

April 12, 2023

Dear Senate Resource Committee Members,

My name is Amber Cunningham, Inupiaq name is Kapuukaq. I come from the village of Uᅗalaᅗliᅗ, also known as Unalakleet. I was raised half my childhood by my maternal grandmother, Theresa Nanouk and she taught me the cultural value of subsistence and sharing. I caught my first silver salmon by means of rod and reel when I was 9 years old and from then on I fell in love with fishing. In all the years that I went fishing with my grandma, we only caught as many as the family would need to feed us for the winter and spring time. The only exception to this was that we also caught extra fish for the elders and less fortunate in the community who did not have the means to go out and subsist for their family. To this day, the only way I fill my quota of salmon is by rod-and-reel, which our ancestors would consider the only humane way to catch fish without interrupting the environment surrounding the fish.

Trolling in Area M proves to be a very disruptive practice, not only for the sea floor marine life, but for other marine species (king crab, killer whales, halibut, sea birds, etc) as well as for the Yukon River residents. NOAA lists out the bycatch by species, but doesn't go into details on the specific types of salmon besides chinook and chum that are caught and then discarded as bycatch in the Area M trawling. This is appalling because in recent years, even the fisheries in Unalakleet have been suffering. I remember years when we did not have to worry about not having enough fish to make it through the winter. Our family was easily able to catch 30 silver salmon by rod and reel per day and now we are lucky to catch 30 silvers per year. It's gotten so bad that I have to fly my family down to Anchorage and camp at Seward and Kasilof to get salmon to meet the needs of my family. I haven't even been able to catch extra fish to give to the elders in my community and it is not right. It is not right that we have trawlers in one area of Alaska just slaughtering our subsistence fish and mammals only to become wanton waste while we struggle to put food on our tables.

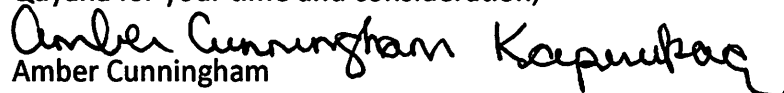
Our ancestors have always had a close relationship with our land and animals and respected our land, water, and air. We have only been taught to take what we need and nothing more. Our people do not waste any parts of their catch. When we catch salmon, we save the heads along with the eggs to make soup or use the eggs for bait. Some people even bake or barbeque the backbone to not waste any leftover meat. What we don't eat, we feed to our pet seagulls. It is due to the slaughtering of our marine life that our people suffer and lose much more of our cultural way of life. We have already had our language, our cultural practices, our LAND, and now our food stolen from us for what? For money! This is continued genocide of our people. Pretty soon Alaska will be depleted of its natural resources due to greed and insensitivity to the cultural values of our Alaska Native people.

I've included pictures of my family to personalize this message and show you how beautiful our way of life is. One picture is of me and my great-aunt, Betty, who just turned 96. This picture was last summer when we were fishing at North River bridge. Her daughter brought her up to

fish and I was there with my kids and when she would feel a tug on her line, I helped her bring in her fish. It was one of the best days for her because she had filled her fish tub with pink salmon to make dried fish. In the video, you can see my late grandma, Theresa, processing a rare king salmon and you can see she put aside the fish head and eggs.

I urge you to defend our subsistence way of life and put a stop to this effort of killing not only our food source, but also the continued genocide of our people. Please act now as you have a duty to our people, especially the First Alaskans who had everything stolen from them.

Quyana for your time and consideration,

  
Amber Cunningham  
Kapuukaq

**From:** [REDACTED]  
**To:** [Sen. Gary Stevens](#); [Sen. Bill Wielechowski](#); [Sen. Click Bishop](#); [Sen. Jesse Bjorkman](#); [Sen. Matt Claman](#); [Sen. Forrest Dunbar](#); [Sen. Cathy Giessel](#); [Sen. Elvi Gray-Jackson](#); [Sen. Lyman Hoffman](#); [Sen. Shelley Hughes](#); [Sen. James Kaufman](#); [Sen. Scott Kawasaki](#); [Sen. Mike Shower](#); [Sen. Bert Stedman](#); [Sen. Jesse Kiehl](#); [Sen. Kelly Merrick](#); [Sen. Robert Myers](#); [Sen. Donny Olson](#); [Sen. Löki Tobin](#); [Sen. David Wilson](#)  
**Subject:** Support SB 128 no amendments  
**Date:** Thursday, April 13, 2023 12:44:25 PM

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Hello Honorable Members of the Alaska State Senate;

I write to offer my support for SB 128 with no amendments.

I attended the February 2023 Alaska Board of Fisheries meeting in Anchorage in which peoples from all across the AYK region attended in support of Proposal 140 as a tool that would have helped offer more opportunity for fish passage through the waters of the South Alaska Peninsula (AREA M). In the month of June, virtually ALL salmon present in the waters of the South Alaska Peninsula are non local salmon... They are ALL bound for somewhere else, in the case of the AYK region, very badly needed Chum and Chinook salmon. In the case of Chignik, very badly needed sockeye salmon.

During the February meeting of the State board of fisheries it was brought up multiple times that it is stated in the State of Alaska Constitution that if subsistence needs cannot be met, no other consumptive uses shall occur of the same resource.

This fell on deaf ears. It takes a 4 vote majority to pass a proposal within the board process and 4 members of the board voted against passing proposal 140 which would have cut fishing time in the South Alaska Peninsula thus reverting the management plan to a pre 2004 management plan. The South Alaska Peninsula salmon fishery was massively expanded, which as an intercept fishery, goes against the Sustainable Salmon Policy, it was expanded in 2004 more than doubling the fishing time for a salmon fishery that IS NOT bound to conservation measures for MOST of the salmon harvested in its waters.

What was witnessed at the February 2023 board of fisheries meeting cannot be described as anything other than a great injustice. Petty Greed won out over thousands of Alaskans being able to subsist on salmon in the AYK region. It is no longer in the hands of the state board of fisheries.

When the state board of fisheries was casting the vote to aid the people of the AYK region, they had a choice to 1. Vote a lawful vote. 2. Vote for fairness 3. Vote for what is right and 4. Vote compassionately. The state board of fisheries majority vote was for none of these.

In 2004, the Sustainable Salmon Policy was ignored when the South Alaska Peninsula intercept fishery management plan expanded a known intercept fishery-massively. This HAS LED to the near extinction of AYK chum salmon stocks, there was talk at the board of fisheries meeting that the Yukon chum stocks may not be able to escape enough fish in the near future to REPRODUCE A RUN. The massive expansion of the intercept fishery has also led to the unhindered interception of Chignik bound sockeye, Chignik- the neighbor to the west of Area M, has had NO commercial salmon fishery in 2018, 2020, both of which were declared disasters, and have 2 more disaster declarations pending for 2021 and 2022. It has been the most shut down salmon seine fishery in the State of Alaska over the past 5 years. It is also one of the oldest salmon fisheries in the state, well over 100 years as a commercial

salmon fishery.

SB 128 will undo an injustice that has been imposed upon the peoples of they AYK region and the Chignik region.

