

PROPOSAL 29

5 AAC 01.180. Subsistence fishing permits; annual limits for salmon.

Establish a seasonal harvest limit of 25 sockeye salmon for the Sinuk River subsistence fishery as follows:

Proposed Regulation: Given the concerning state of the Sinuk River red salmon population and the historical mismanagement of this fishery, I propose the following regulatory changes:

1. Implement a Strict Harvest Limit: Establish a **seasonal harvest limit of 25 red salmon per permit holder**. This conservative limit will allow for more cautious management of the run and help prioritize escapement, ensuring that enough salmon reach the spawning grounds.

2. Prevent Overfishing: There should be no increases in harvest limits beyond the initial 25 red salmon per permit holder. Given the Sinuk River's vulnerability, any increase in the harvest limit could push the population closer to collapse, especially considering the ongoing fishing pressure from nearby rivers. By maintaining this strict limit, we can protect the population and avoid potential overexploitation.

Rationale: The Sinuk River's red salmon population is inherently vulnerable due to its small size and the high fishing pressures from nearby systems. It is clear that the river's salmon run has not been managed with the level of caution it requires. The removal of the camera at Glacial Lake without adequate alternatives for monitoring the population—has left a significant gap in data, making it difficult to assess the true status of the run.

Furthermore, the absence of any harvest restrictions has exacerbated the risk of overfishing. With no limits in place, the potential for high levels of catch by a few permit holders could rapidly deplete the population, leading to irreversible damage. The Sinuk River's red salmon population is already under stress, and without immediate intervention, the fishery could collapse under unsustainable practices.

Conclusion: The proposed regulatory changes are essential to safeguard the Sinuk River's red salmon population. By implementing a strict harvest limit of 25 red salmon per permit holder and committing to sustainable, precautionary management practices, we can prevent the collapse of the fishery. The Sinuk River needs immediate and long term intervention, the red salmon population could continue to decline. I respectfully urge the Alaska Board of Fisheries to adopt this proposal to ensure that the Sinuk River's red salmon population remains viable for future generations.

What is the issue you would like the board to address and why? Introduction: The red salmon run on the Sinuk River, west of Nome, has shown a marked decline over the past several years. Historical data from the ADF&G indicated run sizes ranging from approximately 800 to 3,000 fish, significantly lower than those in neighboring systems such as the Pilgrim River, which can support runs of 60,000 to 80,000 fish. However, since the removal of the Glacial Lake camera, there has been no reliable data to track the current state of the Sinuk River's red salmon population. This lack of data, combined with the increasing pressure from other fisheries, raises serious concerns about the future sustainability of this run.

Issue: In 2024, the red salmon fishery on the Sinuk River was closed abruptly with minimal notice to the public. ADF&G staff did not provide advance warning or information regarding the declining state of the run. While closures are necessary in response to population declines, the lack of communication and foresight points to a reactive, rather than a proactive, approach to management.

Additionally, the Sinuk River is experiencing increasing fishing pressure, particularly when the Pilgrim River, a nearby system, faces restrictions. With no harvest limits in place, a small number of permit holders could potentially overharvest a significant portion of the Sinuk River's already vulnerable run. For instance, if six permit holders each harvest 100 red salmon during a low-run year, this could decimate up to 75% of the entire run. This is not sustainable management—this is depletion.

Population Vulnerability and Mismanagement: Unlike the much larger Pilgrim River, the Sinuk River is at a higher risk of collapse due to its smaller, more fragile salmon run. The current management approach, which has allowed open access without clear, harvest restrictions, has failed to account for this vulnerability. It is possible that the Sinuk River has been mismanaged for years, leading to its current precarious state. The lack of proactive monitoring, combined with an insufficient harvest control system, has put the fishery at risk.

This situation demands a serious reevaluation of how the Sinuk River is managed. The proposed regulations aim to address this by instituting a harvest limit that reflects the fragility of the run and prioritizes the long-term health of the population. It is not enough to react to closures after the fact; we need to implement a management system that protects the run from further depletion.

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

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