

Boards Support Section
Board of Fisheries
Art Nelson, Executive Director
PO Box 115526
Juneau, AK 99811-5526
(907) 465-4110



Alaska Department of Fish and Game
Doug Vincent-Lang, Commissioner
PO Box 115526
Juneau, AK 99811-5526
www.adfg.alaska.gov

Agenda 12: Nonresponsive Submissions from the 2024/2025 Call for Proposals

1. Memorandum on submissions deemed nonresponsive from the 2024/2025 Call for Proposals
 - Appendix with all nonresponsive proposals

MEMORANDUM

STATE OF ALASKA DEPARTMENT OF FISH AND GAME Boards Support Section

TO: Alaska Board of Fisheries

DATE: October 14, 2024

THRU:

PHONE: 907-267-2292

FROM: Art Nelson, Executive Director
Alaska Board of Fisheries

SUBJECT: Submissions deemed
nonresponsive from the
2024/2025 Call for Proposals

Not every proposal submission makes it into the proposal book. Sometimes duplicate proposals are received or the author asks to replace a previously submitted proposal with an updated version (prior to the deadline). Some submissions request regulatory changes that are not within the authority of the board. Other submissions don't actually request a change in regulation but ask the board to take some other non-regulatory action.

When proposals are received, they are assigned a log number. This past year for the 2024/2025 Call for proposals, we received 357 logged submissions (not including test submissions from boards staff). Of these 357, 46 were deemed nonresponsive for various reasons. This memo provides information about those nonresponsive proposals, and the rationale in each case.

Figure 1 summarizes the rationale for nonresponsive proposals from the 2024/2025 Call for Proposals. Table 1 lists the nonresponsive proposals by log number, name of submitter, and rationale for nonresponsiveness. Appendix 1 contains all 46 of the nonresponsive submissions.

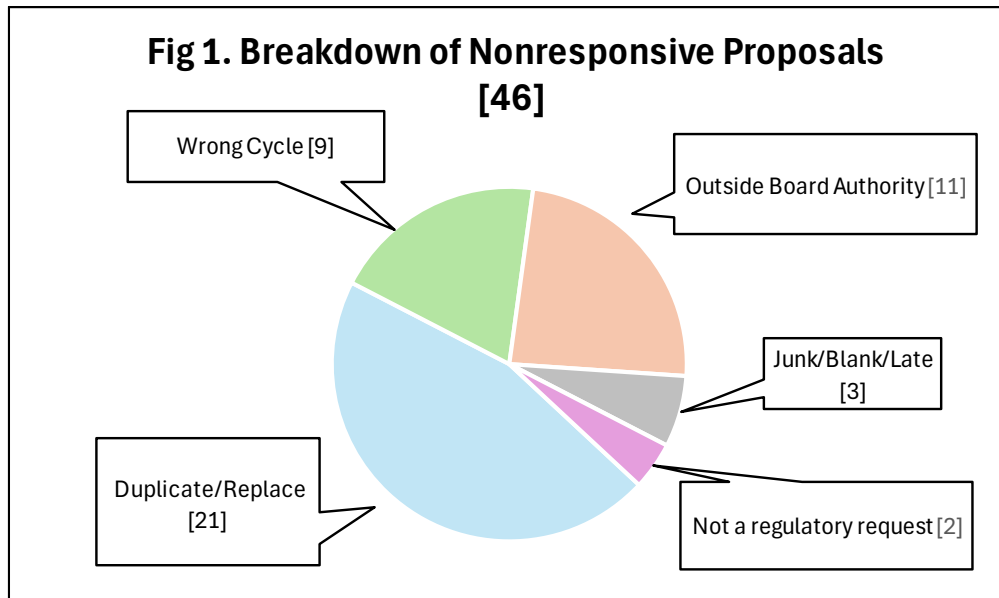


Table 1. List of nonresponsive proposals, sorted by log number and with the name of the submitter and rationale for being deemed nonresponsive.

Log Number	Proposer	Rationale
EF-F24-015	Spam Entry	Junk Entry
EF-F24-018	Sitka AC	Replace [replacement deemed nonresponsive, see EF-F24-022]
EF-F24-022	Sitka AC	Outside board authority and nonregulatory
EF-F24-030	Craig AC	Duplicate of EF-F24-031 [Proposal 208]
EF-F24-046	Jody Mason	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-047	Rob Nelson	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-048	Jody Mason	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-051	Brenda Demmert	Outside board authority
EF-F24-052	Larry Demmert	Duplicate of EF-F24-053 (and outside board authority)
EF-F24-053	Larry Demmert	Outside board authority
EF-F24-054	Larry Demmert	Duplicate of EF-F24-075 (and outside board authority)
EF-F24-065	Manokotak Village Council	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-066	Brenda Demmert	Outside board authority
EF-F24-071	Joseph Person	Replace [Proposal 303]
EF-F24-075	Larry Demmert	Outside board authority
EF-F24-080	Dawson Miller	Duplicate of EF-F24-081 [Proposal 256]
EF-F24-093	Jared Bright	Duplicate of EF-F24-094 [Proposal 240]
EF-F24-098	Thomas A Fisher	Not a regulatory proposal
EF-F24-099	Thomas A Fisher	Not a regulatory proposal
EF-F24-143	Luke Bastian	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-144	John Johanson	Duplicate of Ef-F24 164 [Proposal 195]
EF-F24-153	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]

Log Number	Proposer	Rationale
EF-F24-154	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]
EF-F24-155	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]
EF-F24-158	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]
EF-F24-159	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]
EF-F24-160	Derek Thynes	Duplicate of EF-F-24-161 [Proposal 187]
EF-F24-172	Herring Protectors	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-179	Pioneer Alaskan Fisheries /Hillstrand	Wrong cycle (Statewide Finfish 2025/26)
EF-F24-180	Concerned Citizen	Missed Deadline (also submitted without name)
HQ-F24-001	Darryl Bosshart	Outside board authority
HQ-F24-003	Ben Barnes	Wrong cycle (LCI 2026/2027)
HQ-F24-005	Roger Rowland	Duplicate of HQ-F24-004 [Proposal 277]
HQ-F24-012	Kenneth Jones	Outside board authority
HQ-F24-031	Homer Bairdi Crab Fishermen	Replace [Proposal 290]
HQ-F24-042	Sitka Tribe of Alaska - Jeff Feldpausch	Wrong cycle (Statewide Finfish 2025/26)
HQ-F24-046	David Ivanov	Duplicate of HQ-F24-103 [Proposal 290]
HQ-F24-048	Valdez AC - Bruce Bowman	Outside board authority
HQ-F24-058	Michael Bowen	Junk Entry (blank)
HQ-F24-082	Raymond Nix	Duplicate of HQ-F24-084 [Proposal 82]
HQ-F24-089	SARDFA	Outside board authority
HQ-F24-090	SARDFA	Outside board authority
HQ-F24-106	Michael Cole	Duplicate of HQ-F24-111 [Proposal 138]
HQ-F24-126	Steven Wilfong	Outside board authority
HQ-F24-135	Robert Smith, Warren Chappell	Duplicate of HQ-F24-137 [Proposal 41]
HQ-F24-136	Robert Smith, Warren Chappell	Duplicate of HQ-F24-137 [Proposal 41]

Appendix 1- All 2024/2025 Nonresponsive Submissions

Boards Proposal: All Details

Filing Details

Log Number: EF-F24-015

Timestamp: 2024-03-24 14:51:26.33

Management Unit or Area:

Regulation Book Page Number:

Predefined Topic(s):

Write-in Topic:

Residency Status:

Meeting:

AAC Number:

Issue

kidney stones remedy [REDACTED]

Proposed Solution

kidney stones remedy [REDACTED]

AC Participation

kidney stones remedy [REDACTED]

Submitter Details

Name: Brandonavare

Address: [REDACTED]

City: Parnu

State: Estonia

Zip Code: 123135

Phone: [REDACTED]

Email Address: [REDACTED]

PROPOSAL XXX - 5 AAC .

The Sitka Fish and Game Advisory Committee respectfully and firmly requests the Board take positive action on as many of the following actions as possible:

1. Require the Department to accept vessels whose Alaska State DMV registration lists “Rental” as their Primary Use as satisfactory evidence of that particular use. For Documented vessels, accept the presence of a “Bareboat Charter” agreement as such evidence.
2. Require the Department to amend both their dockside creel census and off-season mail out survey processes to provide a “Rental Vessel/Bareboat Charter” category so that the harvest data for this group can be broken out and shared with the NPFMC.
3. Make a formal request to the NPFMC asking them to:
 - A) Start treating Unguided Anglers fishing from a Rental Vessel as a separate user group when making management decisions for Sport Halibut Harvest.
 - B) Start requiring log keeping for Halibut harvests from Unguided Rental Vessels similar to the logs required of Charter Vessels.
 - C) Start registering Rental Vessels used for Unguided Anglers targeting Halibut, similar to the registration requirements for Charter Vessels.
 - D) Require anglers sport fishing for Halibut from Unguided Rental Vessels to follow the same regulations as those prescribed for Guided Anglers.

