-034)

PROPOSAL 48

5 AAC 01.620. Lawful gear and gear specifications.

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict, as follows:

Remove prohibition on subsistence guide services in the Glennallen subdistrict. Allow for subsistence guide services in the Glenallen subdistrict notwithstanding the prohibition

5 AAC 01.620 Lawful gear and gear specifications

[(L) SUBSISTENCE FISHING GUIDE SERVICES ARE PROHIBITED IN THE GLENNALLEN SUBDISTRICT. FOR THE PURPOSES OF THIS SUBSECTION,

(1) "SUBSISTENCE FISHING GUIDE SERVICES" MEANS ASSISTANCE, FOR COMPENSATION OR WITH THE INTENT TO RECEIVE COMPENSATION, TO A SUBSISTENCE FISHERMAN TO TAKE OR TO ATTEMPT TO TAKE FISH FROM A VESSEL BY ACCOMPANYING OR PHYSICALLY DIRECTING THE SUBSISTENCE FISHERMAN IN SUBSISTENCE FISHING ACTIVITIES DURING ANY PART OF A SUBSISTENCE FISHING TRIP;

(2) "COMPENSATION" MEANS DIRECT OR INDIRECT PAYMENT, REMUNERATION, AND OTHER BENEFITS RECEIVED IN RETURN FOR SERVICES, REGARDLESS OF THE SOURCE; IN THIS PARAGRAPH, "BENEFITS"

(A) INCLUDES

(I) WAGES AND OTHER EMPLOYMENT BENEFITS GIVEN DIRECTLY OR INDIRECTLY TO AN INDIVIDUAL OR ORGANIZATION; AND

(II) DUES, PAYMENTS, FEES, AND OTHER REMUNERATION GIVEN DIRECTLY OR INDIRECTLY TO A FISHING CLUB, BUSINESS, ORGANIZATION, OR INDIVIDUAL WHO PROVIDES SUBSISTENCE FISHING GUIDE SERVICES;

(B) DOES NOT INCLUDE REIMBURSEMENT FOR THE ACTUAL DAILY EXPENSES FOR FUEL, FOOD, OR BAIT.]

In order to assess the significance of guide service use, consideration should also be given to updating the Glennallen Subdistrict Subsistence Permit Harvest ticket to provide a check box on the permit to indicate if commercial services were used.

What is the issue you would like the board to address and why? A prohibition against subsistence guide services in the Glennallen Subdistrict was adopted at 2021 at the Prince William Sound/Upper Copper River Board of Fisheries meeting. This new regulation has unfairly and unnecessarily reduced opportunities for Alaskans and non-rural natives to harvest salmon for food in the Glennallen Subdistrict subsistence fishery. The prohibition has decreased opportunity for Alaskan households and increased competition for the extremely limited number of shore-based fishing sites that can be accessed via the public right of way.

The most reasonable access to this fishery for many subsistence users is by boat, but without an available transport or guide service, many subsistence users may find it very dangerous or are simply unable to participate and meet their subsistence needs. Many households rely on guides and transporters because the number of safe shore-based fishing sites is very limited; they are unwilling to attempt to wade into the dangerous river; they do not own a boat or are not comfortable driving a boat on the Copper River; they do not own, or are unable to afford build, maintain or operate a fishwheel; they do not know someone with a fishwheel to use; or they do not have access to shoreline to place a fishwheel.

The prohibition was aimed at commercial services but it is subsistence users that have been harmed. Guide services merely provide a safe and cost-effective means of accessing fish for personal and family consumption. Significant use of these services in this subsistence fishery very clearly demonstrates their utility and value.

There is no sustainability issue with allowing subsistence users access to salmon resources with the assistance of a guide service. The prohibition was allocative away from the subsistence fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed collaboratively by a group of Glennallen subsistence fishery participants.

PROPOSED BY: Marlene Bertie Irneraucin (HQ-F24-054)

PROPOSAL 49

5 AAC 01.620. Lawful Gear and Gear Specifications.

Prohibit transport services in the Glennallen Subdistrict, as follows:

5 AAC 01.620(1)(1)

(1) Subsistence fishing guide services are prohibited in the Glennallen Subdistrict. For the purposes of this subsection,

(1) "subsistence fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a subsistence fisherman to take or to attempt to take fish from a vessel by accompanying or physically **transporting** [DIRECTING] the subsistence fisherman in subsistence fishing activities during any part of a subsistence fishing trip

What is the issue you would like the board to address and why? We want to clarify language to include the restriction of “transporting” subsistence fishermen in the Glennallen Subdistrict for

subsistence fishing. Monetary compensation for transporting service should not exist in a subsistence fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Ahtna Intertribal Resource Commission (HQ-F24-108)

PROPOSAL 50

5 AAC 1.620. Lawful gear and gear specifications. and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts, as follows:

5AAC 52.022 (a)(XX) Electronics including chart-plotters, depth finders, fish finders, or any other device that may aid in locating fish, depth, or paths of travel while fishing may not be used to aid in the taking of fish from a boat in the Chitina and Glennallen Subdistricts.

What is the issue you would like the board to address and why? “Fair chase” is an important concept that applies to hunting regulations. Many activities such as the use of drones, electronic calls, and even two-way radios are not allowed.

Electronics to aid in the taking of fish should be viewed in the same way.

We have seen increased fishing pressure when other places around the state such as the Kenai and the Yukon are closed. We are likely to see further increase as the Yukon has been closed for half a decade and the Kenai will see closures as well. Participation is only going to grow on the Copper River in years to come. The Copper River can’t feed the whole State.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Kirk Wilson (HQ-F24-109)

Salmon Management Plans (5 proposals)

PROPOSAL 51

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, as follows:

To address this issue, we recommend that the *timing* of the commercial harvest be managed in a manner that avoids disproportionately high exploitation rates for early run Copper River salmon stocks, potential adverse effects on overall population diversity of Copper River salmon, and potential adverse impacts on food security for salmon-dependent subsistence users. To be clear and *sincerely respectful of all user groups* that are reliant on Copper River salmon, the solution that we propose is about *timing* of harvest *not allocation* of harvest among user groups with legitimate needs.

Specifically, we recommend that the board revise the Copper River District Salmon Management Plan, 5 AAC 24.360 as follows, with revised text **underlined in bold**, regulatory text to be deleted fully capitalized and enclosed in brackets, and explanatory comments (if any) *in italics* and enclosed in parentheses:

(a) The department shall manage the Copper River District commercial salmon fishery to achieve a sustainable escapement goal of 360,000 – 750,000 sockeye salmon into the Copper River.

(b) The department shall manage the Copper River District commercial salmon fishery to achieve an inriver goal of salmon, as measured at the sonar counter near Miles Lake, based on the total of the following categories:

Spawning escapement

Lower end of sockeye salmon escapement goal

17,500 other salmon

Glennallen Subdistrict subsistence fishery 61,000 – 82,500 salmon

Chitina Subdistrict personal use fishery 100,000 – 150,000 salmon

Sport fishery 15,000 salmon

Hatchery brood (sockeye salmon) estimated annually

Hatchery surplus (sockeye salmon) estimated annually

TOTAL announced annually

(c) Repealed 4/24/2009.

(d) Repealed 3/30/2000.

(e) The department shall manage the Copper River District commercial salmon fishery to conserve and avoid disproportionate exploitation of early-run Copper River sockeye and king salmon stocks by comparing cumulative sonar passage and management objectives by date, as follows:

(1) After two commercial drift gillnet openings, the Copper River District shall not open to commercial drift gillnet fishing when cumulative sonar passage is less than 70 percent of the cumulative management objective for the same date.

What is the issue you would like the board to address and why? The issue is that management of the Copper River District commercial fishery by the Alaska Department of Fish and Game (department) in five of the six most-recent years (2018-2023) resulted in disproportionately high harvest (exploitation) rates for early run Copper River salmon stocks. Without action by the board to mitigate this issue, persistent disproportionate exploitation of stocks with early migratory timing has the potential to diminish the overall population diversity of Copper River sockeye and king salmon while threatening food security for Copper River subsistence users, and particularly those who fish upstream of the Gakona River in the uppermost portion of the Glennallen Subdistrict. The 2023 season is most representative of this concern, when more than 387,000 salmon were harvested by the commercial fishery before cumulative salmon passage at Miles Lake had reached 50 percent of the department’s objective for cumulative inriver passage. (Note that this estimate for the degree to which Miles Lake salmon passage was lagging behind cumulative commercial harvest and management objectives accounts for the fact that the sonar sensor on the south bank was not operational for a full 24-hr period until 5/31.) Disproportionately high early season harvest

rates occurred to a lesser extent in 2021 and 2022, and also occurred in low-run years of 2018 and 2020 before low sonar counts triggered extended closures of the commercial fishery.

Management that results in a recurring pattern of disproportionately high exploitation rates for early run salmon stocks is inconsistent with two statewide fisheries management policies. These are the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220), which specifies in part that "... conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority;" and the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), which specifies in part that "... salmon escapement should be managed in a manner to maintain genetic and phenotypic characteristics of the stock by assuring appropriate geographic and temporal distribution of spawners"

Management that has the potential to adversely affect population diversity of Copper River salmon would be contrary to the "portfolio-effect" principle, which holds that conservation of population diversity is an important means of enhancing the resilience of salmon populations and associated fisheries to changing environmental conditions (Hilborn et al. 2003, Schindler et al. 2010).

Management that results in disproportionately high harvest rates for early run stocks also may exacerbate known food-security concerns of upriver subsistence users. Because of their location in the watershed, subsistence users from headwater communities have access to the fewest spawning populations, some of which are characterized by early run timing. A preliminary National Park Service assessment of 2005-2021 harvest data found that year-to-year catch stability (one measure of food security, here estimated as interannual variability in catch-per-unit-effort) was lowest (interannual variability was highest) during this period for subsistence users who fished upstream of the Gakona River compared with downstream subsistence users who fished between the Chitina River bridge and the Gakona River. This pattern of low catch stability in the uppermost reach of the Copper River applied to participants in the state subsistence fishery and as well as the federal subsistence fishery and is consistent with findings for the Fraser River in Canada (Nesbitt and Moore 2016). Past research and Alaska Native traditional knowledge indicate that Copper River salmon stocks associated with headwater tributaries are among the earliest to enter the river. Since at least 2004 (board proposal 53 in 2005) and as recently as 2023 (RC019 submitted during the board's October 12-13, 2023 work session), subsistence users have repeatedly urged fisheries managers to allow more early run salmon to reach headwater spawning tributaries.

We considered an alternative solution to this issue, but rejected it in favor of this proposed solution after conferring with department staff from the Division of Commercial Fisheries and the Division of Sport Fisheries. The alternative solution would have required the department to (1) establish a program for post-season estimation and assessment of annual exploitation rates for distinct spawning stocks of Copper River sockeye and king salmon on the basis of genetic stock composition data and other appropriate information; (2) ensure, to the extent practicable, that exploitation does not place distinct stocks at elevated risk of extirpation; and (3) report assessment results to the board on a schedule that conforms to the board cycle. We rejected the genetics-based solution in favor of *this sonar-based solution, which is far simpler and less expensive to implement, thereby enabling immediate action during this board cycle*. Nevertheless, we believe that the use of genetic data to estimate stock-specific exploitation rates ultimately may be required for ensuring the long-term conservation of diversity of Copper River sockeye and king salmon populations and

the resilience of these populations and dependent fisheries, livelihoods, and cultural traditions in the context of changing environmental conditions.

We will provide further analyses and context for the issue and additional justification for the proposed regulatory change in a letter submitted to the board following issuance of the proposal book.

References

Hilborn, R., T.P. Quinn, D.E. Schindler, & D.E. Rogers. 2003. Biocomplexity and fisheries sustainability. *Proceedings of the National Academy of Sciences* 100(11):6564-6568.

Nesbitt, H.K., and J.W. Moore. 2016. Species and population diversity in Pacific salmon fisheries underpin indigenous food security. *Journal of Applied Ecology* 53:1489-1499.

Schindler, D.E., R. Hilborn, B. Chasco, C.P. Boatright, T.P. Quinn, L.A. Rogers, & M.S. Webster. 2010. Population diversity and the portfolio effect in an exploited species. *Nature* 465:609-612

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Prior to submission of this proposal, we consulted with the following groups and benefitted from the perspectives that they offered: ADF&G Division of Commercial Fisheries staff, Cordova & Anchorage, ADF&G Division of Sport Fisheries staff, Glennallen & Fairbanks, Copper Basin Fish and Game Advisory Committee, Copper River / Prince William Sound Fish and Game Advisory Committee, and Wrangell-St. Elias National Park Subsistence Resource Commission

PROPOSED BY: Wrangell-St. Elias National Park and Preserve (HQ-F24-059)

PROPOSAL 52

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, as follows:

5 AAC 24.360 (x) **Allow two Copper River District commercial salmon fisheries 12-hour openers during the week of May 15th, then delay openers by two weeks or until a daily management objective for fish passage is met at the Miles Lake Sonar.**

What is the issue you would like the board to address and why? Protecting genetic diversity of salmon in the Copper River Watershed.