Thank You,  
Timothy Murphy

**From:** [REDACTED]  
**To:** [Sen. Matt Claman](#); [Sen. Jesse Kiehl](#); [Sen. James Kaufman](#); [Sen. Löki Tobin](#); [Sen. Scott Kawasaki](#); [Sen. Cathy Giessel](#); [Sen. Click Bishop](#); [Sen. Donny Olson](#)  
**Subject:** Fwd: Judiciary Committee hearing request for SB 128  
**Date:** Thursday, April 13, 2023 2:01:19 PM

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Senator Claman,

As chair of Judiciary, I urge you to schedule a prompt hearing on SB 128 introduced by Senator Olson. 128 would close an intercept commercial fishery for a month so that thousands of Alaskans may preserve their culture and restore their food security. Passing 128 would show all Alaskans that the legislature prioritizes the customary and traditional lifestyles of Alaskan natives over perpetuating excess profits for a handful of commercial fish harvesters. I copy my interior Senators to encourage them to make every effort to also get this bill to the floor.

The Yukon and Kuskokwim rivers traditionally have provided the primary food source for thousands of families living in dozens of villages. When salmon runs were healthy, commercial fisheries also occurred in these rivers and at their mouths, providing much needed cash to the poorest region of the country. All river fisheries have been virtually shut down for the past 3 years and the King and Chum stocks are so depressed that they are on the verge of extinction.

Area M is located on the Aleutian peninsula. Each June, less than 100 seiners gather to intercept Chum and King Salmon bound for Western Alaska rivers. In 2021, the commercial fleet harvested over 1,000,000 Chum Salmon and over 10,000 King Salmon, despite the fact there are no King Salmon spawning anywhere near Area M.

The seiners average over \$700,000 in yearly income from salmon alone and most also have groundfish and shellfish permits they fish in other seasons. In sharp contrast, average per capita income in the AYK area is less than \$10,000.

Normally the legislature would defer to the Board of Fisheries (BOF) on such decisions. In this case however, the BOF has abdicated its constitutional obligation to manage fish for sustained yield and has violated the subsistence priority law, AS 16.05.258(b), by refusing to adequately restrict the Area M June intercept fishery to help provide a reasonable opportunity for subsistence. The law requires that all other uses be eliminated in such circumstances, but the BOF refused to comply with the law at its recent meeting.

Under such circumstances, the legislature is duty bound to correct these unlawful acts with responsible legislation.

The first step to a floor vote is for you to schedule SB 128 for a hearing. Please do so without delay.

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Michael C. Kramer  
Kramer and Cosgrove

[REDACTED]  
Fairbanks, AK 99701  
[REDACTED]  
[REDACTED]



From: [REDACTED]  
To: [Senate Judiciary](#)  
Subject: Senate Bill 128  
Date: Wednesday, April 19, 2023 12:06:56 PM

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Good afternoon,  
I support Senate Bill 128, Stop Commercial Fishing in Area M This Season. I've never done this kind of opposing before but I feel strongly about this bill. We need our salmon to survive, it is our culture and heritage. Our ancestors survive because of the salmon. I grew up on salmon and spend the summers at fish camp with my grandparents using the fishwheel to catch our salmon.

We are only requesting the commercial fisheries to stop for this season. I know a lot of money is involved, but think about the people who depend on this salmon.

Thank you for your time, and please consider the good of the people and this bill.

*Mashi' Choo (Thank You Very Much in the Gwich'in Language)*

*Margaret Craft (Neegoo Tsoo)*

*Program Assistant*

*Division of Wellness & Prevention*

[REDACTED]  
*Fairbanks, AK 99701*  
[REDACTED]

*"Success is not the key to happiness. Happiness is the key to success. If you love what you are doing, you will be successful". Herman Cain*

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Salmon Testimony  
**Date:** Wednesday, April 19, 2023 2:30:01 PM

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Chair Claman and members of the Senate Judiciary Committee:

My name is Shawna Hytry. I grew up along the Kuskokwim in McGrath. We enjoyed going to fish camp each summer. My family also enjoyed salmon from the Yukon. It is a favorite traditional subsistence food. The impact commercial fishing has on the entire state is unwarranted. Not only is it removing natural food from being harvested, by tradition, by the people of Alaska but it is affecting the food web along our riverways. I support senate bill 128 Commercial salmon fishery closure because every salmon counts.

Thank you for caring,  
Shawna Hytry  
Fairbanks, AK

**From:** [REDACTED]  
**To:** [Sen. Click Bishop](#); [Sen. Jesse Bjorkman](#); [Sen. Matt Claman](#); [Sen. Forrest Dunbar](#); [Sen. Cathy Giessel](#); [Sen. Elvi Gray-Jackson](#); [Sen. Shelley Hughes](#); [Sen. James Kaufman](#); [Sen. Scott Kawasaki](#); [Sen. Jesse Kiehl](#); [Sen. Kelly Merrick](#); [Sen. Robert Myers](#); [Sen. Donny Olson](#); [Sen. Mike Shower](#); [Sen. Bert Stedman](#); [Sen. Löki Tobin](#); [Sen. Bill Wielechowski](#); [Sen. David Wilson](#)  
**Subject:** Support for SB 128  
**Date:** Thursday, April 20, 2023 1:08:34 PM

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To the honorable members of the Alaska State Senate;

This is the 2nd time I have weighed in on SB 128.

The South Alaska Peninsula (Area M) salmon fishery is the sole reason I began attending State of Alaska Board of Fisheries meetings in the first place, that was 10 years ago.

There was a genetic study done over the course of 3 years called the WASSIP study. Western Alaska Salmon Stock Identification Program.

It showed a massive amount of Chignik sockeye is intercepted in the Area M salmon fishery. It also showed AYK Chum stocks intercepted in Area M.

The WASSIP study data was presented for the first time to the board of fisheries in 2013. And ignored by the members of that board. One board member went on record stating "this information is too new to do anything with". That same board member 3 years later during the next Chignik/Area M board meeting stated as a matter of record, "this information is too dated". The same board member also voted against passing proposal 140 in the February 2023 board meeting.

It would be a blessing to have a board member on the state board of fisheries who always votes to protect your interests.

Amazingly, this board member is no longer serving on the board of fisheries. How the State of Alaska has not opened itself up for liability in "fixing" the outcomes of State Board of Fisheries meetings is a mystery to me.

The State of Alaska Board of Fisheries consists of 7 members, however, if you were to go to the

ADFG website to replay the February 2023 Chignik/ Area M meeting, you would hear the Commissioner of ADFG, Doug Vincent Lang as vocal as a commissioner I have ever witnessed during board process as though he were the 8th member of that board. The commissioner exhibits clear bias and in fact helped steer the boards decision making on the matter of interception of non local salmon in Area M. It is evident DVL is a mouthpiece to prosper a specific agenda in fishery regulation.

In my limited time going to board of fisheries meetings in the hopes to get some regulatory relief for my salmon fishery in Chignik, it has been met with virtually no success. There have been proposals passed, with the "teeth" of the proposal compromised away in the desperation to get the proposals passed, in effect proposals that will do basically the bare minimum to help non local salmon in this case- Chignik bound sockeye, return to the waters of the Chignik Management Area (CMA).



I fully support SB 128 as it is written. I would NOT support any amendments to SB 128. The entirety of the Chignik communities (Ivanof Bay, Perryville, Chignik Bay, Chignik Lagoon, and Chignik Lake) have been on the verge of becoming ghost towns without the salmon fishery- going back to the first time in its history in 2018 of not having a commercial harvest. Federal subsistence closures occurred in 2018 and 2020, both years NO commercial fishing occurred targeting sockeye or chinook. Minimum escapement goals for Chinook have been met 1 time in the past 5 years, and that is WITHOUT the Chignik seine fleet able to fish during peak abundance of Chinook salmon in the region. Theyre being caught, just not in the CMA.

The Chignik Bay school has been closed for several years now, it requires a minimum of 10 students to stay open. I believe Chignik Lagoon School will be next unable to meet its minimum requirement of students. There are no other industries in the region to support the local communities.

