

South Alaska Peninsula Salmon June Management Plan (10 proposals)

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 and area for purse seine gear, as follows:

Amend fishing time in the Shumagin Islands for seiners to 72 hour openings interspersed with 72 hour closures. Remove the Volcano Bay Section and the East and West Pavlof Bay Sections from the June Management Plan.

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

(b) The South Unimak fishery takes place in the Unimak District, the Southwestern District **(excluding the Volcano Bay Section)**, [THE EAST PAVLOF BAY AND THE WEST PAVLOF BAY SECTIONS OF THE SOUTH CENTRAL DISTRICT], and the Bechevin Bay Section of the Northwestern District.

(d) In the South Unimak [AND SHUMAGIN ISLANDS] **fishery** [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,

(A) 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.

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

(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,

(A) beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 72 hours until 6:00 a.m. three days later; commercial fishing will then close for 72 hours and reopen at 6:00 a.m. three days later;

(B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 6:00 a.m. on June 25.

(f) 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 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.]

What is the issue you would like the board to address and why? The Chignik sockeye fishery is struggling, with the early run not able to achieve escapement in 2018, 2019, 2020, and 2021, and the late run unable to make escapement in 2018 and 2020.

In 2004 the BOF increased fishing time in the Shumagin Islands to 544 hours in June, up from the historical average of 270 hours the previous 30 years. That's an increase in fishing time of 101%, with the seiners reaping almost all of the benefit. From 2004 to 2018 there were actually 544 hours of continuous fishing time in the Shumagin Islands. In 2019 the BOF made a small adjustment that instituted short, 32-hour closures in the fishery. But 32 hours is not enough time for Chignik-bound sockeye to traverse the area.

In it's 2004 action, the BOF also opened up an entirely new June month interception fishery in the Volcano Bay Section of the Southwestern District and the East and West Pavlof Bay Sections of the South Central District. These areas are well-known and documented heavy interception areas for Chignik-bound sockeye, as well as other east-bound sockeye.

PROPOSED BY: Timothy Murphy (EF-F22-032)

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*, as follows:

Repeal 5 AAC 09.365 and replace with the previous management plan adopted by the BOF approximately 20 years ago but 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 includes 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 cape fisheries. 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 in excess of AYK escapement needs, priority AYK subsistence needs, and historical harvest levels by AYK sport and AYK commercial fisheries to ensure healthy and sustainable AYK salmon and AYK communities.

Old WASSIP data may be the only best available information currently available, and should be used to inform mitigation actions until such time that newly developed genetic markers are incorporated into more relevant 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 have historically been intercepted should be eliminated entirely.

What is the issue you would like the board to address and why? The lack of proactive and precautionary management actions to conserve and meet the escapement goals of AYK chum salmon stocks in Alaska Peninsula Management Area M commercial fisheries in 2020 and 2021 is problematic and unsustainable. The failure of ADF&G to continue genetic mixed stock analysis and assessments of Area M commercial fisheries' interception of Chinook salmon, chum salmon, and coho salmon bound for AYK spawning rivers and tributaries for more than a decade is problematic and unsustainable.

The Alaska Board of Fisheries addressed these concerns previously two decades ago; however, those interception mitigation measures have since been repealed or relaxed to such an extent that the June commercial fisheries in the South Unimak and Shumagin Islands sections, and other sections of Area M, which intercept AYK-bound salmon stocks must be closed or restricted to ensure that commercial interception does not compromise sustainable management principles,

mixed stock fishery policies, and meeting escapement goals of AYK Chinook, chum, and other salmon stocks.

PROPOSED BY: Kuskokwim River Inter-Tribal Fish Commission (EF-F22-065)

PROPOSAL 135

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

Amend the *South Unimak and Shumigan Islands Management Plan* to reduce commercial salmon fishing time in the Shumagin Islands Section, as follows:

...