What is the issue you would like the board to address and why? The Sitka Fish and Game Advisory Committee (AC) has been working for over the last three years to convince fisheries managers at both the North Pacific Fisheries Management Council (the Council), the Alaska Board of Fisheries (the Board) and the Alaska Department of Fish and Game (the Department), to take some action regarding a fairly new, large and rapidly expanding user group of Halibut harvesters, the Unguided Rental Boat/Bare Boat Charter Anglers within Halibut Management Area 2C. We submitted two proposals for the Board’s last Southeast & Yakutat Finfish & Shellfish cycle of meetings and no action was taken. Members of our AC submitted written comments and testified at both the Council’s 2023 meetings and at the October & December meetings of the Council’s Charter Halibut Committee. Again, no action has been taken or promised on this issue. The issue at hand is this rapidly growing user group is taking advantage of the more generous daily Halibut bag limit of two fish of any size per day versus the more restrictive Guided Angler bag limit of one fish per day that falls within a strict “reverse slot limit”.

We have asked both the Department and the Council to break out harvest data for the user group in question but have been told by both that neither group has been able to come up with an

acceptable definition of “Rental Vessel” in order to provide the requested data. We were also told that there are basically insurmountable challenges in breaking out the harvest data for this particular user group of anglers. Within just a short two week period in the fall of 2023, Sitka’s State House Representative’s staff was able to obtain and evaluate data from the Alaska Department of Motor Vehicles on how many vessel registrations in Alaska State House District 2 using the number of vessel registrations listing “Rental” as their primary use. Her staff’s analysis of this data shows that the number of these vessels has nearly doubled between 2001 and 2023. District 2 includes all the communities of Southeast Alaska with the exception of Ketchikan, Juneau, Haines, Skagway and Gustavus. If vessels from these communities were added, it would likely show even greater growth in the Rental Vessel sector within Federal Management Area 2C.

In times of low abundance for our Halibut resources (like we are now experiencing), our AC would prefer to lower the harvest of the Unguided Rental Vessel/Bareboat Charter Anglers (who are primarily non-residents) rather than lowering the bag limit for the remainder of the Unguided Anglers in Area 2C (who are primarily Alaska residents). If this action is approved, but fails over a reasonable timeframe to have a meaningful impact to increase the health of our Halibut resources, then our AC would likely support a reduction in sport bag limits for all Unguided Anglers. In our discussions with the Council, we have been informed that the Council is unlikely to take any action to quantify and/or reduce harvest of the Unguided Rental Vessel/Bareboat Charter user group unless they receive a request to do so from the State of Alaska.

Our AC fully understands the challenges the Board faces when dealing with Proposals that deal with a federally managed species like Halibut. We are also very confident that a serious problem exists and that it is time to engage on efforts to both quantify the Harvest by Unguided Rental Vessel/Bareboat Charter Anglers and to create parity in bag limits between them and Guided Anglers.

PROPOSED BY: Sitka AC

(EF-F24-018)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Establish bareboat charter registration and require collection of harvest data from these vessels, as follows:”)

The Sitka Fish and Game Advisory Committee respectfully and firmly requests the Board take positive action on as many of the following actions as possible:

1. Require the Department to accept vessels whose Alaska State DMV registration lists "Rental" as their Primary Use as satisfactory evidence of that particular use. For Documented vessels, accept the presence of a "Bareboat Charter" agreement as such evidence.
2. Require the Department to amend both their dockside creel census and off-season mail out survey processes to provide a "Rental Vessel/Bareboat Charter" category so that the harvest data for this group can be broken out and shared with the NPFMC.
3. Make a formal request to the NPFMC asking them to:
 - A) Start treating Unguided Anglers fishing from a Rental Vessel as a separate user group when making management decisions for Sport Halibut Harvest.
 - B) Start requiring log keeping for Halibut harvests from Unguided Rental Vessels similar to the logs required of Charter Vessels.
 - C) Start registering Rental Vessels used for Unguided Anglers targeting Halibut, similar to the registration requirements for Charter Vessels.
 - D) Require anglers sport fishing for Halibut from Unguided Rental Vessels to follow the same daily bag/possession/size limits and day closures as those prescribed for Guided Anglers.

What is the issue you would like the board to address and why? The Sitka Fish and Game Advisory Committee (AC) has been working for over the last three years to convince fisheries managers at both the North Pacific Fisheries Management Council (the Council), the Alaska Board of Fisheries (the Board) and the Alaska Department of Fish and Game (the Department), to take some action regarding a fairly new, large and rapidly expanding user group of Halibut harvesters, the Unguided Rental Boat/Bare Boat Charter Anglers within Halibut Management Area 2C. We submitted two proposals for the Board’s last Southeast & Yakutat Finfish & Shellfish cycle of meetings and no action was taken. Members of our AC submitted written comments and testified at both the Council's 2023 meetings and at the October & December meetings of the Council's Charter Halibut Committee. Again, no action has been taken or promised on this issue. The issue at hand is this rapidly growing user group is taking advantage of the more generous daily Halibut bag limit of two fish of any size per day versus the more restrictive Guided Angler bag limit of one fish per day that falls within a strict "reverse slot limit".

We have asked both the Department and the Council to break out harvest data for the user group in question but have been told by both that neither group has been able to come up with an acceptable definition of "Rental Vessel" in order to provide the requested data. We were also told that there are basically insurmountable challenges in breaking out the harvest data for this particular user group of anglers. Within just a short two week period in the fall of 2023, Sitka's State House Representative's staff was able to obtain and evaluate data from the Alaska Department of Motor Vehicles on how many vessel registrations in Alaska State House District 2 using the number of vessel registrations listing "Rental" as their primary use. Her staff's analysis of this data shows that the number of these vessels has nearly doubled between 2001 and 2023. District 2 includes all the communities of Southeast Alaska with the exception of Ketchikan,

Juneau, Haines, Skagway and Gustavus. If vessels from these communities were added, it would likely show even greater growth in the Rental Vessel sector within Federal Management Area 2C. In times of low abundance for our Halibut resources (like we are now experiencing), our AC would prefer to lower the harvest of the Unguided Rental Vessel/Bareboat Charter Anglers (who are primarily non-residents) rather than lowering the bag limit for the remainder of the Unguided Anglers in Area 2C (who are primarily Alaska residents). If this action is approved, but fails over a reasonable timeframe to have a meaningful impact to increase the health of our Halibut resources, then our AC would likely support a reduction in sport bag limits for all Unguided Anglers.

In our discussions with the Council, we have been informed that the Council is unlikely to take any action to quantify and/or reduce harvest of the Unguided Rental Vessel/Bareboat Charter user group unless they receive a request to do so from the State of Alaska.

Our AC fully understands the challenges the Board faces when dealing with Proposals that deal with a federally managed species like Halibut. We are also very confident that a serious problem exists and that it is time to engage on efforts to both quantify the Harvest by Unguided Rental Vessel/Bareboat Charter Anglers and to create parity in bag limits between them and Guided Anglers.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. The Sitka AC is sponsoring this proposal and we have taken numerous actions over the past several years intended to gather official data on this new user group.

PROPOSED BY: Tad Fujioka

(EF-F24-022)

PROPOSAL XXX

5 AAC 47.020. General provisions for seasons and bag, possession, annual, and size limits for the salt waters of the Southeast Alaska Area.

Allow retention of demersal shelf rockfish by nonresidents, as follows:

Establish a bag and possession limit for Demersal Shelf Rockfish (DSR) for Non-Residents.

Non-Resident bag limit of one fish; possession limit of one fish; annual limit of one fish; no size limit.

What is the issue you would like the board to address and why? Currently, non-residents cannot harvest any DSR species (Quillback, Copper, Canary, China and Tiger). There is no survey and/or data that shows a conservation concern for the DSR species. Anglers commonly catch all species of rockfish in Southeast Alaska and the inability to harvest these species is a lost opportunity to the sport fishery. Most anglers agree that all the DSR rockfish are excellent table fare and readily abundant. The mandatory use of deep water release mechanisms has significantly reduced release mortality.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. This prop was developed in the Craig AC.

PROPOSED BY: Craig AC

(EF-F24-030)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

All Commercial fishing boats must have some form of a deep water release.

EXAMPLE: 5 sided cage like device with a hatch on top. (like a crab pot) for example.

to be lowered to the bottem after hauling gear and before Commerial fishing gear is to be reset.

What is the issue you would like the board to address and why? Rock fish Depletion. All charter and recreational fisherman are required to have a DEEP WATER RELEASE on board. To help in the survival of bycatch rockfish. If the numbers are correct by F&G as stated. The rockfish numbers are lowering in all fishing areas. thus the reduction in recreational bag limits. There for it makes sence to require a DEEP WATER RELEASE on commercial fishing boats.if this is not brought under control, the rockfish population could be in jeopardy of compleat colapse.

Why is it Commercail fishing boat ARE NOT REQUIRED TO HAVE A DEEP WATER RELEASE?

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

PROPOSED BY: jody Mason

(EF-F24-046)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.5AAC 39.260

Insert lead-in language here (“more fish, as follows:”)

REPEAL (I) During operation of a purse seine, the propulsion engines of the seine vessel, or the skiff assisting the operation, must be running and the vessel must be controlling the configuration of the purse seine.

