

PROPOSAL 120

5 AAC 09.320. Fishing periods.

Modify fishing periods in the Northern District, as follows:

Caribou Flats section to remain as is, closed indefinitely.

All areas southwest of Franks Point, i.e. Black Hills, Swanson's Lagoon and others will remain as is.

June 1st to June 19th only Nelson River, Bear River, and Port Moller sections will be harvested, not to exceed 3 days per week. No less than 4 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River and Port Moller sections. Harvest can only occur if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

June 20th to June 25th only Nelson River, Bear River, and Port Moller sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River and Nelson River, Port Moller. Harvest can only occur if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

June 26th to June 30th only Ilnik River, Nelson River, Bear River and Port Moller (no harvest in Three Hills) sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River, and Port Moller sections. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

July 1st to July 5th only Ilnik River, Nelson River, Bear River, and Port Moller, sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River and Nelson River. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

July 6th to July 15th only OPH, Ilnik River, Three Hills, Nelson River, Bear River and Port Moller sections will be harvested, not to exceed 4 days per week. No less than 3 day complete closure each week of entire North Alaska Peninsula, including Bear River, Nelson River, and Port Moller. Harvest can only occur in these sections if both Nelson River and Bear River have achieved their minimum periodic escapement goals.

Emergency orders by ADF&G will be allowed in the June North Alaska Peninsula harvest. Only Nelson River, Bear River, and Port Moller sections will be allowed harvest. No less than 2 day complete closure each week in these North Alaska Peninsula sections. Harvest can be considered only if both Nelson River and Bear River has achieved their minimum periodic escapement goals.

Emergency orders by ADF&G will be allowed in the July North Alaska Peninsula harvest. Only Nelson River, Bear River, and Port Moller sections will be allowed harvest. Harvest can be

considered only if both Nelson River and Bear River has achieved their minimum periodic escapement goals.

What is the issue you would like the board to address and why? Preservation for the Native Village of Nelson Lagoon, Nelson River sockeye escapement and harvest.

I have lived in Nelson Lagoon and fished Area M north and south since the mid 1970's, all what I state is true to the best of my recollection and what I have learned from ADF&G reports.

Many fisherman fishing Area M today have not been here so long to have witness what I have. I have much to explain, please take a moment to read, and bear with me.

The Native Village of Nelson Lagoon was founded because of fish returning to Nelson River.

In the recent years, the Native Village of Nelson Lagoon has suffered like never before.

Salmon returns to Nelson River are a matter of survival for the indigenous Aleut native peoples of Nelson Lagoon.

What many fail to grasp, is subsistence for Nelson Lagoon residents translates into fishing income. Without a substantial annual salmon harvest in Nelson River, the Native Village of Nelson Lagoon will cease to exist.

When annual harvests fail, Nelson River fisherman are forced move from the community to search for income, and in some instances, forced to sell the only known livelihood, their Limited Entry Permits. People in Nelson Lagoon know of nothing else but to harvest salmon in Nelson River to survive.

Nelson Lagoon has suffered 1 economic disaster in the past due to poor fish returns and many near disasters since. Currently returns are so dire that a typical Nelson River fisherman goes fishing each year to pay off cannery debts from the previous year or years operating and cost of living expenses.

If not for Peter Pan Seafoods carrying these debts (loans) year after year, Nelson Lagoon would have long been uninhabited.

Current ADF&G North Alaska Peninsula management routinely struggle to achieve minimum escapement goals during the June and late June fishery, only to finally achieve these minimum goals later in late July with a trickle of salmon, barely achieving minimum escapement season goals.

Critical to Nelson Lagoon's survival is the pre July harvest. Most sockeye salmon travel thru the Nelson River system in this narrow time window. Any fishing outside of Nelson River has a direct impact on Nelson River. The farther away harvests occur in the North Alaska Peninsula, the longer direct impact is realized in Nelson River seasonal harvests. It takes 3-4 days for impacts to be

realized by Nelson River. The majority of fish returning to Nelson River must navigate 100 miles thru harvests of Alaska North Peninsula sections OPH, Ilnik, Three Hills and Bear River.