(X) The ADF&G will maintain a sockeye catch ratio approaching South Unimak at 82% and Shumagin Islands at 18%. If Shumagin Island Section fishery achieves 18% of the June Salmon Management Plan catch based on daily reports, the ADF&G shall shutdown this section until fish ticket reports total less than 18%.

...

What is the issue you would like the board to address and why? The South Unimak and Shumagin Island June Fishery has shifted, placing greater pressure on stocks in the Shumagins. In 1975 a sockeye GHF based on Bristol Bay forecast was implemented at 6.8% Unimak and 1.5% Shumagins. The percentages were based on historical catch data (1997 S. Pen AMR, p.2) This GHF remained in place until it was removed in 2001. While the annual amount of sockeye caught varied, the catch ratio between the areas remained at approximately 81.93% Unimak (June) to 18.07% Shumagins (June) for 26 years. In addition to the GHF, the two areas percentages were spread over four time segments to assure that fishing pressure was even more evenly distributed.

This method of fishing while designed to allow a fishery based on Bristol Bay sockeye health, was also beneficial to alleviating pressure on Chignik sockeye transiting migratory pathways in the Shumagins.

Proposed now is that the Shumagin catch would be regulated in such a way that it would approximate 18% of the combined June Unimak and Shumagin fishery catch. If during an opening, the daily reports show the total Shumagin sockeye catch to have exceeded 18%, the Shumagin fishery will close until the appropriate ratio is met and then it may be reopened. This assures the bulk of the sockeye catch focuses more heavily on Bristol Bay sockeye stocks which are presently quite healthy. If a time should arise when Bristol Bay should need protection, then the entire GHF (from 1975-2000) could be implemented and attached to the Bristol Bay forecast as it once was.

The intent is to protect migratory pathways used by Chignik sockeye by returning the interception harvest effort to historical levels and distribution.

What would happen if nothing is changed?

If nothing is done this expanded mixed stock fishery will continue to prosecute larger numbers of eastbound Fish on stocks that are having a difficult time maintaining escapements and or yields.

What are other solutions you considered? Why did you reject them?

Many other solutions have been considered however, the GHJ and how it distributed catch is proven to be workable. Implementing a version of the previous system that was in effect for 20+ years and was based on historical catches is reasonable. Windows already implemented could remain in place and the expected result is that fishing pressure would move to the Unimak section (similar to the historical fishery) as closures in the Shumagins arise. Any west bound sockeye not caught in the Shumagins are expected to be available in the Unimak section.

This proposal could be expected to benefit the S. Pen sockeye escapement which has not been met in 2018, 2019, and 2020. Before the GHJ was introduced in 1975, the S. Pen sockeye escapements also languished..

PROPOSED BY: Ben and Raechel Allen

(EF-F22-069)

PROPOSAL 136

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 implement a chum salmon harvest cap to reduce commercial fishing time, as follows:

ONC proposes that the Board of Fisheries amend the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365, to incorporate a harvest cap during the June fisheries using all gear types. More specifically, set a cap of 280,000 chum salmon and close the commercial fishery for the remainder of June once that cap is met. This request is consistent with historical records, where concerns over large commercial harvests of chum together with weak Yukon River fall chum runs, resulted in a cap limit that, if met, closed the fishery for the remainder of June.

Alaska Peninsula is one of six Fisheries on the migratory path of Coastal Western Alaska (CWA) chum salmon - Alaska Peninsula, Bristol Bay, AK Peninsula, Bristol Bay, Kuskokwim, Yukon, Norton Sound and Arctic. Therefore, based on preliminary estimates for CWA chum from 2021, the South Unimak and Shumagin Islands June should account for approximately one 6th of the chum salmon for the season. Currently, the management plan does not identify any harvest limits for chum salmon. Establishing a cap would ensure that migrating chum reach their spawning grounds to the Arctic-Yukon-Kuskokwim region, as well as Bristol Bay, Alaska Peninsula, Southcentral Alaska, Japan, and Russia. ONC understands that while the request may present difficulties to commercial fishermen in the South Alaska Peninsula Management Area, we all, across user groups and Management Regions, have the shared interest and responsibility to protect the CWA chum salmon stock. When chum salmon are abundant, we all thrive; in times of hardships, we all must work together and share the burden of conservation to ensure abundant populations in the future.