What is the issue you would like the board to address and why? This regulation is unnecessary and antiquated. Fuel prices are extremely high and the requirement an engine must be running is a waste of resources when a fisher wants to just "sit on the net" when fishing is slow.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I talked to participants in this fishery

PROPOSED BY: Rob Nelson

(EF-F24-047)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Require all Commercial Fishing Boats fishing within State Waters to be Monitored by either human or Electronic Equipment while at sea.

What is the issue you would like the board to address and why? Commercial fishing boats fishing within State Waters:

Currently are not required to have observers on board in state water on commercial fishing openings. With the issue of bycatch in the spot light these days, and the light put on bycatch reduction along with the numbers of bycatch unknown to Fish & Game on these vessels. It is Fish & Game's responsibility to reduce all forms of Bycatch. also with monitoring either by human or electronic monitoring this will give Fish & Game better information on bycatch numbers in each commercial fishing area, individual species, fishing gear type used and boats. to better help Fish & Game in the future understand the health of the waters.

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

PROPOSED BY: Jody Mason

(EF-F24-048)

PROPOSAL XXX

5 AAC xx.xxx. New Section.

Insert lead-in language here (“more fish, as follows:”)

Limited entry permits for Charter fishing businesses. Capping charter fleet at current levels. The uptick of new charter businesses appears to be growing faster than any other industry with no limitations. The amount of fish taken drastically impact all Alaska fishers, both commercial and subsistence. Charter fishing mostly appears to go unchecked and when there are limits put in place it often feels like the restrictions are placed upon the commercial fleet vs the charter fleet.

What is the issue you would like the board to address and why? Ever expanding charter fleet

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

PROPOSED BY: Brenda Demmert

(EF-F24-051)

PROPOSAL XXX

5 AAC XX.XXX. New Section.

Require observers for sport fishing services of a specific size, as follows:”)

Require observers at all sport lodges with 5 or more boats. Lodges are commercial enterprises and need to be monitored. Commercial fishermen are monitored for many species such as King salmon and Ifq and have been fined heavily when accidentally retaining one or more than allowed. All lodges have non resident customers and need to be monitored and penalized when breaking the law. Currently there is no monitoring or observers, just an honor system which can be abused. I have seen many sports fishermen at the airport with 5-10 fish boxes. Which at 50lbs apiece are 250 to 500 or more pounds of fish. These lodges fish where locals fish and over crowd local areas turning them into deserts. It harms natives and other locals who depend on subsistence and sport for much of their food.

What is the issue you would like the board to address and why? Over fishing by sport lodges and lack of actual accountability.

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

PROPOSED BY: Larry Demmert

(EF-F24-052)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Require observers at all sport lodges with 5 or more boats. Lodges are commercial enterprises and need to be monitored. Commercial fishermen are monitored for many species such as King salmon and Ifq and have been fined heavily when accidentally retaining one or more than allowed. All lodges have non resident customers and need to be monitored and penalized when breaking the law. Currently there is no monitoring or observers, just an honor system which can be abused. I have seen many sports fishermen at the airport with 5-10 fish boxes. Which at 50lbs apiece are 250 to 500 or more pounds of fish. These lodges fish where locals fish and over crowd local areas turning them into deserts. It harms natives and other locals who depend on subsistence and sport for much of their food.

What is the issue you would like the board to address and why? Over fishing by sport lodges and lack of actual accountability.

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

PROPOSED BY: Larry Demmert

(EF-F24-053)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Charter fishing is a commercial fishery and needs to be regulated as such with a cap on licenses and make them saleable and transferable. Charters make money from fish and therefore should be classified as commercial, to not be classified as commercial is not logical.

What is the issue you would like the board to address and why? To classify charter fishing as a commercial fisheries. They make money from fishing so it's a commercial fishery and needs to be regulated as such.

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

PROPOSED BY: Larry Demmert

(EF-F24-054)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.77.010

Remove requirement for sport fishing license when personal use fishing for tribal cardholders.

If a resident has a Tribal ID card, they will be exempt from the regulation requiring a fishing license.

77.010 (a) Finfish, shellfish, and aquatic plants may be taken for personal use only by a holder of a valid resident Alaska sport fishing license or by an Alaskan resident exempt from licensing under AS 16.05.400, **except a fishing license is not required for those that hold a tribal ID card issued by a federally recognized tribe.**

What is the issue you would like the board to address and why? Remove the requirement for residents who hold a tribal card to obtain a fishing license. In remote rural areas, economic opportunities may be limited affecting the user’s ability to afford a fishing license. License vendors are also not always available in smaller communities. Internet capabilities may also not be available or are too costly to have, thus making it difficult to obtain licenses online which potentially restricts access to a vital food source. Those that have a Tribal ID card will serve as a legal license to allow for fishing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Proposal was discussed and developed with Manokotak City Council, Manokotak Tribal Council, and Manokotak Native Ltd.

PROPOSED BY: Manokotak Village Council

(EF-F24-065)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Limited entry permits for Charter fishing businesses. Capping charter fleet at current levels. The uptick of new charter businesses appears to be growing faster than any other industry with no limitations. The amount of fish taken drastically impact all Alaska fishers, both commercial and subsistence. Charter fishing mostly appears to go unchecked and when there are limits put in place it often feels like the restrictions are placed upon the commercial fleet vs the charter fleet.

What is the issue you would like the board to address and why? Ever expanding charter fleet

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

PROPOSED BY: Brenda Demmert

(EF-F24-066)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.5 AAC 31.214. Shrimp pot guideline harvest level f

Modify the Prince William Sound shrimp pot fishery guideline harvest level, as follows:

5 AAC 31.214. Shrimp pot guideline harvest level for Registration Area E

~~The estimated total allowable harvest for the waters described in 5 AAC 31.210(a) must be more than 110,000 pounds of spot shrimp by round weight before a commercial shrimp pot fishery may be opened.~~ The guideline harvest level for the commercial pot gear fishery in the waters described in 5 AAC 31.210(a) is 40 percent of the total allowable harvest for the area. The department will, to the extent practicable, manage the fishery to allow no more than 50 percent of the guideline harvest level to be taken from any one statistical area. The commissioner will open and close fishing seasons by emergency order, during which pot limits, time, or area may be adjusted to achieve the 50 percent statistical area harvest target.

What is the issue you would like the board to address and why? Currently, the total allowable harvest (TAH) must exceed 110,000 lbs in order for the comThe Sustainable Salmon Fisheries Policy offers a good template for all fisheries with multiple user groups when it states " the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use". This is easily achieved withing the directed shrimp fisheries by merely maintaining the same allocation levels at all TAH levels. If there are available surplus shrimp for harvest, then the commercial fishery should be able to harvest their share of them. Management in the commercial fishery is extremely precise and has a very good track record of managing to their guideline harvest level (GHL). There is no reason why in times of low abundance a smaller more restricted fishery could not take place to harvest the commercial share of the TAH.

The commercial shrimp fishery in Prince William Sound (PWS) is a very unique entry level small boat fishery, and a majority of harvesters direct market their shrimp or otherwise move them through non traditional value added markets. Very few are sold to large scale processors. It would be extremely damaging to these market streams to have a closed season with zero product available. Being able to offer limited supply to markets during a reduced GHL season in times of lower abundance would be very valuable.

In general this fishery is currently in a state of flux and there is a lot of uncertainty surrounding many aspects of it. I have participated extensively in this fishery since its reopening in 2010 and have been heavily involved with the board of fish process regarding the current management plan. This proposal is part of a suite of proposals in which I attempt to anticipate potential issues that exist currently, may arise during the 2024 season or ongoing CFEC process regarding potential limited entry for this fishery, continued uncertainty from the department regarding the current survey and biometric surplus population model, and narratives coming into the 2025 regulatory meeting. I feel that there is signifcant likelihood of the need to review nd adapt much of the current regulatory plan and am submitting proposals concerning several aspects of the plan in order to foster discussion, and serve as a starting point if the need for serious revision of the plan is thought necessary.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed the contents of this proposal with multiple ACs,

other participants in both the recreational and commercial fisheries, and ADFG staff many times and will continue to do so leading up to the 2025 meeting.

PROPOSED BY: Joseph Person

(EF-F24-071)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Charter fishing is a commercial fishery and needs to be regulated as such with a cap on licenses and make them saleable and transferable. Charters make money from fish and therefore should be classified as commercial, to not be classified as commercial is not logical.

What is the issue you would like the board to address and why? To classify charter fishing as a commercial fisheries. They make money from fishing so it's a commercial fishery and needs to be regulated as such.

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

PROPOSED BY: Larry Demmert

(EF-F24-075)

PROPOSAL XXX

5 AAC 32.128 Operation of other gear in Registration Area A.

Allow a person to participate in the Registration Area A commercial Dungeness fishery even if they operated commercial shrimp pots within 14 days of the commercial Dungeness crab opening.

Allowing the shrimp pot fishery **only** for subsistence and commercial use in the 2 week time period prior to the Commercial Dungeness season.

