



Tungwenuk Family Qupak Design, used with permission

## KAWERAK, INC.

### REPRESENTING

**Brevig Mission**

*Sitaisaq*

**Council**

*Akauchak*

**Diomede**

*Iᅇaliq*

**Elim**

*Neviarcuarluaq*

**Gambell**

*Sivuqaq*

**Golovin**

*Chinik*

**King Island**

*Ugiuvak*

**Koyuk**

*Kuuyuk*

**Mary's Igloo**

*Iglaaruk*

**Nome Eskimo**

*Sitnasuami Inuit*

**Savoonga**

*Sivungaq*

**Shaktoolik**

*Saktuliq*

**Shishmaref**

*Kigiqtaq*

**Solomon**

*Anuutaq*

**St. Michael**

*Taciaq*

**Stebbins**

*Tapraq*

**Teller**

*Tupqaᅇruk*

**Unalakleet**

*Uᅇalaqᅇiq*

**Wales**

*Kijigin*

**White Mountain**

*Natchigvik*

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To:

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Kawerak is in support of PROPOSAL 140  
5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Kawerak is the Alaska Native non-profit Tribal Consortium for the 20 federally recognized Tribes of the Bering Strait/Norton Sound region.

Since Time Immemorial, the Inupiaq, Yupik, and St. Lawrence Island Yupik people have subsisted on salmon caught and prepared in the BS/NS region. The southern Seward Peninsula had a chum salmon closure that lasted nearly 30 years. When chum salmon started returning in small numbers, this resulted in the State of Alaska's only Tier II, highly restricted, fishery. Subsistence harvest of salmon in the BS/NS region have been severely declining because of low salmon returns to our rivers. Residents of the BS/NS region are very concerned if there will be another chum salmon closure, or a complete closure of all five species of salmon, due to low returns, or another Tier II fishery. The last couple of years across several regions there have been extremely low returns of all five species of salmon, or a salmon crash. All while commercial fishing in Area M continues to reap all the benefits and subsistence salmon fishermen bare the burden of conservation or worse face complete closure and confiscation of gear and citations, all while only trying to put food on the table. A.S. 16.05.258 clearly states that subsistence use is highest priority above all else including personal, sport & commercial use. Again subsistence users have faced closure, not once has commercial fishing in Area M ever been closed and have continued to intercept salmon that are destined for western Alaska. We are not requesting that Area M face a closure, only requesting a delay in the start of the season opener in order for more salmon that are destined for western Alaska to make it to their spawning grounds, for our rivers to meet escapement goals and for subsistence users to put food on the table and in the freezer.

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Alaska Statute 16.05.258 (subsistence use and allocation), states that the Board may identify manage and regulate a subsistence or commercial fishery.

"(c) The boards shall adopt subsistence fishing and subsistence hunting regulations for each stock and population for which a harvestable portion is determined to exist under (b)(l) of this section. If the harvestable portion is not sufficient to accommodate all consumptive uses of the stock or population, but is sufficient to accommodate subsistence uses of the stock or population, then nonwasteful subsistence uses shall be accorded a preference over other consumptive uses, and the regulations shall provide a reasonable opportunity to satisfy the subsistence uses. If the harvestable portion is sufficient to accommodate the subsistence uses of the stock or population, then the boards may provide for other consumptive uses of the remainder of the harvestable sustained yield or continue subsistence uses, then the preference shall be limited, and the boards shall distinguish among subsistence users, by applying the following criteria:

And 5 AAC 99.010 (Subsistence use and allocation of fish and game) states that:

(c) When circumstances such as increased numbers of users, weather, predation, or loss of habitat may jeopardize the sustained yield of a fish stock or game population, each board will exercise all practical options for restricting nonsubsistence harvest of the stock or population and may address other limiting factors before subsistence uses are restricted below the level the board has determined to provide a reasonable opportunity. If all available restrictions for nonsubsistence harvests have been implemented and further restrictions are needed, the board will eliminate nonsubsistence consumptive uses, and reduce the take for subsistence uses in a series of graduated steps.

