

Sport Fisheries (10 proposals)

PROPOSAL 96

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

Prohibit the use of multiple hooks in the Naknek River drainage, as follows:

I recommend using the same regulatory language as the Nushagak River drainage- “only unbaited, single-hook, artificial lures may be used year round”. I recommend extending the existing regulation to the entire Naknek River Drainage, rather than just between the ADF&G regulatory markers between Rapids Camp and Lake Camp. The regulation would apply to all species and read as follows:

(2)In all flowing waters of the Naknek River drainage, [FROM MARCH 1 THROUGH NOVEMBER 14], only unbaited, single-hook, artificial lures may be used **year round**.

Adopting the above regulatory change would eliminate the need for the regulation below:

[(3) IN ALL FLOWING WATERS OF THE NAKNEK RIVER DRAINAGE UPSTREAM FROM AN ADF&G REGULATORY MARKER LOCATED AT RAPIDS CAMP (RIVER MILE 24.25), INCLUDING ALL WATERS WITHIN A ONE-QUARTER MILE RADIUS OF ALL INLET AND OUTLET STREAMS INTO ALL LAKES AND PONDS IN THIS AREA, ONLY UNBAITED, SINGLE-HOOK, ARTIFICIAL LURES MAY BE USED;]

What is the issue you would like the board to address and why? I’d like the board to address the issue of allowing multiple hooks on the Naknek River. The use of multiple hooks, often treble hooks and often two sets of treble hooks, is an outdated regulation that was suited for days in the past when there was an abundance of salmon. Today, we are seeing consistent and concerning trends showing declines in both King Salmon and Silver Salmon. In an effort to foster conservation and better stewardship of these declining species, I believe we should change the regulation from allowing multiple hooks to single-hook for all species, year round. Anglers can just as effectively catch salmon using single hooks as opposed to multiple hooks, but single hooks are FAR more effective at successfully releasing fish. This will help prevent unintended mortality of targeted species, as well as help protect others species such as Rainbow Trout and Dolly Varden frequently caught while salmon fishing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed this with other anglers, local guides, business owners and one other member of the Naknek – Kvichak AC in addition to myself.

PROPOSED BY: Patricia Edel

(EF-F26-068)

PROPOSAL 97

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

Prohibit the use of bait and multiple hooks while sport fishing for rainbow trout and char and prohibit fish from being removed from the water prior to release in the Naknek River drainage, as follows:

I would recommend: While fishing for trout or char species on the Naknek, only a single, unbaited and barbless hook may be used, with no fish being removed from the water that is going to be released.

What is the issue you would like the board to address and why? Rainbow trout in the Naknek River are getting heavily fished with numbers that appear to be declining, with many fish now showing multiple hook scars.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. My proposal has been developed based on observation while angling there over the last 9 years.

PROPOSED BY: Ladd Nolin (EF-F26-016)

PROPOSAL 98

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

Modify the king salmon annual limit in the Naknek River, as follows:

The new regulation should read:

Annual bag limit of king Salmon on the Naknek river

(12) the daily bag and possession limit for king salmon is three fish 20 inches or greater inlength, of which only one fish may be over 28 inches or greater in length; the annual limit forking salmon 20 inches or greater in length is five fish, only **one** [three] of which may be 28inches or greater in length

What is the issue you would like the board to address and why? I would like to address the decline in king salmon on the Naknek River. During the last BOF cycle, the bag limit for kings over 28” on the Naknek River was reduced from 5 to 3 (over 28inches). Despite sport fishing making a sacrifice in bag limits, there were still over 700 king salmon retained and reported caught by sport fishermen in 2024, to say nothing of those caught commercially. There have been no noticeable increases in the king run, and ADF&G does not have a management plan, or any data on king escapement. Despite this, it is widely known that kings on the Naknek River are a remnant of what they used to be in past years and that they trend with the states declining numbers. Due to lack of official data, we recommend taking a conservative approach to managing kings. We suggest while the annual bag limit remains at 5 kings, but only one fish over 28” inches may be retained.

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

PROPOSED BY: Joey Klutsch, Patricia Edel (EF-F26-056)

PROPOSAL 99

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

Prohibit sport fishing for king salmon in a portion of the Naknek River, as follows:

We propose moving the ADF&G marker located ½ miles above Rapids Camp to the public access road located 1.64 miles below the Rapids Camp road (58° 37.101’N, 156° 34.533’ W). In waters

from this marker upstream, king salmon may not be targeted at all, and if they are accidentally hooked while targeting other species, must NOT be removed from the water and will be released immediately.

