





management tools, such as ensuring escapement goals are met in the Western Alaska Waters, ensure the most accurate data is used in decision making, for the preservation of the salmon run and sustainable for everyone involved.

While Kawerak, Inc. realizes that there are multiple factors contributing to the collapse of western Alaska chum salmon returns, one known chronic cause is the adoption of regulatory measures that favor commercial harvest and denying subsistence harvesters their opportunity, guaranteed in A.S. 16.05.258. The continued practice of fishing a fishery to the point of collapse should and must be stopped for everyone concerned.

Arguments for continued fisheries activities have been made that Commercial Fisherman will lose their livelihood and be forced to stop fishing if further regulation is necessary. We believe further regulation can be successfully implemented without shutting down the Area M fishery. Subsistence salmon harvesters in the BS/NS region are already facing a salmon crash, losing their personal well being, livelihood, our culture, our way of life. We are not being asked to give up any of this, we are being told to give up everything. We have had closures of our subsistence fishing as a last resort for 30 years. Escapement goals aside, and subsistence priorities not withstanding the goal of a management body should be to preserve the species being harvested. The studies and scientific data show that salmon bound for western Alaska have been intercepted by this fishery and in turn have caused diminished returns to western Alaska rivers as evidenced by Seward Peninsula river drainages, eastern Norton Sound river drainages, Yukon and Kuskokwim Rivers crashing and their commercial harvest stopped for the past couple years.

The result of nonaction by ADF&G and AK Board of Fish may in fact be that the salmon population in western Alaska rivers will reach a point that they become extinct in those waterways; and the most tragic thing is that this is completely avoidable thru regulatory measures.

Again, Kawerak, Inc. in not asking for a Area M fisheries closure but rather that management measures be more comprehensive as mentioned in the above to ensure future escapement goals and population numbers are sustainable or more importantly sustained for western Alaska salmon stocks.

For any questions please reach out to Kawerak, Inc. Subsistence Resources Program Director Charles Menadelook at [cbmenadelook@kawerak.org](mailto:cbmenadelook@kawerak.org) or 907-443-4265

Melanie Bahnke

*Mary David acting for Melanie Bahnke*

Kawerak, Inc. President

**KAWERAK, INC.**

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • [www.kawerak.org](http://www.kawerak.org)

Advancing the capacity of our people and tribes for the benefit of the region.