

FP25-14 Executive Summary

<p>General Description</p>	<p>Fisheries Proposal FP25-14 requests that the Federal Subsistence Board revise the Federal subsistence regulations to add snagging (with a handline or rod and reel), cast net, spear, bow and arrow, and capturing by bare hand to methods and gear types for legally harvesting salmon for subsistence within and adjacent to the exterior boundaries of the Togiak National Wildlife Refuge in the Bristol Bay Area. <i>Submitted by: Bristol Bay Native Association.</i></p>
<p>Proposed Regulation</p>	<p style="text-align: center;">§ __.27(e)(5) Bristol Bay Area</p> <p>...</p> <p><i>(iv) Unless otherwise specified, you may take salmon by set gillnet only.</i></p> <p><i>(A) You may take salmon by spear in the Togiak River, excluding tributaries.</i></p> <p><i>(B) You may also use drift gillnets not greater than 10 fathoms [60 feet] in length to take salmon in the Togiak River in the first 2 river miles upstream from the mouth of the Togiak River to the ADF&G regulatory markers.</i></p> <p>...</p> <p><i>(F) You may also take salmon by snagging (by handline or rod and reel), cast net, spear, bow and arrow, or capturing by bare hand within and adjacent to the exterior boundaries of the Togiak National Wildlife Refuge in the Bristol Bay Area.</i></p>
<p>OSM Preliminary Conclusion</p>	<p>Support Proposal FP25-14</p>
<p>Bristol Bay Subsistence Regional Advisory Council Recommendation</p>	
<p>Interagency Staff Committee Comments</p>	
<p>ADF&G Comments</p>	
<p>Written Public Comments</p>	<p>None</p>

DRAFT STAFF ANALYSIS
FP25-14

ISSUES

Fisheries Proposal FP25-14, submitted by the Bristol Bay Native Association, requests that the Federal Subsistence Board (Board) revise the Federal subsistence regulations to add snagging with a handline or rod and reel, cast net, spear, bow and arrow, and capturing by bare hand to methods and gear types for legally harvesting salmon for subsistence within and adjacent to the exterior boundaries of the Togiak National Wildlife Refuge in the Bristol Bay Area.

DISCUSSION

The proponent states that traditional methods of harvesting salmon are currently not allowed. Adding these methods to the regulations would align current traditional harvest methods with regulations. In further conversations, the proponent states several reasons for including these specific gear types in the proposal. All but one are legal methods and gear types in the Lake Clark area. The one method and gear type in the proposal that is not in Federal regulations for the Bristol Bay Area is cast nets, which the proponent explains are commonly used by residents of Manokotak. The proponent also clarified that the intent of the proposal is to add this regulation for the area within the Togiak National Wildlife Refuge in the Bristol Bay Area (Larson 2024, pers. comm.).

Existing Federal Regulation

§ __.27(e)(5) Bristol Bay Area

...

(iv) Unless otherwise specified, you may take salmon by set gillnet only.

(A) You may take salmon by spear in the Togiak River, excluding tributaries.

(B) You may also use drift gillnets not greater than 10 fathoms [60 feet] in length to take salmon in the Togiak River in the first 2 river miles upstream from the mouth of the Togiak River to the ADF&G regulatory markers.¹

¹ ADF&G regulations (5 AAC 01.320(b)(1)(B)) have replaced “ADF&G regulatory markers” with “between the mouth of the river and upstream approximately two miles to a line across the river at 59° 05.50' N. lat.”

Proposed Federal Regulation

§ __.27(e)(5) *Bristol Bay Area*

...

(iv) *Unless otherwise specified, you may take salmon by set gillnet only.*

~~(A) *You may take salmon by spear in the Togiak River, excluding tributaries.*~~

(B) *You may also use drift gillnets not greater than 10 fathoms [60 feet] in length to take salmon in the Togiak River in the first 2 river miles upstream from the mouth of the Togiak River to the ADF&G regulatory markers.*

...

(F) *You may also take salmon by snagging (by handline or rod and reel), cast net, spear, bow and arrow, or capturing by bare hand within and adjacent to the exterior boundaries of the Togiak National Wildlife Refuge in the Bristol Bay Area.*

Relevant Federal Regulations

§ __.25 *Subsistence taking of fish, wildlife, and shellfish: general regulations.*

(a) *Definitions. The following definitions apply to all regulations contained in this part:*

...

