

PROPOSAL 149

5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan; 5AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula; 5 AAC 09.360 Southeastern District Mainland Salmon Management Plan.

Amend management plans for the South Alaska Peninsula area to reduce commercial fishing time, as follows:

During the March-April 2022 Board meeting, the RC 104 captured the language to be evaluated as a management plan to protect the Chignik River Early-Run Sockeye Salmon stock by enacting restrictions to allow salmon to pass through those fisheries. That Board action and intent is parallel to the intent of this proposal. The framework below represents the management tools the Alaska Department of Fish and Game may utilize to manage the South Alaska Peninsula Management Area (Area M) commercial salmon fisheries to reduce take of fish bound to other watersheds. Parallel restrictions are in order to conserve Yukon and Kuskokwim Chum and Chinook salmon during this time of low abundance.

This framework does not restrict the Alaska Department of Fish and Game's emergency order authority to manage salmon stocks sustainably in the South Alaska Peninsula Management Areas and use this emergency order to close fisheries when deemed necessary to protect Yukon and Kuskokwim Salmon stocks of origin.

Based on Yukon and Kuskokwim preseason forecasts, if the lower bound of escapement goals are projected to not be met in one or both rivers then fishing time would be reduced by 50% in the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365), the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366), and the Southeastern District Mainland Salmon Management Plan (5 AAC 09.360).

In addition to time restrictions, fishing area should be modified to reduce catch rates in areas where Chinook and Chum salmon are abundant and gear restrictions employed that may also reduce catch rates of Chinook and Chum salmon specifically.

Based on Yukon and Kuskokwim inseason management tools if the first inriver test fisheries and sonar fish passage monitoring projects confirm low Chinook or Chum salmon returns then the post-June South Alaska Peninsula Management Plans will be further reduced in fishing time and area and gear restrictions will be in order to support sustainable passage of all Yukon and Kuskokwim Bound Chinook and Chum salmon.

The Council understands conservative management options the Board is authorized to make include reduction of time, area, and methods and means. We did not provide prescribed recommendations or defined restrictions. During the Board meeting through the submitting and participation in the AC report, RC submissions, Public Testimony, and Committee of the Whole process, the Council will refine recommended specifics following public distribution of the Alaska Department of Fish and Game proposal analyses. We expect to have further defined restrictions to time, area, and gear types based on information made available by the Alaska Department of Fish and Game describing the known take of Kuskokwim and Yukon bound Chinook and Chum salmon. We will submit data requests to become more informed on the impacts intercept fisheries

have on the referenced watersheds and stocks which should assist educating the public and the public process during deliberations of this proposal.

We further request that Alaska Department of Fish and Game implement a genetic testing program for the Area M commercial fisheries to identify stock of origin for effective management of Arctic-Yukon-Kuskokwim Chinook and Chum salmon. Genetics data will aid in development of avoidance measures to ensure passage of Arctic-Yukon-Kuskokwim bound salmon.

What is the issue you would like the board to address and why?

This proposal addresses the 3 management plans that regulate the South Alaska Peninsula Management Area (Area M) commercial salmon fisheries: the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365), the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366), and the Southeastern District Mainland Salmon Management Plan (5 AAC 09.360).

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 of 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).

These fisheries as noted in AAC 09.365 are a mixed stock salmon fishery and the Chum Salmon directed harvest include stocks bound for the Arctic-Yukon-Kuskokwim region rivers. Additionally, these South Alaska Peninsula Management Area fisheries are known to catch Chinook and Chum salmon of mixed stock origin when targeting Sockeye Salmon. As the Alaska Board of Fisheries (Board) is aware, the Yukon and Kuskokwim Chinook Salmon returns have been severely depressed for over ten years and escapement goals on both rivers have not been met in recent years. The catastrophic Chum Salmon crash in 2021 resulted in severe subsistence harvest restrictions on the Kuskokwim River and complete closure to any salmon harvest on the Yukon River and still escapement goals were not met. Every single salmon is now needed to make it to the spawning grounds and the Area M commercial fishery is within the Alaska Department of Fish and Game authority to manage this mixed stock salmon fishery sustainably in order to help meet Chum and Chinook salmon escapement goals on the Arctic-Yukon-Kuskokwim Rivers. The State of Alaska is also charged with Canada Yukon Salmon treaty obligations and that management authority should extend to sustainable management of all fisheries managed by ADF&G that catch Yukon bound salmon.

This proposal is being submitted to reduce the directed harvest and interception of Arctic-Yukon-Kuskokwim Chinook Salmon stocks, which have been identified by Alaska Department of Fish and Game as Stocks of Yield Concern. Equal burden of conservation efforts should be applied throughout the range of these critically low Yukon and Kuskokwim salmon stocks. During times when subsistence fisheries are severely restricted or closed entirely on these rivers due to low

salmon returns we request the Alaska Board of Fisheries to adopt a modification of the existing regulations in a way that the Area M commercial salmon fisheries equally share the burden of conservation through the restrictions of equal magnitude.

The intent of this proposal is to ensure all user groups managed by the State of Alaska are restricted from take of Arctic-Yukon-Kuskokwim stock of origin salmon during times while there are stocks identified by regulation as Stocks of Concern due to critically low returns.

If the regulations remain unchanged then salmon essential to meeting escapement goals in these Arctic-Yukon-Kuskokwim rivers will continue to be harvested in Area M unabated and escapement goals, Treaty obligations, and basic subsistence salmon needs and mandated State and Federal subsistence priorities will not be met.

All other solutions to ensure every salmon needed to meet Yukon and Kuskokwim rivers Chinook and Chum salmon escapement goals are already being applied via complete closures to the harvest of any salmon on the Yukon River and Coast and severe subsistence fishing restrictions in place on the Kuskokwim River. And of course the inriver commercial fisheries have already been closed completely as well..

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
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