If you are interested to hear a perspective on this, please listen to the public testimony of Axel Kopun at the February 2023 board of fisheries meeting.

<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2022-2023/peninsula/index.html?mediaBasePath=/Meeting%2002-24-23%20%28Feb-24-23%205-32-11%20PM%29#>

At 1:32:44. It cannot be explained in a better way.

2023 will be a make or break salmon season for many in Chignik, simply due to the fact that we cannot get enough sockeye back to the waters of the CMA past the intercept fisheries on either side of Chignik.

The residents of the AYK region don't have salmon to EAT. The interception of AYK chum and chinook stocks in Area M has taken away AYK residents right to subsist on their historical and traditional foods. That alone should have been incentive enough for the board of fisheries to pass regulation to help non local salmon make it back to their natal streams.

There are chum stocks in the AYK region that are now labeled as functionally extinct, there is a high likelihood that there will not be enough soon to reproduce a return.

The only thing about SB 128 that is a negative is that it states it only temporarily closes the Area M salmon fishery in June. THE problem only goes away temporarily.

Please get this bill passed,  
Timothy Murphy

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Written testimony to House Bill 128  
**Date:** Thursday, April 20, 2023 1:13:19 PM

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Chair Claman and members of the Senate Judiciary Committee, mahsi choo for the opportunity to testify today.

For the record, my name is Mackenzie Englishoe, I'm 19 years old, and I'm a tcc emerging leader representing the youth of the villages of Yukon Flats. My Village is gwichyaa zhee.

The action of the Board of Fish at the February Area M meeting violates their statutory obligation in AS [16.05.258](#) to prioritize subsistence needs over non-subsistence harvest.

If the harvestable portion of the stock or population is not sufficient to provide a reasonable opportunity for subsistence uses, the appropriate board shall adopt regulations eliminating consumptive uses, other than subsistence uses.

Commercial harvests are being prioritized over escapement and subsistence in violation of Alaska state law. The combined 2021 and 2022 ex-vessel value of South Peninsula commercial harvest and sales of more than 1.7 million chum salmon exceeded \$4.3M. Meanwhile, chum salmon escapement goals failed to be met and reasonable opportunities for subsistence fishing for Yukon River chum salmon failed to be provided.

Commercial harvests are being prioritized over escapement and subsistence in violation of Alaska state law. The combined 2021 and 2022 ex-vessel value of South Peninsula commercial harvest and sales of more than 1.7 million chum salmon exceeded \$4.3M. Meanwhile, chum salmon escapement goals failed to be met and reasonable opportunities for subsistence fishing for Yukon River chum salmon failed to be provided.

The action of the Board of Fish at the February Area M meeting puts the AYK chum salmon stocks at risk of collapse. There were no Yukon River or tributary summer chum salmon escapement goals met in 2021 or 2022.

Summer chum salmon escapement in 2021 was the lowest on record, representing an 84% decline from the [2010-2019](#) average, while that same year, it was a record high harvest in Area M of over 1.1 million chum.

When the chum salmon crashed in 2020 and 2021, ADF&G took no action despite the fact that their best available genetic analyses of Area M interceptions demonstrated that on average 57% of the Area M chum salmon catch in June were of Coastal Western Alaska origin.

Under the current Area M management, the burden of conservation is unfairly placed entirely on the in-river subsistence fishing communities and still escapement goals are not being met even with zero subsistence fishing.

There are a lot of factors that are driving the salmon declines, like warming waters, disease, predators, low fitness levels, and commercial fishing. In the face of uncertainty, the

Sustainable Salmon Policy directs the State of Alaska to take action that errs on the side of conservation. Conservation is our responsibility and under our control. It is how we can support our salmon to reach their spawning grounds, meeting escapement and treaty obligations.

Sent from my Galaxy

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Testimony for Senate Judiciary Committee on SB 128  
**Date:** Friday, April 21, 2023 8:18:51 AM

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Hello,

I am a First Nation person in the Yukon. I have been unable to practice my cultural practices of harvesting salmon at the end of the Yukon River.

Current commercial fishing at Area M further limits the possibility of reconnection with a cultural way of life. Subsistence needs on this side of the border (Canada) are not being met. We need to limit commercial harvest in critical areas to allow salmon to recover.

Thank you,  
Jared Gonet  
Taku River Tlingit Citizen

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128 Oral Testimony - April 21, 2023 at 1:30pm  
**Date:** Friday, April 21, 2023 8:42:24 AM

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Hello,

I am a physician who has worked in Tribal Health for the past 40 years, and currently work for Tanana Chiefs Conference in Fairbanks, Alaska.

Our population, as much of the US, is facing an epidemic of obesity, worsening over the past decades, and especially prevalent in children. This will have major public health implications, both for health and health care costs.

With traditional fishing, children are raised spending summers at fish camps, where they participate in the catching, cleaning, smoking, drying, preserving, and eventually the consuming of fish. These are healthy activities...the type of healthy activities we are encouraging. There are limited alternatives in rural areas. If this tradition is lost, and lost to future generations, its contribution to healthy living will be lost as well.

Stephen J. Gerrish, MD



The Aleutian Islands is a cash economy whereas the AYK region is a mixed cash-subsistence economy. There are over 250 permits for non-salmon species. They have alternatives, they are not starving. Salmon makes up about 71, 62 and 89 percent of the diets of Tanana, Fort Yukon and Eagle, respectively (2017). Without salmon, we cannot barter and trade. Salmon, moose, and caribou are the backbone of our food systems. All species are in decline and subsistence resources are less reliable and affordable. We have to travel farther and farther to hunt, costing precious gas resources we do not have.

Our economy is depressed. Our fisheries are depressed. Our people are depressed.

Proposal 140 ensures time/area closures, ensuring there are sufficient time windows for chum passage. The heat stress that we saw in 2019 could not be planned for. CWAK is 20 percent of all chum in Area M June fishery but 40 percent of Alaskan chum are of CWAK origin. We need every single salmon to spawn. Summer chum counts on the Yukon River become significant historically around June 28 - July 3. The Area M June fishery would essentially be over at this point.

This year 2023 will be rough. That year's (2019) fish will be coming back this year. By June 21, 2022, only 834 chum passed the Pilot Point sonar station, the lowest count on record. If we set a cap, that could be all our fish. The Area M June fishery will be over by the time we see chum. If we had a repeat of 2019 and a low run, we will be on our way to extinction.

We need 72-hour closures to allow passage. The 2001-2003 Area M June Management Plan resulted in better summer chum runs on the Yukon River. Proposal 140 is not new, this was already in regulation. We went from under 500,000 summer chum in both 2000 and 2001 to over 2.5M and 3.7M in 2005 and 2006, respectively. This shows that allowing chum to pass through Area M resulted in successful spawning and a rebound in population.

This is a food security crisis for about 16 percent of Alaska's population. The Governor has a Food Security Taskforce. Over 95 percent of food is flown into urban areas of Alaska. In rural Alaska, our diet is about 50-60 percent wild foods, mostly salmon, from the lands and waters. Lack of salmon in the AYK region is a major food security issue. Our bodies are adapted to eat

mostly wild foods. We're experiencing serious health disparities trying to adjust to store-bought foods. Our foods are not replaceable. Our bodies need them for optimum health and wellness.

I have 6 people in my household. I received \$1,100 for disaster relief for the fisheries crisis. This is not enough to feed my family. The salmon I'm not currently able to fish are of way more value than that. This disaster relief needs to be looked at equitably. This is not a solution for poor fisheries management.

