



Bering Sea Fishermen's Association

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YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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"Protect and Promote All Wild Fisheries and Traditional Cultures within the Yukon River Drainage"

May 27, 2022

Commissioner Douglas Vincent-Lang
Alaska Department of Fish & Game
333 Raspberry Road
Anchorage, Alaska 99518
VIA Email: doug.vincent-lang@alaska.gov

Re: Take action to support escapement of AYK chum stocks in 2022

Dear Commissioner Vincent-Lang:

The Bering Sea Fishermen's Association ("BSFA") and Yukon River Drainage Fisheries Association ("YDRFA") appeals to the Alaska Department of Fish & Game ("ADF&G") to prevent the unmitigated interception of chum salmon bound for the Arctic-Yukon-Kuskokwim ("AYK") Region by the Area M purse seine fleet during the June commercial salmon fishery. In light of the amounts of AYK-bound chum intercepted by Area M's June purse seine fishery and 2021's escapement failures and subsequent loss of commercial and subsistence harvest of chum throughout the Yukon and Kuskokwim drainages, ADF&G must take emergency action to reduce timed openings or close specific districts within Area M to protect AYK-bound chum stocks.

ADF&G's management of mixed stock fisheries in the Area M region directly affects the ability of the AYK Region to prosecute subsistence and commercial fisheries on those same stocks. ADF&G has a duty to manage those mixed stock fisheries consistent with sustained yield,¹ and is obligated to prioritize subsistence uses of salmon consistent with the subsistence preference.² Historic commercial chum harvests in Area M, followed by the subsequent chum crashes within the AYK Region and the lack of any subsistence harvest in that region, suggest that ADF&G's current management approach prevents it from meeting these duties and obligations.

It is indisputable that Area M's June commercial salmon fishery intercepts high rates of chum bound for the AYK Region – particularly within the Shumagin Islands and South Unimak districts.³ The Western Alaska Salmon Stock Identification Program ("WASSIP") demonstrates that AYK-bound chum stocks comprised between 25.5% to 67.4% of the June commercial chum harvest in 2007; between 19.5% to 44.4% of the June commercial chum harvest in 2008; and between 49.6% to 67.6% of commercial chum harvest during June 2009. With respect to the South Unimak district, WASSIP also confirmed that AYK-bound chum stocks were the most dominant group present in the June commercial harvest. Between 2007 and 2009, AYK-bound chum comprised between 51.0% and 83.3%, 34.9% to 78.2%, and 41.3% and 87.3%, respectively, of the South Unimak district's June commercial chum harvest.

In 2021, Kuskokwim drainage weirs documented the lowest chum escapement on record. The Yukon drainage summer chum run is subject to a BEG of 500,000–1,200,000 fish; in 2021, the drainage-wide escapement was a mere 153,497 fish. The Yukon River fall chum run is subject to an SEG of 300,000–600,000 fish and average 998,000 fish, but in 2021, that run totaled 102,000 fish.

¹ ALASKA CONST. ART. 8, §4.

² 5 AAC 39.220(a); *see also* AS 16.05.258.

³ 5 AAC 09.365(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...[t]he chum salmon are bound for a number of areas, including...the Arctic-Yukon-Kuskokwim...").

As ADF&G is aware, the 2021 summer and fall chum salmon harvest within the AYK Region – in particular, the Yukon Area – was also abysmal. The Yukon Area had no summer or fall chum harvest in its subsistence or commercial fisheries. Within the Kuskokwim drainage, the commercial chum harvest totaled less than 6,000 fish.⁴ In stark contrast, in June 2021 alone, the South Unimak and Shumagin Islands commercial fishery harvested 1,168,601 chum salmon,⁵ the highest chum salmon harvest in the history of the Area M fishery. Over 1.1 million of these chum salmon were harvested by the purse seine fleet.⁶

ADF&G's own pre-season estimates for Yukon Area chum returns do not indicate that 2022 summer and fall chum runs will meet minimum drainage-wide escapement goals. Summer chum estimates forecast a far-below-average run of 162,000–542,000 fish. Fall chum estimates forecast approximately 110,000 fish will return to the Yukon drainage, well below the SEG range of 300,000–600,000 fish. If this occurs, there will be no subsistence or commercial fisheries within the Yukon Area, further devastating local economies and compounding food insecurity throughout the region. Currently, ADF&G's South Alaska Peninsula Salmon Management Strategy for 2022 contains no indication of whether, much less how, ADF&G intends to act to curtail the purse seine fleet's interception of AYK-bound chum stocks within South Peninsula commercial fisheries.

In 2020 and 2021, Governor Dunleavy declared fisheries disasters for chum salmon fisheries on the Yukon⁷ and Kuskokwim⁸ Rivers and asked the U.S. Department of Commerce to do the same. BSFA and YDRFA expects the State, after acknowledging that chum run crashes in the AYK Region are disasters worthy of federal intervention, to alter its 2022 management approach to prevent additional disasters from occurring.

BSFA, along with 12 concerned stakeholder entities, asked Area M fishers to stand down from their purse seine fishery in June of 2022 (enclosure). If they do not agree to this request, we ask for you to use your authority through an emergency order to step in and protect AYK-bound chum stocks. If ADF&G does not limit June commercial harvest opportunities within Area M, the ensuing unmitigated interception of AYK-bound chum all but assures the destruction of AYK Region economies and traditional subsistence lifestyles and places the entire burden of conservation on the shoulders of AYK Region subsistence users. The survival of our communities depends upon ADF&G's intervention.

Sincerely,



Karen Gillis

Executive Director, Bering Sea Fishermen's Association



Serena Fitka

Executive Director, Yukon River Drainage Fisheries Association

cc: Governor Mike Dunleavy
Alaska Board of Fisheries Members:
Märit Carlson-Van Dort Gerad Godfrey Mike Heimbuch John Jensen
McKenzie Mitchell Israel Payton John Wood

Enclosure

⁴ 2021 subsistence harvest estimates of chum salmon within the Kuskokwim drainage are still unavailable.

⁵ <https://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2022.01.pdf>, page 5.

⁶ <https://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2022.01.pdf>, pages 5-6.

⁷ <https://media.fisheries.noaa.gov/2021-10/09.14.21%20Secretary%20Raimondo%20Yukon%20River%20Fishery%20Disaster%20Request%20Ltr%20%281%29.pdf> ; <https://media.fisheries.noaa.gov/2021-05/03.08.21%20Gina%20Raimondo%20AK%20Federal%20Fishery%20Disaster%20Request%20Ltr.pdf>

⁸ https://media.fisheries.noaa.gov/2022-05/121_Dunleavy%202021%20Kuskokwim%20salmon.pdf