

PROPOSAL 139

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 restrict commercial salmon fishing time, as follows:

Rescind 5 AAC 09.365 and replace with the 2001-2003 management plan adopted by the BOF. Additionally, the restored management plan must also be edited to incorporate Chinook salmon and coho salmon in addition to chum and sockeye salmon.

The current South Unimak and Shumagin Islands June Salmon Management Plan no longer include some commercial fisheries in Area M that also intercept significant numbers of AYK-bound salmon during their movements back to the Bering Sea and AYK rivers. Including, Area M fisheries around capes and passages. These additional areas need to be incorporated into a new management plan that guides Area M commercial fisheries and ensures only sustainable interceptions of AYK-bound salmon stocks that are surplus to AYK escapement needs, priority AYK subsistence needs (as measured by Amounts reasonably Necessary for Subsistence Uses codified in 5 AAC 01.236(b)), and historical harvest levels by AYK sport and AYK commercial fisheries to ensure healthy and sustainable AYK salmon and AYK communities.

WASSIP should be used to inform mitigation actions until such time that newly developed genetic markers are incorporated into more relevant in-season mixed stock analyses. Waiting for action until the ADF&G reinitiates these assessments is unacceptable. Otherwise, commercial salmon harvests throughout Area M south of the Alaska Peninsula where AYK salmon are intercepted should be eliminated entirely until such time that fisheries management decisions can be demonstrated to be sustainable.

What is the issue you would like the board to address and why? The tribal communities of the Yukon River have experienced an unprecedented collapse of Yukon River salmon returns in recent years. The failure to meet various salmon escapement goals and the entire closure of reasonable subsistence salmon fishing opportunities in 2021 requires management attention and action in the Alaska Peninsula-Aleutian Island fisheries management area. History has demonstrated that substantial quantities of Yukon River-bound salmon species and stocks are intercepted in commercial fishery operations.

The failure to meet escapement goals and not meeting amounts reasonably necessary for subsistence (5 AAC 01.236(b)) demonstrate that every Yukon-River bound salmon matters and should be conserved. So, that our salmon can return to the Yukon River and its tributaries to spawn and provide for priority customary and traditional uses. While, meeting the United States' Pacific Salmon Treaty obligations to Canada and our First Nations relatives.

2021 yielded an unprecedented, almost 90%, absence of Yukon River chum (summer and fall) Yukon River summer chum harvest averages 2M fish...in 2021 that number was 152,000. Yukon River fall chum harvest averages 998,000 fish...in 2021 that number was 102,000.

The fact that state and federal managers again predict a complete closure of Yukon River subsistence salmon fishing during the 2022 season is alarming. The lack of proactive and

precautionary management actions to conserve Yukon River chum salmon stocks in Alaska Peninsula Management Area M commercial fisheries in 2020 and 2021 is highly problematic as well as unsustainable. The failure for more than a decade of ADF&G to conduct genetic mixed stock analysis and assessments of Area M commercial fisheries' interception of Yukon River Chinook salmon, chum salmon, and coho salmon bound for AYK spawning rivers and tributaries is irresponsible and unsustainable.

The Alaska Board of Fisheries addressed these concerns two decades ago; however, those interception mitigation measures were repealed or relaxed to such an extent that the June commercial fisheries in the South Unimak and Shumagin Islands sections, and the other fisheries of Area M. These areas which intercept Yukon River-bound salmon stocks must be closed or sufficiently restricted to ensure that commercial interception does not compromise a mixture of topics. Including, sustainable management principles, mixed stock fishery policies, and meeting escapement goals of Yukon River Chinook salmon, chum salmon, and other salmon stocks.

PROPOSED BY: Tribal Resources Stewardship Program, Tanana Chiefs Conference
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