Traditional Ecological Knowledge (TEK) of Tribal citizens and accounts from local residents indicate the run timing of Copper River salmon has been delayed by about two weeks in recent years. These accounts are validated and quantified by various projects in the Copper River including radio telemetry studies, genetics and bioenergetics studies, Miles Lake Sonar passage, Tanada Creek Weir passage, and harvest data from subsistence, commercial, and sport fisheries. Local managers and biologists have stated when the Copper River has a late ice-out, and when stream temperature remains cool late into the historical return time, salmon “mill” in the sound

where they are susceptible to disproportionately high catch rates. Among these cohorts are king salmon and sockeye salmon destined for the furthest reaches of the Copper River. TEK is science, and it has long documented that the earliest returning salmon are those that spawn furthest upstream. This knowledge is being reconfirmed by a multitude of studies around Alaska and in the Copper River Basin.

Uneven targeting of these specific stocks decreases the diversity of the Copper River salmon genetic portfolio. On top of this, the Gakona to Slana reach of the Glennallen Subdistrict Subsistence Area has failed to meet Amounts Necessary for Subsistence (ANS) 17 of the past 19 years. These are the early returning fish. By delaying the PWS commercial fishery by two weeks or until a daily management objective is met at the Miles Lake Sonar, we are taking a step in the right direction in protecting the diversity of Copper River salmon. If salmon returns are earlier than that of recent years (a daily management objective is typically met around June 1-4), and a daily management objective is met before this two-week period, then we would expect these upriver stocks to return in numbers and the ensuing commercial fishery will not be disproportionately impacting Chinook and upriver sockeye stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Ahtna Intertribal Fish and Wildlife Committee and Ahtna Tene Nene' jointly recommended this change to address Tribal concerns of sustainability of Chinook and upper Copper River sockeye stocks. This change in management will help prevent future restrictions and closures.

PROPOSED BY: AITRC Fish and Wildlife Committee (HQ-F24-102)

PROPOSAL 53

5 AAC 24.360 Copper River District Management Plan.

Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met, as follows:

Allow commercial fisheries to open for the first two openers as a test fishery, then close until the Copper River cumulative management objective is met.

This will spread the commercial use throughout the season and allow earlier stock to go upstream.

What is the issue you would like the board to address and why? We have concerns of early run wild stocks reaching the upper Copper River tributaries.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We spoke with Wrangell St. Elias NPS and ADF&G about our concerns regarding Salmon in the Copper River and its tributaries.

PROPOSED BY: Copper Basin Advisory Committee (HQ-F24-113)

PROPOSAL 54

5 AAC 24.361. Copper River King Salmon Management Plan.

Restrict use of Copper River District inside closure area during statistical weeks 20 and 21, as follows:

(b) In the commercial fishery, during the statistical weeks 20 and 21, the commissioner may not **close** [open] more than **three** [ONE] 12-hour fishing periods within the inside closure area of the Copper River District described in 5 AAC 24.350(1)(B).

What is the issue you would like the board to address and why? The 3 mandatory inside closures have been taken way too far by management. We no longer have an inside district fishery at all until July, even on years of Chinook abundance like 2023 we were shut out of our traditional fishing areas for far too long. This proposal would maintain the 3 inside closures currently in regulation but the change would require the opening of one inside district during a potential fourth fishing period during weeks 20 and 21, but only if there is an opener.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This idea is widely supported by the Cordova fleet.

PROPOSED BY: Kenneth B. Jones (HQ-F24-011)

PROPOSAL 55

5 AAC 24.361. Copper River King Salmon Management Plan and

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted, as follows:

If the commercial fishery is closed for king conservation measures on the inside waters during the commercial season for more than two consecutive non-mandatory inside closures then the commercial guide services in the Upper Copper River drainage will be limited to at least one conservation measure listed below for a period of no less than one week.

What is the issue you would like the board to address and why? The disconnect between conservation measures upriver and downriver. The commercial fisheries upriver and downriver should be tethered together in a way that promotes stewardship and shared conservation when necessary amongst commercial interest.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. In coordination with others in reviewing historical data.

PROPOSED BY: Shawn Gilman (EF-F24-026)

Commercial (2 proposals)

PROPOSAL 56

5 AAC 24.XXX. New Section.

Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders, as follows:

5.AAC.24.3XX Requirements and specifications for use of 200 Fathoms of Drift Gillnet gear in Area E.

- (a) A CFEC permit holder who holds two Area E drift gillnet permits may operate 200 Fathoms of gear.
- (b) Two Area E drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear under this section.
- (c) When two Area E drift gillnet CFEC permits are fished from the same vessel and jointly operate drift gillnet gear under this section, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one drift gillnet CFEC permit on board the vessel. The identification number and letters must be displayed (1) in letters and numerals 12 inches high with lines at least one inch wide; (2) in a color that contrasts with the background; (3) on both sides of the hull; and (4) in a manner that is plainly visible at all times when the vessel is being operated.
- (d) When two permit holders jointly operate gear under this section, each permit holder is responsible for ensuring that the entire unit of gear is operated in a lawful manner.

What is the issue you would like the board to address and why? Allow stacking of Copper River Drift permits like what has been successfully done in Bristol Bay and Cook Inlet.

The Copper River Drift Fleet has evolved into a more efficient fleet with improved hull and machinery and communication. This is not the same fleet that existed when limited entry was executed. The recent downturn of poor salmon runs, and poor prices has led to this fishery being barely financially viable. The average ex-vessel gross in 1990 was \$44,000 and in 2022 was \$29,000 adjusted for 1990 inflation. The ex-vessel gross is less than it was 32 years ago. Fuel prices, nets, and equipment have gone up dramatically in price the past 34 years while the overall gross has gone down.

The national average for a gallon of gas was \$1.05 in 1990 while in 2021 it was \$3.05.

The mean permit prices were \$159,797 in 1990 meanwhile in 2023 the mean permit prices adjusted for 1990 inflation was \$38,604. This is a complete collapse of permit values and the economic viability of this fishery.

This fleet is barely keeping its head above water, permit stacking would allow two things to happen.

1.) Allowing one vessel to operate two permits would be a fleet consolidation and allow this community fishery to be financially viable once again.

This is near a full participation fishery, allowing people to stack permits would reduce the amount of overall net in the water during commercial openers. This would reduce the overall harvesting efficiency of the fleet but would allow the remaining fishery participants more opportunity.

2.) Most importantly when comparing permit stacking to a buyback like was done in southeast seining permit stacking does not increase the difficulty for new entrants into the fishery. Permit stacking instead creates another path to ownership and experience in the fishery for deckhands

who can buy a permit and stack it on the boat they crew on until they can afford to buy their own operation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This idea has been tossed around by members of the fleet as a potential solution to allowing more financial stability in this fishery.

PROPOSED BY: Darin Gilman (HQ-F24-002)

PROPOSAL 57

5 AAC 24.XXX. New Section.

Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery, as follows:

5.AAC.24.3XX Requirements and specifications for use of 200 Fathoms of Drift Gillnet gear in Area E

(a) Two Area E CFEC Drift Gillnet permit holders may concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear, and a person holding two Area E CFEC Drift Gillnet permits may operate up to 200 fathoms of drift gillnet gear, under this section. (b) When two Area E CFEC Drift Gillnet permit holders fish from the same vessel and jointly operate additional drift gillnet gear, and when a person holding two Area E CFEC Drift Gillnet permits operates additional drift gillnet gear, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one Area E CFEC Drift Gillnet permit on board the vessel. The permanent license plate numbers and letters must be displayed in letters and numerals 12 inches high and at least one inch wide.

What is the issue you would like the board to address and why? Allow two Area E Drift Gillnet CFEC permit holders to concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear, and a person holding two Area E Drift Gillnet CFEC permits may operate up to 200 fathoms of drift gillnet gear under this new section. Often referred to as Permit Stacking.

This would be a fleet funded buyback program that would eliminate gear from the water, and would reduce boats in a now overcrowded fishery. For every nine boats that would stack permits it would be over a mile of gear out of the water. This would help with the up river escapement of Chinook and Sockeye on the Copper River, and would open up more fishing opportunity for those participating in the fishery.

This proposal would also help in reducing conflicts between sport and commercial fishers in the Sound. With the increased number of Sport and Charter operators in the Sound, there have been an increased number of gear entanglements, and navigational issues. Less boats would mean less interactions.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have noted and experienced the success of the Dual permit system in other fisheries in Alaska. I have also discussed this proposal with other members of the Area E Drift fleet.

PROPOSED BY: Fred Marinkovich

(EF-F24-014)

Personal Use (14 proposals)

PROPOSAL 58

5 AAC 24.361. Copper River King Salmon Management Plan.

Amend the *Copper River King Salmon Management Plan*, as follows:

5 AAC 24.361(d) is amended to read:

...

(d) In the Chitina Subdistrict personal use dipnet salmon fishery,

(1) the annual limit for king salmon is one fish;

(2) if the commissioner determines that additional conservation measures are necessary to achieve the escapement goals, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dipnet salmon fishery season and immediately reopen a season during which the retention of king salmon is prohibited; [.]

(3) if the commissioner projects that the upper bound of the escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dipnet salmon fishery season and immediately reopen a season during which the king salmon annual limit per household permit is increased.

What is the issue you would like the board to address and why? In December 2021, the board adopted the current drainagewide sustainable escapement goal (SEG) of 21,000–31,000 king salmon. Copper River spawning escapement exceeded 31,000 king salmon in 2023. To mitigate exceeding the escapement goal, the only management actions available inriver are limited to liberalizing the sport fisheries, which have limited harvest potential and fishing is concentrated to only three tributaries. Allowing an increase in the king salmon annual household limit for the personal use fishery provides the department a management tool to attempt to stay within the SEG, if needed, across all upper Copper River and upper Chitina River stocks.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F23-167)

PROPOSAL 59

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the *Copper River Personal Use Dip Net Salmon Fishery Management Plan*, as follows:

5 AAC 77.591(e) is amended to read:

...

(e) The total annual limit for each personal use salmon fishing permit is **as follows**;

(1) 25 salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household[.];

(2) if the commissioner projects that the upper bound of the Copper River drainage sockeye salmon sustainable escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dip net salmon fishery season and immediately reopen a season during which the annual limit for the head of household is increased by XX sockeye salmon with no increase in the king salmon

annual limit established in 5 AAC 77.591(e)(1), or an increase in the king salmon annual limit by conditions specified in 5 AAC 24.361(d).

What is the issue you would like the board to address and why? Since 2003, the Copper River sockeye salmon escapement goal has been exceeded 4 years, from 2012-2015. To mitigate exceeding the escapement goal, the only management actions available inriver are limited to liberalizing the sport fisheries, which have limited harvest potential and are concentrated to only two tributaries. Allowing an increase in the sockeye salmon annual household limit for the personal use fishery provides the department a management tool to attempt to stay within the SEG as well as distributing harvest across all upper Copper River and Chitina River stocks. The department will provide options and potential harvest from several scenarios of increased limits for the board to consider.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-168)

PROPOSAL 60

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Modify the annual limit for the Chitina Subdistrict, as follows:

Section 5 AAC 77.591(e) The total annual limit for each personal use salmon fishing permit is **20** [25] salmon for the head of household and **5** [10] salmon for each dependent of the permit holder, except that only one king salmon may be retained per household.

What is the issue you would like the board to address and why? Copper River Personal Use Dip Net Salmon Allocation

The Chitina Subdistrict Personal Use Fishery has between 6,000 and 8,000 participants each year. The past three years have gone over the allocated 100,000 – 150,000 salmon limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data). Lowering the bag limit by 5 fish per household member will ensure all Personal Use fishermen a reasonable opportunity to participate while accounting for increased interest in the Copper River fishery, and still remain below the 150,000 fish threshold. Closures around the state have brought and will bring more participants to this fishery. Ensuring the sustainability of Copper River salmon is the responsibility of all user groups including the Personal Use.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Shirley Smelcer (HQ-F24-101)

PROPOSAL 61

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(e) The total annual limit for each personal use salmon fishing permit is [25] **15** salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household. **Supplemental permits for an additional 10 salmon for head of household will be allotted by EO authority if the in-river goal has a harvestable surplus.**

What is the issue you would like the board to address and why? The rationale to change the household limit to 25 salmon was in reflection of “like regulation” between the Upper Cook Inlet and Copper River drainages. However, the Copper River is a completely different watershed, and the historical PU bag limit was 15 for head of household compared to 25 salmon in the upper cook inlet fisheries. Currently the lower copper river subsistence fishery’s bag limit is 15 salmon. The increased bag limit was a reallocation away from the Commercial fishery in (2013). The past few seasons, this increased allocation has hamstrung the lower river biologist’s management due to less than stellar sockeye runs. The productivity of the Copper River differs from the Upper Cook Inlet systems; the bag limits initially reflected what the system could handle on normal run conditions.