Bow means a longbow, recurve bow, or compound bow, excluding a crossbow or any bow equipped with a mechanical device that holds arrows at full draw.

...

Cast net means a circular net with a mesh size of no more than 1.5 inches and weights attached to the perimeter, which, when thrown, surrounds the fish and closes at the bottom when retrieved.

...

Snagging means hooking or attempting to hook a fish elsewhere than in the mouth.

...

Spear means a shaft with a sharp point or fork-like implement attached to one end, which is used to thrust through the water to impale or retrieve fish, and which is operated by hand.

...

§ __.27.27 Subsistence taking of fish

...

(b) Methods, means, and general restrictions.

...

(16) Unless specified otherwise in this section, you may use a rod and reel to take fish without a subsistence fishing permit. Harvest limits applicable to the use of a rod and reel to take fish for subsistence uses shall be as follows:

(i) If you are required to obtain a subsistence fishing permit for an area, that permit is required to take fish for subsistence uses with rod and reel in that area. The harvest and possession limits for taking fish with a rod and reel in those areas are the same as indicated on the permit issued for subsistence fishing with other gear types.

...

§ __.27(e)(5) Bristol Bay Area

...

(iv) Unless otherwise specified, you may take salmon by set gillnet only.

...

(C) You may also take salmon without a permit in Sixmile Lake and its tributaries within and adjacent to the exterior boundaries of Lake Clark National Park and Preserve unless otherwise prohibited, and Lake Clark and its tributaries, by snagging (by handline or rod and reel), using a spear, bow and arrow, rod and reel, or capturing by bare hand.

Existing State Regulation

5 AAC 01.320 Lawful gear specifications

(a) Within any district, salmon, herring, and capelin may be taken only by drift and set gillnets.

(b) Outside the boundaries of any district and within the Naknek, Alagnak, and Wood River special harvest areas, salmon may only be taken by set gillnet, except that salmon may also be

taken by dip nets in the waters described in 5 AAC 01.310(d)² if fishing other than from a vessel, and salmon may also be taken as follows:

(1) in the Togiak River,

(A) excluding its tributaries, by spear;

(B) between the mouth of the river and upstream approximately two miles to a line across the river at 59° 05.50' N. lat., by a drift gillnet that is not more than 10 fathoms [60 feet] in length;

...

(7) by dip net in the Igushik, Weary, and Snake Rivers upstream of the commercial fishing district; a dip net may not be operated from a vessel.

Extent of Federal Public Lands/Waters

For purposes of this discussion, the phrase “Federal public waters” is defined as those waters described under 36 CFR 242.3 and 50 CFR 100.3. Federal public waters are comprised of fresh waters within and adjacent to the Togiak National Wildlife Refuge in the Bristol Bay Area (**Figure 1**). Bristol Bay commercial fishing districts are not within Federal subsistence fisheries management jurisdiction.

Customary and Traditional Use Determinations

Residents of the Togiak District, freshwater drainages flowing into the district, and the community of Manokotak have a customary and traditional use determination for salmon in the Togiak District, including drainages flowing into the district Togiak District (**Figure 2**).

Residents of the Nushagak District and freshwater drainages flowing into the district have a customary and traditional use determination for salmon in the Nushagak District including drainages flowing into the Nushagak District.

Residents of Bristol Bay have a customary and traditional use determination for salmon in drainages flowing into the area between the Togiak District and the Nushagak District.

Regulatory History

Background

See **Background** section under Regulatory History in the analysis of Proposal FP25-11, a request to include drift gillnets, beach seines, and dip nets to legal methods and gear types in the Bristol Bay Area.

² This area is not within Federal subsistence fisheries management jurisdiction.



Figure 1. Map of the Bristol Bay Management Area.

