

PROPOSAL 131

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 and area for purse seine and drift gillnet gear, as follows:

AMEND 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management as follows:

In order to allow a significant fraction of western Alaska chum salmon to migrate through the South Unimak and Shumagin Islands, June drift gillnet and purse seine fisheries will be closed in the South Alaska Peninsula fishing areas during June 12-23, inclusive. This closure will eliminate the requirement for accurate interception numbers to exercise fishery closures associated with interception caps, would reduce resources needed to enforce fishery closures, and will likely have distinct and substantial positive effects on other depressed species and stocks that are intercepted in the June fisheries. Set gillnet fisheries could be managed as they are in the current Plan.

What is the issue you would like the board to address and why? The Alaska Peninsula / Shumagin Islands (Area M) is managed by a 3-year Alaska Board of Fisheries (BOF) cycle instead of 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 Shumagin Islands Management Plan that likely encouraged under-reporting of harvest of chum salmon bound for western Alaska rivers. The chum salmon stocks that the Plan intended to protect clearly remain in increasingly critical condition across western Alaska and the AYK (Arctic-Yukon-Kuskokwim) region into 2025. Commercial and subsistence fisheries have been severely restricted or closed, and most escapements to tributaries throughout the region have been distinctly below escapement goals. Some stocks are increasingly at risk of extinction. Current interceptions of western Alaska chum salmon in South Alaska Peninsula fisheries targeting super-abundant Bristol Bay sockeye salmon are adding a substantial source of mortality on these stocks that is likely preventing recovery to levels that would support commercial harvest or even subsistence harvest in western Alaska rivers. The current Plan also depends critically on accurate reporting of chum salmon interceptions in South Alaska Peninsula fisheries so that the fisheries can be closed by emergency order if interception 'caps' are exceeded. The high number of citations issued in the June fishery in 2023 for discarding of non-target species (i.e., chum salmon) highlights the perverse incentives to under-report interceptions and, therefore, make the current plan ineffective at protecting critically depressed chum salmon stocks.

South Alaska Peninsula fisheries within the Area M management area span over 350 km (~220 miles) from the Shumagin Islands in the east to the south Unimak fishing district in the west. Salmon harvested in this fishing area exhibit a directed migration pathway that brings fish into the fishing district in the Shumagins and carries them westward through the fishing management area before they head north through Unimak Pass and False Pass and into coastal waters of the North Peninsula and the Bering Sea. Time closures of seine and drift gillnet fisheries have been proposed as a way to allow safe passage of depressed chum stocks through the South Peninsula fisheries en route to spawning grounds in western Alaska rivers. However, for time closures to be effective, they must be long enough to allow fish to enter the fishing areas and successfully pass through the western boundary. Estimates from tagging studies performed by ADF&G suggest

that the average travel time for a single fish is at least 5 days (Eggers 1989ⁱ), which means that closures must be substantially longer than this to allow biologically significant numbers of chum salmon to successfully transit the fishing areas. Three years of the WASSIP studiesⁱⁱ show that for 2007-2009, the peak of the western Alaska chum salmon migration through the South Peninsula fishing areas occurred around June 18, with a well-defined peak in abundance at this time.

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.”ⁱⁱⁱ Even more significant, it could mean the extirpation of some chum stocks entirely.

Thus, the Bering Sea Fishermen’s Association (BSFA) proposes the following schedule of closures to protect non-targeted salmon migrating through the South Peninsula June fisheries. We propose to close commercial fishing by seiners and drift gillnetters for 12 days from June 12 to June 23, inclusive. This extended closure would allow non-targeted species to completely transit the entire fishing area at a time coinciding with peak western Alaska chum migration through this fishing area. While this closure would primarily benefit western Alaska chum salmon, it is very likely to also greatly reduce interceptions of imperiled Chinook salmon stocks returning to rivers across a broader geographic area, and sockeye salmon stocks currently of conservation concern (e.g., the early run at Chignik).

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed following BSFA’s board priority to support management decisions to improve the chances for wild salmon stock migration to rebuild and restore abundance for Western Alaska communities. BSFA is guided by prevailing concerns and solutions discussed at AYK fish meetings and numerous federal and regional forums including AYK Advisory Committees, RACs, NPFMC, Gravel to Gravel, bycatch task forces, etc., brought by subsistence and commercial fisher users, biologists and policy advocates.

PROPOSED BY: Bering Sea Fishermen’s Association (BSFA) (EF-F26-122)