What is the issue you would like the board to address and why? My proposal is in regards to the shrimp season getting cut short for individual that both crab and shrimp. The 14 day no pots of any kind prior to Dungeness has hampered the ability to shrimp a full season. I fully understand no other crab gear of any kind 14 days prior to the commercial season, but in 5 years of commercial pot shrimping I have never caught a crab. It's a costly process to stack out when there is open area to shrimp.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This has been the most talked about topic between fishermen with both crab and shrimp permits and we have all agreed on wanting to see a change. It would benefit these small communities and small business families immensely.

I had a personal phone call from ADFG telling me there was quota left on the grounds in an area I fish and he recommended keeping the gear in the water, but I couldn't do to the overlap with the gear cut off for Dungeness season. It was costly, but it's a new gamble we take with the season change as fishermen in hopes of a good crab season.

PROPOSED BY: Individual: Dawson Miller (EF-F24-080)

PROPOSAL XXX

5 AAC 34.109 Area A registration.

Allow participants in the Registration Area A Tanner and golden king crab fisheries to have Tanner crab aboard their vessel while fishing for golden king crab in a closed commercial Tanner crab area.

A vessel registered to fish both Golden King crab and Tanner crab in Registration are A may have baited Golden King crab gear in a portion of Registration Area A that is closed to commercial Tanner crab fishing but may not haul Golden King crab gear in a portion of Registration Area A that is closed to commercial Tanner crab fishing until all Tanner crab are removed from the vessel and the vessels Tanner crab registration is invalidated. Once the vessels Tanner crab registration is invalidated, Tanner crab may not be retained on or sold from that vessel.

What is the issue you would like the board to address and why? The way the regulation is currently written a vesse that is dual registered for Golden King crab and Tanner crab may not have baited gear in the water in an area closed to commercial Tanner crab fishing. There are several portions of registration Area A that have both Golden King crab and Tanner crab. Under the current regulation a Vessel fishing both Golden King crab and Tanner crab has 2 choices:

- 1) Quit Tanner crabbing early to ensure all Tanner crab are removed from the vessel and the vessel registration is invalidated before the close time.
- 2) Remove all the bait containers and tie open the pot doors while the vessel is in town unloading Tanner crab and invalidating their registration.

Either of these options costs a vessel dual registered for Golden King crab and Tanner crab time and money. I believe the rewrite of this regulation mantains the intent not allow the hauling of pots by a dual registered vessel in an area that is closed to Tanner crab, but allows the vessel to leave those pots baited and fishing while unloading and invalidating the Tanner crab registration.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Through conversations with fishery management and fellow permit holders.

PROPOSED BY: Jared Bright

(EF-F24-093)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.AAC 29.090

Insert lead-in language here (“more fish, as follows:”)

Remove the Unuk & Chickamin chinook as stocks of management concern. Open the above-mentioned spring troll areas and *if needed for biological escapement reasons with additional area closures*. Area and timing closures can be used to further restrict the harvest of Stock of concern chinook.

What is the issue you would like the board to address and why? There are large numbers of clipped & coded wire tagged chinook being released from SSRAA hatcheries in the Ketchikan area and most gear groups don’t have good access to them when they’re at their prime. This has caused a significant value loss to gear groups. The Behm Canal stocks (Unuk & Chickamin) have met the requirements for de-listing as a Stock of management concern so expanding spring troll access to the following areas: Gravina Shoreline (101-29), West Rock (101-21), Kendrick Bay (102-10), Earnest Sound (107-10). Opening these areas would provide additional access while also conserving SE AK wild stocks that are still in Stock of Management concern status.

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

PROPOSED BY: Thomas A Fisher

(EF-F24-098)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.39.222(f)(42)

Insert lead-in language here (“more fish, as follows:”)

I would like to see the Alaska Board of Fisheries remove the following rivers from being labeled as a Stock of Management Concern (Unuk, Chickamin, & Chilkat). This will give additional opportunities in select areas of SE AK for chinook harvest that traditionally were allowed while also understanding there are still some Stocks of concern in place in SE AK. It will provide additional access to SSRAA hatchery chinook bound for Ketchikan area. I think it is important to highlight the successes of these management practices that have been in place since 2018 and make sure they aren't a permanent action.

What is the issue you would like the board to address and why? Remove the Chickamin, Unuk and Chilkat Rivers from being considered Stocks of Concern. They have met at least one of the action plan requirements to be considered for removal. This will remove a massive barrier in place allowing the AK Dept. of Fish and Game the ability to give access to gear groups to target hatchery bound salmon.

Unuk Years above Lower Bound: 2018, 2019, 2021, 2023

Chickamin years above Lower Bound: 2020, 2021, 2022, 2023

Chilkat Years above Lower Bound: 2019, 2020, 2021, 2023

Northern SE AK (Chilkat) Action Plan:

1. If the lower bound of the BEG range is met or exceeded in 3 consecutive years or is met in 4 out of 6 consecutive years, the department will recommend removing the stock as a stock of “management concern” at the first Southeast and Yakutat board meeting after this condition is met.

2. Management measures could be relaxed in specific areas or during specific time periods if updated stock composition and harvest data indicates areas and/or times where and/or when restrictions are no longer needed to ensure the BEG is met.

3. In the event the lower bound of the BEG range is met or exceeded in 2 consecutive years, management restrictions may be relaxed or set aside.

Unuk & Chickamin Action Plan:

1. If the lower bound of the BEG range is met or exceeded in 3 consecutive years or is met in 4 out of 6 consecutive years, the department will recommend removing the Unuk River and/or Chickamin River king salmon stocks as a stock of “management concern” at the first Southeast and Yakutat board meeting after this condition is met.

Management practices & objectives have been a success here!!!! It's time for Alaska to take this win!

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

PROPOSED BY: Thomas A Fisher

(EF-F24-099)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.5 AAC 75.995 (4) Definitions

Insert lead-in language here (“more fish, as follows:”)

5 AAC 75.995(4) “bag limit” means the maximum legal take of fish per person per day, in the area in which the person is fishing, even if part or all of the fish are immediately preserved; a fish when landed and not immediately released becomes a part of the bag limit of **any person directly participating in the catch** [THE PERSON ORIGINALLY HOOKING IT];

What is the issue you would like the board to address and why? The definition of "bag limit" as currently written in the regulations makes it hard to assist anglers who need extra help. For example, if I take a rod out of the rod holder and pass it to someone, or crank the handle to set the hook before the intended angler gets there- the fish becomes part of my bag limit and is therefor illegal for the intended angler to retain and must be released immediately, even if the chance of mortality is high (e.g. king salmon). I believe that in order to legally assist other anglers and reduce catch and release mortality, the definition of "bag limit" should be modified to allow an angler to retain a fish even if another angler touched the rod first.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have spoke with many anglers, numerous charter operators and several members of the local AC about the issue and all were in agreement.

PROPOSED BY: Luke Bastian

(EF-F24-143)

PROPOSAL XXX

5 AAC 28.110 Sablefish fishing seasons for Eastern Gulf of Alaska Area.

Change the Southern Southeast Inside (SSEI) Subdistrict sablefish fishery season opening and closing dates to be concurrent with the federal Individual Fishing Quota (IFQ) sablefish fishery season dates.

5 AAC 28.110 (2) in the Southern Southeast Inside Subdistrict would amended to say, Clarence Strait Black Cod will be opened and closed the same time as the Federal IFQ Black Cod in the ocean.

What is the issue you would like the board to address and why? I would like to see Clarence Strait Black cod season open up as the same time as the Federally operated Black cod in the ocean. This would allow a bigger market for fresh local Black cod to the tourism industry.

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

PROPOSED BY: John Johanson

(EF-F24-144)

PROPOSAL XXX

5 AAC 27.130. Lawful gear for Southeastern Alaska Area.

Allow the use of large mesh webbing to surround spawn on kelp pound structure to protect structure and spawn on kelp product.

5 AAC 27.130 (e)(1)(E) webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-153)

PROPOSAL XXX

5 AAC 27.130. Lawful gear for Southeastern Alaska Area.

Allow the use of large mesh webbing to surround spawn on kelp pound structure to protect structure and spawn on kelp product. **5 AAC 27.130 (e)(1)(E) webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.**

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-154)

PROPOSAL XXX

5 AAC 27.130. Lawful gear for Southeastern Alaska area.

Allow protective webbing to be installed around herring pound structures, as follows:

5 AAC 27.130 (e)(1)(E) webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-155)

PROPOSAL XXX

5 AAC 27.130. Lawful gear for Southeastern Alaska Area.

Allow the use of large mesh webbing to surround spawn on kelp pound structure to protect structure and spawn on kelp product. 5 AAC 27.130 (e)(1)(E) **webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.**

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-158)

PROPOSAL XXX

5 AAC 27.130 Lawful gear for Southeastern Alaska Area.

Allow the use of large mesh webbing to surround spawn on kelp pound structure to protect structure and spawn on kelp product.