Feb 2023

My name is Eva Dawn Burk. I grew up commercial and subsistence fishing with my family on the Tanana River near Manley Hot Springs and Nenana. My family has been fishing in the same place for 5 generations now. What we are witnessing today began many years ago. In the late 80s, commercial fishing began to collapse and my family was forced to move into the village and find other employment, largely abandoning our fish camp. Now, here we are and not only is commercial fishing obsolete but so is subsistence fishing. For the amount of time and resources it takes to go to fish camp, we are essentially paying for an expensive camping trip. We returned home for the past few years with very little to share. In fact, for three years now I have driven over a thousand miles to obtain sockeye salmon from commercial fishermen from Kenai and Bristol Bay, as well as from friends along the Copper River. It takes a lot of resources to do that, not all of our people can. We're not the only rural Alaskans suffering from overfishing and mismanagement. Salmon are getting smaller and fewer across a lot of Alaskan waters.

My family and community's subsistence needs are not being met. Subsistence fishing is supposed to be prioritized over all other uses. For many years now, we have had a chronic inability, despite the use of specific management measures, to meet our subsistence needs. For many decades now, we have known that the AYK salmon migrate through Area M. If you look at the physical oceanography, there are major currents that run through Area M carrying nutrients and fish with them. All of the genetic studies done to date show significant presence of CWAK chum. We do not have the time and resources to conduct more studies. We know most salmon, with the exception of Bristol Bay sockeye for now, are experiencing negative health impacts and population declines. The state of Alaska, BOF, has statutory obligations, under AS 16.05.258 Subsistence Use and Allocation of Fish and Game, to manage sustainable salmon and mixed stock fisheries. We need to take management actions to preserve our wild stocks of Alaskan salmon.

I support Proposal 140 to reduce commercial fishing time in Area M. I oppose all proposals that wish to seek increased fishing time.

Feb 2023

Although I commend the fishermen for standing down in 2022 to allow chum to pass. I would remind us that they had that option in 2021 but instead we saw record catches of chum in Area M. This area is one of high value to ADFG and fisheries is the second largest industry in Alaska next to oil and gas. This amount of economic pressure is very intense and I'm sure it influences decision-making. I will again emphasize the legal obligation to adopt regulations eliminating consumptive uses, other than subsistence uses. Like my family and many others, we have learned to adapt to the lack of commercial fishing and I hope others can learn to as well.

My son asked me why we can't go to our fish camp? I tried to explain that it was illegal to fish in our eddy anymore. That we have to fly fish in now even though we're right next to a river that used to be full of fish.

When we take king salmon out of the cupboard or freezer, it is a few years old now. We don't want to waste it and we want to be sure we share with others, especially Elders. In the summer, some of our kids ask, "Why can't we have fresh salmon for dinner?" Instead I reach into the freezer, grab a fish that comes from over six hundred miles away, and say, "Let's try to be grateful for what we have and pray things change soon."

My Name is John H. Lamont Jr. and I grew up at Lamont's Slough on the mouth of the Yukon River. My immediate family fished for salmon since the early 1900's, my Dad John Henry Lamont "Jack" processed salmon since the year he built his homestead and later USGS named the slough after our family.

Our family was the largest consumer of Yukon Chinook Salmon for many years, my Dad and his partner Frank Kern salted Chinook Salmon slabs and terse them for shipment to a retailer in Seattle. After the fishery was temporarily closed, my Dad continued mild curing Chinook Salmon slabs and cold smoked them for bartering throughout the winter months until his passing in 1959. At that time my late eldest brother Frank Kern Lamont continued to process Chinook Salmon for winter sales until FDA closed him down in 1981. He documented a portion of his commercial catch when he was cold smoking them for winter sales. I started helping him in 1965 as a 9 year old, when I turned 12, I was able to get my own gear, vessel, and fishing license to set 150 fathoms of Chinook gear during our commercial fishery which was from June 1<sup>st</sup> until June 30<sup>th</sup> each year (we had a 72 and 48 hour fishing period each week).

Our family also processed (cold smoked) Chum and Coho Salmon for trading with Sheppard Trading Company since at least 1935. We processed thousands of these salmon each year for trade (once dried they were bundled in 20 fish bales) and delivered to Sheppard Trading Stores in Mountain Village and Alakanuk.

Just from this introduction, you will know my family's history of salmon use on the mouth of the Yukon River.

This written document is in relation to Senate Bill 128:

Our Indigenous Peoples on the Yukon River have lived their lives centered on salmon Centuries prior to European contact. 2021 was the first time ever our People were not allowed to harvest salmon for sustenance, which is leading to great economic, social and emotional challenges. Although subsistence has a priority, we have supported closures to maintain escapements for future returns.

Our People are tired of experiencing fishing restrictions by the State of Alaska's Salmon Management Plan for the Yukon, and now telling us they need to do more research to find out what is causing the decline in salmon returning to spawning streams in the Yukon Drainage both in the United States – Alaska and Canada – Yukon. I know for a fact there are three factors related to the decline of salmon to the Arctic Yukon and Kuskokwim (AYK) drainage systems. One, too many hatchery releases into the ocean where wild salmon feed. The Hatchery releases in billions (which are larger and more mature when released in comparison to wild salmon) are eating up the nutrients and possibly some of the smaller salmon smolts in the marine growing environment. Two, by-catch in the Marine waters while harvesting Pollock and other non-salmon species. The North Pacific Fisheries Management Council has made some positive changes to this for Chinook Salmon in implementing both off shore and in shore caps, they are still working on (or in discussion of) Chum Salmon Caps. Three, the most impactful (in my



unscientific research) is the incidental harvest of AYK bound Chinook, Chum and Coho by the commercial salmon fleet in the South Unimak, Shumigan, South and North Peninsula during the month of June.

What should the State of Alaska do to improve salmon escapements in the AYK areas of our great state? For starters, close the Area M Fishery for three weeks in June (June 7 through June 28). Should this happen, numbers of salmon will increase in the AYK drainage. For those of you asking how the profitable Area M fishers will survive... they will be fishing prior to and after these dates. Also, "A decades-old program that pays farmers to leave land fallow is being heralded by the Biden Administration as a climate solution, but environmentalists don't see it that way." Department of Agriculture doles out about two billion dollars each year to farmers and ranchers not to farm, why can't fishermen get paid not to fish? Our State can ask our Federal Government for a portion of this funding to compensate Area M fishers not to commercially harvest salmon during those dates in June.

Why doesn't the Legislature give the Governor direction in taking action on the Area M Fishery? In state jurisdiction he can direct the Commissioner of Commercial Fisheries to close Area M Fishery from 7 June through 28 June each year for at least one Chinook Salmon life cycle (6 years). When this area fishery is closed for those three short weeks in June our state can request Federal funding from the Department of Agriculture to compensate the Area M Fishermen as do the Farmers and Ranchers of America.

As stated above, our People on the Yukon River are tired of restrictions driven by State Fish Managers all on the basis of research and not making escapements. Myself, as a lifelong fisher on the Lower Yukon River have not commercially harvested Chinook Salmon since 1992, other commercial fishers since around 2008. Now, none of our People (who are known as the "Fish People") are allowed to subsist with a salmon net! AND yet multimillion dollar fishermen continue to harvest salmon bound for the Arctic, Yukon Kuskokwim River systems. Under our State Constitution, salmon spawning escapements takes precedence over ALL users (and it seems, EXCEPT Area M Fishers) as we see it, WHY? THE State has the authority to make a change that would positively impact our People on the Yukon River! It can close the only fishery in our state waters that is not a Terminal Water Fishery, that commercial fishery known as Area M Fishery. Please take action on this Senate Bill 128 and close those waters to commercial fishing for three weeks in June for at least one Chinook Salmon life cycle.