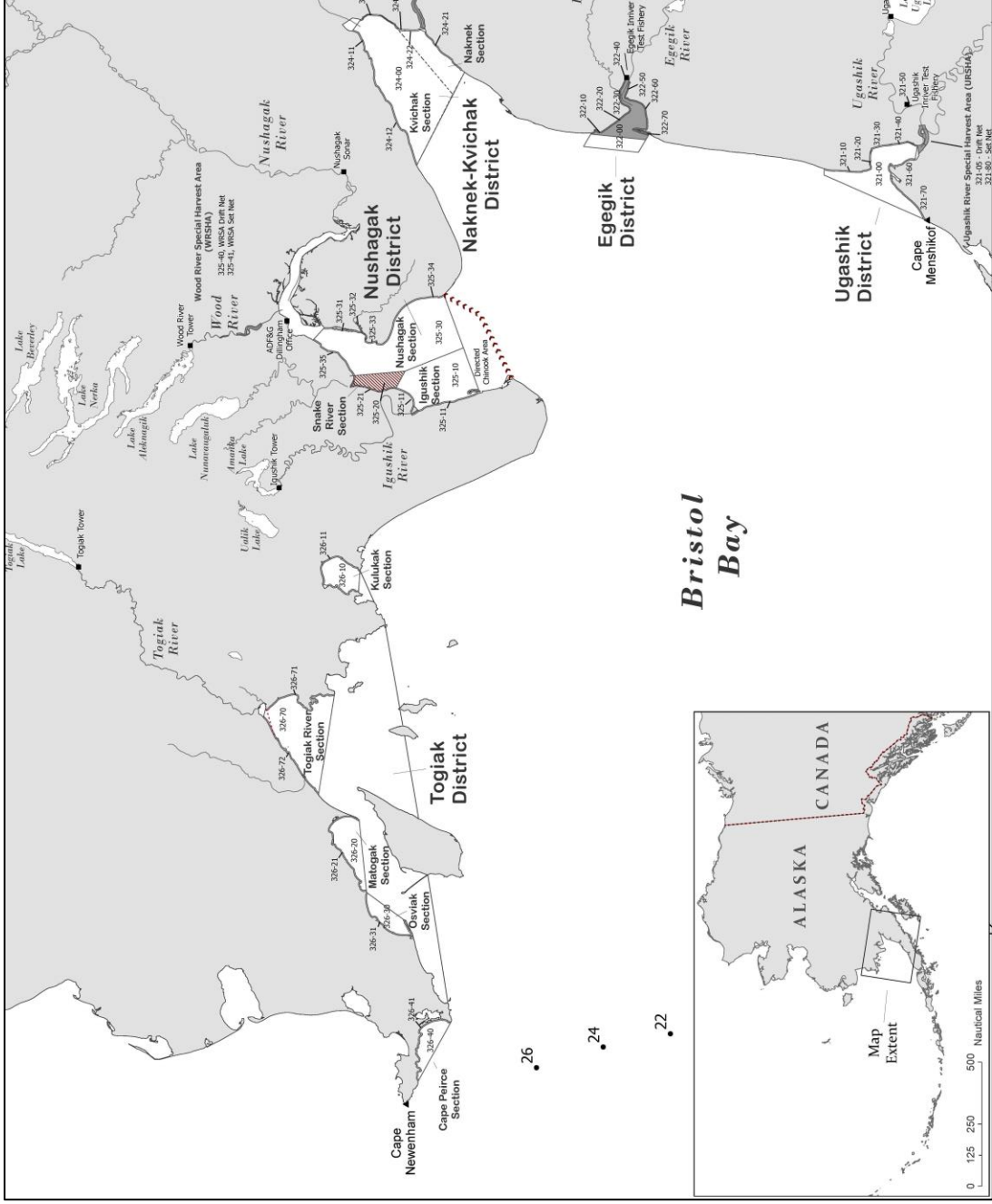


Figure 2. Map of ADF&G Bristol Bay Commercial Salmon Districts (ADF&G 2024).

Regulations

In 1992, the Federal Subsistence Management Program carried over the State regulations governing the harvest of fish for subsistence uses in Federal public non-navigable waters. (57 Fed. Reg. 103, 22564 [May 28, 1992]). This is how most Federal subsistence fishing regulations for the Bristol Bay Area were adopted.

Between 1992 and 1997, the Federal Subsistence Board adopted a statewide regulation allowing the harvest of fish by rod and reel with harvest limitations (§____.27(b)(16); 62 Fed. Reg. 242, 66238 [December 17, 1997]).

