

## **PROPOSAL 132**

### **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 for purse 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 11 days of intermittent closures for both seine and drift gillnet sectors in the middle of the June fishery. This would eliminate triggers.

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

Increase the amount of time for a significant fraction of chum salmon to migrate through the South Unimak and Shumigan Islands June fishery in order to reduce chum bycatch while harvesting sockeye salmon by adopting a more restrictive fishing schedule for all gear types. Because set gillnet gear takes only about 10% of the entire harvest<sup>iii</sup>, it should have the highest fishing opportunity. As noted in a 1987 ADF&G report<sup>iv</sup>, the minimum number of days for a chum salmon to transverse north of Shumigans to southwest Unimak is 4.5 days.

#### **23 DAYS : June 6-28**

| GEAR TYPE       | OPEN/CLOSE | DATE            | TIME       | SETNET     | DRIFT | SEINE | CLOSED     |
|-----------------|------------|-----------------|------------|------------|-------|-------|------------|
| SET NET ONLY    | OPEN       | June 6-June 8   | 6am - 10pm | 64         | 0     | 0     |            |
| SET NET ONLY    | CLOSED     | June 8-June 10  | 10pm-6am   | 0          | 0     | 0     | 30         |
| SET & DRIFT     | OPEN       | June 10-June 13 | 6am - 10pm | 88         | 88    | 0     |            |
| ALL GEAR        | CLOSED     | June 13-June 15 | 2am-6am    | 0          | 0     | 0     | 52         |
| SET & DRIFT     | OPEN       | June 15-June 18 | 6am - 10pm | 88         |       |       |            |
| ALL GEAR        | CLOSED     | June 19-June 20 | 12am-6am   | 0          | 0     | 0     | 30         |
| SET NET ONLY    | OPEN       | June 20-June 24 | 6am - 10pm | 88         | 0     | 0     |            |
| ALL GEAR        | CLOSED     | June 24-June 26 | 10pm-6am   | 0          | 0     | 0     | 32         |
| SET NET ONLY    | OPEN       | June 26-June 28 | 6am - 10pm | 64         |       |       |            |
| <b>TOTALS</b>   |            |                 |            | <b>392</b> |       |       | <b>144</b> |
| SEINE AND DRIFT | CLOSED     | June 6- June 10 | 6am - 10pm |            | 0     | 0     | 64         |
| SET & DRIFT     | OPEN       | June 10-June 13 | 6am - 10pm |            | 88    | 0     |            |
| SEINE           | OPEN       | June 10-June 13 | 6am-2am    |            |       | 68    |            |
| ALL GEAR        | CLOSED     | June 13-June 15 | 2am-6am    | 0          | 0     | 0     | 52         |

|               |               |                 |             |            |            |            |
|---------------|---------------|-----------------|-------------|------------|------------|------------|
| SET & DRIFT   | OPEN          | June 15-June 18 | 6am - 10pm  | 88         |            |            |
| SEINE         | OPEN          | June 16-June 18 | 6am-11:59pm |            | 66         |            |
| DRIFT & SEINE | CLOSED        | June 19-June 23 | 12am-8am    | 0          | 0          | 128        |
| SEINE & DRIFT | OPEN          | June 24-June 28 | 8am-11:59pm | 64         | 64         |            |
| ALL GEAR      | CLOSED        | June 24-June 26 | 10pm-6am    | 0          | 0          | 32         |
| SEINE & DRIFT | OPEN          | June 26-June 28 | 8am-11:59pm | 64         | 64         |            |
|               | <b>TOTALS</b> | <b>TOTALS</b>   |             | <b>304</b> | <b>262</b> | <b>276</b> |

Extended closure mid-season would substitute for elimination of harvest triggers and give chum sufficient passage time in this historically high chum harvest time. A long closure also takes pressure off Alaska Wildlife Troopers monitoring time.

**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 Alaska and the AYK (Arctic-Yukon-Kuskokwim) region into 2025. Several hundred AYK residents attended that meeting to express the substantiated concern that a percentage of Area M June fishery harvest for chum salmon were bound for AYK rivers that have had no escapement goals or ANS (Amounts Necessary for Subsistence) met for summer and fall chum. The Board determination resulted in only a 14% decrease in the June fishery harvest time.

In the latter part of 2023, the Fairbanks Fish and Game Advisory Committee (FAC) submitted an Agenda Change Request (ACR) for Board consideration to address the unforeseen consequences of setting harvest caps on non-targeted species that could trigger closures as well as the voluntary management between processors and seiners that may have encouraged under-reporting of non-retention of non-targeted species. These consequences were evident in the 2023 Area M June fishery where increased Alaska Wildlife Trooper presence within the June fishery revealed a high level of non-retention of non-targeted salmon, raising speculation on the level of under-reporting of harvest and the lack of observation on all sectors.