The EO authority still allows for an increased bag limit when Copper River sockeye is in an above normal productivity cycle and there is a harvestable surplus.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Developed with other drift gillnetters in the fleet.

PROPOSED BY: Kalistrat Kuzmin (HQ-F24-076)

PROPOSAL 62

5 AAC 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Allow inseason adjustment of the Copper River personal use maximum harvest level, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

(f) The maximum harvest level for the Chitina Subdistrict personal use salmon fishery is 100,000 - 150,000 salmon, not including any salmon in excess of the in-river goal or salmon taken after August 31.

IF THE COPPER RIVER DISTRICT COMMERCIAL SALMON FISHERY IS CLOSED FOR 13 OR MORE CONSECUTIVE DAYS, THE MAXIMUM HARVEST LEVEL IN THE CHITINA SUB DISTRICT IS REDUCED TO 50,000 SALMON

What is the issue you would like the board to address and why? The current condition of the copper river salmon stock on years of low abundance is dire. Ever growing non limited populations of upriver users are pulling out salmon at their most fragile and critical adult stage, during their late stages of migration and pre spawning. These pre spawning salmon must be protected on years of low abundance and all user groups need to share equitably in these conservation measures. In December 2017 the board of fish adopted proposal 18 which repealed and replaced regulatory language and has put the copper river salmon runs at risk ever since. The action taken by the board

of fisheries to repeal what was known as the “shared burden” regulation resulted in the copper river nearly missing escapement during the 2018, and 2021 seasons, all despite unprecedented commercial closures. In 2020 despite achieving lower bound sonar goals the stock for the first time actually missed the in river escapement levels. During that year unprecedented commercial fishery closures also occurred, the lions share of the harvest in those low abundance seasons took place upriver, putting the runs at risk. Had this regulation been in place and enforced, the salmon runs would not have missed their escapement goals. It is essential that the burden of conservation is shared among all users not just placed solely on the historical commercial user which has been the case since 2017.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, other fisherman are overwhelmingly in support of this.

PROPOSED BY: Kenneth B. Jones (HQ-F24-009)

PROPOSAL 63

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the opening date of the Chitina Subdistrict personal use fishery, as follows:

5 AAC 77.591 (b) Salmon may be taken from June 21 [7] or 2 weeks after a daily management of fish passage is met at Miles Lake sonar through September 30. The commissioner shall establish a preseason schedule, including fishing times, for the period June 21 [7] through August 31 based on daily projected sonar counts at the sonar counter located near Miles Lake. This abundance-based preseason schedule will distribute the harvest throughout the season. The commissioner must [MAY] close, by an emergency order effective June 21 [7], the Chitina Subdistrict personal use salmon fishing season and shall reopen the season, by emergency order, on or before June 21 [15] depending on the run strength and timing of the sockeye salmon run. Adjustments shall be made to the preseason schedule based on actual sonar counts compared to projected counts. If the actual sonar count at Miles Lake is more than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which additional fishing times will be allowed. If the actual sonar count at Miles Lake is less than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which fishing times will be reduced by a corresponding amount of time.

What is the issue you would like the board to address and why? Protecting genetic diversity of salmon in the Copper River Watershed.

Currently, the Personal Use (PU) fishery in the Chitina Subdistrict (CSD) may begin as early as June 7. Traditional Ecological Knowledge (TEK) of Tribal citizens and accounts from local residents indicate the run timing of Copper River salmon has been delayed by two to three weeks in recent years, most likely due to changing environmental conditions i.e. late ice-out. Data from the Miles Lake Sonar and harvest analysis quantify and validate these accounts. The first fish to enter the river are typically Chinook and sockeye stocks that travel furthest upriver. With the PU fishery catching approximately 9.6% of the total sockeye and 4.4% of the Chinook run (most recent 5-year average), which is equivalent to approximately 164,000 total salmon reported (3-year

average), the fishery disproportionately impacts Chinook and upriver sockeye stocks in the beginning of the season. Chinook have failed to meet escapement goals four of the past 10 years, even despite lowering the escapement goal from 24,000 to a range of 21,000-31,000 in 2021. Protecting Chinook and the genetic diversity of Copper River sockeye is a proactive step to ensure robust populations.

While PU participants are only allowed one Chinook per household, there are approximately 6,000 permits issued annually. In addition to high participation, there is also undocumented en route mortality as a result of fish handling during catch and release while dipnetting.

Based on radio telemetry studies, it is understood that salmon migrating past the Miles Lake Sonar take between 7 and 14 days (based on environmental factors i.e. streamflow) to reach the CSD where the PU fisheries occurs. By delaying the fishery by two weeks, or until 2 weeks after a daily management objective for fish passage is met at the Miles Lake Sonar (which is met on average between June 1 and 4), we will protect the diversity of Copper River salmon by not disproportionately impacting early returning genetic stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Ahtna Intertribal Fish and Wildlife Committee and Ahtna Tene Nene' jointly recommended this change to address Tribal concerns of the sustainability of Chinook and upper Copper River sockeye stocks. This change in management will help prevent future restrictions and closures.

PROPOSED BY: AITRC Fish and Wildlife Committee (HQ-F24-104)

PROPOSAL 64

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(a) Salmon may be taken in the Chitina Subdistrict only under the authority of a Chitina Subdistrict personal use salmon fishing permit. Only one Chitina Subdistrict personal use salmon fishing permit may be issued to a household per calendar year. A household may not be issued both a Copper River subsistence salmon fishing permit and a Chitina Subdistrict personal use salmon fishing permit. **A household may not be issued a Chitina Subdistrict personal use salmon fishing permit if the household has been issued an Upper Cook Inlet personal use salmon fishing permit in the same calendar year.**

What is the issue you would like the board to address and why? Personal Use bag limits reflect a user's household needs. However, the number of people participating in both Cook Inlet and Copper River PU fisheries is increasing. Four out of five PU Dip Net fisheries are operated under one permit and one bag limit in the Upper Cook Inlet PU Dip Net fisheries. We want to see a loophole closed to those taking advantage of multiple bag limits, by limiting a user to either a Chitina Sub district PU salmon fishing permit OR an Upper Cook Inlet PU salmon fishing permit in the same calendar year.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-112)

PROPOSAL 65

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Require a weekly permit and inseason reporting in the Chitina Subdistrict, as follows:

5 AAC 77.591 **(x)**

A participant must purchase a one-week Personal Use dipnet permit from Alaska Department of Fish & Game. Reporting is required within one week of the expiration of the permit. If harvest bag limit is not reached, additional permits may be obtained upon satisfying reporting requirements.

What is the issue you would like the board to address and why? In-season reporting for more accurate harvest assessment and for in-season decision making The Personal Use Fishery in the past three years has exceeded the allocated 100,000 – 150,000 limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data). In-season reporting will help inform managers with responsible decision making

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Ahtna Tene Nene' (HQ-F24-110)

PROPOSAL 66

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal, as follows:

5 AAC 77.591 Add subsection (i) as written

(i) The department, in consultation with the hatchery operator, shall manage the Chitina Subdistrict Personal Use salmon fishing through restricting time and area by emergency order to achieve the Gulkana Brood Stock escapement goal.

What is the issue you would like the board to address and why? Prince William Sound Aquaculture has failed to achieve its broodstock goal for the Gulkana hatchery for the 8 most recent years, despite ample escapement passing the lower Copper River sonar. Many of the fish necessary to achieve broodstock are caught in the personal use fishery. We ask the board to require the department to manage to achieve this goal with input from PWSAC and grant them the necessary tools to do so. Full utilization of the Gulkana Hatchery will benefit all users over the long term.

There is precedent set in other Prince William Sound fisheries in which hatchery operators and ADFG managers consult each other to restrict fishing time for broodstock escapements goals. One Example is in 5 AAC. 24.365 part (a).

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-113)

PROPOSAL 67

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict, as follows:

Add 5 AAC 77.591 (c) (1)

(c) Salmon may be taken only with dip nets.

(1) King salmon intended or required to be released may not be removed from the water.

What is the issue you would like the board to address and why? Removing king salmon from the water, that are intended to be released, is not allowed in sport fisheries. This is because it severely impedes the ability for king salmon to complete their life cycle. Removing king salmon should not be allowed in personal use fisheries.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-114)

PROPOSAL 68

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit dipnetting from a boat in the Chitina Subdistrict, as follows:

5 AAC 77.591 (c) Salmon may be taken only with dip nets **while not in a boat.**

What is the issue you would like the board to address and why? Reduce undue stress on Copper River king and sockeye salmon in the Chitina Subdistrict

Being able to target holding areas during times of high water that are not accessible from shore enhances the ability to catch king salmon. Based on ADF&G data, average king harvest per permit from 2019 to 2023 is 0.4 from boat and 0.3 from shore. About 6,000 Personal Use permits are issued each year. Only one king salmon can be retained annually per household. Fishing from a boat increases the number of kings caught and released. En route mortality of king salmon due to catch and release stress is not documented and could be contributing to decreased escapements. Copper River king salmon have failed to meet escapement goals 4 of the last 10 years.

High stream flows have become more frequent in recent years, slowing the migration time by forcing fish to find refuge in eddies and pools until conditions are favorable for continued migration. Prior to use of boats for dipnetting, the salmon could seek this refuge in inaccessible areas to fishermen during times of high water. Now these areas are targeted.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Faye Ewan (HQ-F24-107)

PROPOSAL 69

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Establish restrictions when dipnetting from a boat in the Chitina Subdistrict, as follows:

(C) Salmon may be taken only with dip nets. Salmon taken with a dipnet from a powerboat will be subject to more time and area restrictions to allow fish passage to return to a pattern that more closely resembles past practices in the fishery.

What is the issue you would like the board to address and why? The change in the nature, efficiency and scope of area not previously accessed by the Personal Use fishery in the Chitina Subdistrict. The use of power boats and especially the increase in charter power boats has allowed the take of fish holding on the bottom of the river during high water events and throughout the season in areas the were never before fished or exploited. This change in harvest method and area combined with increased commercialization is a drastic change that the Department has not fully recognized.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Coordinated with others watching the river activities.

PROPOSED BY: Shawn Gilman (EF-F24-028)

PROPOSAL 70

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Extend the lower boundary of the Chitina Subdistrict, as follows:

The Chitina Dipnetters Assn. is requesting the BOF extend the lower boundary of the Chitina Personal Use Dipnet Fishery with new language in 5AAC 77.591(h) as defined below.

For the purpose of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina-McCarthy Bridge downstream **to a line crossing the Copper River from a point just upstream of Canyon Creek on the east (lat. 61 deg 24'36.00"N – lon. 144 deg. 28'25.34"W) angling across the Copper River to the existing lower limit sign at Haley Creek** [to an east west line crossing the Copper River approximately 200 yds. Upstream of Haley Creek]

This extension would, at its longest point, increase the drift area by approximately .4 of a mile or 694 yds. and give boat dipnetters a longer continuous drift, allowing more spacing between boats and alleviate the dangerous congestion of boats that occurs now. The revised language would still give law enforcement a straight line sight of the entire boundary line as viewed from Haley Creek. This small increase in size of the Chitina Sub-district is unlikely to result in increased harvests, since the fishery is managed by emergency order to stay within the allocation contained in the management plan and because Personal Use dipnetters are held to an annual bag limit and once met they are done for the year.

A map identifying the existing and proposed lower boundaries will be submitted to the BOF prior to the December 2024 Copper River/Prince William Sound meeting.

What is the issue you would like the board to address and why? In the last 12 years, drift dipnetting from both personal and guided boats has substantially increased as a method of harvesting salmon in the Chitina Personal Use Dipnet Fishery (CPUDF). This is in large part due to the very limited number of suitable sites available for shore based dipnetting. Because much of the CPUDF lies within the deep turbulent waters of Woods Canyon on the Copper River, productive areas to dip from boats are very limited. A favorable and high use area for drift dipnetting from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the lower boundary of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with up to and over 15 boats drifting the same area. This congestion of boats in this short drift area has created a very dangerous navigation hazard for these boaters within the swift waters of the Copper River and boat accidents are inevitable.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The Chitina Dipnetters Assn. and the Fairbanks Fish & Game Advisory Committee.