ONC suggests incorporating the chum salmon harvest cap into a new section between (d) and (e). The South Unimak and Shumagin Islands commercial fisheries are limited to harvesting 280,000 chum salmon during the month of June using all gear types. If reached, it would result in a closure of the fishery for the remainder of June.

Regulation of 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 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,

(A) 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.

(e) Commercial harvest of chum salmon will not exceed 280,000 fish to ensure that migrating chum reach their spawning grounds to the Arctic-Yukon-Kuskokwim region, as well as Bristol Bay, Alaska Peninsula, Southcentral Alaska, Japan, and Russia. Therefore, the fishing periods, as specified in (b) of this section, may not be fulfilled once this limit is met.

(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 Orutsararmiut Native Council (ONC) is the federally recognized Tribe for the Native Village of Bethel, Alaska. Bethel is located along the delta of the Kuskokwim River, approximately 90 miles inland from the Bering Sea and approximately 398 miles northwest of Anchorage. ONC serves approximately 4,500 Alaska Native residents from all villages throughout Yukon-Kuskokwim (YK) Delta, over 3,800 of which are enrolled as Tribal members.

ONC would like to address the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. More specifically, we would like to establish a chum salmon (*Oncorhynchus keta*) commercial harvest cap of 280,000 for all gear types during the South Unimak and Shumagin Islands June fisheries.

The Alaska Peninsula consists of a mixed stock fishery during the month of June, where chum salmon populations are bound for a number of areas, including the Arctic-Yukon-Kuskokwim (AYK) region. ONC, and many subsistence users across the YK Delta, have concerns on the extreme disparity in harvest between the Alaska Peninsula commercial and Kuskokwim and Yukon River subsistence fisheries. This commercial fishery harvested approximately 1,168,601 chum in 2021¹, while subsistence users on the Kuskokwim and Yukon Rivers harvested approximately 9,621² and 1,253³ chum salmon, respectively. Tribes along the YK Delta are experiencing food security hardships and loss of culture when not allowed to fish, while the South Unimak and Shumagin Islands are harvesting an abundant amount of chum salmon for commercial uses. The stark contrast between the chum salmon commercial harvests on the South Unimak and Shumagin Islands June Salmon Commercial Fishery and subsistence harvests on the Kuskokwim is a direct result of the lack of harvest limits for chum salmon.

References:

¹Regional Report No. 4K22-01 - 2021 South Peninsula Salmon Annual Management Report and 2020 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands

Management Areas

²Alaska Department of Fish & Game (ADF&G) Draft Preliminary Kuskokwim River Salmon Harvest Estimates 2021 Postseason Surveys

³Yukon River Salmon 2021 Season Summary and 2022 Season Outlook, Regional Information Report 3A22-01 ADF&G

PROPOSED BY: Orutsararmiut Traditional Native Council (HQ-F22-018)

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 reduce commercial salmon fishing time, as follows:

ONC would like to reduce the current commercial fishing period hours for all gear types during the June fishery described in the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. Specifically, ONC proposes to amend section (d), to reduce total commercial fishing time to 100 hours. Alaska Peninsula is one of six Fisheries on the migratory path of CWA chum salmon; Alaska Peninsula, Bristol Bay, AK Peninsula, Bristol Bay, Kuskokwim, Yukon, Norton Sound and Arctic. Therefore, the South Unimak and Shumagin Islands June fisheries should have a harvest window that accounts for approximately one 6th of the total harvest window of the Commercial June fishery.

These reduced harvest hours create fishing closures that will span over a longer period of time, allowing passage of chum salmon stock through the Alaska Peninsula area and return to spawning grounds along Western Alaska. Below are our proposed fishing periods. Still, ONC is open to the Board of Fisheries decision on restructuring the fishing openers to account for reduced 100 harvest hours. All gear types and dates may be modified for the June commercial fishery.