In 1999, the Board adopted these Federal regulations for fish in navigable waters, in addition to non-navigable waters (64 Fed. Reg. 5 [January 8, 1999]). More recent additions are described below.

In December 2006, the Alaska Board of Fisheries took the lead by taking up Proposal 251, which was submitted to the Federal Subsistence Board (Proposal FP07-05) by the Twin Hills Traditional Council. The Board of Fisheries added it to its agenda as a supplementary proposal based on its concern for conservation, enforcement, and regulatory coordination (ADF&G 2006a). Proposal 251 requested to allow the use of drift gillnets not greater than 10 fathoms in length and 15 feet in depth to take salmon in the Togiak River. The Board of Fisheries passed Proposal 251 with amendment (ADF&G 2006b). In January 2007, the Federal Subsistence Board adopted the same language as the Board of Fisheries: “*You may also use drift gillnets not greater than 10 fathoms in length to take salmon in the Togiak River in the first 2 river miles upstream from the mouth of the Togiak River to the ADF&G regulatory markers*” (§____.27(e)(5)(xii)(B)). Additionally, both Boards added marking requirements to the regulation: “*You may not possess salmon taken with a drift gillnet under the authority of a subsistence fishing permit unless both lobes of the caudal fin (tail) or the dorsal fin have been removed*” (§____.27(e)(5)(iv)(B)).

The Bristol Bay Subsistence Regional Advisory Council supported the proposal (FP07-05) with modification to use a drift gillnet 10 fathoms long and 2.5 fathoms deep, from two river miles upstream from the mouth of the Togiak River (OSM 2007a). The Federal Subsistence Board justified its modification of the proposal with the justification, “. . . Marking all salmon caught with drift gillnets should not be a significant burden . . .” (OSM 2007b:1).

In 2018, the Alaska Board of Fisheries passed Proposal 19 with amendments in Record Copy 48³, which was submitted by the Board of Fisheries, to allow the use of dip nets to harvest salmon for subsistence in the Dillingham area, and the Igushik, Weary, and Snake rivers providing a dip net may not be operated from a vessel (5 AAC 01.320(b)(7), ADF&G 2018a). It amended the proposal by adding the Igushik, Weary, and Snake rivers, frequented by Manokotak residents to harvest salmon, based on comments by the Nushagak Fish and Game Advisory Committee and testimony that this was already being done when only a few salmon or only a specific species were desired by Manokotak residents. The Nushagak Committee amended the proposal to include these areas (ADF&G 2018c,

³ Once a meeting begins, comments and new information may be submitted to the board as a Record Copy.

ADF&G 2018d). The Naknek/Kvichak Fish and Game Advisory Committee amended the proposal to support the use of dip nets in their area as well, which was not considered by the Board (ADF&G 2018e).

In 2021, Proposal FP21-06 was submitted by the Bristol Bay Native Association, a request to include dip nets, beach seines, and gillnets under legal methods and gear types for salmon harvesting in the Bristol Bay Area. The Bristol Bay Council did not support the proposal with the justification that the proposal was too broad in scope and did not address specific issues including salmon management and conservation concerns in some vulnerable drainages. The proposal was on the consent agenda with other proposals for which the Board adopted all Council recommendations at one time with no commentary (OSM 2021).

Current Events Involving the Species

Three other proposals were submitted regarding closures and methods and gear types for harvesting salmon for subsistence. Proposal FP25-10 seeks to remove closures to the harvest of fish within 300 feet of a stream mouth used by salmon. Proposal FP25-14 seeks to add drift gillnets, beach seines, and dip nets to legal methods and gear types in the Bristol Bay Area. Proposal FP25-13 seeks to allow set gillnets up to 25 fathoms in the Egegik River.

Additionally, on January 11, 2024, the Wild Fish Conservancy submitted a petition to the U.S. Department of Commerce and National Oceanic Atmospheric Administration (NOAA) to list Alaskan Chinook Salmon as a threatened or endangered species and to designate critical habitat, pursuant to the Endangered Species Act (ESA). The petition cited the effects of roads, mining, pollutants, and other habitat degradation, overutilization for commercial and recreational purposes, and disease and predation as primary factors that warranted listing. The petition also claimed existing regulatory mechanisms may be inadequate to protect Chinook Salmon populations that enter the marine environment of the Gulf of Alaska.