Naknek River Drainage:

- Naknek River main stem

- **King Salmon: Closed year round to all king salmon fishing from ADF&G Marker (new location 58° 37.101'N, 156° 34.533' W) upstream to the ADF&G marker at "Trefon's Cabin" near the mouth of Naknek Lake.**

What is the issue you would like the board to address and why? Over the years the Naknek River has seen a notable decrease in the numbers of king salmon. Recognizing this decrease, ADF&G has already closed all fishing of king salmon in key spawning areas, including King Salmon Creek and Paul's Creek, and all waters above the first ADF&G marker located half mile upstream above Rapids Camp. There is no retention of king salmon allowed up the Big Creek drainage where fishing remains open. Yearly bag limits of king salmon on the Naknek have been lowered from 5 to 3. These measures have not been enough to bring about any appreciable increase in what are dismal king runs. Further, there is nothing to stop anglers from fishing the portion of the Naknek River immediately below the ADF&G Rapids Camp marker later in the season which are critical king salmon spawning grounds, and which have seen drastic reductions of the numbers of kings over the last decade while at the same time seen increased pressure from anglers.

As pointed out, all waters of the Naknek River upstream of the ADF&G marker are closed to king salmon fishing. These waters are key spawning habitat. However, significant amounts of spawning grounds exist BELOW this marker, which are wide open to the retention of king salmon. These areas are fished very hard in the latter weeks of the season towards the end of July, and it takes a significant toll on the kings when they are most vulnerable, preparing their nests for spawning. Most of this pressure comes from the many sport fishing lodges in the area. Fishing in these locations is popular with the lodges because it is relatively easy to catch kings on their spawning beds, and unlike the spawning beds on the Naknek tributaries (Big Creek, Paul's Creek and King Salmon Creek) these main stem Naknek River spawning beds are open to the retention of kings and are close and easily accessible to the lodges. It is not uncommon to see many boats in these areas at all hours of the day. We propose moving the ADF&G marker located ½ miles above Rapids Camp to the public access road located 1.64 miles below the Rapids Camp road (58° 37.101'N, 156° 34.533' W). This would protect spawning kings as well as spawning trout below the current regulatory marker.

What will happen if nothing is done?

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

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

PROPOSED BY: Joey Klutsch

(EF-F26-054)

PROPOSAL 100

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

Prohibit sport fishing for king salmon in a portion of the Naknek River, as follows:

Move the marker from its current location [(River Mile 24.25)] downstream to 58°37'04" North, 156°34'31" West.

This location also coincides with a Borough access road and recreational use area referred to as Rainbow Bend, allowing for it to have a prominent placement and easy to see from the river.

Replace all text throughout 5 AAC 67.022 that refer to the rapids camp marker as [(River Mile 24.25)] with 58°37'04" North, 156°34'31" West or using the appropriate river mileage such as (River Mile 23)

What is the issue you would like the board to address and why? I would like the board to consider moving the current regulatory marker located on the Naknek River at Rapids Camp (River Mile 24.25) downriver approximately 1.2 miles. Historically, kings have used this area to spawn. Currently open to sport fishing, it is a heavily fished area and the last spot kings can be caught before they reach the protected spawning area designated by the current marker. By moving current ADF&G marker downriver, it would add a layer of protection to kings staging to spawn.

The benefits of moving the marker are twofold. Moving this marker downstream will also protect trout that spawn below the marker. The river is closed to sportfishing from April 10th through June 7th to protect spawning trout between the ADF&G river mile 24.25 marker and the ADF&G marker located at Trefon's Cabin (outlet of Naknek Lake). Moving the Rapids camp marker downriver will allow for the trout spawning below the current regulatory maker to have the same protection.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes, I have worked with one other AC member to write this and recieved feedback and support for this proposal from other operators and local anglers.

PROPOSED BY: Patricia Edel

(EF-F26-069)

PROPOSAL 101

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

Prohibit the use of bait and multiple hooks in the Egegik and Ugashik drainages, as follows:

Egegik River Drainage, add; Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of 1/2 inch or less are allowed year around.

