

## **Oppose Proposal 135**

**RC45**

**Tony Parra, Box Elder SD, CAMF Member and Area M Fisherman**

- **Bachelor of Science, Fisheries Biology, Humboldt State University, 1994. Cum Laude, 3.52 GPA.**
- **Population and Mixed-Stock Fishery Geneticist, Washington Dept. Fish & Wildlife, 1994-1997.**
- **Marine Fish Biologist/Research Diver, W.D.F.W., 1997-2011.**
- **Graduate Coursework, Biostatistics, University of Washington, 2002-2003.**
- **Principal Investigator, Biological Impacts and Mitigation of The Second Tacoma Narrows Bridge Project.**
- **ESA Aquatic species evaluation, study design, and reporting, U.S. Bureau of Reclamation and U.S. Fish & Wildlife Service.**

**Andrei Snegeriv, Homer AK, CAMF Member and Area M Fisherman**

- **Area M fisherman since 2011: 4 years as deckhand, 4 years as owner/operator**
- **I'm a year-round, career commercial fisherman.**
- **I am finding it increasingly difficult to provide for my family under the increasing, often unnecessary, re**

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Proposal 135 Claims that there is “Excessive harvest of discrete migrating Arctic/Yukon/Kuskokwim (AYK) chinook, sockeye, and chum stocks of concern in the South Unimak and Shumagin Islands fishery.”

*Nothing could be farther from the truth*

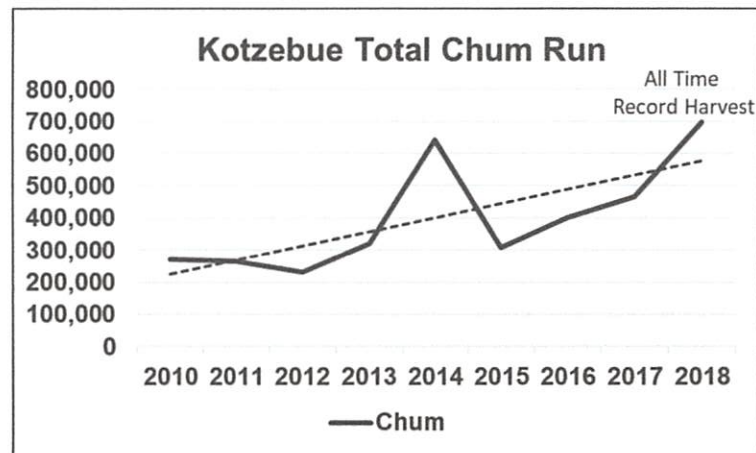
- ▶ The Stocks of concern in AYK are Yukon and Norton Sound chinook, as well as Norton Sound chum.
- ▶ According to NOAA technical reports, AYK chinook absent/rare in the South Unimak/Shumagin Islands area (Guthrie et al., 2016; Guyon et al., 2015), and the ADFG website itself states Yukon Chinook do not emigrate from the Bering Sea ([https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative\\_yukon.main](https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative_yukon.main) ).
- ▶ In addition, ADFG biologists recommend removing Norton Sound chum from list of stocks of concern (Menard & Leon, 2019).
- ▶ Virtually all other salmon stocks throughout the AYK region have experienced growing (And often, record) runs during the last 7 years.

By Area:

Arctic

- ▶ Subsistence fisheries have harvested small numbers of chum and chinook, and the first recorded occurrence of sockeye was made in 2012.

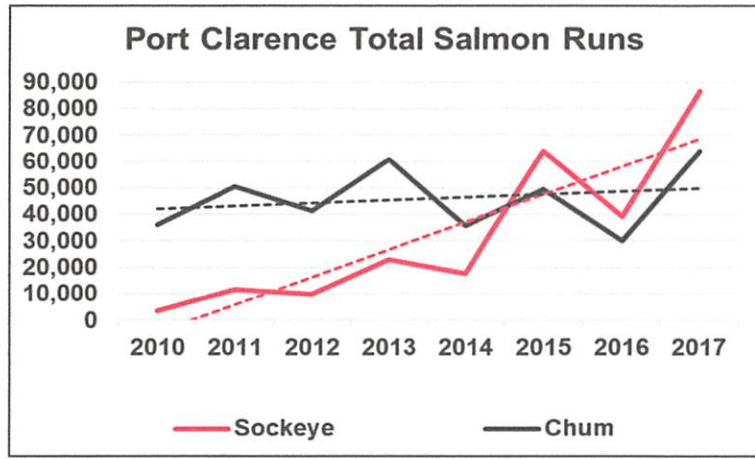
Kotzebue Area



- ▶ The only monitored fishery is chum, which had an all-time record harvest in 2018.
- ▶ Only eight years of harvest >400,000 have occurred in history, 4 of those in the last 5 years.