5 AAC 27.130 (e)(1)(E) webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-159)

PROPOSAL XXX

5 AAC 27.130. Lawful gear for Southeastern Alaska Area.

Allow the use of large mesh webbing to surround spawn on kelp pound structure to protect structure and spawn on kelp product. 5 AAC 27.130 (e)(1)(E) **webbing of no less than 7 inches that allows the free movement of herring through the web may be used to surround pound structure for protecting the pound structure and spawn on kelp product.**

What is the issue you would like the board to address and why? After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

After herring are introduced to a closed pound, sea lions can tear holes in the pound webbing releasing herring. In addition they may enter the pound chasing herring and destroying spawn on kelp product. We would like to be able to surround the pound structure with a larger mesh net to provide additional protection to the pound structure, spawn on kelp product, and retain the herring in the pound until released. An additional net would also prevent sea lions having access inside the pound once the pound net is lowered to release herring.

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

PROPOSED BY: Derek Thynes

(EF-F24-160)

PROPOSAL XXX

5 AAC 27.059. Management guidelines for commercial herring sac roe fisheries.

Eliminate provisions to allow for herring sac roe fisheries in the state.

We propose the deletion of 27.059:

Section 5 AAC 27.059 - Management Guidelines for Commercial Herring Sac Roe Fisheries

[(A) IF THE DEPARTMENT HAS ADEQUATE INFORMATION, AND IF DEPARTMENT MANAGEMENT PROGRAMS ARE IN PLACE, THE DEPARTMENT MAY MANAGE COMMERCIAL HERRING SAC ROE FISHERIES, TO ENHANCE THE VALUE OF THE LANDED PRODUCT AS FOLLOWS: (1) FISHING PERIODS MAY BE ESTABLISHED BY EMERGENCY ORDER IN AREAS AND DURING TIMES WHEN SAMPLING HAS DEMONSTRATED, OR WHEN OTHER FACTORS INDICATE, THAT THE HERRING ROE CONTENT OF THE CATCH IS LIKELY TO BE HIGHEST;(2) FISHING PERIODS MAY BE ESTABLISHED BY EMERGENCY ORDER IN AREAS AND DURING TIMES WHEN SAMPLING HAS DEMONSTRATED, OR WHEN OTHER FACTORS INDICATE, THAT THE CATCH IS COMPOSED OF THE MAXIMUM AVERAGE SIZE OF HERRING AVAILABLE FOR THE STOCK;(3) IN A PRESEASON MANAGEMENT PLAN, THE DEPARTMENT SHALL SPECIFY THE PARTICULAR HERRING FISHERIES THAT ARE TO BE MANAGED TO ENHANCE THE VALUE OF THE LANDED PRODUCT.(B) THE DEPARTMENT MAY MODIFY HERRING SAC ROE FISHING PERIODS AND AREAS TO MINIMIZE THE HARVEST OF RECRUIT-SIZED HERRING DURING THE CONDUCT OF A SAC ROE FISHERY THAT TARGETS POST-RECRUIT HERRING.]

What is the issue you would like the board to address and why? Since being implemented in 1992, 27.059 has obligated ADF&G to dedicate staff time to add value for limited entry permit holders in commercial sac roe herring fisheries. This obligation has coincided with growing biomass estimates and growing quotas, has supported high-grading that targets the oldest herring with the greatest percentage of mature roe through extensive use of test sets, and has aligned Department energies with commercial fishers instead of prioritizing subsistence users.

ADF&G vessel sounding activities on pre-spawning herring in pursuit of higher-value herring schools contribute to large scale-disturbance on spawning grounds from this fishery, including increased reporting of "false spawn" events in fishing-adjacent areas, wherein stressed males release milt in the absence of eggs and therefore fail to reproduce.

The current language of the regulation creates a tension between Department obligations to ensure a subsistence priority and Department obligations to create value for a commercial fishery and should be rescinded.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We developed the proposal in consultation with a small group of subsistence herring egg harvesters and community elders and were informed by prior conversations with many others.

PROPOSED BY: Herring Protectors

(EF-F24-172)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.5 AAC 39.XXX

Insert lead-in language here (“more fish, as follows:”)

As per the MSC recommendation in its final draft report March 22 2024, Create a specific policy.

We recommend that ADFG consider a specific policy (similar to its Genetics and Pathology policies) to address the possible changes in ecosystem structure and function caused by its hatchery program in the marine environment to be used in its hatchery permitting process. In particular, we suggest a focus on inter and intra specific competition and how these processes might contribute to survival, growth and age structure in salmon. While emphasizing the marine environment and competition in this recommendation, we do not mean to exclude or ignore the freshwater or estuary systems nor other ecological process or ecosystem structure.

In 2009, ADF&G began a Performance Review (5 AAC 40.860) (Appendix A1) to initiate the Internal Review of Prince William Sound Aquaculture Corporation Special Publication No. 09-10. “This review was due to the number and seriousness and extensive record of unresolved, ongoing problems including exceeding permitted stocking levels; substandard broodstock to egg take survival rate; withholding data required in permits; conducting cost recovery harvest outside Special Harvest Areas without emergency order authority; refusing to fund required monitoring, cost recovery shortfalls; **large-scale straying, refusal to participate in straying evaluation**; roe-stripping associated with excessive broodstock collections; inadequate reporting of roe sales; chum salmon *Oncorhynchus keta* otolith marking program failures; erratic management recommendations; lack of good faith negotiations; cooperative agreement problems; failure to report hatchery production/operational problems; and department failure to enforce compliance with permits, annual, and basic management plans.”

While ADFG may assure some of these problems have been resolved, the large scale inter-regional straying violations remain completely unresolved. If sustainable salmon into the future is desired, this issue cannot afford further delay and the precautionary approach must be attended to in the PWS and SEAK Management and Allocation Plans or however the BOF and ADFG can begin to insert meaningful corrections until the danger of straying ceases.

This issue needs serious attention.

What is the issue you would like the board to address and why? There is no structured mechanism for the public to relay best available information to the BOF that is recognized as jeopardizing wild fish populations. I can only try.The issue of hatchery straying has been delayed for decades and it appears Alaska is the last to understand something needs to be done about this dangerous hatchery wild interaction.. The Marine Stewardship Council (MSC) is Alaska’s sustainability certification. The March 22, 2024 MSC final assessment placed conditions and recommendations on the certification of Alaskan salmon due to the large scale regional and inter-regional straying that chronically invades wild salmon systems, placing wild fish in jeopardy. It is time for Alaska to advance management strategy to ecosystem level strategy.

Condition 1. Meet requirements for PI 1.3.1 by demonstrating a high likelihood that Chum Salmon enhancement activities in Southeast Alaska do not have significant negative impacts on the local adaptation, reproductive performance and productivity or diversity of wild salmon stocks.

Condition 2. Meet requirements for PI 1.3.1 by demonstrating a high likelihood that Pink and

Chum Salmon enhancement activities in Prince William Sound do not have significant negative impacts on the local adaptation, reproductive performance and productivity or diversity of wild salmon stocks.

Condition 3. Meet requirements for PI 1.3.1 by demonstrating a high likelihood that Pink Salmon enhancement activities in Lower Cook Inlet do not have significant negative impacts on the local adaptation, reproductive performance and productivity or diversity of wild salmon stocks.

Condition 4. Meet requirements for PI 1.3.3b by demonstrating that a moderate-level analysis of relevant information on hatchery straying and relative fitness is conducted and used by decision makers to quantitatively estimate the impact of enhancement activities on wild-stock status, productivity, and diversity of Pink and Chum Salmon in Southeast Alaska, Prince William Sound and Lower Cook Inlet

Condition 5. Meet requirements for PI 3.3.2c by demonstrating that decision-making processes use the precautionary approach and are based on best available information as applied the Pink and Chum Salmon hatchery enhancement programs.

The Alaska Hatchery Research program (AHRP), genetic results showing hatchery pinks have a Relative Reproductive Success that is less than half wild pinks are a red flag. If our goal is sustainable salmon, the precautionary approach must replace the chronic delay of action and begin a systematic process to find ways to minimize PWS hatchery pinks straying into wild populations. The Genetics policy warns against the PWS inter-regional straying 250 miles away into LCI streams such as the significant stock Barabara Creek, when otolith sampling found 87% of PWS hatchery pinks present in the run during that sample. The SEAK West Crawfish Index Stream inundated with 100% hatchery chums from a remote release is unacceptable. How far reaching is this straying? Wild fish are the mandated priority in the state. The sustainable Salmon Policy's, Precautionary approach must be applied to the PWS and SEAK hatchery operations that by statute mandates responsibility directly onto hatchery permit holders for the privilege of attaining a hatchery operation that they "shall have no adverse affects on wild fish of the state".

Wild fish of the state are reserved as a public trust for the benefit of the people as a whole rather than for the benefit of the government, corporations or private persons. (section 2 Article VIII of the constitution). Sections 15 and 17 reinforce the public trust doctrine of management, to prohibit the state from granting any person or group privileged or monopolistic access to the wild fish, game, waters, or lands of Alaska. Wild ocean pastures, interception of the food web and the evolutionary trajectory and long-term viability of populations are included in this public trust.

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

December 2017, I submitted an Emergency Petition RC 027 pertaining to inter-regional straying from PWS into Lower Cook Inlet 250 miles away.