Ugashik River Drainage, add; Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of 1/2 inch or less are allowed year around.

What is the issue you would like the board to address and why? Ban the use of bait for sport fishing, in the Egegik River and Ugashik River Drainage system. The Egegik River and Ugashik Narrows are experiencing increasing fishing pressure from local and fly out lodges. The use of cured eggs has a higher mortality rate on sport caught fish than artificial lures or flies. Arctic

Grayling, on the upper reaches of the Egegik River, Ugashik Narrows and Ugashik River is either catch and release or closed. Fishing any of these drainages with bait counters the idea of protecting the Grayling population.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have been guiding sportfishermen on the Becharof and Ugashik River systems every year since 1978. The last 15 years there has been a dramatic increase in fishing pressure, especially on Silver Salmon. With declining run strength of King and Silver Salmon I believe it's time to start protecting these fisheries.

PROPOSED BY: Tracy Vrem

(EF-F26-065)

PROPOSAL 102

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

Increase the area open to sport fishing for king salmon and modify the dates that bait is allowed in the Togiak River drainage, as follows:

TOGIAK RIVER DRAINAGE: • Unbaited, single-hook, artificial lures or flies may be used year-round. • July 11th-April 30: Bait is allowed. • King salmon: • 20 inches or longer: No retention allowed. All king salmon 20 inches or longer caught may not be removed from the water and must be released immediately. • Less than 20 inches: 10 per day, 10 in possession. • Upstream of the confluence of Pungokepuk River (59.2574230, - 160.1978034) and the Togiak River: • Closed year-round to king salmon fishing.

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

At the 2022 Bristol Bay Finfish meeting, new sportfishing regulations were adopted to conserve King Salmon. These changes eliminated the use of bait, prohibited the retention of adult King Salmon, and restricted King Salmon targeting above the Geciak River.

In 2023, the Board of Fisheries passed Proposal 256 (formerly ACR 9) at the Lower Cook Inlet meeting, allowing bait use on the Togiak River after July 15th to target species other than King Salmon.

While we are grateful for the opportunity to use bait for Sockeye after July 15th, we respectfully request consideration for allowing bait use five days earlier, for the following reasons:

- King Salmon are still catch and release on the Togiak River, and we have no intention to request a retention season.
- As the primary outfitter on the river in June and July, we have implemented conservation tactics to prevent King Salmon mortality when using bait to target Sockeye and Chum.
- Lodge policy prohibits the use of cured salmon eggs to reduce mortality across all species.
- Bait may only be used on a jig/fly or lure that cannot be swallowed by any fish.
- King Salmon are typically not holding in the same water where Sockeye, Chum, and Pink Salmon are being targeted.
- Pressure from other outfitters in June and July has significantly decreased now that adult King retention is no longer allowed, thereby reducing potential incidental mortality.

Proposed Boundary Adjustment for King Salmon Regulations

Additionally, we would like to propose a more enforceable boundary for King Salmon targeting restrictions.

Currently, it is illegal to target King Salmon above the Geciak River. However, this presents several enforcement challenges:

- Other species can still be legally targeted above the Geciak River.
- Flies used for Chum and Rainbow Trout are also effective for King Salmon. This creates ambiguity for enforcement, as intent is hard to judge.
- If an angler is swinging a fly for Rainbows and catches a King above the Geciak, is that illegal? This creates a legal gray area.
- The closure above the Geciak River in 2023 was based on aerial surveys from the early 2000s, which suggested spawning activity between the Geciak and Pungokepuk Rivers. However, studies conducted by the U.S. Fish and Wildlife Service (USFWS) contradict these earlier findings.
- The Pungokepuk River is the legal upstream boundary for outfitters without special permits and lies approximately 4.5 miles above the Geciak.
- For clarity and practicality in enforcement, we propose shifting the no-King-Salmon fishing boundary from the Geciak River to the Pungokepuk River.

Supporting Data: Chinook Salmon Radiotelemetry Study Summary

Study: Estimation of Chinook Salmon Escapement, Distribution and Run Timing in the Togiak River Watershed (Tanner & Sethi, USFWS 2014)

Purpose: To assess Chinook Salmon spawning abundance, timing, and distribution using radiotelemetry and mark-recapture methods.

