

RC submitted by Matt Marinkovich, author of Proposal 95.

**I have greatly condensed and clarified the explanatory section of Proposal 95** (see below). I realize the version I submitted was confusing and too long. This version more concisely explains the intent of the proposal. I would appreciate if this version were considered throughout the meeting process.

My suggested regulation modifications are unchanged, except for a clerical error I found in my proposed language, 06.37(b)(2), which I corrected.

Please read this more concise version of Proposal 95.

Sincerely,  
Matt Marinkovich

**PROPOSAL 95** *(condensed and clarified)*

**5 AAC 06.370. Registration and reregistration.**

Modify early season registration requirements, as follows:

Change 5 AAC 06.370 to read as follows:

(a) Before taking salmon in the Bristol Bay Area, a CFEC salmon drift gillnet permit holder shall register for a district described in 5 AAC 06.200. Before taking salmon in the Nushagak District, a CFEC salmon set gillnet permit holder shall register for a statistical area described in (l) of this section. A CFEC salmon drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. For the purposes of this section, a CFEC salmon drift gillnet permit holder and a drift gillnet vessel may be registered in only one district at a time and a CFEC salmon set gillnet permit holder in the Nushagak District may be registered in only one statistical area at a time. Initial district registration and statistical area registration is accomplished by completing a registration form provided by the department and returning the completed form to the department office in Dillingham or King Salmon or electronically on the department's website.

(b) Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district. Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration **or unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the

Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

06.37(b)(1): Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered, **or intending to unregister the permit**, shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district, **or before unregistration takes effect**.

**06.37(b)(2): Prior to 9:00 a.m. June 25, except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder may elect to unregister their permit, by which they are not transferring to a new district, nor shall they remain eligible to fish in their existing district; rather the transfer shall unregister their permit from fishing in any district. Effective after the 48-hour district transfer notification period, the permitholder may again register their drift permit as described in 06.37(a).**

06.37(b)(3): Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration/**unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

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

When a Bristol Bay drift permit holder renews their permit, it starts out as unregistered, and stays that way until it is registered to fish in a fishing district.

Once a Bristol Bay Drift permit holder registers their permit to fish in any district, they are not allowed to unregister their permit. This means their permit must remain registered in one of the fishing districts, or be waiting through a 48-hour transfer period, for the entire season, until ADFG waives the transfer period at the end of the season. There currently is no way for a permit holder to unregister their permit once it has been registered.

An unregistered permit is perceived as advantageous to many drift gillnet fishermen because they can wait until it is blatantly obvious (due to large fish volumes in a fishing district) as to where they may want to start their fishing season. For this reason many fishermen wait to register their permit until late in the season.

Starting late in the season, without a proper vessel "shakedown" or hands-on crew training, is unsafe for many reasons. Unfortunately, for the reason stated above, many fishermen make this their common practice.

This proposal offers a solution that will allow late-starting fishermen a chance to test-run their vessels in the early season, yet still maintain their perceived late-start advantage. This will lead to greater safety in the fishery.

**The situation as it currently exists:**

If a permit holder wants to immediately start fishing in a fishing district, they have to keep their permit unregistered until they choose to fish. Many fishermen wait until there are abundant fish in the district they choose to fish, before they register their permit. This often means the vessel and crew have a hurried and unprepared start to the season, which can lead to unsafe vessel operations, and under-trained (and unsafe) crew members.

**Situation if this proposal were enacted:**

A drift permit holder who registered their permit to fish in a Bristol Bay regulatory area (besides Togiak) may elect to unregister their permit, provided this choice is made prior to 9:00 a.m. June 25. If they choose to unregister their permit, they must stand down from fishing for a 48-hour period. After the 48-hour waiting period, their permit will again be unregistered. This unregistered permit can then be registered in any fishing district (besides Togiak) and the permit can start fishing immediately after registering.

This proposal allows fisherman time to field-test their boat and “break in” their crew before heavy fishing. It will reduce the risk of injury or catastrophic incident by allowing “first-opening problems” to be encountered and addressed in a stress-free state of mind, in good weather, and with no dramatic profit-driven variables in play.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee?** This proposal was developed in cooperation with ADFG biologists.

**PROPOSED BY:** Matt Marinkovich