I submitted a proposal to close the Area M Fishery at the last Alaska Peninsula State Board of Fish meeting this past February and no action was taken, now it is before you as a Senate Bill, please take action now and support the closure for at least six years.

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Our AC voted unanimously to support proposal 140 to reduce fishing time in the Area M fishery. Specific issues concerned loss of subsistence, hatchery fish, size of boats, types of gear allowed, number of non-resident permits and total permits, loss of commercial fishing in the Interior, genetic studies, salmon migration routes, ecosystem impacts, teaching our youth, caring for our Elders, the size of the AYK region, Bering sea collapses, Alaskan seafood prices, food security, community wellbeing, and the number of villages and people impacted. We also did not receive ADFG's comments on proposal 140 until after our January meeting. We had to have another meeting and multiple phone calls to cover this proposal in detail.

Our villages lost a huge, irreplaceable part of our culture and economy when the fish plants in Nenana and Manley Hot Springs closed. Many fish camps along the Tanana River were abandoned as villagers traveled to other communities for work as they could not eke out a living from the river any longer. Although we empathize with other commercial fishermen, we all must sacrifice to keep the salmon returning to their spawning grounds. We are going to have to make a hard decision. Are we going to protect future generations of salmon and people? Or are we going to take the last salmon from the ecosystem for commercial purposes?

The watersheds of the AYK region make up 40 percent of Alaska. These lands and waters feed about 120,000 residents that live in the 118 communities within this region. This region also has some of the highest poverty rates in Alaska with limited economic opportunities, lack of housing, pronounced health disparities, and aging or failing infrastructure. The Yukon River is the 3rd longest river and has the fourth largest watershed in North America. The Y-K Delta is one of the largest in the world. In an area of this magnitude, commercial and subsistence fishing was destroyed in less than 3 decades. This demonstrates gross negligence and mismanagement of wild Alaskan salmon stocks. Historically, and currently, fisheries crash before science and regulations ever keep up. It appears that the science is questionable and there is no real understanding of how to manage salmon that have the longest migration routes in the world. That would mean managing the health of all the ecosystems along a 1,800+ mile journey, including Area M. What would it take to increase salmon runs in the AYK region? There are only

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so many tools at our disposal and the first step would be to stop overfishing and allow salmon to pass through Area M to reach their spawning grounds. Area M is most definitely on the migratory path of the salmon. Whether we look at datasets from 1952-2016, 1990-2015, 2007-2009, or just 2022, CWAK chum have always had a significant presence in Area M. That presence has been declining while the presence of Asian hatchery chum has been increasing. That makes sense because Asia is releasing record numbers of hatchery chum. It makes sense because our AYK chum numbers are declining. The fish that Area M fishermen are catching are mostly Asian and CWAK. Based on the most recent study, if we were to look at only salmon Native to Alaska in this area in June, we would realize that about 40 percent of our Alaskan chum are from CWAK. How can we justify fishing these chum if we are seeing chum crash all over the AYK region? We are most definitely overfishing in this region if those fish are not being seen in their spawning streams. If these salmon do not make it their spawning grounds, there will not be fish in the future.

Overfishing, habitat destruction and pollution are affecting fisheries worldwide. When it comes to habitat destruction for the AYK region, we do not have mega infrastructure projects and large scale dams in our watershed areas yet. We do know the health of the ocean is in serious decline which is illustrated by the numerous collapses of various species in the Bering Sea, including crab and salmon, not to mention impacts to marine mammals and seabirds. Warming waters and marine heatwaves pose serious threats to our fisheries with risk and uncertainty. When fish were floating up dead in the AYK region from heat stress in 2019, Area M fishermen did not adjust their harvest that year or the following two years. In fact, somehow, over 2.2M chum were harvested in the Alaska Peninsula/Aleutian Islands and record catches were set in 2021. This lack of oversight during a critical period for AYK chum demonstrates our inability to manage overfishing along the CWAK chum migratory paths during ecosystem crisis.

We do not have control over warming waters, we have control of overfishing. We could not have predicted what happened in 2019 with scientific models or pre-season meetings. Our ecosystems and the habitat they provide are being significantly altered by climate change. The

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end result is we still need to manage the risk and uncertainty. This is not the time to be defending our actions in one area while disregarding the entirety of the big picture. Without protection and conservation of the CWAK chum salmon that pass through Area M, we are putting entire ecosystems and watersheds at risk. We are endangering the other species that inhabit the AYK region and rely on the nutrient cycling the salmon provide. When salmon are low, predators like wolves and bears, attack more moose and caribou. With moose, caribou and salmon being the backbone of our food security, our entire food system is now at risk. Food security is a major issue in Alaska. Here we produce 60 percent of the nation's seafood but cannot even afford to buy it ourselves. King crab is \$135 a lb in the restaurant. Bristol Bay sockeye is \$19 a lb retail. These economic drivers, and therefore political as well, play more of a role in decision-making than science. If we followed science, we would understand chinook salmon is an indicator species, a keystone species. Their health is indicative of the health of their ecosystems. When they begin to decline, other species soon follow. We see many Chinook stocks listed as Stocks of Concern. What is the purpose of listing this stock? To acknowledge management changes need to be made but not make any that result in significant change or success? We know that most salmon are experiencing negative effects with the exception of Bristol Bay sockeye at this time. What are our concrete steps and actions to protect these wild salmon stocks? How are we upholding Alaska's constitution, statutes and regulations to manage salmon returns for wild stock conservation? Are we actually meeting our escapement goals? No, not for many years now. Are we meeting subsistence needs? No, not for many years now. Will commercial fishing ever exist again? Probably not.

Many scientists attempt to explain uncertainty as impacts from climate change. While this is valid, it does not excuse us from making extremely difficult decisions. Currently, NOAA is working to improve modeling and prediction of climate impacts on fisheries. However, predicting compound extreme events such as marine heatwaves, record air temperatures and record low water levels would be nearly impossible. Those types of algorithms take years to develop and ground-truth. We do not have enough salmon to wait for that. Maybe if we would have started that in the 80s but we did not even know that climate change was going to happen

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so rapidly at that time. That goes to show that exercising caution and care should be of utmost importance. Without the presence of climate change, we annihilated commercial fishing in our region before the turn of the century. That was overfishing, not habitat destruction. We need to control the things that we can and prepare for the worst to come. We are not out of the woods yet.

The children. This is what I want to close with. We have been importing Bristol Bay sockeye into our Interior villages. While this is a kind gesture, it does not replace the chinook and chum salmon. With the donations from the State, we barely get enough to make a batch of strips. To make fish camp viable, we are now buying more fish to meet our subsistence needs. To keep our traditions alive and pass them onto future generations, we are spending good money to buy these fish. We have had to learn how to work with sockeye, changing all of the recipes that have been passed down for generations. Even though we are grateful, it's just not the same. The commercial fishing culture that many are testifying about here has already been lost for us, we are just trying to feed our people at this point. Now, we are learning to be farmers. Not that we necessarily want to, but our fish and game resources are less reliable and affordable. We are learning to adapt, maybe in some ways, being forced to.

We have so many questions. Will there be salmon for the future generations? Will they be wild or hatchery? Will Chinook and Chum return to the AYK region? What traditions will our children pass to theirs? I run the fish camp for our village. While this is a great responsibility and I enjoy bringing people together to process and preserve traditionally. I also am saddened that we cannot take these children out to set a net or run a fish wheel. How are they supposed to learn how to fish, when to fish, where to fish? Is their education and lifestyle less important than commercial fisheries in Area M? Our legacy can be an epic feat or an epic failure.