January 2018 This petition was to be taken up at the SE BOF meeting in Sitka but inter-regional straying issue delayed for consideration at the Statewide March 2018 meeting

March 2018 statewide meeting, submitted RC 235 to find solution to the petition on chronic straying for consideration but the BOF did not consider the straying petition but found this issue warranted resurrecting the Hatchery Committee Joint Protocol for Salmon Enhancement that had

been missing since 2002. The board voted to make this the committee of the whole, however the issue of staying was not considered.

July 2018 - two emergency petitions were submitted to the BOF to delay 70,000,000 extra production allotted to Solomon Gulch hatchery to give the BOF time to consider implications to wild fish priority and massive inter-regional straying occurring into the wild significant and portfolio river systems of CI and the GOA. Both of these Emergency petitions were not considered an emergency and this issue of straying and creating a hatchery Committee was to be taken up at the October 2018 meeting in Anchorage.

August 2018 chronic straying 30 million hatchery Remote Release Site of chum salmon occurred for the 2nd year in a row with a proportion of up to 100% in an ADFG index stream as well as a Hatchery Research study stream documented in West Crawfish Arm SE Alaska near Sitka.

October 2018 meeting the issue of straying was not considered.

March 2019 hatchery committee Anchorage - No consideration was deliberated pertaining to inter-regional straying from a region of 80% hatchery propagated fish into a region of 98% wild fish. The second largest wild runs in North America.

April 2019 Lower Cook Inlet Kodiak GOA Call for Proposals submitted two proposals with an array of solutions for consideration to deal with the chronic inter-regional straying issue and the unreliability of escapement goals spawned from this straying into wild population systems These two proposals were pulled from Dec 2019 Seward proposal book without explanation and became listed under “non-regulatory proposals”, and moved into the 2019 October 23 and 24th work session in Anchorage for deliberation.

EF-F19-095 PROPOSAL XXX -5 AAC 5 AAC 39.223. Policy for statewide salmon escapement to Regain our Wild Fish Priority using Board authority of 16.10.251 for the conservation and development of fisheries resources

EF-F19-097 PROPOSAL XXX -5 AAC 5 AAC 40.005. General asking for Control measures under BOF authority 16.05.251(8) on the chronic inter-regional straying issue brought to the board in December 2017.

2019 October 23 and 24 Anchorage ACR to be taken up at the work session out of cycle to alert the BOF of this serious problem to “take corrective action” as ADFG stated to do if there was any problems in their deliberations at the RPT that set up this remote release in 2014 - no action on ACR2 Non-regulatory proposals EF-F19-095 EF-F19-097 were not considered nor mentioned.

2021 Submitted PWS SEAK proposals on straying

STRAYING AND WILD STOCK ISSUES

"Large-scale straying of the enhanced chum salmon also has negative implications on wild stock management. The department manages for wild chum salmon escapement goals based on

aerial survey counts of fish in streams. All fish counted in streams are assumed to be wild stock fish. The presence of a high proportion of stray hatchery fish in streams artificially inflates wild stock escapement estimates. Inflated wild stock escapement numbers may mislead management into believing that the escapement goals have been met. The department then opens districts to harvest wild stock fish assumed to be excess to escapement goals. However, the escapement goal may not have been met because of the large number of hatchery strays in the aerial survey escapement estimates. Additionally, there are significant genetic concerns associated with hatchery strays interbreeding with wild stocks."

ONE OF THE DEPARTMENTS GREATEST CONCERNS...GENETIC INTEGRITY

PROPOSED BY: Pioneer Alaskan Fisheries /Hillstrand

(EF-F24-179)

PROPOSAL XXX -

Prohibit trawl gear in P.W.S for pollock. **What is the issue you would like the board to address and why?** Draggers fishing in P.W S are catching king salmon and rock fish as bycatch. If they trawl on the bottom or near bottom for pollock could be damaging the fauna and bottom habitat and crushing crabs. During recent analysis on pelagic trawl fishing they admit that they trawl on bottom or the foot rope touches bottom, its time to protect at least the state waters from trawl.

PROPOSED BY: Concerned citizen

(EF-F24-180)

<p>Filing Details Log Number: EF-F24-180 Timestamp: 2024-04-11 00:16:18.74 Management Unit or Area: Regulation Book Page Number: Predefined Topic(s): Commercial Write-in Topic: Residency Status: Meeting: AAC Number:</p>

PROPOSAL XXX

5 AAC 39.210. Management Plan for High Impact Emerging Fisheries.

Insert lead-in language here (“more fish, as follows:”)

Change the halibut harvest limits regulation so that the “unguided sport fishing” and the “guided sport fishing” harvest numbers match in terms of size limits and the daily bag limit of 1 per day. Also consider an annual bag limit of (4-6) for all Out-of-State sport-fisherman.

What is the issue you would like the board to address and why? The decreasing halibut numbers due to overfishing by all users.

One of the current strategies to reduce the number of halibut taken by Out-of-State anglers is to limit “Guided Sport Fishing” to 1 Halibut per day below a specific length. This means that most guided fisherman only take 1 smaller halibut per day. This is a solid strategy and keeps people from targeting the larger breeding population.

However, because there is no size limit to “unguided sport fishing” with a daily limit of 2 per day vs 1 per day when guided, the current policy encourages anglers to not only target and harvest the “oversized” breeding aged halibut, but it also double’s the number of fish taken.

Furthermore, when there is a “day closure” for “Guided Sport Fishing” with the stated objective to help reduce the number of halibut taken, the exact opposite happens as more anglers will then change to “self-guided” for that day and will harvest 2 “oversized” halibut vs the 1 sized-restricted halibut with a guide.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, through conversations with other out-of-state sport-anglers, AK residents, AK Charter Operators, and AK Lodge Operators.

PROPOSED BY: Darryl Bosshardt

(HQ-F24-001)

PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here (“more fish, as follows:”)

Would like to see the change of possession limit from 6 to 12. It would make storage issue for overnight fisherman. It is costly for fisherman to freeze using the businesses that offer that.

What is the issue you would like the board to address and why? Resurrection Bay Fresh Waters possession limit.

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

PROPOSED BY: Ben Barnes

(HQ-F24-003)

PROPOSAL XXX

5 AAC 34.XXX New Section.

Insert lead-in language here (“more fish, as follows:”)

5AAC 34.XXX State waters Aleutian Islands golden crab Harvest strategy

Points to be included

- State waters east of 169 deg**
- Vessels 58’ and under**
- Fishing hours 8:00 AM to 7:59 PM**
- 90 pot limit**
- Single pot only**
- Close east of 169 deg to longline crab pot gear**
- Season, Sept 1 – Apr 30**
- GHL set annually by ADF&G, not to exceed 100,000 pounds**
- Size limit, 6” male crab**
- Daily reporting**

What is the issue you would like the board to address and why? Create a single pot golden crab fishery for vessels 58’ and under with its own allocation. Currently, area O golden crab is fully rationalized and allocated to the federal fishery. There exists, however, an open access parallel State fishery that if prosecuted would create uncertainty for management, possibly forcing closure to the State waters of area O where 10% of existing quota is traditionally caught. A dedicated allocation for vessels 58’ and under would reduce uncertainty and retain opportunity for smaller local boats.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. A few local fishermen have talked about this potential for several years.

PROPOSED BY: Roger Rowland

(HQ-F24-005)

PROPOSAL XXX

5 AAC 28.272. Sablefish Harvest, Possession, and Landing Requirements for Prince William Sound Area.

Allow an individual to own two limited entry permits for sablefish in Prince William Sound, as follows:

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

(a) Before commercial fishing for sablefish in another registration area, the operator of a vessel registered to take sablefish in the Prince William Sound Area must land all sablefish taken and submit a copy of the completed fish ticket for the landed fish to the department.

(b) The operator of a fishing vessel may not take sablefish in the Prince William Sound Area while sablefish taken in another registration area are on board the vessel.

(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 amount specified by the department.

The department will determine the annual amount as follows:

(1) the annual 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 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 average percentages of harvest for the vessel categories described in (1) of this subsection are as follows: (A) combined categories A, vessels with a length of 90 feet, and B, vessels with a maximum overall length of 60 feet: 18.53 percent; (B) category C, vessels with a maximum overall length of 50 feet: 70.33 percent; (C) category D, vessels with a maximum overall length of 35 feet: 11.14 percent.

(d) When participating in the commercial sablefish fishery in the Prince William Sound Area, the holder of a CFEC limited entry permit or interim-use permit must retain for inspection on board the vessel a copy of each completed fish ticket issued to the permit holder during the current annual season.

(e) At least six hours before landing sablefish, a CFEC permit holder must notify the department by telephone, to a telephone number specified in writing by the department on the registration forms at the time of registration, the following information: (1) location of landing, and estimated time of arrival; (2) name of buyer or processor; (3) estimated number of pounds of sablefish on board the vessel; (4) whether the catch is dressed fish or in the round.

