

Bering Sea Fishermen's Association

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May 24, 2022

Area M Seiners Association P.O. Box 324 Sand Point, AK 99661

Delivered via email: areamseiners@gmail.com

Re: Request to stand-down during June 2022 openers to ensure escapement of AYK-

bound chum salmon

Dear President Kiley Thompson:

In June 2010-12, the Area M purse seine fleet voluntarily forewent participation in the first commercial salmon opening of the season to prevent interception of chum stocks passing through the Alaska Peninsula region en route to natal streams in the Arctic-Yukon-Kuskokwim (AYK) Region. Considering recent failures to meet minimal chum salmon escapement goals within the AYK Region, the loss of subsistence and commercial harvest of chum salmon on the Yukon River in 2021, and dire chum salmon harvest projections for 2022, the Bering Sea Fishermen's Association, together with the undersigned organizations, asks the Area M purse seine fleet to stand down during all June commercial salmon openers to prevent the interception of AYK-bound chum stocks.

High rates of AYK-bound chum salmon are intercepted in Area M's June salmon fishery, particularly within the Shumagin Islands and South Unimak districts. The Western Alaska Salmon Stock Identification Program (WASSIP) demonstrated that AYK-bound chum stocks comprised, on average, between 31.53% – 51.8% of the June commercial chum harvest between 2007 and 2009. WASSIP also confirmed that with respect to the South Unimak district, AYK-bound chum stocks were the most dominant group present in the June commercial harvest. Between 2007 and 2009, AYK-bound chum stocks comprised, on average, 42.4% - 82.93%, of the South Unimak district's June commercial chum harvest.

In 2021, the Yukon Area had no summer or fall subsistence or commercial chum harvest. Within the Kuskokwim drainage, less than 6,000 chum salmon were commercially harvested in 2021 and there was zero in-river commercial opportunity. In stark contrast, in June 2021 alone, the South Unimak and Shumagin Islands June commercial fishery harvested 1,168,601 chum salmon, the highest chum salmon harvest in the history of the Area M fishery.

2021 also saw dire summer chum salmon escapement levels throughout the AYK Region. Kuskokwim drainage weirs documented the lowest chum escapement on record. The Yukon drainage is subject to a BEG of 500,000–1,200,000 summer chum; in 2021, the drainage-wide escapement was a mere 153,497 summer chum salmon. 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, almost 200,000 under the lower range of the SEG.

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The Alaska Department of Fish & Game (ADF&G) 2022 pre-season estimate for Yukon Area chum returns does not inspire confidence that chum run strength will improve. Summer chum estimates forecast a farbelow-average run of 162,000-542,000 fish. Fall chum run estimates forecast approximately 110,000 fish, well below the SEG range of 300,000-600,000 fish. If these forecasts hold, the 2022 summer and fall chum runs will not meet minimum drainage-wide escapement levels, and there will be no subsistence and commercial fisheries, further devastating local economies and compounding food insecurity throughout the AYK region.

The sustainability of future chum stocks depends upon achieving escapement goals in the AYK Region this year. If the Area M purse seine fleet does not stand down, the unmitigated harvest of AYK-bound chum salmon all but assures the crash of chum stocks and the destruction of economies and traditional subsistence lifestyles.

This coalition, made up of organizations with strong economic and cultural ties to our in-region fisheries, recognizes that standing down from June commercial openers is not without economic consequences. But the survival of the AYK region – and the existence of its chum runs – depends upon the recognition of how our collective actions affect one another. Area M's unmitigated interception of AYK-bound chum salmon stocks in the June salmon fishery will drive those stocks beyond recovery and endanger an entire region and peoples' ways of life.

Thank you for considering this request.

cc: Governor Mike Dunleavy

Commissioner Doug Vincent-Lang Alaska Board of Fisheries Members:

Märit Carlson-Van Dort Gerad Godfrey Israel Payton

McKenzie Mitchell

Mike Heimbuch

John Wood

John Jensen



Vivian Korthuis, Chief Executive Officer Association of Village Council Presidents

Polsin Samuelsen, Jr. Din Samuelsen, Jr., Board Chair Bristol Bay Economic Development Corporation



Andrew Tuy Andrew Guy, President Calista Corporation



Eric Deakin, Chief Executive Officer Coastal Village Region Fund



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Kevin Whitworth, Interim Executive Director Kuskokwim River Inter-Tribal Fish Commission



Janis Ivanoff, President & Chief Executive Officer
Norton Sound Economic Development Corporation



Serena Fitka, Executive Director Yukon River Drainage Fisheries Association







Stephen Maxi, Jr., Speaker Yukon-Kuskokwim Regional Tribal Government



Yukon River Inter-Tribal Fish Commission



Theresa Clark, Executive Director Yukon River Inter-Tribal Watershed Council