

South Alaska Peninsula Salmon June Management Plan (11 proposals)

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.”ⁱ 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)

PROPOSAL 128

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

Adopt chum, coho and king salmon catch thresholds that trigger time and area closures to conserve Koyukuk River salmon, as follows:

1. Implement Time Closures and Fleet Movement in Area M: Introduce time closures for Area M and mandate the fleet movement when bycatch of Chinook, chum, and coho salmon reaches a predetermined threshold. Trigger action when Area M starts catching bycatch.
2. Prioritize Koyukuk River Salmon: Recognize the specific vulnerability of Koyukuk River salmon populations and prioritize their protection in management decisions. Any bycatch limits set should consider the needs of these subsistence-dependent communities.

What is the issue you would like the board to address and why? This proposal addresses the urgent need to protect Pacific salmon populations migrating to the Arctic/Yukon/Kuskokwim (AYK) region by reducing bycatch in the Area M fishery. AYK salmon (Chinook, chum, and coho) are crucial for the ecological, cultural, and economic well-being of Western Alaska communities, particularly for subsistence. Salmon play a critical role in nutrient cycling, transferring marine-derived nutrients to freshwater ecosystems when they die after spawning, which supports the entire food web. The Area M fishery has been identified as a source of significant bycatch of AYK-bound salmon. This bycatch directly reduces salmon returns to the Yukon and Kuskokwim rivers, impacting subsistence harvests and ecosystem health. This proposal outlines specific, actionable steps to minimize bycatch in Area M and protect these vital salmon populations.

Salmon populations in the AYK region are facing significant challenges, including bycatch in commercial fisheries, particularly in Area M. Bycatch of chinook, chum, and coho salmon in Area M negatively impacts the already stressed salmon runs returning to the Yukon and Kuskokwim rivers. The large-scale removal of salmon flesh and associated nutrients from the ecosystem disrupts the natural nutrient cycle, negatively impacting local ecosystems.

Specific concerns exist regarding the declining salmon runs in the Koyukuk River, a major tributary of the Yukon River. Communities along the Koyukuk River rely heavily on salmon for subsistence. Recent years have seen drastic reductions in salmon returns, leading to severe impacts on food security and cultural practices. These declines exacerbate the hardships faced by residents who depend on salmon for their livelihood. Any further reduction in salmon numbers due to bycatch in Area M directly affects the ability of Koyukuk River communities to meet their subsistence needs.

These proposed changes aim to directly address the issue of salmon bycatch in Area M and its broader impacts on AYK salmon populations and ecosystems, with particular attention to the Koyukuk River. Time closures during critical migration periods will significantly reduce bycatch of AYK bound salmon. Recognizing the specific needs of Koyukuk River communities is vital for ensuring their food security and cultural survival.

Implementing these regulatory changes is essential for the sustainable management and conservation of salmon populations in the AYK region, especially for the Koyukuk River. These measures will help protect salmon during their migration, preserve the ecological balance of freshwater ecosystems, and support the subsistence and cultural needs of communities that rely on these vital resources.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Koyukuk River Fish & Game Advisory Committee and discussed during a April 9th, 2025 meeting. A motion to submit this proposal on behalf of the Koyukuk River AC was supported unanimously.

PROPOSED BY: Koyukuk River Fish & Game Advisory Committee Jack Reakoff, Chair
(EF-F26-134)

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.

(EF-F26-021)

PROPOSAL 130

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:

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], **chinook and pink** salmon in a mixed stock fishery [DURING THE MONTH OF JUNE]. The sockeye salmon are predominantly Bristol Bay [AND ALASKA PENINSULA ORIGIN], **Chignik, and southcentral Alaska origin**. The chum salmon are bound for a number of areas, including Japan, Russia, the Arctic-Yukon- Kuskokwim, Bristol Bay,[THE ALASKA PENINSULA] **Chignik**, and southcentral Alaska. **The chinook are bound for a number of areas, including the Arctic-Yukon-Kuskokwim, Bristol Bay, Chignik, southcentral Alaska, southeast Alaska, Canada and the lower 48.** These salmon stocks have historically been harvested **at varying levels** 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).

(d) In the South Unimak **fishery** [AND SHUMAGIN ISLANDS FISHERIES] the commissioner may establish, by emergency order, commercial fishing periods as follows:

(e) In the Shumagin Island fishery, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(A) beginning June 6, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning June 10, 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 10, commercial fishing periods will begin at 5:59 a.m. and run 66 hours until 11:59 p.m. two days later; commercial fishing will then close for 78 hours and reopen at 5:59 a.m. four days later; the final commercial fishing period in June will begin at 5:59 a.m. June 22 and end at 11:59 p.m. on June 24.

(f)[(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.