(f) An operator of a vessel participating in the Prince William Sound Area commercial sablefish fishery shall obtain sablefish log sheets provided by the department. The vessel operator must have the log sheets on board the vessel at all times and must submit to the department no later than seven days following delivery completed log sheets that correspond with each ADF&G sablefish fish ticket. (1) A log sheet under this section must: (A) include the date, the specific location of harvest by latitude and longitude, the number of hooks fished or the number of pots fished, the average depth, and the time gear is deployed and hauled, for each set; (B) include for the target species, and for each bycatch species, the number of fish retained and discarded for each set; (C) be updated not later than 11:59 p.m. local time on the day after the day of

operation; and (D) be made available to a local representative of the department upon request. (2)
A person may not make a false entry in a log sheet described in this section.

(g) An operator of a vessel retaining sablefish in federal waters may not operate gear in state waters of the Prince William Sound Area during the same trip.

(h) One individual may simultaneously own, hold, and fish up to two limited entry Prince William Sound Sablefish CFEC Permits.

What is the issue you would like the board to address and why? Current regulation and market conditions make operating a directed PWS Sablefish operation nearly untenable. Allowing an individual to own hold and operate two permits in his or her name would greatly improve the economic viability of this small fishery.

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

PROPOSED BY: Kenneth B Jones

(HQ-F24-012)

PROPOSAL XXX

5 AAC 35.510. Fishing seasons for Registration Area J..

Change season opening date for the Kodiak District commercial Tanner crab fishery from January 15 to February 20, as follows:”)

Put the proposal body here: Single-spaced, normal 1” margins, and 12 point Times New Roman, justified.

Between paragraphs, do a full line break.

...

...

What is the issue you would like the board to address and why? We, the local Homer Bairdi Crab fishermen, request a change in the Kodiak Bairdi Crab Fishery opening date from January 15 to February 20. This adjustment is necessary due to extreme cold temperatures and heavy ice packs in Homer Harbor, and Northern Enterprises boat launch ramp also has heavy ice which makes it impossible to launch vessels to go and participate in the fishery.

Additionally, small-scale fishermen like us are at a disadvantage compared to larger vessels, as we have limited capacity and resources. This makes it difficult for us to compete in the fishery. Delaying the opener will prioritize safety, prevent potential risks, and create a more equitable fishing environment for small vessels and local fishermen.

Furthermore, we fishermen invest significant amounts of money in equipment and vessels, only to be prevented from fishing due to ice conditions. This results in lost revenue and wasted resources. By delaying the opener, we can ensure that our investments are not futile and that we can actually utilize our vessels and equipment.

Finally, this delay will avoid conflicts with the pollock season, which begins on January 20th, and reduce the risk of unsafe situations and reduced catch quality. We believe this change will contribute to a sustainable and successful fishing season for all participants.

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

PROPOSED BY: Homer Bairdi Crab Fisherman

(HQ-F24-031)

PROPOSAL XXX

5 AAC 39.212. Forage Fish Management Plan.

Add herring as a forage fish and add provisions to prohibit the use of forage fish as fish meal.

We suggest adding herring to the Forage Fish Management Plan and prohibiting the production of fish meal from whole forage fish.

- (a) This management plan governs the commercial harvesting of forage fish species in the waters of Alaska.
- (b) The board finds that forage fish perform a critical role in the complex marine ecosystem by providing the transfer of energy from the primary and secondary producers to higher trophic levels. The higher trophic levels include many commercially important fish and shellfish species. Forage fish also serve as important prey species for marine mammals and seabirds.
- (c) The board finds that abundant populations of forage fish are necessary to sustain healthy populations of commercially important species of salmon, groundfish, halibut, and shellfish.
- (d) Except as otherwise provided in 5 AAC 03 - 5 AAC 39, forage fish may not be commercially taken.
- (e) A vessel fishing in a directed groundfish fishery may retain a maximum allowable bycatch of forage fish equal to no more than two percent of the round weight or round weight equivalent of the groundfish on board the vessel.

(f) The production of fish meal from whole forage fish, listed or exempt from this plan, is prohibited.

(g)[(F)] For the purposes of this section, "forage fish" means the following species of fish:

- (1) Family Osmeridae (capelin, eulachon, and other smelts);
- (2) Family Myctophidae (laternfishes);
- (3) Family Bathylagidae (deep-sea smelt);
- (4) Family Ammodtidea (Pacific sand lance);
- (5) Family Trichodontidae (Pacific sandfish);
- (6) Family Pholidae (gunnels);
- (7) Family Stichaeidae (pricklebacks, warbonnets, eelblennys, cockscombs, and shannys);
- (8) Family Gonostomatidae (bristlemouths, lightfishes, and anglemouths);
- (9) species of the Order Euphausiacea (krill).

(10) Family Clupeidae (Pacific herring)

What is the issue you would like the board to address and why? Pacific herring fulfill the ecological niche described by the Alaska Forage Fish Management plan in 39.212(b) and 39.212(c). Management agencies (including ADF&G) and fish biologists all agree that Pacific herring are forage fish. Pacific herring should be added to the Alaska Forage Fish Management Plan.

Additionally, fish meal prices have increased due to expanding demand from agriculture and aquaculture. This situation has the potential to lead to the creation of direct fish meal fisheries on Alaska's forage fishes. Allowing these types of fisheries to be established would: (1) negatively affect wild Alaska salmon fisheries, other fisheries and tourism businesses that indirectly rely on herring, sand lance, and smelt, and the ecosystem as a whole; and (2) be contradictory to Alaska's position on farmed salmon.

Alaska's forage fishes are more valuable left in the water than ground into fish meal.

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

PROPOSED BY: Sitka Tribe of Alaska

(HQ-F24-042)

PROPOSAL XXX

5 AAC 35.510. Fishing seasons for Registration Area J.

Change season opening date for the Kodiak District commercial Tanner crab fishery from January 15 to February 20, as follows:”)

The only change in regulation we need is the opening date to the season. Everything else can stay exactly the same.

What is the issue you would like the board to address and why? We the Homer small boat fleet would like to propose a change in Kodiak Bairdi crab fishery opening from Jan 15 to Feb 20. We propose this because of extreme cold temperatures and ice that engulfs the harbor and surrounding waters. There has been seasons our small boat fleet were unable to participate in the season due to these circumstances. There has also been seasons we had to spend lots of money to deal with the ice just to make it out of the harbor, setting us back on profits or even putting us in the red after fishing a full season.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We spoke to the Fish and Game biologists who regulate the fishery, they were agreeable to the proposal. In fact saying it would be better.

PROPOSED BY: David Ivanov

(HQ-F24-046)

PROPOSAL XXX

5 AAC 55.022 - General Provisions for Seasons, Bag, Possession, and Size Limits, and Methods and Means for the Prince William Sound Area

(b)(5)(D) only under a permit issued by the department;

5 AAC 55.055 - Prince William Sound Noncommercial Shrimp Fishery Management Plan

(a)(2) a Harvest Recording Form is Required as Specified in 5 AAC 75.016

5 AAC 75.016 - Shellfish Harvest Recording Form Provisions

(3) the harvest recording form must be retained in the possession of the fisherman and be readily available for inspection while taking or transporting the species for which the harvest recording form is issued

Insert lead-in language here (“more fish, as follows:”)

Charge a nominal Shrimp Enhancement Fee of \$10 per non-commercial Prince William Sound shrimp harvest recording form, or “permit”; proceeds to be used by the Department only for Prince William Sound shrimp stock assessment, for funding necessary in season harvest reporting and direct management of this resource.

Proposed statute amendment,

AS 16.05.340 License, permit, and tag fees; surcharge; miscellaneous permits to take fish and game.

(28) Prince William Sound non-commercial shrimp permit 10

What is the issue you would like the board to address and why? The current shrimp pot survey conducted by the Department of Fish and Game (commercial fisheries division) only surveys the commercial operating areas, but catch allocation is derived from the entire PWS region. There are no funds, surveys, or sampling contributions from the sport fish division to assist in stock assessment ahead of the Total allowable Harvest (TAH) allocation for the entire Prince William Sound.

The Department’s fall shrimp survey is limited to 11 sites due to budget constraints. The Department has expressed the desire to sample additional locations. There are no samples taken from areas closed to commercial fishing, which represent a bulk of the non-commercial harvest and overall allocation (approximately 40% of TAH). The maximum sustained yield model therefore relies on abstract data and is not a reliable measure of recruitment or overall health of the stock.

It is important for fisheries managers to have access to increased pot survey data in order to calculate the Maximum Sustained Yield (MSY) harvestable surplus accurately. This is only possible with more survey sites in conjunction within season management for the non-commercial fishery.

Failure to support this proposal will result in a continued “shoot from the hip” approach. The current equation for MSY will continue to be unresponsive. This will most likely result in damage to the resource and the stock is subject to a continued dramatic cyclical state of instability.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed at length and with considerable input by fishery participants, the Valdez ADF&G Advisory Committee, the Whittier ADF&G Advisory Committee, ShrimpPros Association, and the Alaska Department of Fish and Game staff.