On May 24, 2024, the National Marine Fisheries Service (NMFS) published in the Federal Register their 90-day finding and determined the petition contained substantial information indicating the petitioned action may be warranted (89 Fed. Reg. 102, 45815 [May 24, 2024]).⁴ This 90-day finding moved the petition forward to a 12-month status review process, which is a comprehensive review of the best available scientific and commercial information. The finding at the 12-month stage is based on a more thorough review of the available information, as compared to the narrow scope of review at the 90-day stage.⁵

⁴ <https://www.federalregister.gov/documents/2024/05/24/2024-11381/endangered-and-threatened-wildlife-90-day-finding-on-a-petition-to-list-gulf-of-alaska-chinook>

⁵ Information on the status of this review process can be found by going to www.regulations.gov and searching for agency docket # 240520-0140. For additional information contact Julie Scheurer, NMFS Alaska Region, Julie.scheurer@noaa.gov, (907) 586-7111; or Heather Austin, NMFS, Office of Protected Resources, heather.austin@noaa.gov, (301) 427-8422.

Biological Background

There are numerous salmon stocks in the Bristol Bay Area that are targeted by subsistence, sport, and commercial fisheries. In general, all salmon stocks are in a productive period. There are only a few major monitoring projects for in-season abundance in the freshwaters and other run indicators used for managing the commercial salmon harvest in marine waters. There are no specific conservation concerns to report at this time for Sockeye, Pink, Chum, and Coho salmon; however, some runs of Chinook Salmon have been depressed for many years. In October 2022, Alaska Department of Fish and Game (ADF&G) recommended that Nushagak River Chinook Salmon be listed as a stock of management concern at the Bristol Bay Area Alaska Board of Fisheries meeting held in November 2022. This prompted the Alaska Board of Fisheries to adopt the Nushagak River King Salmon Action Plan. The in-river run goal for Chinook Salmon in the Nushagak River is 95,000 and has not been met six of the last seven years. The sustainable escapement goal (SEG) of 55,000 to 120,000 also was not met in four of the last six years (ADF&G 2022).

The Togiak District 2024 inshore run report from the ADF&G Division of Commercial Fisheries calls for a run of 680,000 Togiak River Sockeye Salmon with a potential surplus of 520,000 fish (ADF&G 2024).

Cultural Knowledge and Traditional Practices

Community Background

Three villages situated in the Togiak National Wildlife Refuge within the Bristol Bay Area, Manokotak, Togiak, and Twin Hills, are the focus of this section and will primarily be affected by the proposed regulation (**Figure 1**). The village of Togiak is situated alongside the shoreline of Togiak Bay about two miles west of the mouth of the Togiak River, and the village of Twin Hills is situated about one and a half miles inland on a branch of the Togiak River. Most Togiak residents can access the river at any time by way of the channel running very close to the beach at the northern end of the village. For a while in the 1990s a commercial salmon processing plant was located at Togiak and utilized a slough to unload fish tenders and fishing boats at high tide. Yup'ik-speaking *Tuyuryarmiut* historically lived in this area (Wolfe et al. 1984, Gross 1991).

In the 1950s a cannery was built at Togiak, and the population of the area began to significantly increase as people concentrated nearby the cannery site and for other reasons. People moved to Togiak from small villages upriver as well as from small villages south of Togiak and north along the Kuskokwim River. Twin Hills was founded in 1965 by former residents of Quinhagak and Togiak. The populations of both Togiak and Twin Hills have steadily increased and were estimated at 817 and 103 people, respectively, in 2020 (Coiley-Kenner et al. 2003, ADCCED 2024).

Manokotak is also a recent community. People moved to Manokotak from the areas of Kulukak, Nushagak, and Togiak bays. Igushik, located at the mouth of the Igushik River at Nushagak Bay, was one of four large settlements along Nushagak Bay whose residents formed much of the early population of Manokotak, and most Manokotak families maintain summer fish camps at Igushik on

Nushagak Bay. Later, people moved to Manokotak from western Bristol Bay, particularly the settlements in the Togiak, Osviak, and Goodnews Bay areas (Schichnes and Chythlook 1988). The population of Manokotak has steadily increased and was estimated at 488 people in 2020 (ADCCED 2024).