PROPOSED BY: The Chitina Dipnetters Assn. (HQ-F24-030)

PROPOSAL 71

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit guiding in the Chitina Subdistrict, as follows:

5 AAC 01.620(x) Fishing guide services are prohibited in the Copper River Chitina Subdistrict Personal Use Fishery.

(x) "fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a Personal Use Fishery participant to take or to attempt to take fish from a vessel by accompanying or physically directing the Personal Use Fishery participant in fishing activities during any part of a fishing trip

What is the issue you would like the board to address and why? Guided fishing from a boat is already not allowed in the Glennallen Subdistrict. We would like to expand this to apply to the Chitina Subdistrict Personal Use Fishery as well.

The Personal Use Fishery in the past three years has exceeded the allocated 100,000 – 150,000 limit with a three-year average of 163,989 (an underestimation, based on preliminary 2023 data).

Guided fishing from a boat provides expertise and allows targeting of holding areas especially during times of high water that are not accessible from shore and enhances ability to catch king salmon and sockeye salmon. Based on ADF&G data, average king harvest per permit from 2019 to 2023 is 0.4 from boat and 0.3 from shore. About 6,000 to 8,000 Personal Use permits are issued each year, many of which use guide services. Only one king salmon can be retained annually per household. Fishing from a boat increases the number of kings caught and released. En route mortality of king salmon due to catch and release stress is not documented and could be contributing to decreased escapements. Copper River king salmon have failed to meet escapement goals 4 of the last 10 years.

High water levels have become more frequent in recent years, slowing the migration time by forcing fish to seek refuge in eddies and pools until conditions are favorable for continued migration. Prior to use of boats for dip netting and guided fishing trips, the salmon could seek this refuge in inaccessible areas to fishermen during times of high water. Now these areas are targeted by guides.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No.

PROPOSED BY: Ahtna Tene Nene’ (HQ-F24-112)

Sport (1 proposal)

PROPOSAL 72

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Close sport fishing for salmon based on water temperature in the Gulkana River, as follows:

5AAC 52.023 (9)(x) Close Gulkana River to fishing for Chinook and sockeye salmon by emergency order when water temperature at the Sourdough station exceeds 18 degrees Celsius (C) at any time during a 24-hour period for 3 consecutive days or exceeds 20 degrees C. Fishing may resume when stream temperature recedes and does not reach 18 degrees C at any time for 2 consecutive days.

What is the issue you would like the board to address and why? Protect Gulkana River salmon from excessive effects of heat stress.

It is generally understood that heat stress causes increased en route, pre-spawn mortality of salmon when stream temperatures rise above 18 degrees Celsius (C) (von Biela et al. 2020). The following is largely based on studies conducted in the neighboring Yukon River drainage, a thermal, geomorphic regime that closely resembles the precipitation driven Gulkana River system. Not only does heat stress largely affect Chinook, female Chinook are susceptible to pre-spawn mortality at a rate approximately twice that of male Chinook (Hinch et al. 2021).

In Alaska, weir operations have already restricted handling of fish when critical water temperature thresholds are met. For example, at the Andreafsky Weir (a tributary to the Yukon River), sampling activity is suspended when daily mean water temperature readings are greater than or equal to 17 degrees Celsius for three consecutive days, or if high water temperature readings exceed 20 degrees Celsius (Shink, 2020).

The Gulkana River is a non-glacial, clearwater, precipitation driven river with pools, riffles, and runs. When stream temperatures rise, en route fish seek refuge and congregate in deep pools where they are targeted by fisherman. Once ready to spawn, fish seek suitable conditions typically in shallow water tail outs of pools to build redds. At this point they are subject to jet boats and rafts routinely interrupting the process and amplifying the effects of stress. When salmon become stressed they may die before successfully spawning.

In recent years the Gulkana River has seen increased fishing pressure. With closures around the state, this river will most likely witness increased fishing in future years. With Copper River Chinook failing to reach escapement goals in four out of the past 10 years, and a large population contribution from the Gulkana stock (19-27% based on telemetry studies) (Schwanke & Piche, 2023), it is imperative we be proactive to protect populations during times of environmental stress.

The USGS already has a 10-year index of real-time stream temperature with precision to 0.1 degree Celsius at the Gulkana River Sourdough station. Implementation of this proposal will not require additional resources. Link to USGS Gulkana River Station: <https://waterdata.usgs.gov/monitoring-location/15200280/#parameterCode=00010&period=P365D&showMedian=false>

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: Ahtna Intertribal Resource Commission, Fisheries Dept. (HQ-F24-105)

Commercial Fishing Permits, Allocation Plan and Hatchery Operations (9 proposals)
Commercial Fishing Permits (2 proposals)

PROPOSAL 73

5 AAC 24.333. Requirements and specifications for for use of 250 fathoms of purse seine gear in Area E.

Allow permit stacking by Prince William Sound commercial salmon purse seine permit holders, as follows:

5 AAC 24.333. Requirements and specifications for use of 250 fathoms of purse seine gear in Area E. (a) Two Area E purse seine CFEC permit holders may concurrently fish from the same vessel and jointly operate up to 250 fathoms in the aggregate of seine and lead, **and a person holding two Area E purse seine CFEC permits may operate up to 250 fathoms of seine and lead**, under this section, except that, in times of conservation, purse seine gear may be restricted by emergency order to an aggregate length of 225 fathoms of seine and lead. (b) When two Area E purse seine CFEC permit holders (**or one permit holder with two Area E purse seine CFEC permits**) fish

from the same vessel and jointly operate purse seine gear under this section, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one purse seine CFEC permit holder on board the vessel. The identification number and letters must be displayed (1) in letters and numerals 12 inches high with lines at least one inch wide;(2) in a color that contrasts with the background; (3) on both sides of the hull; and (4) in a manner that is plainly visible at all times when the vessel is being operated. (c) When two permit holders jointly operate gear under this section, each permit holder is responsible for ensuring that the entire unit of gear is operated in a lawful manner.

What is the issue you would like the board to address and why? In the last board cycle, the Alaska Board of Fisheries adopted a regulation change to allow two permit holders to operate 250 fathoms of aggregate seine length on one vessel. I propose allowing a single permit holder, holding two S01E Seine permits to operate the same 250 fathoms of aggregate length similar to what was recently passed by the BOF for Cook Inlet drift gillnet fisheries. Current CFEC regulations already allow an individual to hold two S01E permits, but current regulations preclude that same permit holder from operating both.

I believe this proposal will help address the issue of congestion that the last "stacking" proposal attempted to address. While it helped, I believe there is plenty of room for continued improvement in alleviating congestion in the PWS seine fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This has been widely discussed amongst other members of the PWS purse seine fishery.

PROPOSED BY: James Burton (EF-F24-096)

PROPOSAL 74

5 AAC 24.333. Requirements and Specifications for Use of 250 Fathoms of Purse Seine Gear in Area E.

Allow permit stacking in the Prince William Sound commercial salmon purse seine fishery, as follows:

5 AAC 24.333. Requirements and specifications for use of 250 fathoms of purse seine gear in Area E

(a) Two Area E purse seine CFEC permit holders may concurrently fish from the same vessel and jointly operate up to 250 fathoms in the aggregate of seine and lead under this section, except that, in times of conservation, purse seine gear may be restricted by emergency order to an aggregate length of 225 fathoms of seine and lead. **And one person holding Two Area E purse seine CFEC Permits may operate up to 250 fathoms in the aggregate of seine and lead under this section, except that, in times of conservation, purse seine gear may be restricted by emergency order to an aggregate length of 225 fathoms of seine and lead.**

(b) When two Area E purse seine CFEC permit holders fish from the same vessel and jointly operate purse seine gear under this section, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter

"D" must be removed or covered when the vessel is operating with only one purse seine CFEC permit holder on board the vessel. The identification number and letters must be displayed

- (1) in letters and numerals 12 inches high with lines at least one inch wide;
- (2) in a color that contrasts with the background;
- (3) on both sides of the hull; and
- (4) in a manner that is plainly visible at all times when the vessel is being operated.

(c) When two permit holders jointly operate gear under this section, each permit holder is responsible for ensuring that the entire unit of gear is operated in a lawful manner.

What is the issue you would like the board to address and why? Current regulation allows one individual to own up to two permits, but precludes one individual from fishing those two permits and taking advantage of the stacking proposal passed last cycle. The stacking has done exactly what we designed it to do, it has helped with fleet congestion, however having one individual holding and fishing two permits could help to further lessen congestion and alleviate permit holder issues currently experienced under the existing regulation.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Developed with a group of other individual seine fisherman.

PROPOSED BY: Kenneth B. Jones (HQ-F24-013)

Allocation Plan and Hatchery Operations (7 proposals)

PROPOSAL 75

5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan, as follows:

[Remove] and **add** the language in 5 AAC 24.370. PRINCE WILLIAM SOUND MANAGEMENT AND SALMON ENHANCEMENT ALLOCATION PLAN. Under

(h) If the drift gillnet or purse seine gear group harvest value of enhanced salmon is **50 [45]** percent or less of the **[previous five-year]** average exvessel value comparison of the common property enhanced salmon stocks harvested **since inception starting in 2006**, as calculated by the department under (c) of this section, then in the year following this calculation the fishery shall be managed as follows:

(1) if the drift gillnet gear group harvest value is **50 [45]** percent or less, then in the year following the current calculations, the drift gillnet gear group shall have exclusive access to the Port Chalmers Subdistrict to harvest enhanced salmon returns from June 1 through July 30, during fishing periods established by emergency order; and

(2) if the purse seine gear group harvest value is **50 [45]** percent or less, then in the year following the current calculations, the purse seine gear group shall have exclusive access to the **[Esther Subdistrict] Port Chalmers Subdistrict** to harvest enhanced salmon returns from June 1 through July 20, during fishing periods established by emergency order.

What is the issue you would like the board to address and why? (h) If the drift gillnet or purse seine gear group harvest value of enhanced salmon is 45 percent or less of the previous five-year average exvessel value comparison of the common property enhanced salmon stocks harvested, as calculated by the department under (c) of this section, then in the year following this calculation the fishery shall be managed as follows:

(1) if the drift gillnet gear group harvest value is 45 percent or less, then in the year following the current calculations, the drift gillnet gear group shall have exclusive access to the Port Chalmers Subdistrict to harvest enhanced salmon returns from June 1 through July 30, during fishing periods established by emergency order; and

(2) if the purse seine gear group harvest value is 45 percent or less, then in the year following the current calculations, the purse seine gear group shall have exclusive access to the Esther Subdistrict to harvest enhanced salmon returns from June 1 through July 20, during fishing periods established by emergency order. The current plan incorporates a five-year rolling average when determining allocation values which determine which user group is allowed to fish in the allocation shared districts.

The current enhanced salmon allocation plan includes a five-year rolling average for determining PWSAC enhanced salmon value percentages for which user group is allowed access to the shared enhanced salmon districts of the Port Chalmers Subdistrict and the Esther Subdistrict. The Port Chalmers Subdistrict is a remote release chum fishery, and the Esther Subdistrict is the PWSAC hatchery that produces all the enhanced chum salmon in PWS.

The use of a five-year rolling average has resulted in denying the drift gillnet fleet their allotted 50% share of the PWSAC enhanced salmon value. Since the current enhanced salmon allocation plan was adopted in 2006 through 2022 the drift has been denied 65.4 million in PWSAC only value (COAR Report). That comes to an average of 3.85 million a year in lost revenue for the drift fleet. With the 65.4 million PWSAC enhanced salmon lost revenue and the 241.5 million VFDA enhanced salmon allocated to the seine fleet, the current plan has allocated 306.9 million dollars in enhanced salmon to the seine fleet over the drift fleet. This proposal requests that the five-year rolling average be replaced by an average since inception of the plan beginning in 2006. And reduce the plan to one shared fishing district by removing the Esther Subdistrict from the plan.

If the seine fleet were to gain access the Esther Subdistrict chum fishery while harvesting millions of VFDA enhanced pink salmon whose value is not included in the plan would be devastating for the drift and set net fisherman. VFDA is the largest and most successful pink hatchery in Alaska. The seine fleet would be allocated all the enhanced chums at the AFK Hatchery remote release, the Port Chalmers remote release and the Esther Hatchery chums returning to the Esther Subdistrict, along with all the enhanced pinks at Solomon Gulch Hatchery, AFK Hatchery, Cannery Creek Hatchery and shared access to the enhanced pinks at the Esther Hatchery. The drift fleet would have shared access to the Main Bay Hatchery and the Esther Hatchery enhanced pinks. The drift fleet does catch a small portion of enhanced red salmon on the Copper River returning to the Gulkana Hatchery which has been a bust for the last several years. And it's been discussed on shutting it down at PWSAC due to low returns. Basically, the seine fleet would have complete access to two remote release chum fisheries and one chum hatchery, three pink hatcheries and

shared access to another pink hatchery while the drift fleet would have shared access to one red salmon and one pink hatchery.