Regulation of 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan, specifically amendment to section (d):

“... (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;]

(1) [(2)] for seine and drift gillnet gear,

(A) Beginning June 10, All daily fishing periods will be 16 hours in length, from 6:00 AM until 10:00 PM. The following fishing period will be 48 [six] hours later. After June 25th, the

following fishing period will be 4 hours, not to exceed a total of 100 hours of commercial fishing.

[(A) 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.

...

What is the issue you would like the board to address and why? The Orutsararmiut Native Council (ONC) is a federally recognized Tribal governing body for the Native Village of Bethel, Alaska. Bethel is located along the delta of the Kuskokwim River, approximately 90 miles inland from the Bering Sea and approximately 398 miles northwest of Anchorage. ONC serves approximately 4,500 Alaska Native residents from all villages throughout Yukon-Kuskokwim Delta (YK Delta), over 3,800 of which are enrolled as Tribal members.

ONC is extremely concerned about the health, safety, and general welfare of the people of our Tribe and the YK Delta Region after experiencing the lowest chum salmon (*Oncorhynchus keta*) return on record in 2021. Therefore, ONC would like to address the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. Specifically, ONC proposes to establish reduced fishing time for all gear types during the June fisheries in South Unimak and Shumagin Islands.

Both chum salmon and sockeye salmon (*O. nerka*) are harvested in the month of June along the south Alaska Peninsula; the sockeye salmon are predominantly Bristol Bay and Alaska Peninsula origin and the chum salmon, however, are bound for a number of areas, including the Arctic-Yukon-Kuskokwim (AYK) region. In 2021, the South Unimak and Shumagin Islands June salmon commercial fishery experienced an abundant harvest of approximately 1,168,601¹ chum salmon, while subsistence users on the Kuskokwim and Yukon River approximately harvested 9,621² and 1,253³ chum salmon, respectively. This drastic difference of harvest between fisheries signifies that further protection is needed on the migratory route of Coastal Western Alaska (CWA) chum salmon to comply with the Policy for the Management of Sustainable Salmon Fisheries, 5 AAC 39.222. Therefore, it is critical to reduce commercial fishing periods in the South Unimak and Shumagin Islands, where chum salmon stock is bound for the AYK region, among many other regions.

The Kuskokwim River faced a record low return of chum salmon in 2021 and yet again is expected to face another poor return in 2022. Declining stock of salmon creates unrest and stability in our community as food security declines further. It is of utmost importance that we act right away, to protect our livelihood and allow future generations to continue harvesting salmon.

¹Regional Report No. 4K22-01 - 2021 South Peninsula Salmon Annual Management Report and 2020 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas

²Alaska Department of Fish & Game (ADF&G) Draft Preliminary Kuskokwim River Salmon Harvest Estimates 2021 Postseason Surveys

PROPOSED BY: Orutsararmiut Traditional Native Council (HQ-F22-019)

PROPOSAL 138

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 require the department to place observers onboard commercial salmon fishing vessels, as follows:

ONC would like to address necessary changes in the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. Specifically, ONC proposes to enhance the accountability of harvest data collected and facilitate information gathering by incorporating an onboard observer component into the management plan.

ONC firmly believes in 5 AAC 39.141, the Onboard Observer Program, and supports the findings in 5 AAC 39.141(a), where, “the Board of Fisheries finds that ... observers on board fishing vessels would greatly enhance management, primarily by facilitating information gathering and by improving regulatory compliance.” Additionally, 5 AAC 39.141 (e) states that, “onboard observers shall carry out such scientific and other duties as deemed necessary or appropriate to manage, protect, maintain, improve and extend the fish and aquatic plant resources of the State” which may be in direct support of the recently introduced Alaska Salmon Research Task Force Act.

To further consider this proposal, one must take into account the drastic difference of harvest between the South Unimak and Shumagin Islands June salmon commercial fishery and subsistence fishery on the Kuskokwim River in 2021. This, and the expected low returns of chum salmon in 2022, will likely increase tensions between users, and subsistence users will expect higher accountability of commercial fisheries.