Proposal 140 is the compromise. To meet escapement goals, we have to let salmon through by modifying fishing gear, limiting openings, or total number of permits. It is the responsibility of ADFG to manage the fisheries for sustainable wild salmon stocks. This is in all of our best



interest. In times of uncertainty, there is more risk. We need to account for that and take conservative approaches. More salmon spawning in the AYK region means more salmon passing through Area M in the future. That should be our goal, as it is the state's legal responsibility.

To the Alaska State legislature

Senate Bill 128

I am writing in support of SB128, the closure of the June Area M salmon fishery. The fishers, both commercial and subsistence of Area M, the Yukon River, The Kuskokwim River, Norton Sound, Bristol Bay, Chignik and other Gulf of Alaska areas all are affected by the management of Area M particularly in June. The regulation, 5AAC 39.220. Policy for the mixed stock salmon fisheries and 5AAC 39.222. Policy for the management of sustainable fisheries both speak to the top priority of management, adequate escapement. Even the subsistence priority is secondary to sustaining the runs. For the past three years the coastal western Alaskan chum stock has had the bulk of its habitat closed to chum and king salmon fishing. The pink salmon fisheries of western Alaska have a very limited market and even the coho stocks barely support fishing. The State Constitution, statutes and the regulations promulgated by the Board of fisheries all speak to sustainability and attaining escapement goals. The Department of Fish and Game and the Board of Fisheries have both dismissed the laws and have chosen to enact the most minimal fishing time restriction on a fishery that is well documented as the largest consumer of CWAK chum in recent years. How is it that publicly noticed laws are disregarded at the expense of ~130,000 residents and an area covering the size of Texas? The Board establishes regulation just to disregard them as the mood strikes? Public process should be followed. The Board should be held accountable for their charge in the Constitution, in statute and certainly in the regulations they established.

Salmon crashes have occurred over the years. In the past, the state responded with more focused management. I have vivid memories of the chum crash of 1987 in Western Alaska. I was the area fisheries manager north of the Yukon. I was the first and only manager charged with establishing a Tier II salmon fishery. This was very unpopular, requiring all of my attention and the assistance of multiple layers of the Department and even the attention of the Department of Law due to a lawsuit and public outcry. I was shot at on two occasions, the Troopers had to accompany me to fishery meetings, the attorney general of the state and I were co-speakers at regional meetings. To make matters more interesting both my supervisor and his supervisor had nervous breakdowns, one never recovered. Today things have not boiled over to the same point...yet. However, talk to the managers and you will hear of incredible stress, not just of the staff but of the local residents losing culture and food security. Discussing fisheries proposal 140 with department leadership, I was told they viewed that proposal as punitive to the Area M fishers. That was spoken by someone with no experience actually closing fisheries for the long term and facing the disenfranchised public. The proposal would have reduced the June commercial fishery, a far cry from the complete and multi-year closure that is ongoing in AYK. The conscious decision to extirpate salmon stocks with chronic under-escapement and to forbid fishing over multiple regions of the state to avoid relatively small declines in the big business of the June Area M salmon fishery is far more punitive.

We have a crisis. The situation begs for attention. Area M has only grown for decades with no conservation regulation as required of all other fisheries in the state.

Charles Lean

Nome

**From:** [Krystal Lapp](#)  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128 - Written Testimony  
**Date:** Friday, April 21, 2023 11:31:11 AM

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Chair Claman and members of the Senate Judiciary Committee, thank you for the opportunity to provide written testimony on SB 128 today.

My name is Krystal Lapp, I am the Tribal Stewardship Coordinator for Healy Lake Village Council, which is the governing body for the Healy Lake Tribe (Menda's Cha'Ag) of the Upper Tanana/40 Mile Region.

I support senate bill 128 for Commercial Salmon Fishery Closure, because commercial harvests are being prioritized over escarpment and subsistence. The action of the Board of Fish at the February 2023 Area M Meeting in Anchorage, Alaska, violates their statutory obligation in AS 16.05.258 to prioritize subsistence needs. This is not just about subsistence, this is about the overall health, wellbeing, education and our overall traditional and customary ways of life.

For years now, the people of the Upper Tanana River have not been able to provide fish for their families or communities, they have not been able to teach their youth how to be stewards of the land, they have been unable to practice their traditional and customary ways of life because of emergency orders stopping subsistence fishing due to record low numbers of salmon in the Tanana River. The burden of conservation has fallen upon the people who do not profit off the commercial sales of salmon, but the people whose lives literally depend on them. There are many factors contributing to the decline in salmon numbers from climate change to commercial fishing, so this issue needs to be tackled from many angles.

It is all of our responsibility to protect the natural resources for not only our current generation of people, but for future generations. If the laws continue to be broken and commercial fisheries are continued to be prioritized, our Elders tell us that there will be no more salmon for anyone.

In the face of uncertainty, the Sustainable Salmon Policy directs the State of Alaska to take action that errs on the side of conservation. Conservation is our responsibility and under our control. It is how we can support our salmon to reach their spawning grounds, meeting escapement and treaty obligations.

Thank you,

--

Krystal Lapp  
Tribal Stewardship Coordinator  
Healy Lake Village Council  
Cell (907) 378-6190  
[krystal.lapp@healylake.org](mailto:krystal.lapp@healylake.org)  
[www.healylake.org](http://www.healylake.org)

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Fish  
**Date:** Friday, April 21, 2023 11:50:29 AM

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Hi my name Jacqueline Morgan from Ruby,Ak I lived in Ruby all my life

There are a lot of factors that are driving the salmon declines, like warming waters, disease, predators, low fitness levels, and commercial fishing. In the face of uncertainty, the Sustainable Salmon Policy directs the State of Alaska to take action that errs on the side of conservation. Conservation is our responsibility and under our control. It is how we can support our salmon to reach their spawning grounds, meeting escapement and treaty obligations.

Sent from [Mail](#) for Windows

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128 Oral Testimony  
**Date:** Friday, April 21, 2023 12:02:37 PM

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For the Record, my name is Mary Captain I'm from Ruby  
Our Subsistence needs are not being met  
I support senate bill 128 commercial salmon fishery closure, because every salmon counts.

The action of the Board of fish at the February area M meeting puts the AYK chum salmon stocks at risk of collapse. There were no Yukon River or tributary summer chum salmon escapement goals met in 2021 or 2022

Summer chum salmon escapement in 2021 was the lowest on record, representing an 84 % decline from the 2010-2019 average, while that same year, it was a record high harvest in area M of over 1.1 million chum.

Thank you,

Sent from [Mail](#) for Windows

**From:** [REDACTED]  
**To:** [Senate Judiciary](#); [Representative.Donny.Olson@akleg.gov](mailto:Representative.Donny.Olson@akleg.gov); [Sen. Scott Kawasaki](#); [REDACTED] [Alaska Watchman](#)  
**Subject:** We support SB 128  
**Date:** Friday, April 21, 2023 12:37:43 PM

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Commercial fisheries should not dominate to the extent that subsistence fishing in the Yukon River has to be shut down.