As mentioned previously, the first Bristol Bay cannery was built along Nushagak Bay in the 1880s and along Togiak Bay in the 1950s. While some residents were hired to work in canneries their integration into the commercial salmon fishery began after World War II (Wolfe et al. 1984).

The commercial salmon fishery at Togiak has more in common with the Kuskokwim than it does with the rest of Bristol Bay. Most commercial fishing vessels used in the area are “Togiak skiffs,” a semi-V bottomed wooden or aluminum boat 25–26 feet long and powered by high horsepower outboard (some have inboard) engines. A drift gillnet is pulled by hand over the bow or by a hand turned roller. This contrasts with the typical aluminum fishing boat with electronic rollers, holds containing ice, cabins, running water, stoves, heat, and communications equipment (Wolfe et al. 1984).

The Togiak District salmon commercial salmon fishery is managed differently than other districts in Bristol Bay, and regulations favor local boats that are not able to travel to other districts and local set gillnets over the other, heavily capitalized fishing boats common in other Bristol Bay salmon commercial fisheries. Transferring into the Togiak District prior to the midpoint of the Sockeye Salmon escapement goal is prohibited by regulation if the permit or vessel has been previously registered in any of the four other Bristol Bay districts. Conversely, permit holders registered to fish in the Togiak District are prohibited from fishing in any other Bristol Bay district until the midpoint of the Sockeye Salmon escapement goal has been reached (Elison et al. 2024).

Additionally, since 1967 herring have been harvested commercially from the marine waters of the Togiak District. A large concentration returns to Togiak each spring to spawn and have been the focus of herring sac roe and spawn on kelp (harvested by hand) fisheries. While this herring fishery has sometimes been the largest in Alaska, the market is volatile, and there was no commercial herring fishing in 2023 due to lack of buyers or processors, and the herring roe on kelp fishery ended in 2003 (Elison et al. 2024).

Subsistence Fishing

The human population in the Bristol Bay Area has been supported by an abundance of salmon for thousands of years. Hunting, fishing, and gathering were all practiced, but fishing was by far the most important because of the large and predictable salmon runs. People were drawn into the fur trade early in the 1800s bringing radical changes before traditional subsistence patterns were documented in their entirety (VanStone 1984). Early documentation is focused on the period between 1880 and 1930.

For this early history, see the **Subsistence Fishing** section under Cultural Knowledge and Traditional Practices in the analysis for Proposal FP25-11, a request to include drift gillnets, beach seines, and dip nets to legal methods and gear types in the Bristol Bay Area.

More recently, the heavy reliance of Manokotak, Togiak, and Twin Hills on locally harvested salmon for home use has been well-documented (Wolfe et al. 1984, Wolfe 1989, Schichnes and Chythlook 1988, Gross 1991, Coiley-Kenner et al. 2003, Fall et al. 2012, Holen et al. 2012, Jones et al. 2019).

For these villages, salmon commercial and subsistence fisheries are inter-twined. Gear in one can be used in the other, necessary skills are similar, and people involved with commercial fishing are also subsistence harvesters. A portion of subsistence harvest is retained from commercial catches. However, some people are not directly involved with commercial fishing, and they harvest salmon for subsistence from primarily the Togiak and Igushik river drainages. Salmon subsistence fishing occurs most often in the lower reaches of the rivers, by people searching for firmer, fresher Sockeye Salmon. In Togiak, much of this fishing effort is by elders and children who are not commercial fishing, though others participate too.

Fishing continues after the commercial fishery has closed for the season. In late summer and early fall, spawning Sockeye Salmon are harvested from Togiak Lake and Ualik and Amanka lakes from where the Igushik River flows.

Methods and Gear Types

In freshwaters traditional methods of the past have been deemphasized in favor of the use of set gillnets, the only legal gear type allowed in most of the area. Generally, people use gillnets to harvest larger quantities of salmon that they preserve by splitting and drying on racks for most of the summer. However, people continue to use all traditional methods, including when they are prescribed by tradition and conditions and are efficient. People choose what method and gear type to use based on many factors including salmon species available at the time, harvest goals, preservation method to be used, size of the work party, weather, harvest site, and other factors.