As stated the Regulations for the Board of Fisheries, Sec. 16.05.251 (a)(13), the Board of Fisheries may adopt regulations it considers advisable in accordance with AS 44.62 for “regulating, in a fishery, observers on board fishing vessels as defined in AS 16.05.475(d), that are registered under the laws of the state, as defined in AS 16.05.475(c)...”

The recommended changes include the insertion of a clause to incorporate onboard observers and amend subsequent order of stipulations. Amend 5 AAC 09.365 to read:

Regulation of 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 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,

(A) 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.

(e) Certified observers will be onboard commercial fishing vessels to collect first-hand harvest data to assure effective monitoring, compliance, control and enforcement.

(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 Orutsararmiut Native Council (ONC) is the federally recognized Tribal governing body for the Native Village of Bethel, Alaska. Bethel is located along the delta of the Kuskokwim River, approximately 90 miles inland from the Bering Sea and approximately 398 miles northwest of Anchorage. ONC serves approximately 4,500 Alaska Native residents from all villages throughout Yukon-Kuskokwim Delta (YK Delta), over 3,800 of which are enrolled as Tribal members.

The south Alaska Peninsula fishery consists of a mixed stock fishery during the month of June; the sockeye salmon (*Oncorhynchus nerka*) are predominantly Bristol Bay and Alaska Peninsula origin and the chum salmon (*O. keta*), however, are found for a number of areas, including the Arctic-Yukon-Kuskokwim (AYK) region. In 2021, the South Unimak and Shumagin Islands June salmon commercial fishery experienced an abundant harvest of approximately 1,168,601 chum salmon₁, while subsistence users on the Kuskokwim and Yukon River approximately harvested 9,621₂ and 1,253₃ chum salmon, respectively. The disparity in harvest between fisheries further divides users and creates animosity due to lack of trust.

Low returns of chum salmon are expected again this season, thus further decreasing food security and increasing the risk of community instability in our region. The alarming declines of salmon across the state, together with the research findings communicated through the roundtable discussions led by U.S. Senators Dan Sullivan and Lisa Murkowski, have increased our concern for the health, safety, and general welfare of the people of our Tribe and the YK Delta Region.

After experiencing the lowest chum salmon return on record on the Kuskokwim River, ONC firmly believes it is of utmost importance to have the most reliable harvest information possible. For this reason, ONC would like to address necessary changes in the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. Specifically, ONC proposes to enhance the accountability of harvest data collected and facilitate information gathering by incorporating an onboard observer component into the management plan. We find the need to protect our livelihood and allow future generations to continue harvesting salmon..

PROPOSED BY: Orutsararmiut Traditional Native Council (HQ-F22-020)

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
(HQ-F22-034)

PROPOSAL 140

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:

Repeal the current *South Unimak and Shumagin Islands June Salmon Management Plan* and readopt an amended version of the management plan in place from 2001-2003, as follows:

Erase all of the current 5 AAC 09.365 and replace with the following, edited language from the 2001-2003 plan;

5 AAC 09.365. SOUTH UNIMAK AND SHUMAGIN ISLANDS JUNE SALMON MANAGEMENT PLAN (2001-2003).

(a) The South Unimak and Shumagin Islands June fisheries harvest [BOTH] **chinook salmon**, sockeyesalmon and chum salmon in a mixed stock fishery. These stocks of salmon are bound for Bristol Bay and the Arctic-Yukon-Kuskokwim region, as well as other areas across the North Pacific Ocean. These salmon stocks have historically been intercepted in significant numbers along the Alaska Peninsula. To ensure that none of these salmon stocks are overharvested, it is necessary to restrain the interception of these stocks as provided in the management plan in this section, and consistent with the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) and 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 Ikatan Bay Section in the Southwestern District, and the Bechevin Bay Section in the Northwestern District, plus the following waters of the Southwestern District located outside of the Ikatan Bay Section and not described as closed waters in 5 AAC 09.350;