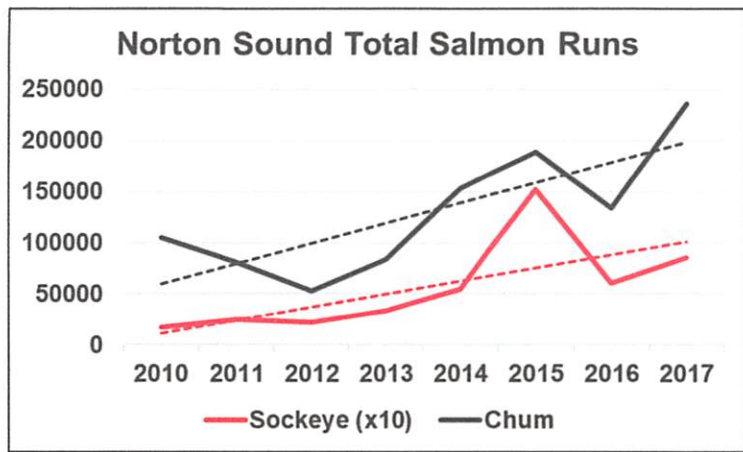
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### Port Clarence Area



- ▶ The 2017 sockeye salmon harvest was the highest on record.
- ▶ 2017 Pilgrim River chum escapement was highest ever.

### Norton Sound

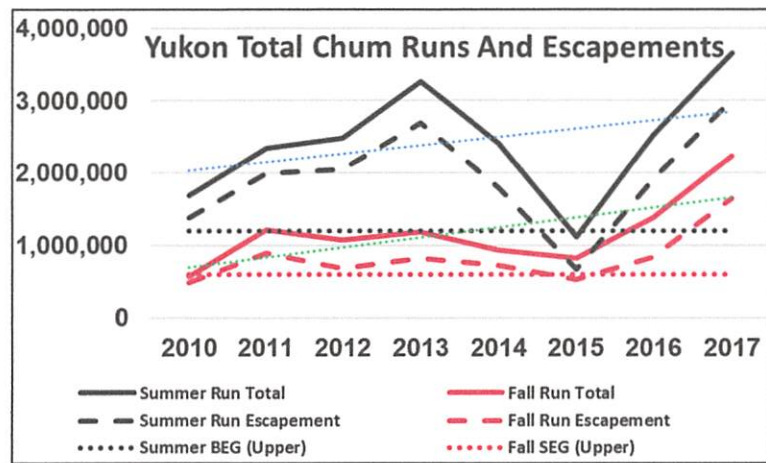


- ▶ Above average to near-record runs of chum and sockeye in 2017 and 2018.
- ▶ Chum and sockeye have exceeded OEG 4/5 years.
- ▶ And ADFG biologists recommend delisting Norton Sound chum from stocks of concern.

*Tony Parra & Andrei Snegeriv, CAMF members*

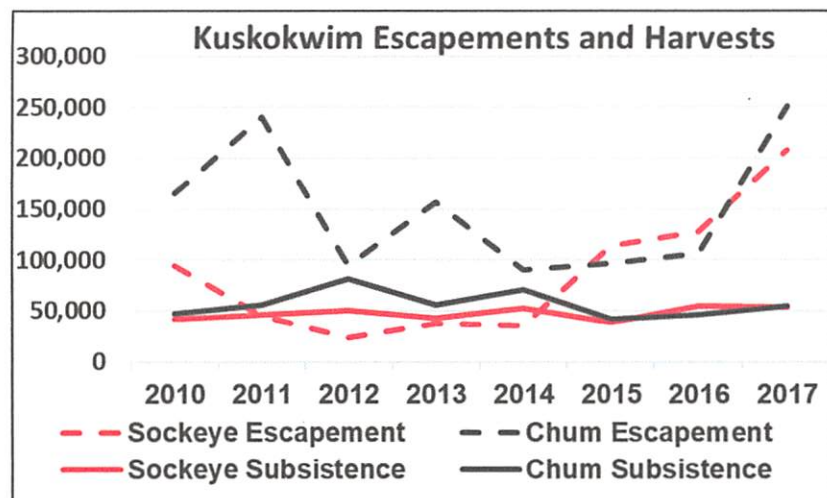
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## Yukon