Jon and Ruth Ewig

[REDACTED] [REDACTED]

Fairbanks, AK 99701

[REDACTED]

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128 Concern Alanna Kochuten  
**Date:** Friday, April 21, 2023 1:14:18 PM

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Greetings,

My name is alanna kochuten. I am Unangax and belong to the Qawalangin Tribe of Unalaska. I come from generations of area M and Bering Sea fisherman. My familys originally from false pass, and my immediate family has been residing in Unalaska. Job security has always been a priority for myself, which is why after high school I attended the California State University Maritime Academy, and obtained my USCG 3rd Mate Unlimited Tonnage license and a Bachelor of Science in Marine Transportation. Growing up on fishing boats, I've always had the dream of owning and running my own fishing vessel in Area M to commercially fish salmon, making a living by doing what I love- but money of course was an issue after financially putting myself through university. After graduating I joined the International Organization of Masters Mates and Pilots. I've worked on Matson and American President Lines container vessels, which provide food for rural places in Alaska, as well as transport refrigerated containers of seafood from canneries in Alaska. Even when I am not directly on a fishing vessel I am still supporting our fisheries, economy, communities, and state as a whole. Last year I saved enough money for a down payment for a fishing vessel, and when my grandfather passed I was handed down an area M drifting permit. Everything was starting to fall into place, until this, which has potential to derail everything, not just for myself but for my family, my community, and my native people. Job security has always been scary for a family of fisherman and for this exact reason. My family had to find security elsewhere and put fishing on the back burners for some time, and this is our chance to keep it alive. This summer I am crewing my vessel with all family, teaching them the ways of our ancestors and trying my best to keep tradition alive. Yes I have options to fall back on, which is why I attended university, but my true passion is out there fishing. Everyone should be able to do what they love and care about for a living, and our native people deserve the opportunity to thrive and obtain job security for something that is in our DNA and our right as indigenous peoples to this area. The state needs to support our peoples and our culture that has been so washed out over the years.

Respectfully,  
Alanna Kochuten

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Date:** Friday, April 21, 2023 1:42:14 PM

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To: Senate.Judiciary@akleg.gov

For the record, my name is Leah Morgan I'm from Ruby.

Our subsistence needs are not being met

I support senate bill 128 commercial salmon fishery closure, because salmon counts.

The action of the board of fish at the February area meeting puts the AYK chum stocks at risk of collapse. There were no summer chum salmon escapement in 2021 was the lowest on record.



**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Testimony,  
**Date:** Friday, April 21, 2023 1:48:33 PM

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Hello, Evelyn Sarten here at the Ruby Tribal Natural Resource Desk, my testimony for Ruby Tribe is that I support SB 128 because every fish counts!

Mr. Chairman and Members of the Committee,

My name is Alvin Osterback, I am Mayor of the Aleutians East Borough, I am a multi-generation commercial and subsistence fisherman in Area M. My family are Aleuts and have been here long before the arrival of any other indigenous people settled this land know as Alaska, named by the Aleut.

If the Alaska Legislators were to override the decision of the board of fish without the benefit of the scientific data and ADF&G expertise, this would mean they would make a decision based on voter strength and the will of the heart strings, in my opinion this will prove disastrous to the fisheries in Alaska and prove to not benefit or correct the long standing problem in the AYK.

Over the past 40 years the salmon return to the AYK has decreased to the point that residents are not able to harvest the amount of salmon to see them through the year.

If the state had been proactive and installing enhancement hatcheries in the rivers to help recover the Chum and King runs until a know solution could be found to return the runs to normal I don't think Area M would be facing a shutdown of a commercial fishery that has existed for over a hundred years and a subsistence fishery that has supported the Aleut people longer than any other indigenous people in Alaska.

Without salmon, the multiple processors and the fishing economy they support would be eliminated.

32% of the fish taxes received by Aleutians East Borough in 22 were from salmon

80% of the private sector jobs in the AEB communities are seafood-related

The great majority of Area M salmon permits are owned and fished by Alaska residents.

If by legislation the state shuts down the Area M fishery for the Month of June; have you thought of ways to pay for the following:

- Bond payments for the Aleutians East Borough and the Six communities within the AEB
- Replace lost revenue to fishing vessels and crew members.
- Insurance costs for vessels that participate in the Area M fishery.
- Payments to local businesses due to fishery closer, you must remember that all business in the communities of the Aleutians East Borough depend on the June salmon season.

**From:** [IGAP Coordinator](#)  
**To:** [Senate Judiciary](#)  
**Subject:** Testimony  
**Date:** Friday, April 21, 2023 1:55:51 PM

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Chair Claman and Members of the senate judiciary committee, thank you for the opportunity to testify today, My name is Maureen McCarty I am from Ruby Alaska Born and raised here. Our subsistence needs are not being met. I support senate bill 128 commercial salmon fishery closure, because every salmon counts. Under the current area M management, the burden of conservation is unfairly placed entirely on the in-river subsistence fishing communities and still escapement goals are not being met even with zero subsistence fishing. With that my children are not learning the ways of subsistence living. If nothing is being done now to shut down Area M, fishing for subsistence living is going to be gone. I grew up living a subsistence life style, fishing for salmon in the summer was a way to prepare for winter. Something my kids would not see if nothing is done to help us protect the salmon I am in support of Senate bill 128.

***Thank you,***

Maureen McCarty  
Ruby Tribal Council  
Indian General Assistant Program  
Ruby, Alaska  
(907) 468-4479

Chair Claman and members of the Senate Judiciary Committee, thank you for the opportunity to testify today. For the record, name is Debbie Hartman. I live at the top of the Kuskokwim River in McGrath, AK. I have been boating 200 miles down river to my home, Georgetown every summer for 20 years to fish the area my family has fished for over 100 years. 2022 was the first Summer I did not subsistence fish. The people on the Kuskokwim and Yukon Rivers are being neglected when we speak about how we have not had enough fish to feed our families for many years now. We are prohibited from subsistence fishing, unable to provide for our families because the law says there isn't enough fish in the waters. My family has shifted from one species of salmon to another in order to work for food security. Yet, almost all salmon populations on our rivers have faced devastating declines. So substitutions are unrealistic.

Let me ask you this, why is commercial fishing allowed to continue without meaningful restrictions during a time of salmon crisis. A person on the river cannot feed themselves and family our fish but the fish can be caught and sold? Or caught and wasted. It is time to make it right. Commercial fishing in Area M needs to help carry the burden of conservation, and we need to allow the people to gather, to provide for their families as their families have done for generations. There has been no progress toward equity, therefore I strongly support Senate Bill 128 and urge you to do the same. When smokehouses are empty, every fish counts.

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128 testimony  
**Date:** Friday, April 21, 2023 3:40:50 PM

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Chair Claman and members of the Senate Judiciary Committee, thank you for the opportunity to testify today

For the record my name is Brenda Ambrose, I am a subsistence fisherwoman from Ruby. I am in support of Senate Bill 128 Commercial Salmon Fishery closure, because every salmon counts.

As you all should be aware, action of the Board of Fish, at the February Area M meeting violates their statutory obligation to prioritize subsistence needs OVER non-subsistence harvest.

Commercial harvests are being prioritized over escapement and subsistence needs, which is in violation of ALASKA STATE LAW. By us not being able to provide salmon to our families it is hurting our culture, our way of life. With many of us already dealing with Intergenerational Trauma, losing our subsistence fishing way of life will add more trauma and health issues to our lives. This is a big impact on our mental health, our physical health and that deeply impacts our children's and our grandchildren's future.

If you really care about Alaskans and Alaska's future, don't leave the burden of conserving the salmon only up to the in-river subsistence users. It was mentioned that closing Area m would impact thousands, yes I agree, it is already effecting thousands of people, along the Yukon river alone- we are only trying to feed our families as well. Please CLOSE commercial fishing in Area M.