The first enhanced salmon allocation plan adopted by the BOF in 1990 was not fair to the seine fleet or the drift fleet. It included all wild and enhanced salmon and the promise that there would be no re-allocation and any shortfalls would be made in new production. It was bound to fail, and it did. PWSAC could never keep up with new production, with falling prices and other damage caused by the oil spill the seine fleet kept falling short. The drift fleet was opposed to it mainly because of the Exxon Valdez oil spill that had occurred the year before because the seine fishery was damaged a lot more than the drift fishery, but the main reason was why would anyone include wild stocks in an enhanced salmon allocation plan? All that did was make the plan that much harder to fulfill its goals. I served on the BOF subcommittee that worked on the current plan. The product that came out of the subcommittee was to **include all enhanced salmon** and remove wild stocks from the plan. VFDA enhanced salmon was removed from the plan at 10:00pm the night before vote the next morning. Yet again a fair enhanced salmon allocation plan slipped away from the drift fleet.

The drift fishery has been in deep decline the last four years. All you must do is look at the CEFC data. It looks like seine fishery did before 2006 when the current plan was adopted.

The drift fleet does not want more than what they were promised from the beginning of the enhanced salmon program in Area E. They want a fair allocation plan that protects the fishery and delivers on what it claims to do. After 19 years it's time to acknowledge the developments in the fisheries that have occurred since this plan went into effect in 2006.

PROPOSED BY: Michael Bowen (EF-F24-090)

PROPOSAL 76
5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to increase access to the Port Chalmers Subdistrict by drift gillnet permit holders, as follows:

(h) If the drift gillnet or purse seine gear group harvest value of enhanced salmon is **50** [45] percent or less of the previous five-year average exvessel value comparison of the common property enhanced salmon stocks harvested, as calculated by the department under (c) of this section, then in the year following this calculation the fishery shall be managed as follows:

- (1) if the drift gillnet gear group harvest value is **50** [45] percent or less, then in the year following the current calculations, the drift gillnet gear group shall have exclusive access to the Port Chalmers Subdistrict to harvest enhanced salmon returns from June 1 through July 30, during fishing periods established by emergency order; and
- (2) if the purse seine gear group harvest value is **50** [45] percent or less, then in the year following the current calculations, the purse seine gear group shall have exclusive access to the **Port Chalmers Subdistrict** [ESTHER SUBDISTRICT] to harvest enhanced salmon

returns [FROM JUNE 1 THROUGH JULY 20, DURING FISHING PERIODS ESTABLISHED BY EMERGENCY ORDER]

What is the issue you would like the board to address and why? The Prince William Sound Enhancement Allocation plan is flawed. Currently it has a 5-year rolling average that is supposed to balance the percentages between the commercial fleets. This plan is ineffective in ensuring a 50/50 split between the Seine and Drift fleet. Since the inception of the plan in 2005 just on Prince William Sound Aquaculture (PWSAC) fish the drift fleet is behind the seine fleet by \$68,000,000. This data was derived from ADFG via the COAR report values of PWSAC enhanced salmon.

The plan has been in effect nearly 20 years without any updating or review to see it is working as intended. The drift fleet being behind \$68,000,000 shows that is currently flawed. My proposal would substitute the language in part (h) of the regulation known as the "allocation trigger" to allow the drift fleet additional access to the Port Chalmers Subdistrict. Currently the drift fleet only has access to this district if we fall below 45 percent on the 5-year rolling average. Allowing the drift fleet access to the Port Chalmers Subdistrict when they fall below 50 percent would alleviate some of this disparity.

Additionally, this substitute language would eliminate the possibility of the seine fleet having access to the Esther Subdistrict for Prince William Sound Aquaculture chums. The possibility that the seine fleet has access to harvest Esther chums via this enhancement plan is not conforming to the intent of parity, especially when the drift fleet is behind by such an exorbitant amount.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have worked with a few other drift gillnetters in drafting this regulation change.

PROPOSED BY: Darin Gilman (HQ-F24-017)

PROPOSAL 77

5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

Include salmon produced by Valdez Fishery Development Association in the Prince William Sound Management and Salmon Enhancement Allocation Plan, as follows:

Remove the language in 5 AAC 24.370. PRINCE WILLIAM SOUND MANAGEMENT AND SALMON ENHANCEMENT ALLOCATION PLAN. Under

[(J) IN THIS SECTION, "ENHANCED SALMON STOCKS" MEANS SALMON PRODUCED BY THE PRINCE WILLIAM SOUND AQUACULTURE CORPORATION"]

Or add the language to 5 AAC 24.370. PRINCE WILLIAM SOUND MANAGEMENT AND SALMON ENHANCEMENT ALLOCATION PLAN. Under

5 AAC 24.370. PRINCE WILLIAM SOUND AQUACULTURE CORPORATION MANAGEMENT AND SALMON ENHANCEMENT ALLOCATION PLAN.

What is the issue you would like the board to address and why? This regional plan does not include the value of all enhanced salmon produced in the Copper River/Prince William Sound region (Area E). The value of enhanced salmon production from the private non-profit corporation Valdez Fisheries Development Association's (VFDA) Solomon Gulch Hatchery is not included in the regional allocation management plan. The construction of the Solomon Gulch Hatchery was financed by funds from the State of Alaska, and it continues to use state financing. The original Solomon Gulch hatchery operational permit included chum production intended to benefit the drift gillnet fleet which was never accomplished.

5 AAC 33.364. Southeastern Alaska Area Enhanced Salmon Allocation Management Plan includes the value of all enhanced salmon produced in the Southeastern Alaska region (Area A) that includes two regional hatchery associations and all independent private non-profit hatchery operators involving 17 hatchery facilities.

5 AAC 24.370. and 5 AAC 33.364. stated goals are to provide a fair and reasonable allocation of the harvest of enhanced salmon among the commercial fisheries.

State of Alaska regional enhanced salmon allocation plans should be based on the same criteria for all regions of the state. Which would include all enhanced salmon produced and all the user groups in the region as the starting point.

If 5 AAC 24.370. is the regional (Area E) enhanced salmon allocation plan then the plan should address and include all enhanced salmon produced in the region. If the BOF determines that a commercial user group deserves or is entitled to more enhanced salmon than the recognized historic average, then the percentage triggers can be adjusted to reflect that.

There cannot be a fair and reasonable enhanced salmon allocation plan when a large percentage of the enhanced salmon resource produced in Area E is not included in the regional plan. There is no difference between a hatchery built by the State of Alaska, PWSAC, VFDA and the 17 hatchery facilities located in SE Alaska. They all used public funds for their construction and startup operations and their purpose is to enhance regional fisheries for the benefit of all users. Both PWSAC and VFDA continue to use public funds for improvements and increase production. But VFDA use of public funds and increases in production only benefits one commercial user group.

If all the enhanced salmon value produced in the Prince William Sound region is not recognized and included in the Prince William Sound Enhanced Salmon Allocation Plan, then the enhanced salmon value will not be complete, accurate and accounted for. Since 2006 when the current allocation plan was adopted to 2021, VFDA has produced 233 million pink and 550 thousand coho salmon with a value of over 245 million dollars.

The current management plan has been in effect for 19 years. A review of the plan with stakeholder involvement to see if the plan can be updated and improved to meet its purpose and goals which states **“is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups. It is the intent of the Board of Fisheries (board) to allocate enhanced salmon stocks in the Prince William Sound Area to maintain the long-term historic balance**

between competing commercial users that has existed since statehood, while acknowledging developments in the fisheries that have occurred since this plan went into effect in 1991”.

After 19 years it’s time to acknowledge the developments in the fisheries that have occurred since this plan went into effect in 2006.

This proposal does not propose to reallocate VFDA produced enhanced salmon to other commercial salmon user groups, but to only include the value of all enhanced salmon in the regional plan so that the plan is complete, inclusive and everyone will know the total value of all PWS enhanced salmon. And possibly all PWS commercial common property salmon fisheries can receive a benefit from the value of VFDA enhanced salmon production.

PROPOSED BY: Michael Bowen (EF-F24-078)

PROPOSAL 78
5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25% , as follows:

The solution is very simple. Reduce the permitted egg intake of each Prince William Sound Hatchery that produces pink and chum salmon by 25%. Then do an evaluation within five years.

What is the issue you would like the board to address and why? Reduce pink and chum hatchery egg takes in the Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA) by 25% of current permitting levels.

There is significant evidence that there is an ocean carrying capacity that is exacerbated by the proliferation of Alaskan and Asian hatchery releases into the North Pacific. This is particularly important to Chinook salmon as stocks have declined dramatically all over Alaska. Chinook decline is so critical that the Yukon River may lose discrete stocks. An emergency Agreement between Canada and Alaska was signed April 1, 2024, to impose a drastic Chinook harvest moratorium of at least seven years. Sadly, the situation with Chinook on the Yukon River is now becoming a statewide problem; the Nushagak, the Kenai and many other Alaskan rivers have conservation plans in action because of the declines. Emergency Orders to close Chinook sports fishing entirely in many of Alaska’s most iconic river systems have already been implemented. While hatcheries are not the only factor in salmon decline, they are among the top five, including climate change, bycatch, intercept, disease, hatcheries.

The Alaska Board of Fisheries has limited authority to provide injunctive relief on this issue but to the extent that they can reduce hatchery egg take permitting levels, this is the only venue open to public proposals.

For several years, different groups have been submitting proposals for hatchery egg take reduction. All those proposals have been refused on the basis of lack of conclusive evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying.

The Alaska Department of Fish and Game, which directs information to the Board of Fish, has been consistently reluctant to consider peer-reviewed research outside of the Department and to even evaluate their own internal research that indicates hatchery production can have an effect on the health of wild salmon stocks. The “iterative” process that the Department assures the public is watchdogging hatcheries is an inter-dependent process with hatcheries and therefore is not seen as sufficiently separated from hatchery production to apply significant oversight. This is an extraordinarily frustrating situation to many who depend on wild salmon stocks and are outside of the hatchery management systems.

CONCLUSIONS: The goal of Alaska’s PNP hatchery system is economic, not conservation. In a 2011 international report *Shifting the Balance: Towards Sustainable Salmon Populations and Fisheries of the Future*, renown Canadian scientists Dr. Richard Beamish and Dr. Donald Noakes noted: “While Alaska’s large ocean-ranching program may have contributed to the observed increase in catch, there remain many unanswered questions about potential negative impacts on wild fish and deleterious effects on other Alaskan salmon fisheries (Hilborn and Eggers 2000; Clark et al. 2006; Knapp et al. 2007). As with most if not all large-scale hatchery programs, there is a lack of information to critically evaluate the program either with respect to its stated production objectives or other criteria (i.e., ecosystem interactions, etc.), and more research is clearly needed in that respect.”

In addition to on-going research on hatchery impacts, we also need an independent venue to review all the latest peer-reviewed science and to have an on-going dialogue on application of what we can have consensus on. The Board of Fish Hatchery Committee would be a good start as long as it is not an orchestrated situation.

Prior to the next Prince William Sound Board of Fish meeting, I will be working with many others to gather many supporting documents.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Reduction of hatchery egg take (and thus releases) has long been the goal of the Fairbanks Advisory Committee as it has researched the negative impacts of hatcheries for years. This includes conversations with some of the top salmon scientists in Alaska, Canada and the Pacific Northwest, as well as conversations with stakeholders in AYK river systems.

PROPOSED BY: Virgil Umphenour (HQ-F24-130)

PROPOSAL 79

5 AAC 24.367 Main Bay Salmon Hatchery Harvest Management Plan.; 5 AAC 55.023 Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.; and 5 AAC 01.610. Fishing Seasons.

Close Main Bay to all fishing during hatchery cost recovery operations, as follows:

5 AAC 24.367 Main Bay Salmon Hatchery Harvest Management Plan (NEW SUBSECTION (H))
No Common Property salmon fishing shall occur in the Main Bay Alternating Gear Zone (AGZ),

Special Harvest Area (SHA), or Terminal Harvest Area (THA) from the time Prince William Sound Aquaculture Corporation commences cost recovery operations until they cease efforts in the Main Bay Hatchery for the year.

If this language were to be adopted, it would alleviate the issue PWSAC has with completing its cost recovery goal in a timely and efficient manner.

What is the issue you would like the board to address and why? There is a rampant increase of boating traffic into Main Bay in the months of June and July interfering with cost recovery efforts. This is just the start of an immense issue at hand where Prince William Sound Aquaculture (PWSAC) is not able to meet their cost recovery goals effectively or efficiently, due to multiple vessels being in the way of the seiner trying to harvest these sockeye salmon. This is leading to a long delay in meeting cost recovery goals for PWSAC and directly affects quality with time degradation for much of the sockeye salmon due to the delay in harvesting these sockeye salmon. It is prudent for PWSAC to operate in an efficient and expedient manner while achieving their cost recovery goals. This will allow more opportunity to all user groups for the foreseeable future. We further request that the State make the necessary corresponding subsistence, personal use, and sport fishery regulatory changes to be consistent with the requested change to commercial fishery regulations.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by a committee of members of the CDFU Board of Directors, Prince William Sound Setnet Association, and the Native Village of Eyak Department of the Environment and Natural Resources staff where it was recommended by the Native Village of Eyak Resource Advisory Council and unanimously approved by Tribal Council

PROPOSED BY: Native Village of Eyak (HQ-F24-098)

PROPOSAL 80

5 AAC 55.023 Special provisions for seasons, bag, possession, and size limits, and methods and means for Prince William Sound Area.

