

PROPOSAL 27

5 AAC 01.610. Fishing seasons.

Amend subsistence fishing season to remove linkage between subsistence salmon fishing opportunity and commercial salmon fishing periods, as follows:

The Native Village of Chenega recommends that the Board amend 5 AAC 01.610(g) to eliminate the link between subsistence fishing opening times and commercial fishing periods as follows:

5 AAC 01.610. Fishing seasons.

(g) Salmon may be taken in the districts described in 5 AAC 01.605(b), only from May 15 through October 31, [DURING FISHING PERIODS AS FOLLOWS:

(1) FROM MAY 15 UNTIL TWO DAYS BEFORE THE COMMERCIAL OPENING OF THAT SALMON DISTRICT, SEVEN DAYS PER WEEK;

(2) DURING THE COMMERCIAL SALMON SEASON, ONLY DURING OPEN COMMERCIAL SALMON FISHING PERIODS IN THAT DISTRICT AND SATURDAYS FROM 6:00 A.M. TO 10:00 P.M.;

(3) FROM TWO DAYS FOLLOWING THE CLOSURE OF THE COMMERCIAL SALMON FISHING SEASON IN THAT DISTRICT THROUGH OCTOBER 31, SEVEN DAYS A WEEK;

(4) NOTWITHSTANDING (G)(2) OF THIS SECTION, SUBSISTENCE FISHING IS NOT ALLOWED 24 HOURS BEFORE OPEN COMMERCIAL SALMON FISHING PERIODS IN THAT DISTRICT.]

What is the issue you would like the board to address and why? The Native Village of Chenega proposes that the Board provide additional subsistence salmon fishing opening times in the Eshamy and Southwestern Districts of Prince William Sound. In 2017, the Board amended 5 AAC 01.610(g) to open subsistence fishing on Saturdays from 6:00 a.m. to 10:00 p.m. during open commercial fishing periods. That change was made in response to Proposals 19 and 20, which requested additional opportunity to harvest salmon outside of open commercial fishing periods. ADF&G's comments on Proposals 19 and 20 recognized that if the proposals were adopted "subsistence salmon fishing opportunity would increase substantially for individuals who do not have a commercial salmon fishing permit." Staff Comments at 47.

The Board's 2017 amendment to 5 AAC 01.610(g) was a positive step forward but it is inadequate to provide a reasonable opportunity for subsistence salmon fishing in much of Prince William Sound. The Board should amend 5 AAC 01.610(g) to eliminate the link between subsistence salmon fishing opening times and commercial fishing periods. The link is neither practical nor appropriate considering the different technologies used by the different user groups. Many subsistence fishers residing in rural areas of Prince William Sound lack the technological ability to closely monitor commercial fishing times, which are announced through radio transmissions and/or posted to the ADF&G website, resulting in significant uncertainty about when subsistence fishing is allowed.

Furthermore, the Board's decision to open subsistence fishing on Saturdays does not achieve the intended goal of providing adequate fishing times. Traveling to traditional subsistence fishing locations in Prince William Sound is time consuming and costly. A weekly 16-hour opening

provides only a narrow window for subsistence fishers. If fish are not running during that particular fishing time or weather prevents travel to fishing areas, subsistence fishers will not be able to meet their needs. When fishing during commercial openings, subsistence fishers must compete for fishing locations with the commercial fleet, which uses larger, faster boats.

PROPOSED BY: Native Village of Chenega

(HQ-F20-065)
