

COMMENTS ON RC 109

Board Member Vince Webster has proposed an approximately 17 percent reduction of the amount of fishing time that would be allowed in the South Peninsula June fishery (RC 109). The proposal, if adopted, would significantly alter the management plan adopted by the Board in 2004 and undercut the premises of that plan, as described in the Board's findings (2004-229-FB). This proposed revision of the June fishery management plan raises a number of questions and issues that should be addressed before action on this proposal is taken.

Public comments favoring the "windows" management regime reflected in RC 109 focus on the need to protect chum salmon migrating back to river systems in Northern Norton Sound, the only area where yield concerns still exist for central western Alaska (CWAK) chum salmon. At its AYK meeting, the Board heard information concerning the status of the stocks and their overall improvement in the last 5-10 years, during which time the June fishery management plan has been in effect. See, Special Publication No. 12-29, "Norton Sound Subdistrict 1 and Subdistricts 2 and 3 Chum Salmon Stock Status and Action Plans, 2012; A Report to the Alaska Board of Fisheries (Menard and Bergstrom, December 2012)." Indicators of this improvement include:

- the BEG in subdistrict 1 was achieved or exceeded every year except 2009.
- the SEG/OEG in two rivers west of Cape Nome, the Snake and Nome Rivers, were achieved in 2 of the last 5 years.
- the authors concluded that there "has not been a chronic inability to meet escapement goals" in Subdistrict 1. *Id.* at 3.
- Tier II restrictions on subsistence were liberalized beginning in 2004 and no Tier II restrictions on subsistence have been imposed since 2006.

The authors noted that despite the improvement to chum salmon runs and increased subsistence opportunities, chum salmon subsistence harvests remain low compared to the pre-1990s. "This may reflect changes in the species targeted by subsistence fishermen; record pink...and coho salmon...runs in the mid-2000s in subdistrict 1 allowed subsistence permit holders to easily target those species." *Id.* "Additionally, beginning in 2003, record sockeye salmon...runs returning to the Pilgrim River in the Port Clarence District for several years, resulted in a three- to eightfold increase of permits issued." *Id.*

In recognition of these improved runs in Norton Sound Subdistrict 1, the Board, among other actions, adopted proposals to allow additional commercial fishing east of Cape Nome (# 116) and to repeal the closure of marine waters west of Cape Nome (# 117).

Norton Sound representatives have in particular pointed to the Nome River as a system that needs protection from interception in the June fishery. The report to the Board identifies habitat issues for this river: "Prior mining activity on the Nome River and its tributaries as well as road construction has adversely affected salmon populations over the years." *Id.* at 5 (quoting a 1996-2010 comprehensive salmon plan).

The report to the Board shows that the 10-year average return of chum salmon to the Nome River is approximately 4,000 fish, and that the 5-year average return is about 3,100 fish. Id. at 20 (Table 1). Since 2004, when the current management plan has been in effect, the harvest of chum salmon in the June fishery has averaged approximately 412,000 fish. See RC 117. Results from WASSIP suggest that a harvest of this magnitude in the June fishery constitutes a harvest rate of approximately 3.6 % on the CWAK stock complex. See PC 28 at 11 (Tables B-D). The best available scientific information, from WASSIP and other studies (see RC 69), indicates that Norton Sound chum salmon are well mixed with other CWAK chum runs and are not selectively vulnerable to the June fishery.

Applying a 3.6 % harvest rate to the Nome River return of 3,000-4,000 chum salmon, indicates that the June fishery's total impact on that particular run is in the range of 100-140 fish. While it cannot be projected with certainty how much the harvest of chum salmon in the June fishery would be reduced if the "windows" regime in RC 109 were adopted, assuming that a 17 percent reduction in fishing time equates to a 17 percent reduction in the chum harvest suggests that the "savings" of Nome River chum salmon from the adoption of this new "windows" regime, would be around 20 fish. However, not all of these fish passed through the June fishery would necessarily return to the Nome River. Those fish would have to run a gauntlet of commercial and subsistence fisheries up the coast of Alaska, all of which also take CWAK, and also survive normal mortality losses from predation and other factors as these fish migrate hundreds of miles from the Alaska Peninsula to Norton Sound. It could well be that the amount of additional Nome River chum that would return to the river if the new "windows" regime were adopted, would be in the single digits. Savings of this magnitude would not be detectable in the Nome River and would not affect the management of that run in any respect, a point past Board have repeatedly recognized.

The "windows" management regime contained in RC 109 simply cannot be justified on the basis of science or on any assessments of its costs and benefits. The proposal would impose huge, adverse impacts on the fishermen and communities of the Alaska Peninsula for no measurable benefit.