If sockeye weir counts are not achieving their minimum escapement goals, sockeye harvests in Nelson River are curtailed or terminated, yet fishing harvests continue in OPH, Ilnik and Three Hills sections. Nelson River has been shut down due to the lack of minimum periodic escapement for as many as 20 consecutive days during the traditional harvest period for Nelson River.

Over the years, North Alaska Peninsula has seen increases in vessel sizes and vessel productivity. Changes to ADG&G fishing regulations pursuing \$\$\$ over preservation of sustainable harvests and escapements for Nelson River. Changes made to allow earlier fishing time in areas normally closed to fishing before Nelson River salmon peak (traditionally 4th of July). Changes allowing smaller rivers with minor escapements in comparison, dictating harvests for the entire North Alaska Peninsula. Changes made to allow for longer fishing harvests in North Alaska Peninsula. Changes to allow gear depth increases from well-established 45md to 70md, translating into 36% of added net in the water. Changes to minimum mesh size ensuring catch of even smaller salmon, increasing salmon harvests. All of these changes have impacted Nelson River harvests and escapements to diminish Nelson River's capacity to achieve modest periodic June escapement goals year after year.

Throughout history (ADF&G records from 1962 to present) accurately state that Nelson River section and Bear River sections combined (including Sandy River) make up, sometimes more than 90% of total escapement achieved in the entire North Alaska Peninsula. Nelson River at times making up near 40% of total escapement for the entire North Alaska Peninsula. OPH (IPH Meshik River), Ilnik River, Three Hills (Three Hills does not have a salmon return) sections combined have been as high as 30% escapement, but are consistent through-out history as being less than 20% of total North Alaska Peninsula escapements achieved. These systems are not lake spawning salmon returns, but river spawning salmon returns. OPH (IPH Meshik River), Ilnik River, and Sandy River will never have the capacity to achieve high escapements as Bear River (over 1,000,000 sockeye) and Nelson River (over 500,000 sockeye).

By July 15th of any given season, sockeye salmon returning to Nelson River have declined to where most Nelson River fisherman have either stopped fishing, or reduced effort to only making mean low water tides to ensure a better harvest for their efforts.

ADF&G North Peninsula management sockeye cumulative escapement goals for July 15th are Bear River minimum 130000 (48%) to 230000 (44%). Sandy River min 29000 (11%) to 67000 (13%), Ilnik min 28000 (10%) to 40000 (8%), Nelson River min 95000 (32%) to 185000 (35%).

ADF&G North Peninsula management sockeye cumulative escapement goals for July 20th are Bear River minimum 140000 (47%) to 250000 (48%). Sandy River min 32000 (11%) to 71000 (12%), Ilnik min 30400 (10%) to 45600 (8%), Nelson River min 85000 (31%) to 210000 (36%).

By these calculations, escapements do not warrant fish harvests in OPH, Ilnik and Three Hills (combined) achieving 90% of total fish harvested in a single season in North Alaska Peninsula.

When Nelson River and Bear River combined harvest sadly achieved 16% (5 year average) for total season harvest of the entire North Alaska Peninsula. 2021 resulted in Nelson River achieving a meager 3% of the near 2,800,000 total salmon harvested in the North Alaska Peninsula.

Current ADF&G management typically will open OPH, and or Ilnik, Three Hills sections on June 20th, close OPH a couple days later, while Ilnik, Three Hills and possibly Bear River remain harvesting for a duration of the rest of the week, insuring harvest of southbound salmon, then opening OPH again, repeating the harvest week after week until fishing has diminished thru July. Often Bear River has not achieved its minimum periodic escapement goals, and is shut down completely while fishing North of Bear River remains harvesting. Harvests in the North Alaska Peninsula have reached near 4,000,000 sockeye in a single season.

The problem with all this is that there are rarely any rest periods (windows) between harvests, certainly not long enough for salmon to return to Nelson River and Bear River untouched.

Nelson River and Bear River sections have always had a 3 day a week, to 4 day week after the 15th of June. Only after escapement levels are achieved, are additional days considered during any given week.

It takes 3-4 days for fish to travel from OPH to Nelson River, therefore I propose...

Windows be mandatory each week in the June and July North Alaska Peninsula.

PROPOSED BY: Mark McNeley (EF-F22-056)