For example, beach seines are commonly used in the Togiak River drainage when people are targeting a specific number of salmon so as not to overwhelm their processing and smokehouse capacities (locally called “round hauling.”) Beach seining is generally a non-lethal method for capturing salmon that allows users to select the number and species of fish they want to harvest. Beach seines are also used when there is a limited amount of time, and many fish are required. At certain times it is very quick and efficient requiring at least two persons, one in the boat and the other on the beach. Beach seining is a particularly good gear type for areas where fish are hold up to rest before running upstream. Beach seining is common for harvesting spawning Sockeye Salmon at Togiak, Amanka, and Ualik lakes in the fall (Wolfe et al 1984, Gross 1991, Jones et al. 2019).

Dip nets and cast nets are regularly used by Manokotak residents in the Igushik, Weary, and Snake rivers that run into Nushagak Bay (ADF&G 2018c; Larsen 2024, pers. comm.; Sill *in pub*).

People also harvest salmon with rod and reel when only a few fresh fish are desired to eat fresh (Schichnes and Chythlook 1988, Gross 1991, Coiley-Kenner et al. 2003, Fall et al. 2012, Holen et al. 2012, Jones et al. 2019). Spears are used for same purposes as rod and reel, selective fishing of fresh

fish for immediate consumption, usually spawning Sockeye Salmon and occasionally Coho Salmon (Gross 1991).

Snagging with a handline or rod and reel, bow and arrow, and capturing by bare hand are methods and gear types used to selectively harvest salmon.

Harvest History

The recent 5-year average salmon subsistence harvest estimate, 4,587 salmon, in the Togiak area is close to the historical average, 5,013 fish (**Table 1**). Residents of Togiak and Twin Hills are the main participants in the subsistence fishery on the Togiak area. By far, most of the harvest is Sockeye Salmon, followed by Chinook and then Coho salmon. Chum and Pink salmon are taken in lesser numbers. These estimates are based on the results of the Bristol Bay Subsistence Salmon Harvest Permit System (Jones and Neufeld 2022). One quarter to one third of Chinook and Sockeye salmon are retained from commercial catches based on periodic household surveys. Most of both species are harvested with subsistence gillnets, and rod and reel is used to a lesser degree to harvest salmon. Salmon comprises about one third of the harvest of wild resources for home use by weight (Coiley-Kenner et al. 2003, Fall et al. 2012, Jones et al. 2019).

Table 1. The estimated harvest of salmon, by species, for subsistence purposes in the Togiak area, based on the ADF&G salmon permit system (Jones and Neufeld 2022).

Year ⁶	Permits Issued	Sockeye Harvest	Chinook Harvest	Coho Harvest	Chum Harvest	Pink Harvest	Total Harvest
1985	51	3,400	600	1,000	100	1,500	6,600
1986	29	2,400	700	800	100	500	4,500
1987	46	3,600	700	1,000	0	1,600	6,900
1988	29	2,413	429	716	45	792	4,395
1989	40	2,825	551	891	112	976	5,355
1990	37	3,689	480	786	60	1,111	6,126
1991	43	3,517	470	553	27	1,238	5,805
1992	40	3,716	1,361	626	135	1,231	7,069
1993	38	2,139	784	571	8	743	4,245
1994	25	1,777	904	398	77	910	4,066
1995	22	1,318	448	425	0	703	2,894
1996	19	662	471	285	59	199	1,676
1997	31	1,440	667	380	0	260	2,747
1998	42	2,211	782	412	76	310	3,791
1999	76	3,780	1,244	479	84	217	5,804
2000	54	3,013	1,116	569	90	342	5,130
2001	92	4,162	1,612	367	61	388	6,590
2002	36	2,319	703	605	10	241	3,878
2003	92	4,403	1,208	483	451	883	7,428

⁶ 2020 and 2021 data are preliminary. The ADF&G Division of Subsistence and Togiak village conducted household surveys of the harvest of salmon for subsistence for 2016 and 2017 and issued subsistence salmon harvest permits to people who reported harvesting salmon, resulting in a higher distribution of permits than in other years (Jones et al. 2019).