- ▶ 2017 was a 20-year record run & harvest of both summer and fall chum.
- ▶ Escapement goals for both chum runs were exceeded in 7 of the last 8 years.

## Kuskokwim



- ▶ Record escapements for chum and sockeye in 2017.
- ▶ Subsistence harvests of chum and sockeye are stable.

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### Proposal 135 is in direct contrast to the facts:

- ▶ AYK chinook are absent/rare in South Unimak/Shumagin Islands (SUSI) June fishery (Guthrie et al., 2016; Guyon et al., 2015; <http://www.adfg.alaska.gov>).
- ▶ Chum harvest rate = 3-7% combined AYK stocks, and impact of the June SUSI fishery is: "So minimal, if detectable at all, as to be insignificant." (BOF, 2004). (WASSIP 12-25, 2012).
- ▶ Sockeye harvest rate = 0.3-3% combined AYK stocks (WASSIP 12-24, 2012). Impact of the June SUSI fishery on AYK sockeye is statistically undetectable (SUSI harvest < 95% C.I. for total run estimate).
- ▶ Watersheds throughout AYK are experiencing increasing, and often, record runs of chum and sockeye.
- ▶ These watershed trends indicate under-escapement of tributary stocks within these watersheds needs to be addressed at the local level (i.e. habitat, harvest).

Proposal 135 is an arbitrary and capricious attempt to curtail the SUSI June fishery, would result in no measurable benefits to Stocks of Concern, and harm the economies in communities of Alaska. Thank you for this opportunity to address this proposal to the Board of Fisheries.

### References

Guthrie, C. M. III, H. T. Nguyen, and J. R. Guyon. 2016. Genetic stock composition analysis of the Chinook salmon bycatch samples from the 2014 Gulf of Alaska trawl fisheries. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-311, 31 p. <http://dx.doi.org/10.7289/V5/TM-AFSC-311>.

Guyon, J. R., C. M. Guthrie III, A.R. Munro, J. Jasper, and W.D. Templin. 2015. Genetic stock composition analysis of the Chinook salmon bycatch in the Gulf of Alaska walleye pollock (*Gadus chalcogrammus*) trawl fisheries. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-291, 26 p. Document available: <http://www.afsc.noaa.gov/Publications/AFSC-TM/NOAA-TM-AFSC-291.pdf>

Habicht, C., A. R. Munro, T. H. Dann, D. M. Eggers, W. D. Templin, M. J. Witteveen, T. T. Baker, K. G. Howard, J. R. Jasper, S. D. Rogers Olive, H. L. Liller, E. L. Chenoweth and E. C. Volk. 2012. *Harvest and Harvest Rates of Sockeye Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2006-2008*. Alaska Department of Fish and Game, Special Publication No. 12-24, Anchorage.

[https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative\\_yukon.main](https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative_yukon.main)

Munro, A. R., C. Habicht, T. H. Dann, D. M. Eggers, W. D. Templin, M. J. Witteveen, T. T. Baker, K. G. Howard, J. R. Jasper, S. D. Rogers Olive, H. L. Liller, E. L. Chenoweth, and E. C. Volk. 2012. *Harvest and harvest rates of chum salmon stocks in fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2007-2009*. Alaska Department of Fish and Game, Special Publication No. 12-25, Anchorage.

Norton Sound Chum and King Salmon Stock Status and Fishery Overview. A Report to the Alaska Board of Fisheries, January, 2019 Presented by Jim Menard and Justin Leon RC 3: Written Reports, tabs 2 and 3 RC 3: Oral Reports, tab 15A 1.

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