Key Findings:

- **Escapement Estimate:** ~13,050 Chinook Salmon entered the Togiak River in 2012.
- **Spawning Locations:**
 - Only **2%** spawned in **Gechiak Creek**.
 - No significant spawning activity was documented in the stretch between the **Geciak and Pungokepuk Rivers**, contrary to the 2022 claim during the BOF meeting.
 - Most tributary spawners were found above the Pungokepuk River, primarily in Naylorun, Kemuk, and Ongivinuk Rivers (20+ miles above the Pungokepuk)
- **Run Timing:**
 - Tributary-bound Chinook entered the river earlier than mainstem spawners.

Conclusion: The assertion that the majority of Chinook Salmon spawn between the Geciak and Pungokepuk Rivers is not supported by telemetry data. The majority of spawning occurs in tributaries above the Pungokepuk.

Final Recommendation

We respectfully propose two changes:

1. Allow bait use on the Togiak River starting **July 11th** instead of July 16th, with strict conservation measures already in place.
2. Move the no-King-Salmon-targeting boundary from the **Geciak River** to the **Pungokepuk River** (59.2574230, -160.1978034) for greater enforceability and alignment with the best available science

These adjustments would support both conservation goals and practical enforcement while continuing to protect the core spawning population of Chinook Salmon in the Togiak Riversystem.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal has been developed by Togiak River Lodge
PROPOSED BY: Togiak River Lodge/ Jordan Larsen, Zackery Larsen (EF-F26-086)

PROPOSAL 103

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

Prohibit the placing of any substance in the water for the purpose of attracting fish by scent (chumming), as follows:

Current Regulation:

Chumming:

In waters closed to the use of bait, sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

Proposed new regulation:

Sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

What is the issue you would like the board to address and why? We would like to see chumming (throwing in bait to attract fish) by guides and guided anglers prohibited in Bristol Bay waters. It is currently legal in areas where bait is allowed. We've seen that it disrupts the fish's natural feeding habits and also makes them much more susceptible to being caught. We've often witnessed guides use chum to attract fish to their location and their angler's flies, while the rest of us struggle to produce good fishing. We feel takes away the "fair chase" aspect of fishing and also contributes to fish mortality because the fish are caught and released more than usual.

***This proposal is not intended to stop the use of bait or bait fishing in areas where it is currently allowed, it is only intended to prohibit chumming by sport fishing guides and guided anglers.

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

PROPOSED BY: Pat Vermillion and Scott Schumacher of Royal Coachman Lodge
(EF-F26-094)

PROPOSAL 104

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

Modify gear to barbless hooks in Morine, Kulik, American, and Brooks drainages, as follows:

Create seasonal barbless fishing requirements for Moraine creek, Kulik River, American Creek, and Brooks River.

Barbless can be defined as "Hook with no pointed barb at end through manufacture or the crushing of manufactured barbed hook so that point is no longer present or bent closed."

- Moraine Creek (all flowing waters):
 - June 8-October 31: Only unbaited, **barbless**, single-hook, artificial flies may be used.
- Kulik River (all flowing waters):

- June 8-October 31: Only unbaited, **barbless**, single-hook, artificial lures or flies may be used
- American Creek (all flowing waters):
 - June 8-October 31: Only unbaited, **barbless**, single-hook, artificial flies may be used
- Brooks River (all flowing waters):
 - June 8-October 31: Only unbaited, **barbless**, single-hook, artificial flies may be used

The potential alternative considered was to make barbless requirement year round. However, it was felt that it was unnecessary due to potential winter subsistence fishing needs with barbed hooks in some locations as well as lack of overall winter sportfishing presence in these locations.

What is the issue you would like the board to address and why? The issue we would like to address is the poor care and treatment of fish in seasonally intensified catch and release fisheries in Bristol Bay from the use of barbed hooks. Research suggests the use of barbed hooks amplifies a variety of causes of fish mortality and decreased health.

Primary rivers of note would be Moraine Creek, Kulik River, American Creek, and Brooks River. These rivers see high levels of summer seasonal catch-and-release angler pressure which causes fish to be caught multiple times over the course of the season. With elevated pressure on these rivers for catch and release purposes, it is important that fish are treated in the best possible manner to ensure continued fishery success and visitor satisfaction.

In contrast to many other rivers in the Bristol Bay region, these rivers are not customarily catch-and-keep fisheries during the summer season. Thus, as a predominantly catch and release fishery, the ability to consistently catch healthy fish with as little impact as possible should be expected. ADFG switching to a barbless regulation might be considered insignificant by some, but it would be very simple to implement and enforce as a regulation.