Manage the Main Bay sport fishery based on the hatchery corporate escapement goal, as follows:

Alaska Administrative Code Number: 5 AAC 55.023

(10) in Main Bay, sport fishing is prohibited [FROM A VESSEL THAT IS]

(A) within **250** [60] feet of the Main Bay Hatchery barrier seine; and

(B) inside the Main Bay Hatchery barrier seine and shoreward to the head of the bay.

(C) (i) The department, in consultation with the hatchery operator, shall manage the Main Bay sport fishery salmon fishing through restricting time and area by emergency order to achieve corporate escapement goals.

What is the issue you would like the board to address and why? Changing the sport fishing distance inside the Main Bay would mimic regulation 5 AAC 55.023 in part (3) for waters of Lake Bay's distance from Ester Hatchery to halt all interference with hatchery operations.

Removing the "From the Vessel" portion would also alleviate sport fishing from shore inside the AGZ and brood pen, which Hatchery Managers have voiced to PWSAC as a problem.

Overall this would eliminate a great deal of costly damage to the barrier seine from lost tackle and boats/motors, as well as alleviate the conflicts between user groups, hatchery staff, and cost recovery vessels during broodstock collection and cost recovery operations.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed this proposal in collaboration with CDFU members and Prince William Sound Setnetters Association, and used PWSAC as a resource.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-111)

PROPOSAL 81

5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Modify the area open to sport fishing near the Main Bay Hatchery, as follows:

PWSAC recommends making Main Bay language consistent with Wally Noerenberg Hatchery but keep the distance closer for MBH and at the distance it has been as well as providing a visible cork line at the distance required. 5 AAC 55.023(3) the waters of Lake Bay of Esther Island inside ADF&G regulatory markers located approximately 100 feet seaward of the Esther Hatchery broodstock holding pen are closed to sport fishing;

5AAC 55.023(10) the waters of Main Bay inside a line of buoys located approximately 60 feet seaward of the Main Bay Hatchery broodstock holding pen are closed to sport fishing;

[(10) IN MAIN BAY, SPORT FISHING IS PROHIBITED FROM A VESSEL THAT IS (A) WITHIN 60 FEET OF THE MAIN BAY HATCHERY BARRIER SEINE;AND (B) INSIDE THE MAIN BAY HATCHERY BARRIER SEINE AND SHOREWARD TO THE HEAD OF THE BAY.]

What is the issue you would like the board to address and why? 1) Snagging hooks are consistently becoming entangled in the Main Bay barrier seine compromising barrier seine integrity and usefulness. Through multiple tide series this causes additional mesh to become entangled with a snagging hook, resulting in lifting leadlines or sinking corklines eliminating barrier seine integrity and allowing unwanted fish passage behind the barrier seine.

2) Snagging hooks in the barrier seine pose a safety concern for personnel removing and cleaning the barrier seine.

3) Snagging of Main Bay sockeye intended for use as broodstock inside the barrier seine broodstock enclosure when not fishing from a vessel. The State of Alaska has strict sockeye salmon culture protocols that have allowed for the successful culture of this species. Culling broodstock with open wounds is part of the protocol to help minimize IHN transmission in brood holding areas. Snagging inside the barrier seine on fish intended as brood increases the number of wounded fish staff encounter and are required to cull and may increase the incidence of IHN in Main Bay Hatchery brood.

The barrier seine is designed and operated to protect salmon intended as brood and allow orderly fisheries on fish swimming outside the barrier seine to continue for all user groups. If nothing were changed, barrier seine integrity will continue to be compromised, whether by snagging tackle, boat or propellor damage, whereby tens of thousands of fish can be lost to all user groups. Until all Main Bay brood collection is secured in the freshwater brood pond, the barrier seine must remain in place. Barrier seine removal occurs as soon as all brood are secured in the freshwater brood pond and occurs on or before July 15th. When the barrier seine is not in the water, fishing is open to up to 300 feet from the fish ladder.

As a solution, barrier seine dive inspection frequency and snag hook removal was increased to weekly in 2023. This was at additional cost to PWSAC and the Main Bay operation but ultimately proved unsuccessful. Planning and coordinating dives after heavier weekend traffic was still not sufficient to remove problematic snagging gear and maintain barrier seine integrity.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The proposal was developed in consultation with Cordova Fishermen United and ADF&G Area Management.

PROPOSED BY: Prince William Sound Aquaculture Corporation (HQ-F24-057)

Prince William Sound and Upper Copper and Upper Susitna Rivers Sport (13 proposals)

Prince William Sound (7 proposals)

PROPOSAL 82

5 AAC 55.005. Description of the Prince William Sound Area.

Modify the Prince William Sound management area marine waters into two units, as follows:

5 AAC 55.005 Description of the Prince William Sound Area. The Prince William Sound Area consists of all waters of the Gulf of Alaska and its drainages, west of the longitude of Cape Suckling (144° W. long.), and east of the longitude of Cape Fairfield (148° 50.25' W. long.), excluding the Copper River drainage upstream of a line crossing the Copper River between the south bank of the confluence of Haley Creek and the south bank of the confluence of Canyon Creek in Wood Canyon.

- (a) **Inside PWS waters defined as: all waters north of a line drawn from Cape Puget to the southwest tip of Montague Island at Cape Clear; a line drawn from the Northeast tip of Montague Island at Zaikof to the southwest tip of Hinchinbrook Island at Cape Hinchinbrook; and the southeast tip of Hinchinbrook Island at Point Bentinck to Point Whitshed.**
- (b) **Outside PWS waters defined as: all waters south of the lines drawn and identified for inside PWS waters.**

I am open to exactly where these lines should be drawn. These area definitions can be better defined by the Department based on the specific locations they use to define inside and outside waters in their assessment work.

What is the issue you would like the board to address and why? 5 AAC 55.005 Currently reads *“The Prince William Sound Area consists of all waters of the Gulf of Alaska and its drainages, west of the longitude of Cape Suckling (144° W. long.), and east of the longitude of Cape Fairfield (148° 50.25' W. long.), excluding the Copper River drainage upstream of a line crossing the Copper River between the south bank of the confluence of Haley Creek and the south bank of the confluence of Canyon Creek in Wood Canyon.”*

The area is so vast that regulatory and management requirements are ineffective for tangible management. Prince William Sound should have regulatory defined Inside waters and Outside waters. The state has already utilized inside and outside delineation for rockfish observations/study. My thoughts are to utilize the following description to coincide with the rockfish observation/study boundaries. This will allow more effective management of PWS inside waters and relaxed management of PWS outside waters. In other words, I believe it to be necessary to further regulate PWS inside rockfish regulations however PWS outside waters have far less effort and populations are stronger outside therefore bag and possession limits could be higher without causing further damage to the inside waters. I believe rockfish surveys and data conducted by ADFG reflect this.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Consulted ADFG for information.

PROPOSED BY: Raymond Nix (HQ-F24-084)

PROPOSAL 83

5 AAC 55.022. General provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Allow a resident sport angler to use two rods when fishing for salmon, as follows:”)

A resident sport fish angler may use two rods when fishing for salmon, a person using two rods under this regulation may only retain salmon. The bag limits stay the same.

What is the issue you would like the board to address and why? In Southeast Alaska it is permissible for resident anglers to use two rods to troll for salmon. I would like to propose the same regulations for Prince William Sound and eventually the other marine areas in South Central Alaska. The reason why this is important is that it increases efficiency, saves fuel and potentially increases food security for resident anglers fishing alone.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I developed this proposal on my own because I am retiring and I know from my 30 years experience fishing in Southcentral Alaska that trolling with one rod is not very effective, which was fine when fuel was priced low, but high fuel prices make going fishing prohibitively expensive. This action will not result in additional harvest of Salmon but may reduce the cost of going out and catching a salmon for dinner. There should be no additional cost to this regulation and I can't think of anyone that would be harmed by this except the fuel dock might sell a few gallons less fuel.

PROPOSED BY: Andy Mezirow

(EF-F24-034)

PROPOSAL 84

5 AAC 55.022. General provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel, as follows:

Mirror Southeast and Kodiak Alaska sport regulations as well as the federal halibut regulation by prohibiting charter captain and crew from retaining sport caught king salmon or rockfish.

5 AAC 55.022.

(2) king salmon: may be taken from January 1 - December 31, as follows:

(A) in fresh waters, as follows:

(i) king salmon 20 inches or greater in length; bag limit of two fish; possession limit of four fish;

(ii) king salmon less than 20 inches in length; bag and possession limit of 10 fish;

(B) in the salt waters; bag limit of two fish; possession limit of four fish; no size limit;

(i)Charter operators and crew members may not retain king salmon while clients are on board the vessel.

(9) rockfish:

(A) may be taken from January 1 - December 31; bag limit of four fish; possession limit of eight fish, of which only one per day and in possession may be nonpelagic rockfish; no size limit;

(i)Charter operators and crew members may not retain rockfish while clients are on board the vessel.

(B) repealed 3/29/2018;

What is the issue you would like the board to address and why? Sport harvest of saltwater king salmon and rockfish is ever increasing according to ADFG's sport fish harvest and effort estimates for North Gulf Coast/Prince William Sound. In 2022 the sport harvest of rockfish was 99,569 Fish and the saltwater sport harvest of king salmon was 7,113 fish. In 2012 the sport harvest of rockfish was 68,337 Fish and saltwater sport harvest of king salmon was 3,044 fish. This 45% increase in rockfish harvest and 130% increase in king salmon harvest in 10 years demands attention by the board. A portion of this increased harvest is the result of the ever-growing charter fleet. Currently the charter fleet captains, and crew are allowed to retain their own limit of sport caught rockfish and king salmon every trip they go on. Regulations forbidding charter captains and crew from retaining rockfish and king salmon have been put in place by this board in Southeast Alaska, Kodiak and on a federal level for halibut in the halibut fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and submitted by the Copper River/Prince William Sound Advisory Committee.

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-070)

PROPOSAL 85

55.022 General provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Modify the bag and possession limit for coho salmon, as follows:

5 AAC 55.022 (a) (3)

3) salmon, other than king salmon: may be taken from January 1 - December 31; bag limit of six fish; possession limit of 12 fish, of which only three fish per day and six [THREE] in possession may be coho salmon; no size limit

What is the issue you would like the board to address and why? The current regulations in place read as follows in section 3 of the code:

(3) salmon, other than king salmon: may be taken from January 1 - December 31; bag limit of six fish; possession limit of 12 fish, of which only three fish per day and in possession may be coho salmon; no size limit;

I believe the possession limit should be increased because the coho that are harvested by sport are predominantly terminal (hatchery) fish. Additionally, a high percentage of our clientele base is resident fishermen that are harvesting for their winter supply of salmon and book multiple day trips to capitalize on 2-day possession limits. Current regulations require a return to port which is in excess of 70 miles typically. Our company did approximately 120 days' worth of overnight or remote lodge stays last season as these types of trips are the most financially viable for Alaskans. A single day possession limit seems to make these trips almost punitive because there is not a return to port.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Consulted ADFG Staff for information.

PROPOSED BY: Raymond Nix (HQ-F24-085)

PROPOSAL 86

5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for Prince William Sound.

Modify the sport fishing area and season dates in Ibeck Creek, as follows:

On September 21st the Sport Harvest of Coho Salmon will be prohibited above a point 1.5 miles above the Copper River Highway.

What is the issue you would like the board to address and why? We would like to protect spawning Coho Salmon on Ibeck Creek on the Copper River Flats in late September after they have entered their spawning grounds.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was discussed and submitted by the Copper River/Prince William Sound Advisory Committee.

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-071)

PROPOSAL 87

5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area.

Modify the sport fishing area and season in a Copper River Delta system, as follows:

On September 21st the Sport Harvest of Coho Salmon will be prohibited above a point 1 mile above the confluence with Alaganik Slough.

What is the issue you would like the board to address and why? We would like to close 18 Mile system on the Copper River Delta at a point 1 mile north of the confluence with Alaganik Slough on September 21st. This would protect spawning Coho Salmon from removal and catch and release mortality. There would still be sport fishing opportunity below this closure.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was discussed and submitted by the Copper River/Prince William Sound Advisory Committee

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-072)

PROPOSAL 88

5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sounds Area.

Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed, as follows:

New regulatory language to be added under 5 AAC 55.023 (XX) **In the Copper River Delta, in years with low run entry combined with low aerial survey counts and after seven consecutive days of commercial fishing closures, then the bag limits will be reduced to 2 fish and fishing with bait will be prohibited. If the commercial fishery is closed for 14 consecutive days combined with low aerial survey counts, then the bag limit will be reduced to one coho and catch and release will be prohibited.**

What is the issue you would like the board to address and why? Establish restrictions in the Copper River Delta coho salmon sport fishery based on the number of consecutive days the commercial fishery is closed.

Establish restrictions in the Copper River Delta coho salmon sport fishery based on the shared burden of conservation and the increased use and ease of access in the sport fishery. In 2018 we failed to achieve the SEG for the Copper River Delta due to delayed sport fishing restrictions.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This Proposal was discussed and developed by the Copper River/Prince William Sound Advisory Committee.

PROPOSED BY: Copper River/PWS Advisory Committee (HQ-F24-035)

Upper Copper and Upper Susitna River (6 proposals)

PROPOSAL 89

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Increase the bag and possession limit for burbot in Lake Louise, as follows:

5 AAC 52.023(13)(C) is amended to read:

(C) the bag and possession limit for burbot is **two** [ONE] fish, with no size limit;

What is the issue you would like the board to address and why? Historically, Lake Louise burbot were overfished when both set lines and liberal bag limits were allowed prior to 1988. The lake has been closed or restricted to a bag limit of one burbot since 1991 to allow the population to recover. A 2023 population survey of Lake Louise burbot indicated the population has increased and recovered to a level that would sustain increased fishing mortality associated with a two fish bag and possession limit. Lake Louise is part of the Tyone River drainage, and this regulation would align burbot regulations among other lakes within the drainage.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-171)

PROPOSAL 90

5 AAC 52.023. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Modify bag and possession limits of burbot in Crosswind Lake, as follows:

To mimic the Tyone River Drainage regulations, which has a bag/possession limit of 2 burbot per person per day.

What is the issue you would like the board to address and why? In Crosswinds Lake, anglers are allowed to set 5 lines with bait for burbot during winter. However, they often catch lake trout instead, which have a daily limit of 1 fish per person and suffer from high mortality rates after being released due to swallowing the hook and bait.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This was developed in coordination with local anglers and landowners who frequently fish at Crosswinds Lake and share concerns about lake trout bycatch.

PROPOSED BY: Butch Reinhart (HQ-F24-077)

PROPOSAL 91

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Modify seasons, bag, possession, and size limits for Arctic grayling in Mendeltna Creek, Moose Lake, and Our Creek, as follows:

5 AAC 52.023 (14), (15), and (17) are amended to read:

...

(14) in Mendeltna Creek drainage,

(A) in all flowing waters, including all waters within one-quarter mile of Mendeltna Creek’s confluence with Tazlina Lake,

(i) Sport fishing for salmon is closed; salmon may not be taken or possessed;

(ii) **repealed**[ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH, WHICH MUST BE GREATER THAN 12 INCHES IN LENGTH];

(15) in Moose Lake,

(C) **repealed**[ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH];

(17) in Our Creek,

(A) **repealed**[ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH];

What is the issue you would like the board to address and why? Due to sustainability concerns, regulations for Arctic grayling were restricted for Mendeltna Creek (2000), Moose Lake and Our Creek (2003). Our Creek and Moose Lake had been used for Arctic grayling egg collection to support the regional stocking program, which potentially removed some unknown level of future production. Since 2000, angler effort on all these systems has greatly decreased and egg collections from Moose Lake and Our Creek were terminated after 2001. Changing these special regulations to general provisions for the Upper Copper and Upper Susitna River Area will simplify Arctic grayling regulations and provide additional fishing opportunity.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-169)

PROPOSAL 92

5 AAC 52.023. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Modify the seasonal bait closure in Paxson and Summit Lakes, as follows:

Extend the use of bait for taking Lake Trout and Burbot in Paxson and Summit Lakes for one more month. New reg. Would read as the existing regulation except the end date for bait would be April 15, rather than March 15. The bait extension would only apply to Paxson and Summit Lak

What is the issue you would like the board to address and why? Increase sport fish opportunity in Paxson and Summit Lakes for fishermen. Paxson and Summit Lake are under-utilized at the

present time. Over the past decade, sport fishing has diminished appreciably. Spring fishing is now almost completely utilized by Copper Basin residents.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Paxson AC

PROPOSED BY: Paxson Advisory Committee (HQ-F24-115)

PROPOSAL 93

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Modify area closed to sport fishing in Hungry Hollow Creek, as follows:

5 AAC 52.023(9)(E) is amended to read:

...

(E) in all waters of the Middle Fork of the Gulkana River from the outlet of Dickey Lake to an ADF&G regulatory marker located approximately three miles downstream, including Hungry Hollow Creek **downstream of the outlet of Wait-A-Bit Lake**, and Twelvemile Creek,

(i) sport fishing is allowed only from June 15 – April 14, except that sport fishing for king salmon is closed; king salmon may not be taken or possessed and must be released immediately and returned to the water unharmed;

What is the issue you would like the board to address and why? A seasonal sport fishing closure (April 15 – June 14) was implemented in a section of the Middle Fork Gulkana River and Hungry Hollow Creek in 1997 to protect spawning rainbow and steelhead trout. Twelvemile Creek was included in the sport fishing closure regulations in 2003. Since 1997, several surveys and radiotelemetry work have failed to identify any rainbow trout presence in Hungry Hollow Creek above the outlet to Wait-a-Bit Lake. Hungry Hollow Creek extends upstream of Wait-A-Bit Lake and drains several road-accessible lakes along the Denali Highway including Octopus, Teardrop, and Ten Mile Lakes that support lake trout, Arctic grayling and whitefish populations. Removal of the sport fishing closure will allow additional angler opportunity for these waters.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-170)

PROPOSAL 94

5 AAC 52.022. General provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Repeal definition of “bow and arrow” in area regulations, as follows:

5 AAC 52.022(b) is amended to read:

...

(b) **repealed**[FOR THE PURPOSES OF THIS SECTION, “BOW” MEANS A LONG BOW, RECURVE BOW, COMPOUND BOW, OR CROSSBOW].

What is the issue you would like the board to address and why? The board added the definition of “bow and arrow” to Statewide Provisions under 5 AAC 75.995 during the statewide meeting in March 2019. A portion of the bow and arrow language was removed from the Upper Copper Upper Susitna Management Area regulations, but the definition in the area regulations was not repealed. This proposal corrects that oversight.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F23-172)

Herring (9 proposals)

PROPOSAL 95

5 AAC 27.300. Description of Prince William Sound, 5 AAC 27.305. Fishing Districts, Subdistricts, and Sections, and 5 AAC 27.365. Prince William Sound Herring Management Plan.

Make numerous changes to management of commercial herring fisheries in Prince William Sound, as follows:

5 AAC 27.300. Description of Prince William Sound Area. The Prince William Sound Area **includes all waters of Alaska between 148° 50.25' W. long. (near Cape Fairfield) and 144° W. long. (near Cape Suckling)** [HAS AS ITS WESTERN BOUNDARY A LINE EXTENDING SOUTH FROM CAPE FAIRFIELD, AS ITS EASTERN BOUNDARY A LINE EXTENDING SOUTH FROM CAPE SUCKLING AND AS ITS SOUTHERN BOUNDARY 59° N. LAT.]

5 AAC 27.305. Fishing districts, Subdistricts and Sections.

(a) Prince William Sound District: all waters of the Prince William Sound Management Area, excluding the Kayak Island District. (b) Kayak Island District: all waters from a line from a point at 60° 01.16' N. lat., 144° 00.00' W. long., to a point at 59° 57.98' N. lat., 144° 00.00' W. long., to a point at 59° 44.29' N. lat., 144° 36.12' W. long., to a point at 60° 17.13' N. lat., 146° 15.02' W. long., to Hook Point at 60° 20.11' N. lat., 146° 15.02' W. long.
[REPEALED]

5 AAC 27.365. Prince William Sound District Herring Management Plan. (a) The purpose of the Prince William Sound **District** herring management plan in this section is to describe management strategies for all Prince William Sound **District** herring fisheries and to provide for an optimum sustained yield and an equitable allocation for all user groups. (b) The management plan for herring fisheries in **the** Prince William Sound **District** assumes that all of these fisheries use a single stock of herring which may be harvested at the rate of zero to 20 percent of the spawning biomass. The management year for herring is **January 1 through December 31** [JULY 1 THROUGH JUNE 30]. Guideline harvest levels are established before the **sac roe fisheries** [FOOD AND BAIT SEASON] in the **spring** [FALL] and are based upon the final spawning biomass estimate from the previous year, cohort analysis, and projected recruitment. The minimum spawning biomass threshold is **8400** [22,000] tons, and no fishery may be opened if the estimated spawning biomass is below this threshold level. The department may allow, based upon age class strength, a harvest of herring at an exploitation rate between zero and 20 percent of the projected spawning biomass when that biomass is between 8400 [22,000] tons and 42,500 tons. The

department may allow a harvest of herring at a maximum exploitation rate of 20 percent when the total projected spawning biomass is greater than 42,500 tons.

(c) The guideline harvest of herring is allocated by fishery as follows:

- (1) purse seine sac roe fishery: 58.1 percent;
- (2) gillnet sac roe fishery: 3.4 percent;
- (3) food and bait fishery: 16.3 percent;
- (4) spawn-on-kelp not in pounds: 8.0 percent; and
- (5) spawn-on-kelp in pounds: 14.2 percent.

(d) Harvest quotas for the spawn-on-kelp fisheries are derived as follows:

- (1) spawn-on-kelp not in pounds: one ton of spawn-on-kelp may be taken for every eight tons of herring allocated to this fishery;
- (2) spawn-on-kelp in pounds: the spawn-on-kelp in pounds harvest objective will be set based on the ratio of one ton of spawn on kelp for every 12.5 tons of herring allocated to this fishery; the commissioner, or an authorized designee, shall manage the fishery to achieve this harvest objective by restricting those persons holding a CFEC permit to participate in the fishery to a specified number of kelp blades annually based on the number of permit holders registered under 5 AAC 27.334(a) to fish with pounds, and to an equal portion of the guideline harvest of herring allocated in (c)(5) of this section based on the total number of permit holders.

(6) 80 percent of the unharvested remainder of spring sac roe fisheries may be allocated to the fall food and bait fishery.

5 AAC 27.XXX. Harvest strategies for the Kayak Island District. (a) this district does not have a history of commercial herring harvest and may be opened to fishing on an exploratory basis with no specified guideline harvest level; Prince William Sound Area herring fisheries CFEC permit holders may participate in this exploratory district using the gear standard specified on their permits; the district listed as exploratory under this paragraph may be opened or closed, based on inseason information such as observed.

What is the issue you would like the board to address and why? Updates to the PWS herring management plan and lowering GHL back to historical levels. These levels were changed in the 1990s and the fishery has remained closed ever since, disenfranchising historic users and an entire generation of younger commercial fisherman who could use a spring fishery and income but have not been able to participate due to this change.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I utilized the language from an ADFG originated proposal for the majority, however modified the GHL level back to the proper historical level.

PROPOSED BY: Kenneth Jones (HQ-F24-006)

PROPOSAL 96

5 AAC 27.365 Prince William Sound Herring Management Plan.

Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation, as follows:

5 AAC 27.365. Prince William Sound **District** Herring Management Plan.

(a) The purpose of the Prince William Sound **District** herring management plan in this section is to describe management strategies for all Prince William Sound **District** herring fisheries and to provide for an optimum sustained yield and an equitable allocation for all user groups.

(b) The management plan for herring fisheries in **the** Prince William Sound **District** assumes that all of these fisheries use a single stock of herring which may be harvested at the rate of zero to 20 percent of the spawning biomass. The management year for herring is **January 1 through December 31** [JULY 1 THROUGH JUNE 30]. Guideline harvest levels are established before the **sac roe fisheries** [FOOD AND BAIT SEASON] in the **spring** [FALL] and are based upon the final spawning biomass estimate from the previous year, cohort analysis, and projected recruitment. The minimum spawning biomass threshold is 22,000 tons, and no fishery may be opened if the estimated spawning biomass is below this threshold level. The department may allow, based upon age class strength, a harvest of herring at an exploitation rate between zero and 20 percent of the projected spawning biomass when that biomass is between 22,000 tons and 42,500 tons. The department may allow a harvest of herring at a maximum exploitation rate of 20 percent when the total projected spawning biomass is greater than 42,500 tons.

