

February 13, 2023

Marit Carlson-Van Dort, Chair

Alaska Board of Fisheries

P.O. Box 115526

1255 W. 8th St.

Juneau, Alaska 99811-5526

Dear Madam Chair;

My name is Timothy Andrew, I am a former commercial fisherman of the now non-existent commercial salmon fishery of the Lower Yukon. I am also the former Director of Natural Resources for the Association of Village Council Presidents and have testified many times before the Board of Fisheries. We once had a thriving fishery providing for the many uses all along the entire reach of the Yukon River from the headwaters in the Yukon Territory to the coastal waters of the Yukon River. All of which, in the most recent years, have become severely extirpated due to many factors including interception, over fishing, errors in scientific data collection and interpretation, etc.

Alaska is in a unique situation, unlike many of its sister states of the Lower 48. Alaska has its interest in the wild and natural resources embodied and forever etched in its constitution. It reads as follows:

"Article 8. - Natural Resources. Section 4. Fish, forests, wildlife, grasslands, and all other replenishable resources belong to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to the preferences among preferential uses.." (Source: ADF&G Website Accessed 02/10/2023)

The State of Alaska, its Administrative Body, Legislative Body, its subsidiary boards and commission have the constitutional, statutory, moral and ethical obligation to provide for sustained yield management of all resources, including fisheries. In my personal opinion, that obligation has been breached in all levels due to various interests within the state and outside the state. This led to the near extinction and extirpation of the Yukon River, Kuskokwim River, Norton Sound and Unalakleet River salmon resources.

For several years, the Yukon River subsistence and commercial fishery have been non-existent and is now endemic to the Kuskokwim River by the severely limited and diminished return of the chinook and chum salmon. This led the managing authorities to further restrict the subsistence fishing to inhumane levels given the importance of the subsistence fisheries in our region. We, as citizens, users, and

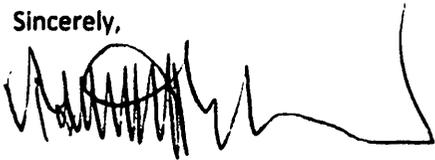
managers have an obligation to conserve/preserve these precious runs for us and future generation. It requires us to not only limit or eliminate human caused mortality, but requires us to utilize all scientific means and methods to determine at-sea and natal stream/waterway mortality. We've sacrificed for more than forty years on both rivers in our attempt to contribute our duty of conservation that yielded absolutely nothing but continued declines and more harvest restrictions. We've genetically identified all sources of both chinook and chum from all parts of the Pacific bowl and the Bering Sea. We **MUST IDENTIFY AND DELIGENTLY SEARCH FOR ALL SOURCES OF MORTALITY** and minimize/eliminate all human caused mortality, including the South Peninsula commercial fisheries. On page 33 of the 2022 South Peninsula Annual Management Report (attached), the historical high harvest of chinook salmon occurred in 2015 with 53,236 chinook salmon. During the subsequent years following, until 2022, shows a low harvest of 11,275 in 2017 and a high of 22,755 in 2019. These recent year numbers are exceeding the historical harvests of previous years tremendously. Recently, I asked an ADF&G Area Biologist if there was any genetic analysis conducted in the chinook salmon caught in the South Peninsula Commercial Fishery? His unfortunate response was, "No!"

In my own opinion, I believe the Alaska Department of Fish & Game is in severe dereliction of their duty to provide for sustained yield by intentionally not analyzing genetic information from areas of known interception, specifically the South Peninsula fisheries. With the current state of the Yukon and Kuskokwim River salmon fisheries, it is of utmost importance and priority to identify all sources of mortality and quickly and efficiently eliminate them to protect the Yukon and Kuskokwim River chinook salmon under the sustained yield principle of Alaska's constitution.

I SUPPORT:

- **Increased fishing opportunity for setnetters.** They are the cleanest gear type that minimally harvest chums and kings,
- **Decrease fishing opportunities for drift netters and seiners.** The two gear types harvest large amounts of kings and chums.
- **Genetic analysis of all kings caught in the fishery.**

Sincerely,



Timothy Andrew,

Subsistence Fisherman, Kuskokwim

Attachment: Appendix A10, 2022 South Peninsula AMR

Appendix A10.—Page 3 of 3.

