PROPOSAL 127

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear, as follows:

Alaska Administrative Code Number: 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan as amended by the Alaska Board of Fisheries adoption of RC 190 on February 26, 2023.

Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time for the seine and drift gillnet sectors as follows:

Increase the amount of time for chum salmon to migrate through the South Unimak and Shumigan Islands June fishery in order to reduce chum salmon interceptions while harvesting sockeye salmon by establishing a minimum of a 10-day consecutive closure between June 10th and June 23rd for the seine and drift gillnet fleets.

What is the issue you would like the board to address and why? The Alaska Peninsula / Shumigan Islands (Area M) is managed by a 3-year Alaska Board of Fisheries (BOF) cycle instead of an in-season escapement management as almost all other Alaska salmon fisheries are regulated.

In February of 2023, the Alaska Board of Fisheries adopted a South Unimak and Shumigan Islands Management Plan that may have encouraged under-reporting of harvest of Coastal Western Alaska (CWAK) chum, while the chum stocks that the Plan intended to protect clearly remain in increasingly critical condition across Western.

Coastal Western Alaska (CWAK) chum and king salmon have been in severe decline to the point of extirpation in some discrete stocks. That situation only worsened in the 2023 and 2024 AYK salmon seasons. This includes the Yukon River, Kuskokwim River, Unalakleet River and the Nushagak River. The predominant AYK chum producing rivers are the Yukon and the Kuskokwim. The relationships between the intercept of chum in Area M and the declines of CWAK chum has never been adequately established to understand the social and ecological impacts of Area M fisheries on AYK salmon and subsistence communities. But in times of severe concern over the sustainability of AYK stocks, it is not a matter of every fish counting but every egg counting for fecundity on the spawning grounds.

The Alaska Sustainable Salmon Policy (SSP/ 5AAC 39.222) requires that "the burden of conservation" of a depleted species be shared. In 2022, Bering Sea Fishermen's Association, along with several tribal consortiums, wrote a letter to the Alaska Department of Fish and Game noting "If ADF&G does not limit June commercial harvest opportunities within Area M, the ensuing unmitigated interception of AYK-bound chum all but assures the destruction of AYK Region economies and traditional subsistence lifestyles, and places the entire burden of conservation on the shoulders of AYK Region subsistence users. The survival of our communities depends upon ADF&G's intervention." Even more significant, it could mean the extirpation of some chum stocks entirely.

Any closure intended to protect migrating non-target species must be long enough for a significant number of fish to completely transit the South Peninsula fishing districts. Further, for a closure to permit a substantial number of fish to transit the entire fishing area, it should be at least 10 days long and focused on the peak of the chum migration.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. Tanana Chiefs Conference, several advisory committees.

PROPOSED BY: Orutsararmiut Native Council	(EF-F26-143)
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