Area M is a vast region encompassing the waters south of the Alaska Peninsula and including the Shumagin Islands, spanning over 1000 miles and 10 degrees of longitude. This makes traditional monitoring by the Alaska Wildlife Troopers very difficult. Further, because Area M is so large, any regulation that uses time closures to protect migrating non-target species (i.e., western AK chum and Chinook salmon), must include time closures that are sufficiently long to allow a significant number of non-targeted fish to transit the entire fishing area which is at least 220 miles from the east to the west boundary. As currently implemented, fish are heavily targeted as they enter fishing areas in the Shumagin Islands and are targeted again as they exit South Peninsula fisheries in the Unimak District.

In addition, the predominant gear types in Area M (58' purse seine and drift gillnet) have significantly expanded in size which has greatly increased their harvest capabilities.

Gear types in Area M (CFEC 2022)

| AREA M GEAR TYPES | TOTAL | RESIDENT | NON-RESIDENT |
|-------------------|-------|----------|--------------|
| PURSE SEINE       | 121   | 81       | 38           |
| DRIFT GILLNET     | 162   | 93       | 68           |
| SET GILLNET       | 116   | 95       | 16           |

- **Tonnage Increase:** Vessels built in the last decade have seen a significant increase in tonnage compared to those built before the 1960s, with an average tonnage of 125 tons versus 45 tons, respectively.
- **Purse Seine Size:** Purse seines themselves can be quite large, reaching over 2,000 meters in length and 200 meters in depth, varying in size based on the vessel, mesh size, and target species.

The adopted management plan allows a voluntary agreement between processors and seiners to self-police the fishery based on triggers and because just a small level of increased Trooper activity illustrated that there is wide-spread non-retention of chum (and possibly Chinook) in the sector not part of that agreement. These observations raise the concern that continuation of this 3-year management plan could result in significant further under-reporting of non-targeted fish harvest including substantial harvest of severely depressed CWAK chum salmon.

In short, even with non-target chum harvest triggers, without significantly increased observation the current three-year management plan prosecuted by a processor/seiner agreement has insufficient “windows” to protect non-targeted salmon stocks, therefore affording little incentive to provide full disclosures on harvest rates. The only reasonable alternative is to increase the closures during the high chum density periods.

While that 2023 ACR petition was not considered to sufficiently meet the criteria, the underlying reason for the petition has only become more urgent and has raised more concerns.

The 2023 harvest seems historically imbalanced for the June fishery and the 2024 harvest timing seems questionably close to the trigger of 450,000 chum bycatch that would have shut down the remainder of the fishery.

|      |                      | CHINOOK | CHUM      |
|------|----------------------|---------|-----------|
| 2023 | <b>TOTAL HARVEST</b> | 11,067  | 1,120,863 |
|      | <b>JUNE FISHERY</b>  | 1,824   | 205,522   |
| 2024 | <b>TOTAL HARVEST</b> | 7,280   | 575,513   |
|      | <b>JUNE FISHERY</b>  | 1,257   | 450,839   |

Despite 2024 being a very low abundance year in most of Alaska, the June fishery chum bycatch was still far too high in comparison to the dire returns in the AYK for 2023 and 2024. That figure hit the trigger point on the last day so raises concerns about reporting. The comparison of post 2023 management plan change to pre 2023 management plan does not indicate a significant reduction in harvest of non-targeted species for the entire season. These numbers do not include

“personal use” (“home pack) counts nor do they include the ADF&G test fishery numbers. In addition, the genetic sampling of chum salmon has been limited, with recent data not released and the genetic sampling of Chinook in Area M has never existed.

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 and is projected to be even worse in 2025. 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 enough evidence to indicate significant impact over the decades. In more recent years of lowered abundance, that relationship may be even more significant. 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.

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. Work by ADF&G showed that chum salmon caught and tagged in the Shumagins district were recaptured an average of 4.6 days later in the Unimak district (Eggers 1988 Appendix F.5). This should be viewed as a conservative estimate of the time required by an individual fish to *transit the entire* South Peninsula fishing area. 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. Data from WASSIP<sup>i</sup> shows that chum salmon catches peaked around June 18 in the three years of study.

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.”<sup>ii</sup> Even more significant, it could mean the extirpation of some chum stocks entirely.

Thus, the Fairbanks AC proposes the following schedule of closures to protect chum salmon migrating through the South Peninsula June fisheries. The preferred action would be to close the June fishery entirely. The alternative is to restrict harvest time during the historically heavy fishing period of June 18th-June 28th in order to provide maximum passage of non-targeted salmon species.

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

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee Jeff Lucas, Chair

(EF-F26-136)

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