(1) waters north and west of a line from Cape Pankof Light to Thin Point (54° 57.32' N. lat., 162° 33.50' W. long.); and

(2) waters enclosed by a line from Thin Point (54° 57.32' N. lat., 162 ° 33.50' W. long.) to the northernmost tip of Stag Point (54° 59.10' N. lat., 162° 18.10' W. long.) on Deer Island to the southernmost tip of Dolgoi Cape (55 ° 03.15' N. lat., 161 ° 44.35' W. long.) on Dolgoi Island and from the northernmost tip of Bluff Point (55° 09.93' N. lat., 161° 53.72' W. long.) on Dolgoi Island to ArchPoint Light (55° 12.30' N. lat., 161 ° 54.30' W. long.).

(c) The Shumagin Islands fishery takes place in the Shumagin Islands Section.

(d) Beginning June 10 **through June 30**, the commissioner may open, by emergency order, commercial fishing periods for purse seine and drift gillnet gear as follows:

(1) commercial fishing periods may occur only from 6:00 a.m. to 10:00 p.m. and may not be open for more than

- (A) three days in any seven-day period;
- (B) 16 hours per day;
- (C) 48 hours in any seven-day period;
- (D) two consecutive 16-hour fishing periods in any seven-day period;

[(2) THROUGH JUNE 24, COMMERCIAL FISHING PERIODS IN THE SHUMAGIN ISLANDS AND SOUTH UNIMAK FISHERIES WILL OCCUR AT THE SAME TIME;

(3) AFTER JUNE 24, THE PROVISIONS OF (F) APPLY.]

(e) Beginning June 10, the commissioner may open, by emergency order, commercial fishing periods for set gillnet gear in both the South Unimak and Shumagin Islands fisheries as follows:

(1) from June 10 through [JUNE 24] **June 30**,

- (A) commercial fishing periods may occur only from 6:00 a.m. to 10:00 p.m.;
- [(B) THE FISHERY WILL BE CLOSED FOR ONE PERIOD IF, DURING THE PRECEDING PERIOD, THE RATIO OF SOCKEYE SALMON TO CHUM SALMON IS NOT EQUAL TO OR GREATER THAN THE RECENT 10 YEAR AVERAGE;

(2) AFTER JUNE 24, THE SCHEDULE OF OPENINGS AND CLOSINGS OF FISHING PERIODS SHALL COINCIDE WITH THE SCHEDULE FOR SEINE AND DRIFT GILLNET GEAR AS SPECIFIED IN (F) OF THIS SECTION.

(F) AFTER JUNE 24, IN EITHER THE SOUTH UNIMAK OR SHUMAGIN ISLANDS FISHERIES,

(1) IF THE RATIO OF SOCKEYE SALMON TO CHUM SALMON IS TWO TO ONE OR LESS ON ANY DAY, THE NEXT DAILY FISHING PERIOD FOR SEINE AND DRIFT GILLNET GEAR SHALL BE OF SIX-HOUR DURATION IN THAT FISHERY;

(2) IF THE RATIO OF SOCKEYE SALMON TO CHUM SALMON IS GREATER

THAN TWO TO ONE, THE COMMISSIONER MAY EXTEND THE FISHING PERIOD BY EMERGENCY ORDER, TO A MAXIMUM OF 16 HOURS AS DESCRIBED IN (D)(L) OF THIS SECTION;

(3) IF THE RATIO OF SOCKEYE SALMON TO CHUM SALMON IS TWO TO ONE OR LESS FOR TWO CONSECUTIVE FISHING PERIODS, THE FISHERY SHALL CLOSE FOR ALL GEAR TYPES.]

(g) 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.

What is the issue you would like the board to address and why? Reduce Excessive harvest of migrating discrete stocks of concern in the Cook Inlet, Bristol Bay, and AYK areas.

2021 saw a decrease of Yukon River summer and fall chum escapement of almost 90%. This was without any directed fishery and no subsistence harvest.