(g)(f) Notwithstanding (d) of this section, commercial salmon fishing will close in the waters of the Volcano Bay Section of the Southwestern District south and east of a line from Arch Point Light at 55° 12.30' N. lat., 161° 54.30' W. long. to a point on Belkofski Peninsula at 55° 09.50' N. lat., 161° 57.80' W. long. and in the portion of the West Pavlof Bay Section south of Black Point (55° 24.48' N. lat.), if the harvest of sockeye salmon from the South Central District, the Volcano Bay Section of the Southwestern District, and the Belkofski Bay Section, excluding those waters inside of a line between Vodapoini Point and Bold Cape, reaches 191,000 sockeye salmon based on fish ticket information.

(h)(g) Notwithstanding (d) of this section, commercial salmon fishing is closed to purse seine gear in the waters of the Volcano Bay Section of the Southwestern District, the Belkofski Bay Section of the Southwestern District, excluding those waters inside of a line between Vodapoini Point at 55° 01.88' N. lat., 162° 24.80' W. long., and Bold Cape at 55° 01.24' N. lat., 162° 16.40' W. long., and the South Central District.

What is the issue you would like the board to address and why? The current regulations for the June Shumagin Islands fishery do not have long enough closures to allow for the passage of migrating stocks, including Chignik-bound sockeye, through the area.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. We worked with members of Chignik's federally recognized Tribes to develop this proposal.

PROPOSED BY: Chignik Intertribal Coalition (EF-F26-100)

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)

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 harvestⁱⁱⁱ, it should have the highest fishing opportunity. As noted in a 1987 ADF&G report^{iv}, 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			
TOTALS				392			144
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	0
SEINE & DRIFT	OPEN	June 26-June 28	8am-11:59pm	64	64	32
	TOTALS	TOTALS		304	262	276

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
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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	TOTAL HARVEST	11,067	1,120,863
	JUNE FISHERY	1,824	205,522
2024	TOTAL HARVEST	7,280	575,513
	JUNE FISHERY	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 WASSIPⁱ 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.”ⁱⁱ 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)

PROPOSAL 133

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:

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], **chinook and pink** salmon in a mixed stock fishery [DURING THE MONTH OF JUNE]. The sockeye salmon are predominantly Bristol Bay [AND ALASKA PENINSULA ORIGIN], **Chignik, and southcentral Alaska origin.** The chum salmon are bound for a number of areas, including Japan, Russia, the Arctic-Yukon- Kuskokwim, Bristol

Bay, [THE ALASKA PENINSULA] Chignik, and southcentral Alaska. The chinook are bound for a number of areas, including the Arctic-Yukon-Kuskokwim, Bristol Bay, Chignik, southcentral Alaska, southeast Alaska, Canada and the lower 48. These salmon stocks have historically been harvested at varying levels 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).

(d) In the South Unimak fishery [AND SHUMAGIN ISLANDS FISHERIES] the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(A) beginning June 6, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning June 10, 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 and drift gillnet gear, beginning June 10, commercial fishing periods will begin at 5:59 a.m. and run 66 hours until 11:59 p.m. two days later; commercial fishing will then close for 78 hours and reopen at 5:59 a.m. four days later; the final commercial fishing period in June will begin at 5:59 a.m. June 28 and run 42 hours until 11:59 p.m. on June 29.

(e) In the Shumagin Island fishery, the commissioner may establish, by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(A) beginning June 6, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning June 10, 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 10, commercial fishing periods will begin at 5:59 a.m. and run 66 hours until 11:59 p.m. two days later; commercial fishing will then close for 78 hours and reopen at 5:59 a.m. four days later; the final commercial fishing period in June will begin at 5:59 a.m. June 22 and end at 11:59 p.m. on June 24.

(f) [(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.

(g)[(f)] Notwithstanding (d) of this section, commercial salmon fishing will close in the waters of the Volcano Bay Section of the Southwestern District south and east of a line from Arch Point Light at 55° 12.30' N. lat., 161° 54.30' W. long. to a point on Belkofski Peninsula at 55° 09.50' N. lat., 161° 57.80' W. long. and in the portion of the West Pavlof Bay Section south of Black Point (55° 24.48' N. lat.), if the harvest of sockeye salmon from the South Central District, the Volcano Bay Section of the Southwestern District, and the Belkofski Bay Section, excluding those waters inside of a line between Vodapoini Point and Bold Cape, reaches 191,000 sockeye salmon based on fish ticket information.

(h)[(g)] Notwithstanding (d) of this section, commercial salmon fishing is closed to purse seine gear in the waters of the Volcano Bay Section of the Southwestern District, the Belkofski Bay Section of the Southwestern District, excluding those waters inside of a line between Vodapoini Point at 55° 01.88' N. lat., 162° 24.80' W. long., and Bold Cape at 55° 01.24' N. lat., 162° 16.40' W. long., and the South Central District.