Year ^{a,b}	Permits	Landings	Chinook	Sockeye	Coho	Pink	Chum	Total
1997	307	5,803	7,780	2,281,566	116,136	2,321,371	627,996	5,354,849
1998	311	8,014	4,919	2,183,776	154,194	8,047,998	721,068	11,111,955
1999	310	7,021	5,074	2,991,819	192,503	8,456,449	840,030	12,485,875
2000	311	7,110	5,445	2,006,487	257,245	3,562,866	1,066,653	6,898,696
2001	242	3,277	2,620	614,080	214,252	4,021,381	933,014	5,785,347
2002	199	3,883	6,428	1,036,722	202,728	2,170,809	820,257	4,236,944
2003	195	3,909	2,874	1,055,218	132,374	4,262,920	639,772	6,093,158
2004	204	4,670	7,123	2,206,683	236,144	6,681,447	794,660	9,926,057
2005	209	4,948	4,554	2,338,294	145,754	9,423,314	741,600	12,653,516
2006	204	4,921	5,433	1,851,240	170,060	4,264,078	1,185,661	7,476,472
2007	205	5,301	5,324	2,450,061	151,736	7,306,366	681,087	10,594,574
2008	231	5,551	4,378	2,249,144	227,550	12,723,983	814,123	16,019,178
2009	239	5,823	5,875	1,725,616	248,941	7,921,119	1,684,944	11,586,495
2010	247	4,266	7,863	1,284,882	164,824	837,985	792,369	3,087,923
2011	250	5,614	7,214	1,919,235	153,482	5,004,314	979,187	8,063,432
2012	249	5,330	7,697	2,017,684	91,934	491,281	623,967	3,232,563
2013	249	6,845	6,705	2,242,305	294,867	7,800,873	952,160	11,296,910
2014	242	4,402	7,353	1,429,333	297,776	722,186	505,197	2,961,845
2015	245	6,097	53,236	3,208,991	271,570	16,711,506	680,167	20,925,470
2016	236	4,496	15,275	2,491,351	190,896	2,894,412	429,703	6,021,637
2017	241	5,931	11,278	3,222,952	350,447	21,864,700	1,960,576	27,409,953
2018	249	3,173	17,027	1,330,913	259,633	762,817	998,585	3,368,975
2019	258	5,095	22,755	1,625,532	521,559	20,526,804	1,168,952	23,865,602
2020	245	3,135	21,501	1,069,943	183,139	5,051,480	915,147	7,241,210
2021	247	4,132	13,898	4,601,985	331,944	16,561,273	2,256,363	23,765,463
2022	245	3,792	14,505	4,387,007	46,619	5,864,792	822,314	11,135,237
Averages								
1920-1949 ^c	—	—	9,860	1,417,517	123,910	3,679,217	1,301,020	6,531,523
1950-1981 ^c	240	3,286	2,815	745,955	49,022	2,085,724	766,219	3,649,734
1982-2001	327	6,165	9,545	2,237,965	264,410	6,622,540	1,355,200	10,489,660
2002-2011	218	4,889	5,707	1,811,710	183,359	6,059,634	913,366	8,973,775
2012-2021	246	4,864	17,673	2,324,099	279,377	9,338,733	1,049,082	13,008,963

Note: Permit and landing numbers are only available from 1970 through present.

^a From 1928 to 1950, commercial salmon catches in the Aleutian Islands and the South Peninsula were combined. Aleutian Islands catches are generally much smaller than South Peninsula harvests. South Peninsula harvests were generally dominated by pink salmon. The 1978-1999 Aleutian Islands average salmon harvest was 510,317 fish, whereas the 1978-1999 average harvest for the South Peninsula was 10,671,164 salmon.

^b Since 1989, salmon numbers include test fish harvests.

^c These historical averages are intended to illustrate how salmon productivity has fluctuated in the South Peninsula.