The Yukon River summer chum run averages 2 million fish. In 2021 that number was 152,000. The Yukon River fall chum run average is 998,000 fish. In 2021 that number was 102,000. Two large producers of chum salmon in the Yukon Drainage, the Chena and Salcha Rivers, saw only 22% of average escapement under perfect counting conditions. Alaska did not meet any of its Treaty obligations with Canada. (There is an international treaty with Canada over Yukon River Chinook, summer and fall chum that spawn in Canada.)

This resulted in unprecedented loss of subsistence chum fishing opportunity in the Yukon River.

At the same time, the S. Unimak and Shumagin Islands June 2021 fishery had the highest harvest of chum salmon in the history of the Area M fishery. 1,168,601 chum were harvested in the 2021 June fishery alone.

This indicates that there is a direct correlation between the high harvest of chum in Area M to the loss of chum escapement to the AYK and a total loss of chum subsistence harvest. Reducing the Area M June fishery will allow opportunity to see if chum escapement in the AYK will be able to meet escapement goals and allow for a subsistence harvest.

This is ultimately both a conservation and a subsistence issue.

PROPOSED BY: Fairbanks Advisory Committee Fisheries Sub-Committee (HQ-F22-040)

PROPOSAL 141

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 require the department to manage the June fishery by emergency order to close those areas within the

management plan. Amend **5 AAC 09.330. Gear.** to allow other gear types to be used in the commercial fishery, as follows:

Fishing season and periods would be operated by Emergency Order in Area M during the month of June **OR** Selective gear types (Seines, Dip Nets, Hook and Line and other gear types) that can selectively harvest sockeye releasing all other types of salmon bound for Arctic, Yukon and Kuskokwim areas may be used to harvest sockeye salmon.

What is the issue you would like the board to address and why? I would like the Alaska Board of Fish to limit the number of AYK bound Salmon (Chinook, Chum and Coho) that can be incidentally harvested in the Aleutian Islands/Shumagin Islands/Alaska Peninsula area OR close the Area M fishery for the month of June. **Reason is:** Indigenous Peoples on the Yukon River are not allowed to harvest ANY OF THESE SALMON for sustenance that this area freely harvests commercially on their way to their spawning grounds **AND** spawning escapement for these salmon stocks are not being met.

PROPOSED BY: John H. Lamont Jr. (EF-F22-008)

PROPOSAL 142

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

Amend *South Unimak and Shumagin Islands June Salmon Management Plan* and *Post-June Salmon Management Plan* to allow more fishing time for set gillnet gear only, as follows:

5AAC 09.365 Fishing time for the June fishery for set gillnet only.

6:00 am June 10 until 3:00 pm June 13th 81 hours

6:am June 15 until 10:00 pm June 17 64 hours

6am June 20 until 10:00 pm June 22 64 hours

6:am June 25 until 10:00 pm June 27 64 hours

6am June 29 until 6:00 pm June 30 36 hours

5AAC 09.366 Post - June Salmon Fishery for Set Gillnet only

6:00 am July 5 until 10:00 pm July 7 64 hours

6:00 am July 10 until 10:00 pm July 12 64 hours

6:00am July 15 until 10:00 pm July 17 64 hours

6:00 am July 20 until 10:00 pm July 22 64 hours

6:00 am July 25 until 10:00 pm July 27 64 hours

6:00 am July 29 until 6:00 pm July 30 36 hours

What is the issue you would like the board to address and why? I would like to separate the setnet scheduled opening in the June and post June schedule from the drift and seine openings. and would like to move some fishing time from the June fishery to the post June fishery as the setnet fishermen are struggling to catch salmon in the early part of the season the salmon are running offshore and Arnt in the bays or closer to shore till late June. I attempted to make the closures to coincide with the seine and drift schedule. this proposal is an attempt to keep fishing hours the same but to distribute more evenly through July.

PROPOSED BY: Jim Smith

(EF-F22-022)