What is the issue you would like the board to address and why? The current regulations for the South Unimak and Shumagin Islands June Salmon Management Plan do not have long enough closures to allow for the passage of migrating stocks, including CWAK-bound chums and Chignik-bound sockeye, through the area.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. The Chignik Advisory Committee developed this proposal and is submitting it.

PROPOSED BY: Chignik Advisory Committee

(EF-F26-147)

PROPOSAL 134

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 increase commercial salmon fishing time for purse seine and drift gillnet gear, as follows:

- (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 6, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning June 10, 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 and drift gillnet gear,

(C) beginning June 10, 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;

(D) notwithstanding (A) of this paragraph, 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.
- (f) Notwithstanding (d) of this section, commercial salmon fishing will close in the waters of the Volcano Bay Section of the Southwestern District south and east of a line from Arch Point Light at 55° 12.30' N. lat., 161° 54.30' W. long. to a point on Belkofski Peninsula at 55° 09.50' N. lat., 161° 57.80' W. long. and in the portion of the West Pavlof Bay Section south of Black

What is the issue you would like the board to address and why? 5 AAC 09.365 was modified in March 2023 to its current regulatory language, primarily due to poor summer run chum escapements to the Yukon River in 2021 and 2022. Since that time summer run escapement has been within the biological escapement goal range of 500,000 to 1.2 million; 845,988 and 758,260 in 2023 and 2024 respectively. Empirical research published by NOAA Fisheries and international ocean research groups demonstrate the poor escapements in 2021 and 2022 were due to extreme warm ocean conditions in the Bering Sea and North Pacific Ocean in the years 2016 – 2019 when juvenile Yukon (CWAK stock) chum were in very poor condition contributing to lower than normal survival. This and additional research have shown that Area M interception of CWAK stocks is not the driver for low Yukon River chum returns. Finally, Area M Seiners introduced an adaptive management plan at the 2023 board of fish meeting that was endorsed by the board and implemented in the 2023 season and each season after, including the upcoming 2025 season. We are proposing to continue adaptive management which has significantly contributed to decreases in the June chum harvest.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed through Area M Seiners Association

PROPOSED BY: Area M Seiners Association

(EF-F26-164)

PROPOSAL 135

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

Create a new regulation to provide the department emergency order authority to require nonretention of king salmon and to amend the retention provision as follows:

Current 5 AAC 09.365 (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.

Proposed Reg:

5 AAC 09.xxx. Retention of king salmon taken in a commercial fishery. This regulation is in place to provide guidance to the department when it is determined that conservation is required for king salmon. Notwithstanding 5 AAC 09.365 (e), from June 1 through October 31, if the department determines a need to conserve king salmon, the commissioner may, by emergency order, close the commercial salmon fishery and immediately reopen the commercial salmon fishery, during which king salmon 28 inches or greater in length may not be retained, and king salmon 28 inches or greater in length taken incidentally in the commercial salmon fishery must be returned to the water unharmed.

What is the issue you would like the board to address and why? Require release (nonretention) of king salmon 28" and larger in the June seine fishery. In 2024, 1,257 king salmon were harvested in June Shumagin and South Unimak fisheries. Based on ADF&G genetic stock analysis in 2014, 64.2% of the Chinook were of British Columbia and West Coast U.S. origin. A small portion of these migratory king salmon harvested in the June seine fishery may be bound for Bristol Bay, Yukon and Kuskokwim Rivers. Nevertheless, in a time of low abundance, non-retention of king salmon will benefit the effected North Pacific stocks.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by Area M Seiners Association.

PROPOSED BY: Area M Seiners Association

(EF-F26-165)

PROPOSAL 136

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

5 AAC 09.330. Gear.

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

Close the salmon fishing from June 7 through June 28.

Salmon fishing will be closed in the South Unimak and Shumagin Islands fishery for 3 weeks in June (June 7 through June 28).

What is the issue you would like the board to address and why? Close South Unimak and Shumagin Islands June salmon fishing from June 7 through June 28. During this time period in the month of June this fishery intercepts salmon bound for AYK. Yukon People have not harvested salmon traditionally for going on 5 years now AND Yet Area M has been allowed to commercially harvest salmon bound to this River.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. No

PROPOSED BY: John H. Lamont Jr.

(EF-F26-010)

PROPOSAL 137

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 increase commercial salmon fishing time for set gillnet gear, as follows:

At the end of the last fishing period in June (June 28), a 24 hour extension would be given to set net fishermen only in the Shumagin Is. ending at 10:00pm on June 29.

What is the issue you would like the board to address and why? I am asking the board to give set net fishermen a 24 hour extension on the last fishing period in June. The small boats always lose fishing time due to weather and run timing has shifted to later part of June so early June is not productive.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Yes. After talking with other fishermen about this change I called and talked with our local ADF&G biologist, out of Kodiak office.

PROPOSED BY: Rick Eastlick

(HQ-F26-011)