(c) The guideline harvest of herring is allocated by fishery as follows:

- (1) purse seine sac roe fishery: 58.1 percent;
- (2) gillnet sac roe fishery: 3.4 percent;
- (3) food and bait fishery: 16.3 percent;
- (4) spawn-on-kelp not in pounds: 8.0 percent; and
- (5) spawn-on-kelp in pounds: 14.2 percent.

(d) Harvest quotas for the spawn-on-kelp fisheries are derived as follows:

- (1) spawn-on-kelp not in pounds: one ton of spawn-on-kelp may be taken for every eight tons of herring allocated to this fishery;
- (2) spawn-on-kelp in pounds: the spawn-on-kelp in pounds harvest objective will be set based on the ratio of one ton of spawn on kelp for every 12.5 tons of herring allocated to this fishery; the commissioner, or an authorized designee, shall manage the fishery to achieve this harvest objective by restricting those persons holding a CFEC permit to participate in the fishery to a specified number of kelp blades annually based on the number of permit holders registered under 5 AAC 27.334(a) to fish with pounds, and to an equal portion of the guideline harvest of herring allocated in (c)(5) of this section based on the total number of permit holders.

(3) 80 percent of the unharvested remainder of spring sac roe fisheries may be allocated to the fall food and bait fishery.

What is the issue you would like the board to address and why? CDFU and ADFG collaborated to adopt new language into the Herring Management Plan to define a Prince William Sound District, change the season start and end dates, and add a new subsection that will allow unharvested Sac Roe herring to be harvested in the fall food and bait fishery.

Changing the season start date will help ADFG open the fishery when the harvest threshold is reached. The July 1 start date hampers ADFG's ability to open the fishery for the fall food and bait fishery, because biomass estimates aren't available until late fall. Starting the season on January 1 will allow the department to open the sac roe fishery first based on a fall biomass estimate.

The rollover clause will allow unharvested sac roe to be harvested in a more valuable food and bait fishery. Commercial groundfish fishermen are paying exorbitant prices for bait. Allowing this

resource to be harvested locally in Area E will alleviate some of the cost burden on the groundfish fleet.

Recently the Board and CFEC formed a Herring Revitalization Committee. This rollover clause is a simple but effective way to achieve the State's intent to revitalize our once thriving local herring fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed this proposal with ADFG.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-116)

PROPOSAL 97

5 AAC 27.365 Prince William Sound Herring Management Plan.

Reduce the minimum herring spawning biomass threshold, as follows:

(b) The management plan for herring fisheries in Prince William Sound assumes that all of these fisheries use a single stock of herring which may be harvested at the rate of zero to 20 percent of the spawning biomass. The management year for herring is July 1 through June 30. Guideline harvest levels are established before the food and bait season in the fall and are based upon the final spawning biomass estimate from the previous year, cohort analysis, and projected recruitment. The minimum spawning biomass threshold is **16,000** [22,000] tons, and no fishery may be opened if the estimated spawning biomass is below this threshold level. The department may allow, based upon age class strength, a harvest of herring at an exploitation rate between zero and 20 percent of the projected spawning biomass when that biomass is between **16,000** [22,000] tons and 42,500 tons. The department may allow a harvest of herring at a maximum exploitation rate of 20 percent when the total projected spawning biomass is greater than 42,500 tons.

What is the issue you would like the board to address and why? In 1994 the minimum herring biomass threshold was raised to 22,000 tons from 8,400 tons. Since this increase, there have been essentially zero commercial herring fisheries operating in Prince William Sound. The 8,400 minimum biomass was based on an aerial survey data biomass estimate. In 1994, the department switched to ASL sampling to build a model and used the data from a longer time series to establish a threshold. The current threshold is based on a 25 percent biomass. The time series used was based on 1980's herring biomasses, which was an above average level of herring productivity for the Prince William Sound Area. It is our understanding that if the department had switched the existing aerial survey model from the 8,400 ton threshold to ASL model, the threshold should have been closer to 16,000 tons. This 16,000 tons would reflect a biomass estimate without incorporating a longer time series of data and setting a threshold at 25 percent of unfished biomass. We would like the department to use a longer data set from 1980-2024 to establish a new minimum spawning biomass threshold. By using a longer time series, it reflects what the true unfished biomass is in Prince William Sound.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU)

(EF-F24-119)

PROPOSAL 98

5 AAC 27.300. Description of Prince William Sound Area.

Align Prince William Sound herring and salmon management area descriptions, as follows:

5 AAC 27.300 is amended to read:

The Prince William Sound Area includes all waters of Alaska between 148° 50.25' W. long. (near Cape Fairfield) and 144° W. long. (near Cape Suckling). [THE PRINCE WILLIAM SOUND AREA HAS AS ITS WESTERN BOUNDARY A LINE EXTENDING SOUTH FROM CAPE FAIRFIELD, AS ITS EASTERN BOUNDARY A LINE EXTENDING SOUTH FROM CAPE SUCKLING AND AS ITS SOUTHERN BOUNDARY 59° N. LAT.]

What is the issue you would like the board to address and why? The Prince William Sound Area herring and salmon fisheries boundaries do not align. The current herring fishery management area east boundary overlaps the Yakutat Area western boundary, and its south boundary is outside of state managed waters.

Additionally, there is no geospatial reference in this regulation to accurately define the western and eastern boundaries of the Prince William Sound Area. Defining these boundaries along lines of longitude will allow for a consistent and repeatable point of reference for those involved in area fisheries.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F24-139)

PROPOSAL 99

5 AAC 27.305. Fishing districts, subdistricts and sections.

Define commercial herring fishery districts in Prince William Sound, as follows:

5 AAC 27.305. Fishing districts, subdistricts and sections.

(a) Prince William Sound District: all waters of the Prince William Sound Management Area, excluding the Kayak Island District.

(b) Kayak Island District: all waters from a line from a point at 60° 01.16' N. lat., 144° 00.00' W. long., to a point at 59° 57.98' N. lat., 144° 00.00' W. long., to a point at 59° 44.29' N. lat., 144° 36.12' W. long., to a point at 60° 17.13' N. lat., 146° 15.02' W. long., to Hook Point at 60° 20.11' N. lat., 146° 15.02' W. long.

What is the issue you would like the board to address and why? Currently there is not a regulation defining the waters around Kayak Island within Area E to operate a herring fishery. This regulation will define the boundaries to allow the department to implement an exploratory fishery. Defining the Prince William Sound District apart from the Kayak Island subdistrict will allow managers to operate both fisheries effectively.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed this proposal with ADFG.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-115)

PROPOSAL 100

5 AAC 27.XXX New Section.

Adopt a Kayak Island District herring management plan, as follows:

5 AAC 27.XXX. Harvest strategies for the Kayak Island District. (a) this district does not have a history of commercial herring harvest and may be opened to fishing on an exploratory basis with no specified guideline harvest level; Prince William Sound Area herring fisheries CFEC permit holders may participate in this exploratory district using the gear standard specified on their permits; the district listed as exploratory under this paragraph may be opened or closed, based on inseason information such as observed stock abundance, harvest levels, and changes in fish behavior or harvest patterns, including such changes in the adjacent Prince William Sound District;

What is the issue you would like the board to address and why? CDFU and ADFG collaborated to develop language for an exploratory herring fishery near Kayak Island. There is a biomass of herring that has been spawning near Kayak Island which has no historical harvest, but operates within the Area E region. We are unsure how a fishery would operate in this area. A good first step is language that defines that existing Area E herring permit holders are allowed to harvest these herring if the department decides to open the exploratory fishery. Breaking Kayak Island out of the existing management plan allows the department to execute a fishery.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed this proposal with ADFG.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-117)

PROPOSAL 101

5AAC 27.365. Prince William Sound Herring Management Plan.

Adopt a new exploratory fishery for herring in the eastern portion of the Prince William Sound Management Area, as follows:

5AAC 27.365 Prince William Sound Herring Management Plan

b) The management plan for herring fisheries in Prince William Sound assumes that all of those fisheries (ADD) (NORTH OF A LINE FROM CAPE PUGET TO CAPE CLEARE, FROM ZIAKOF POINT TO CAPE HINCHINBROOK AND FROM STRABERRY HILL TO WHITEHED) use a single stock of herring which may be harvested at the rate of zero to 20 percent of the spawning biomass. (Leave the remainder of (b) intact

ADD new (f) PRINCE WILLIAM SOUND WATERS SOUTH OF A LINE FROM CAPE PUGET TO CAPE CLEARE, FROM ZIAKOF POINT TO CAPE HINCHINBROOK AND FROM STRAWBERRY HILL TO WHITSHED WILL BE MANAGED AS EXPLORATORY IN COORDINATION WITH ADFG WITH A MINIMUM HARVEST OBJECTIVE OF 500 TONS WITH EXISTING GEAR REGULATIONS AND NO GEAR ALLOCATIONS.

What is the issue you would like the board to address and why? Currently Prince William Sound Herring are all considered a single stock. About 15 years ago a significant biomass of herring has been spawning in the vicinity of Kayak Island. There has been samples collected and

sporadic aerial surveys conducted documenting this phenomenon. In 2023 over 32 miles of spawn was observed in this area. Unfortunately this population is not being considered part of the Price William Sound stock and is not included in the overall assessment of the Prince William Sound herring population even though it is within the defined boundaries of area E.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I had conversations with other interested parties as well as ADFG representatives

PROPOSED BY: Rob Nelson (EF-F24-043)

PROPOSAL 102

5 AAC 27.XXX. New section.

Allow commercial fishery permit holders to harvest herring for the own use as bait, as follows:

5 AAC 27.XXX. Harvest of bait by permit holders in Prince William Sound District. The holder of a valid Prince William Sound Herring permit may take but may not sell herring for use as bait.

- (1) herring may be taken at any time;**
- (2) herring may be taken by any gear specified in 5 AAC 39.105;**
- (3) in the 72 hours before and 72 hours after an open commercial herring sac roe fishing period in the Prince William Sound Area, a vessel, crewmember, or permit holder that participates in that commercial herring sac roe fishing period may not take herring under this section in any district in the Prince William Sound Area;**
- (4) a person or vessel may not take more than one ton of herring in a calendar year.**
- (5) any herring that is harvested under 5 AAC.27.XXX will be deducted from the Prince William Sound food and bait fishery allocation under 5 AAC 27.365**

What is the issue you would like the board to address and why? There is a consistent challenge and issue that there is a lack of bait access in Area E. Adopting this regulation would give the department a tool to allow a small harvest of bait in Area E if we are below the 22,000 ton threshold to execute a fall food and bait fishery. There are similar regulations in other areas that allow for 1 ton of bait to be harvested by permit holders.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Cordova District Fishermen United (CDFU) (EF-F24-118)

PROPOSAL 103

5 AAC 27.332. Seine Specifications and Operations for Prince William Sound Area.

Allow dual permit commercial herring purse seine operations in Prince William Sound, as follows:

5 AAC 27.332. Seine specifications and operations for Prince William Sound Area. A person may not operate a purse seine that is more than 1,025 meshes in depth and more than 150 fathoms in length from April 15 through June 30.

Except. Two Prince William Sound sac roe herring seine CFEC permit holders may concurrently fish from the same vessel and jointly operate a single purse seine that is up to a maximum 1700 meshes in depth and 200 fathoms of length, and a person holding two Prince William Sound sac roe herring seine CFEC permits may operate a single purse seine that is a maximum 1700 meshes in depth and 200 fathoms of length, under this section. When two Prince William Sound sac roe herring seine CFEC Permit holders fish from the same vessel and jointly operate additional seine gear, and when a person holding two Prince William Sound sac roe herring seine CFEC Permits operates additional seine gear, the vessel must display its ADF&G permanent license plate number followed by the letter "D" to identify the vessel as a dual permit vessel. The letter "D" must be removed or covered when the vessel is operating with only one CFEC permit on board the vessel. The permanent license plate number and letters must be displayed.

- (A) in letters and numerals 12 inches high with lines at least one inch wide;
- (B) in a color that contrasts with the background;
- (C) on both sides of the hull; and
- (D) in a manner that is plainly visible at all times when the vessel is being operated;

When two CFEC permit holders jointly operate gear each permit holder

- (A) must be on board the fishing vessel and present
- (B) is responsible for ensuring that the entire unit of gear is operated in a lawful manner.

What is the issue you would like the board to address and why? Currently, there are way too many limited entry sac roe seine permits for the small quota that Prince William Sound can support. There is also a very limited market for herring and especially for sac roe products. Allowing for permit stacking of permits will help incentivize permit holders to group up on fewer participating vessels making it a tenable fishery for a few participants. In the 80s this fishery was known to be exceptionally congested and dangerous with many boats, tenders, and airplanes all crammed into very small areas for very few fish. Adopting this change will improve safety and viability for bringing back a small economically viable herring fishery in prince william sound.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. In coordination with other individual fisherman.

PROPOSED BY: Kenneth B. Jones

(HQ-F24-010)
