

PROPOSAL 129

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to reduce commercial salmon fishing time as follows:

Draft Language:

A later start date for Commercial Fishing in the June Fishery would enable More Salmon bound for the AYK coastline and rivers to move thru the Area M fishery. 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

(a) The South Unimak and Shumagin Islands June fisheries harvest both sockeye salmon and chum salmon in a mixed stock fishery during the month of June. The sockeye salmon are predominantly Bristol Bay and Alaska Peninsula origin. The chum salmon are bound for a number of areas, including Japan, Russia, the Arctic-Yukon-Kuskokwim, Bristol Bay, the Alaska Peninsula, and southcentral Alaska. These salmon stocks have historically been harvested along the south Alaska Peninsula during the month of June. This management plan is intended to be consistent with the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) and the Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220).

(b) The South Unimak fishery takes place in the Unimak District, the Southwestern District, the East Pavlof Bay and the West Pavlof Bay Sections of the South Central District, and the Bechevin Bay Section of the Northwestern District.

(c) The Shumagin Islands fishery takes place in the Shumagin Islands Section.

(d) In the South Unimak and Shumagin Islands fisheries, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(A) beginning **June 16**, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning **June 20**, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on **June 28**;

(2) for seine gear, beginning **June 20**, the first commercial fishing period will begin at 5:59 a.m., then close after 68 hours at 1:59 a.m.; the second commercial fishing period will begin 76 hour later at 5:59 a.m., then close after 66 hours at 11:59 p.m.; the third commercial fishing period will begin 32 hours later at 7:59 a.m., then close after 88 hours at 11:59 p.m.; the final commercial fishing period in June will begin 32 hours later at 7:59 a.m. then close after 88 hours at 11:59 p.m.;

(3) for drift gillnet gear, beginning **June 20**, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later; the final commercial fishing period will end at 10:00 p.m. on June 28.

(e) All salmon caught by a CFEC permit holder must be retained, and each CFEC permit holder must report the number of salmon caught, including those taken but not sold, on an ADF&G fish ticket. For the purposes of this subsection, "caught" means brought on board the vessel.

(h) If chum salmon harvest equals or exceeds 300,000 fish by **June 23**, based on fish ticket information, the commissioner shall reduce commercial fishing time in the South Unimak and Shumagin Islands June fisheries by 44 hours during each of the remaining fishing periods in June for purse seine gear. If chum salmon harvest equals or exceeds 450,000 fish by **June 23**, based on fish ticket information, the commissioner shall close commercial salmon fishing in the South Unimak and Shumagin Islands June fisheries for the remainder of June for purse seine gear.

What is the issue you would like the board to address and why? Reduce Excessive harvest of returning Chum Salmon stocks to the Norton Sound Bering Straits Region.

From 2018 to 2023 the Norton Sound Region (State Fish Weir Counts, State of Alaska Department of Fish and Game Website) saw a 80% Average decline in Chum Salmon Escapement in each of the 14 River systems that are counted by the State of Alaska in the Norton Sound Bering Strait Area. This includes one River system which experienced a 97% decline in that same period. While Area M may not be the only contributing factor in this unprecedented decline it has to be acknowledged that the fishery does play a significant role in those numbers dropping. This proposal only addresses the needs of the Norton Sound Bering Straits Region and it does not include the unprecedented drops in the Yukon Kuskokwim River Systems but those numbers are no less staggering.

In a very recent Board of Fish meeting, it was stated by several testifying individuals that “Chum Chucking” does not occur in the Area M fishery. This was also stated by a Board of Fish member as fact. In 2023 the Alaska State Troopers gave out 21 citations to the Area M Fishermen and 9 of those citations were for “Chum Chucking”. This practice is to skirt the regulation requiring the fisherman to keep on board all incidental salmon caught in the pursuit of their target species. And by regulation if the amount of incidental take exceeds the amount allocated for the fishery, then the fishery must be closed by emergency order. The real problem with “Chum Chucking” is that the number of salmon thrown overboard is unknown and chum thrown overboard are not observable to be alive or dead. The amount of chum thrown overboard is uncounted and unregulated and there could be 100,000 salmon that should be counted in the incidental limit let alone their lack of population be counted towards escapement goals for their home river systems. This illegal activity is reprehensible and should be met with consequences.

This amendment proposed would alleviate most of the need for “Chum Chucking” as it would prevent most of the intercept of Chum Salmon by Area M Fishermen. A June 20 start date would enable chum destined for Western Alaska Rivers the time they need to move thru the Area M Fisheries.

Recent scientific studies conducted by Western Alaska Sustainable Salmon Initiative Program (WASSIP) have shown that intercepted fish bound for Western Alaska are being taken out of their traditional routes to their home river systems.

The continued process for managing a resource without taking into account, all variables, such as their home river system escapement goals, and ensuring that these numbers are being met to sustain the population of those waterways is reckless and irresponsible. We are not arguing that we own all the fish, nor do we want the harvest of them stopped, but that these practices be practical and comprehensive thru utilizing all 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.

According to state statute 16.05.258 subsistence use and allocation. The board may identify manage and regulate a subsistence or commercial fishery. "(c) The boards shall adopt subsistence fishing and subsistence hunting regulations for each stock and population for which a harvestable portion is determined to exist under (b)(1) of this section. If the harvestable portion is not sufficient to accommodate all consumptive uses of the stock or population, but is sufficient to accommodate subsistence uses of the stock or population, then non-wasteful subsistence uses shall be accorded a preference over other consumptive uses, and the regulations shall provide a reasonable opportunity to satisfy the subsistence uses. If the harvestable portion is sufficient to accommodate the subsistence uses of the stock or population, then the boards may provide for other consumptive uses of the remainder of the harvestable sustained yield or continue subsistence uses, then the preference shall be limited, and the boards shall distinguish between subsistence users, by applying the following criteria:

And in accordance with 5 AAC 99.010 Subsistence use and allocation of fish and game. (c) When circumstances such as increased numbers of users, weather, predation, or loss of habitat may jeopardize the sustained yield of a fish stock or game population, each board will exercise all practical options for restricting non-subsistence harvest of the stock or population and may address other limiting factors before subsistence uses are restricted below the level the board has determined to provide a reasonable opportunity. If all available restrictions for nonsubsistence harvests have been implemented and further restrictions are needed, the board will eliminate non-subsistence consumptive uses, and reduce the take for subsistence uses in a series of graduated steps. While Kawerak, Inc. realizes that there are numerous causes of the collapse of western Alaska chum salmon returns. One chronic cause is the adopting of regulatory measures that favor commercial harvest and denying subsistence harvesters their opportunity through AS 16.05.258.

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. While Kawerak, Inc. sympathizes, people in the Bering Straits/Norton Sound Region have had closures of their subsistence fishing as a last resort that lasted nearly 30 years. The Bering Straits/Norton Sound Region has also been the only region in the State of Alaska's history to go to a Teir II Fishery.

This proposal is to conserve the Chum Salmon in our rivers and to preserve the Subsistence Culture and traditions of the Subsistence Users and ultimately their health and wellbeing. There also cannot be any argument that the Chum Salmon destined for the AYK regions and river systems are separate from the fish going thru Area M. This argument has been settled and it is a fact that chum salmon are intercepted in the Area M fishery that are destined for the Arctic Yukon & Kuskokwim Regions.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. N/A

PROPOSED BY: Kawerak, Inc.

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