Management decisions regarding fisheries in the South Unimak and Shumagin Islands Salmon Management Plan have relied heavily on escapement goals for the Aleutian and Alaska Peninsula waterways to manage the Area M Intercept Fishery without taking into account the escapement goals for the BS/NS region. The BS/NS region waterways have been in a constant rate of decline for over 30 years.

The major issue is the prevention of salmon returns to Western Alaska rivers to spawn and replenish already distressed fish spawning grounds. One of the factors contributing to low western Alaska salmon returns is the Area M Salmon Interception Fishery as identified by Scientific Fishery studies, conducted by various groups. This situation violates A.S. 16.05.790, which prevents blockading a fish or game resource from being hunted or fished in any part of its habitat. Yes, Area M is another competing source, however, due to their extremely high success rate with commercial fishing gear and creating a blockade where pretty much no salmon can cross they are over competing with subsistence salmon fisherman in western Alaska and we are not able to harvest salmon in times of decline.

Scientific studies conducted by Western Alaska Sustainable Salmon Initiative Program (WASSIP) have shown that intercepted fish bound for Western Alaska are being taken before reaching their home river systems.

The continued process for managing a resource without taking into account, all variables, such as their home river system escapement goals, and ensuring that these numbers are being met to sustain the population of those waterways is reckless and irresponsible. These salmon are community resources, not resources for the sole benefit of Area M commercial fishermen. The complete cessation of the Area M harvest is not necessary in order to make significant changes that would reduce that fishery's harvest of western Alaska-bound salmon. We are asking for practical and comprehensive actions thru utilizing all

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management tools, such as ensuring escapement goals are met in the Western Alaska Waters, ensure the most accurate data is used in decision making, for the preservation of the salmon run and sustainable for everyone involved.

While Kawerak, Inc. realizes that there are multiple factors contributing to the collapse of western Alaska chum salmon returns, one known chronic cause is the adoption of regulatory measures that favor commercial harvest and denying subsistence harvesters their opportunity, guaranteed in A.S. 16.05.258. The continued practice of fishing a fishery to the point of collapse should and must be stopped for everyone concerned.

Arguments for continued fisheries activities have been made that Commercial Fisherman will lose their livelihood and be forced to stop fishing if further regulation is necessary. We believe further regulation can be successfully implemented without shutting down the Area M fishery. Subsistence salmon harvesters in the BS/NS region are already facing a salmon crash, losing their personal well being, livelihood, our culture, our way of life. We are not being asked to give up any of this, we are being told to give up everything. We have had closures of our subsistence fishing as a last resort for 30 years. Escapement goals aside, and subsistence priorities not withstanding the goal of a management body should be to preserve the species being harvested. The studies and scientific data show that salmon bound for western Alaska have been intercepted by this fishery and in turn have caused diminished returns to western Alaska rivers as evidenced by Seward Peninsula river drainages, eastern Norton Sound river drainages, Yukon and Kuskokwim Rivers crashing and their commercial harvest stopped for the past couple years.

The result of nonaction by ADF&G and AK Board of Fish may in fact be that the salmon population in western Alaska rivers will reach a point that they become extinct in those waterways; and the most tragic thing is that this is completely avoidable thru regulatory measures.

Again, Kawerak, Inc. in not asking for a Area M fisheries closure but rather that management measures be more comprehensive as mentioned in the above to ensure future escapement goals and population numbers are sustainable or more importantly sustained for western Alaska salmon stocks.

For any questions please reach out to Kawerak, Inc. Subsistence Resources Program Director Charles Menadelook at [cbmenadelook@kawerak.org](mailto:cbmenadelook@kawerak.org) or 907-443-4265

Melanie Bahnke

*Mary David acting for Melanie Bahnke*

Kawerak, Inc. President

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