Year ⁶	Permits Issued	Sockeye Harvest	Chinook Harvest	Coho Harvest	Chum Harvest	Pink Harvest	Total Harvest
2004	46	1,795	1,094	383	108	204	3,584
2005	45	2,299	1,528	301	26	295	4,448
2006	61	2,728	1,630	492	354	408	5,612
2007	48	2,548	1,234	420	19	110	4,332
2008	91	3,770	1,337	701	114	541	6,463
2009	40	2,220	827	365	5	272	3,689
2010	64	3,256	1,162	735	113	514	5,779
2011	68	3,462	966	497	42	545	5,512
2012	53	5,265	933	764	84	293	7,339
2013	64	3,695	691	375	33	208	5,002
2014	59	4,586	607	669	190	486	6,539
2015	48	2,387	876	312	23	650	4,249
2016	70	3,780	1,141	377	198	521	6,017
2017	70	5,163	959	544	131	545	7,341
2018	34	2,326	481	192	85	181	3,264
2019	28	1,779	599	143	26	98	2,645
2020	32	2,333	672	314	17	333	3,670
2021	34	3,159	114	72	20	585	3,949
5-yr average (2016-2020)	47	3,076	770	314	91	336	4,587
10-yr average (2011-2020)	53	3,478	792	419	83	386	5,158
Historical ave. (1985-2020)	49	2,949	888	526	88	565	5,013

Manokotak harvests salmon in drainages running to Nushagak Bay, especially from the Igushik River and along the shore of Nushagak Bay at the mouth of the Igushik River. For the village of Manokotak, preliminary information for 2021 estimates the village harvested 1,044 salmon for home use. This is below the 5-year (1,623 fish) and 10-year (1,674 fish) annual averages, and below the historical average since 1985 of 3,233 salmon (Jones and Neufeld 2022). Most of the harvest is Sockeye Salmon followed closely by Chinook Salmon and lesser amounts of Coho, Chum, and Pink salmon. Salmon contributes from one third to one half of wild resources harvested for subsistence in pounds edible weight based on periodic household harvest surveys. Most, over two thirds, are harvested with subsistence gillnets and lesser numbers are retained from commercial catches and harvested with rod and reel (Schichnes and Chythlook 1988, Coiley-Kenner et al. 2003, Holen et al. 2012).

Effects of the Proposal

If Proposal FP25-14 is adopted, federally qualified subsistence users will be able to use additional gear types of snagging (with a handline or rod and reel), cast net, spear, bow and arrow, and capturing by bare hand to methods and gear types for legally harvesting salmon for subsistence within and adjacent to the exterior boundaries of the Togiak National Wildlife Refuge within the Bristol Bay Area. These methods are considered less efficient than gillnets and do not pose any conservation concerns for salmon while at the same time increasing access to the fishery through allowance of additional gear types. No effects on the resource or nonsubsistence users is anticipated.

If Proposal FP25-14 is not adopted, federally qualified subsistence users will not be able to legally harvest salmon with these methods and gear types.

OSM PRELIMINARY CONCLUSION

Support Proposal FP25-14.

Justification

The methods and gear types of snagging (with a handline or rod and reel), cast net, spear, bow and arrow, or capturing by bare hand should be allowed in the Manokotak, Togiak, and Twin Hills areas to legally harvest salmon for subsistence. These methods and gear types are less efficient than gillnets currently allowed, and their use will have no effects on salmon conservation or nonsubsistence uses.

Currently, spears are a legal gear type on the Togiak River under both State and Federal regulations, and dip nets are a legal gear type under State regulations in the Igushik, Weary, and Snake rivers that run into Nushagak Bay and used by Manokotak residents. Adoption of this proposal will expand their legal use to the rest of the proposed area.

Before statehood, the U.S. Fish and Wildlife Service allowed residents of the Bristol Bay Area to use all traditional methods and gear types. After statehood, the State introduced new subsistence regulations allowing the use of only set gillnets, with some exceptions in regulation, to legally harvest salmon for subsistence uses, although traditional methods and gear types are still used and should be legal by supporting this proposal.

LITERATURE CITED

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