PROPOSED BY: PWS/Valdez and Whittier Advisory Committee (HQ-F24-048)

INSTRUCTIONS FOR COMPLETING PROPOSAL FORM

Top of form check boxes:

- As appropriate, insert information about the fish or game management unit your regulation would change.
- Depending on the venue in which the regulation change will be heard, check the appropriate box(es) for the activities the regulation change would affect.
[Alaska Legislature Infobase, 5AAC.](#)

Fillable numbered boxes:

1. If known, enter the series of letter and numbers which identify the regulation to be changed. For example, 5 AAC 72.055. If it will be a new section or provision, then enter 5 AAC 72.XXX. If you don't know the regulatory code, leave it blank.
2. Write a short explanation about the issue your proposal addresses, or why you are proposing the regulation change. Address only one issue per proposal. State the issue clearly and concisely. The board will reject proposals that contain multiple or confusing issues.

State why the regulation change should be adopted or provide an explanation about what will happen if the regulation is not changed.

To assist you in development of your issue statement (#2 on the form), you may want to consider the following:

- What would happen if nothing is changed?
 - What are other solutions you considered? Why did you reject them?
3. Print or type your proposal as you would like to see it appear in the regulation book. The boards prefer that revised regulatory language is provided. **New or amended text should appear first and be in bold text and underlined.** [REGULATORY TEXT BEING DELETED SHOULD BE FULLY CAPITALIZED AND ENCLOSED IN BRACKETS]. It is not necessary to bold and underline text if entire change contains new language.

EXAMPLES: **5 AAC 27.810. Fishing seasons and periods.**

In the Togiak and Bay districts, herring may
be taken by purse seines and hand purse
seines from April 25 through **July 15** [JUNE 1]

5 AAC 85.025(3). Unit 9(B) Caribou.

NONRESIDENT HUNTERS: **2** [3] caribou; however,
no more than 1 bull may be taken.

Alternatively, you may state your changes in clear sentences. For example, “Extend the season to July 15 in the Togiak and Bay districts,” or “Reduce the bag limit for caribou in Unit 9(B) to two caribou.”

4. Please explain if you collaborated with others in the development of your proposal. The board encourages individuals or organizations to communicate and coordinate with others in the development of proposals. Local Advisory Committees (AC) are an excellent resource and the collective knowledge and experience within ACs may help improve proposals, increasing their chances of success. Here is a link to ACs across the state <https://www.adfg.alaska.gov/index.cfm?adfg=process.acregion>. You can also work with area staff from the Department of Fish and Game to better understand the current regulations, and what the effect(s) of your proposed change may be.

Bottom of form (submission block):

- Write the name of the group that voted to submit the proposal or your name if you are submitting the proposal. This name will be published in the proposal book. The boards of Fisheries and Game will not consider anonymous proposals.
- Fill in your address and zip code, and telephone number. These will NOT be published; it simply enables us to reach you if clarification is necessary.

Mail, fax, or upload the completed form online. See details below.

Mail: Alaska Board of Fisheries/Game
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

Upload: <https://arcg.is/1LDOCO0>

NOTE: Proposals must be received by the deadline in the call for proposals; there are no exceptions. A fax is considered an original. The form must be physically received by fax or mail; postmark is not adequate.

If you have any questions or need assistance, please consult staff at any Fish and Game office.

ALASKA BOARD OF FISHERIES
Regulation Proposal Form 2024-2025
Proposals must be received Tuesday, April 10, 2024
PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or online at:
<https://arcg.is/1LDOCO0>

BOARD OF FISHERIES REGULATIONS
<input type="checkbox"/> Subsistence <input type="checkbox"/> Personal Use <input type="checkbox"/> Sport <input type="checkbox"/> Commercial
*Which meeting would you like to submit your proposal to? <input type="checkbox"/> Southeast and Yakutat Finfish and Shellfish <input type="checkbox"/> Prince William Sound Finfish and Shellfish <input type="checkbox"/> All Other Shellfish Statewide
Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.
1. Alaska Administrative Code Number: 5 AAC _____
*2. What is the issue you would like the board to address and why?
*3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)
4. Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

***Submitted By:** _____
Individual or Group

***Address** ***City, State** ***ZIP Code**

Home Phone ***Work Phone** ***Email**

**Indicates a required field*

PROPOSAL XXX

5 AAC 55.005. Description of the Prince William Sound Area. Modify the Prince William Sound management area marine waters into two units.

Insert lead-in language here (“more fish, 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-F24-082)

PROPOSAL XXX

5 AAC 41.250. Permit conditions.

Require aquatic farm sites to be deeper than 75 feet mean low water in areas where commercial dive fisheries occur.

Under 5 AAC 41.250 (5) add the following:

in commercial dive harvest areas this requires siting a farm in water depths greater than 75 feet mean low water.

(5) prevent aquatic farm and hatchery operations from significantly altering an established use of fish and wildlife resources; **in commercial dive harvest areas this requires siting a farm in water depths greater than 75 feet mean low water.**

What is the issue you would like the board to address and why? Under 5 AAC 41.250 it specifies under (5): That an aquatic farm permit holder prevent aquatic farm and hatchery operations from significantly altering an established use of fish and wildlife resources. CFEC limited entry permit fisheries for sea cucumbers (Q11A), sea urchins (U11A) and geoducks (J11A) require direct connectivity from the seafloor to the surface of the water column for their breathing lines, haul bags and for geoducks their stinger lines. Placing an aquatic farm in waters shallow enough for dive harvesting by default significantly alters the commercial fishery. Farm infrastructure not only creates a serious safety risk for divers; it greatly restricts diver access to the common property resource. Providing specific depth criteria in commercial dive harvest areas will minimize conflict and allow better efficiency for farm applicants.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We have had numerous discussions with ADFG and ADNR about this issue. The SARDFa geoduck and sea cucumber committees worked on developing this proposal.

PROPOSED BY: Southeast Alaska Regional Dive Fisheries Association (HQ-F24-089)

PROPOSAL XXX

5 AAC 41.250. Permit conditions.

Require aquatic farm site to be further than 200 feet from shore at the mean high tide in areas where commercial dive fisheries occur.

Under 5 AAC 41.250 (5) add the following:

in commercial dive harvest areas this requires siting a farm atleast 200 feet from the shore line at mean high tide

What is the issue you would like the board to address and why? Under 5 AAC 41.250 it specifies under (5):

That an aquatic farm permit holder prevent aquatic farm and hatchery operations from significantly altering an established use of fish and wildlife resources. CFEC limited entry permit fisheries for sea cucumbers (Q11A), sea urchins (U11A) and geoducks (J11A) require direct connectivity from the seafloor to the surface of the water column for their breathing lines, haul bags and for geoducks their stinger lines. Fishing vessels need to be able to anchor and also follow the diver as they move in the water column. If farm infrastructure is placed too close to the shoreline, it makes it impossible for this fishery to be executed; thereby significantly altering the commercial sea cucumber, geoduck and sea urchin fisheries. Farm infrastructure not only creates a serious safety risk for divers; it greatly restricts diver access to the common property resource. Providing specific distance to shore regulations in commercial dive harvest areas will minimize conflict and allow better efficiency for farm applicants.

Although there is guidance in AS 38.05.127 and 11 AAC 51.045 regarding free access to and along navigable waters, the 50 foot guidance within those regulations is inadequate to accommodate the commercial harvest of sea cucumbers, geoduck clams and sea urchins along those strips of shoreline.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. We have had numerous discussions with ADFG and ADNR about this issue. The SARDFGA geoduck and sea cucumber committees worked on developing this.

PROPOSED BY: Southeast Alaska Regional Dive Fisheries Association (HQ-F24-090)

PROPOSAL XXX

5 AAC 47.021. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the salt waters of the Southeast Alaska Area.

Prohibit snagging in the Mendenhall Wildlife Refuge, as follows:

Solution: Within the boundaries of the Mendenhall Wildlife Refuge, make snagging of salmon and trout and implement the statewide freshwater method and means. Fish caught elsewhere than the mouth (snagged) must be released immediately. The use non tradition gear including lead weighted and/or lead wrapped treble hooks is prohibited. The use of bait is legal year-round and Juneau roadside saltwater bag limits apply.

What is the issue you would like the board to address and why? Problem: A portion of the chinook and silver salmon returning to the McCauley fish hatchery enter the Gastineau Channel/Mendenhall Wildlife Refuge from the northeast end and use the high tide cycle to push across the Refuge to return to the hatchery. During these tide cycles when the tide is falling, the waters within the Mendenhall Wildlife Refuge drain and flow like a stream or river. The fish that do not make it across the bar tend to concentrate just the same as if they are in a stream or river. This creates a superb shore-based sport angling opportunity for people using traditional sport fishing and flyfishing gear. Anglers using non-traditional methods (snagging) often disrespect and interfere with anglers using traditional means, creating an unpleasant and unsporting fishing atmosphere. Most of the anglers using this fishery are either using traditional tackle or fly tackle. When anglers that are snagging enter, they often disregard ethical means and good fishing etiquette. Examples of this are fishing too close to anglers that were there first, casting over other's lines and or snagging fish that are directly being targeted by the angler that was there before. This creates tension and argument that could be avoided by good etiquette.

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

PROPOSED BY: Michael Cole

(HQ-F24-106)