It is understood that there are many variables that may have an impact on fish mortality and health. It is also understood that some of these variables may have a greater impact on fish mortality than the use of barbed hooks. However, all variables that negatively affect healthy fish populations are additive. Thus, we feel each should be given attention, especially as fish are targeted and caught multiple times.

The objective of this regulation change is not only to solve for the portion of fish mortality directly related to the use of barbed hooks, but to extend to other factors of mortality that can be amplified by barbed hooks. The term “death by a thousand cuts” illustrates what we are hoping to solve with this regulation change via a clear and actionable topic that will positively affect multiple sources of mortality.

Justification and Details:

Fish Mortality:

- A study reported that barbed hooks related to 7% of fish mortality over 2% de-barbed hooks when hooked superficially. Additionally, 29% fish mortality when fish were deeply hooked with barbed hooks over 6% mortality when fish were deeply hooked without barbed hooks.
 - *Robert B. DuBois, Kurt E. Kuklinski, Effect of Hook Type on Mortality, Trauma, and Capture Efficiency of Wild, Stream-Resident Trout Caught by Active Baitfishing, North American Journal of Fisheries Management, Volume 24, Issue 2, May 2004, Pages 617–*

- Another study, though not determined statistically significant (>5%), showed every sample where barbed hooks were used resulted in greater catch and release mortality.
 - Ian I. Courter, Thomas Buehrens, Mark Roes, Tara E. Blackman, Benjamin Briscoe, Sean Gibbs, *Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington, Fisheries Research, Volume 268, 2023, 106848, ISSN 0165-7836, <https://doi.org/10.1016/j.fishres.2023.106848>.*

Increased Fish Handling Time:

- Study Reported barbed hooks were associated with a three second median increase in fish handling time.
 - Ian I. Courter, Thomas Buehrens, Mark Roes, Tara E. Blackman, Benjamin Briscoe, Sean Gibbs, *Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington, Fisheries Research, Volume 268, 2023, 106848, ISSN 0165-7836, <https://doi.org/10.1016/j.fishres.2023.106848>.*
- According to another study, beyond superficially hooked fish, deeply hooked fish take significantly more effort to unhook safely. With that, deeply hooked fish with barbed hooks required extended time with the fish's mouth out of the water. Study found that extended air exposure after fish exhaustion resulted in a survival rate as low as 28%.
 - Fergusson, R. A., and B. b. Tufts. 1992. *Physiological effects of brief air exposure in exhaustively exercised rainbow trout (Oncorhynchus mykiss): implications for "catch and release" fisheries. Can. J. Fish. Aquat. Sci. 49: 11 57-1 162.*

Bear and Wildlife Safety:

- In addition to fish mortality, these rivers play host to some of the highest density of Brown Bears in Alaska. When dealing with safety around bears, three seconds can mean a lot of time to avoid a potential negative situation or a bear taking a fish from an Angler. Using barbless hooks for the purpose of quicker fish releases can greatly aid in overall safety and experience around bears.

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

PROPOSED BY: Bristol Adventures, Operator of Brooks, Grosvenor, Kulik, and Mission Lodges
(EF-F26-126)

PROPOSAL 105

5 AAC 06.XXX. New Section.

Adopt a Bristol Bay King Salmon Management Plan, as follows:

Establish King Salmon Management Plans for Bristol Bay drainages, as follows:

Adopt a King Salmon Management plan for streams located in the Bristol Bay watershed that do not currently have a plan in place and have an active sports or subsistence or personal use fishery associated with them, such as Kvichak/Alagnak, Naknek Igushik, Ugashik, Sandy and the Meshik.

What is the issue you would like the board to address and why? We are experiencing severe declines in our king salmon populations all over Alaska. These declines can be attributed to numerous causes, some that are beyond our ability to control and others that we can take measures to insure we can offer additional protection to a specie that is struggling. This proposal is intended to help us get a handle on managing the runs that we have and put tools in a tool box to use if or

when runs become jeopardized or if they are flourishing and healthy, where we can consider liberalizing.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Other sports fishing resource users were consulted and I received positive feedback on the concept of this proposal.

PROPOSED BY: Nanci Morris Lyon

(EF-F26-046)