Thank You,

*Brenda Ambrose*

Tribal Administrator

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128  
**Date:** Friday, April 21, 2023 3:43:37 PM

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Chair Claman and members of the Senate Judiciary Committee, thank you for allowing Alaskan subsistence fishermen and women to testify today.

For the Record my name is Patrick McCarty, First Chief of Ruby Tribal Council and a lifelong subsistence fisherman, from Ruby Alaska.

I support Senate Bill 128 Commercial salmon fishery closure, because every salmon counts.

As you all should be aware, action of the Board of Fish, at the February Area M meeting violates their statutory obligation in AS 16.05.258, to prioritize subsistence needs over non-subsistence harvest.

Commercial harvests are being prioritized over escapement and subsistence NEEDS, which is in violation of ALASKA STATE LAW. By us not being able to provide salmon to our families we are seeing more people depend on processed foods. This causes a big impact on our physical and mental health and our children's future health because of what is in processed foods. If you really care about Alaskan's and Alaskan's future, the future of salmon- as a whole, don't leave the burden of conserving the salmon only up to the in-river subsistence users. Close commercial fishing in Area M.

Thank You,

*Patrick McCarty*

First Chief

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** Senate Bill 128  
**Date:** Monday, April 24, 2023 10:10:28 AM

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Senator Clamen and members of the Judiciary committee. Thank you for the opportunity to testify. For the record my name is Lena McCarty from Ruby Alaska. Member of the Ruby Tribe. I'm married to William McCarty Jr., we've fished all our 60 years together, except for the last 3 years. We feel the effects of no salmon, for the winter. We normally dry and smoke salmon, and jar our fish. The action of the Board of Fish at the February meeting violates their Alaska statutory obligation to prioritize subsistence over commercial fishing. Which is very unfair. We ask that you consider our need for fish, in adopting Senate Bill 128, which we fully support.

Sent from my Galaxy

4/24/23

I would like to voice my opinion on the SB-128 bill up for approval.

I feel we as natives of Alaska need this before the salmon are totally gone and no hope for return. The need is evident in the way of life and traditional summer harvest for the winter food. Not only that, the traditional teaching younger natives how to cut the fish to and process. It could be a lost like the native language. Not only do the Yukon natives benefit but much wider populations of natives that don't live there and benefit from families sharing their traditional food. A way of life is being threatened if we don't get it back. I hate to think it will be a distant memory of how it used to be. Even now I have not have a king salmon in a very long time. Please help us save our native rights to have subsistence fishing again.

Quianna / Ana Base'

Debra Heard

Fairbanks Alaska



**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB128  
**Date:** Tuesday, April 25, 2023 9:41:04 AM

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My name is Julie Roberts Hyslop and I was born and raised in Tanana Alaska. I have lived here all my life. I support SB128. Fishing has been a part of my entire life until a few years ago when fishing was closed on the Yukon river. My family depends on this food source. It provides healthy food and it also gives my family a very healthy lifestyle. This is not a time to be selfish because every salmon counts today, otherwise it will be extinct in a few years. My only hope and prayers is that my grandchildren will be able to know what salmon tastes like. I thank you for your time and consideration in a very contentious issue. You do have the power to save this resource.

Julie Roberts Hyslop  
Tanana, Alaska 99777

To the Alaska State Legislature

April 25, 2023

Senate Bill 128

The salmon stocks in the AYK region of the Bering Sea are circling the drain! Chum and Chinook salmon fishing has been closed on the Yukon and Kuskokwim for the past three years. The outlook for 2023 is more of the same. Norton Sound and Bristol Bay are seeing sweeping closures and restrictions as well. The AYK region was the most significant chum salmon fishery in the state from statehood into the 1990s. The Yukon king salmon have the highest oil content on the market which made them a high-value fishery despite their more modest numbers. These commercial fisheries were the basis of the economy in western Alaska. The commercial fisheries also supported the subsistence activities by providing extended families nets, boats and upkeep for fish camps. These businesses and the lifestyle have been gutted. The alternatives for employment require traveling for work or wholesale emigration. As the bread-winners move away, the villages collapse due to the loss of revenue and the able residents.

During testimony for the bill April 21, I made the statement that 130,000 residents of the state had lost their opportunity for salmon fishing. The number is significantly more, above 150,000 when the Kuskokwim communities are included. The AYK fisheries commercial value has never been as large as that of Area M. However, it has supported many times more residents of the state. Those people are now finding themselves adrift as they migrate to population centers, seeking training for new careers or just affordable housing. There are those with few options, who due to age or lack of resources depended on extended family for support. They are now the responsibility of the rest of the state.

The need for conservation measures to address the western Alaskan salmon decline is undeniable. Science shows that one-fifth of the Area M chum harvest is bound for western Alaska. The proportion was likely much more during years like 2021 when chum conservation was not practiced. Ten years earlier, before the most recent decline, the proportion of Western Alaska chum was over 50%. Today Area M is the largest single western Alaska chum harvester, greater than the Yukon, Kuskokwim and Norton Sound combined. Given the state of the salmon in Western Alaska and the pages of law and regulation speaking to sustained yield management, so often touted by the state officials, why does the Area M fishery get a free pass regarding the burden of conservation? A reduction of 1/6 of the fishing time is a far different impact than the ongoing complete closures of commercial and subsistence fishing here in AYK. The original proposal asked for a 60% reduction on fishing time. It is misdirection to lay the blame for these declines on an issue over which we have little control, such as climate change, while refusing to take conservation measures beyond these stocks' spawning streams. Area M fishers harvest the bulk of these fish and should also bear the burden of conservation proportional to their impact.

Yes, there are multiple causes for the salmon decline. Some are not fully understood. Some will take years to address. The State of Alaska is the manager of our salmon stocks. We have immediate control of salmon management. The human-induced sources of salmon mortality are our responsibility to address. That list includes commercial fisheries; interspecific and intraspecific competition from hatchery stocks, both foreign and domestic; and climate change. The extirpation of salmon stocks to the detriment of resident Alaskans is a black eye to the state. The situation is dire. We, the residents dependent on this resource, need to own the situation—this includes the residents of the AYK region and all the harvesters, including Area M fishers.

Charles Lean

Nome

April 25, 2023

The Honorable Matt Claman, Chair  
Senate Judiciary Committee  
120 4<sup>th</sup> Street  
Juneau, AK 99801

**Re: Supporting SB 128**

*Submitted via email to [Senate.Judiciary@akleg.gov](mailto:Senate.Judiciary@akleg.gov).*

Dear Senator Claman and Members of the Judiciary Committee,

My name is Mike Williams Sr. I am Yupik, a lifelong fisherman and hunter, and a grandfather. I am Chief of the Akiak Native Community and Vice-Chair of the Kuskokwim River Inter-Tribal Fish Commission. I support Senate Bill 128 and ask this Committee to do the same.

Since 2020 we have seen chum salmon declines on the Kuskokwim River like never before, in addition to king and coho salmon declines. We now have long chum salmon conservation closures that restrict subsistence and commercial fishing on the Kuskokwim, meaning our communities are not meeting our chum harvest needs.

Just a few years ago, I was catching 2000 chums a summer. In 2021, I caught 2.

Our families are sacrificing weeks and weeks of fishing to try to meet chum escapement goals – yet these are still unattained, threatening the future of Kuskokwim chum stocks. We do not have enough chum to feed our Elders, teach our children, stock our freezers for the winter, and practice our traditional way of life.

The Board of Fisheries and Alaska Department of Fish and Game have ignored statutes and policies to prioritize subsistence and sustainability of fisheries uses by permitting Area M commercial fisheries to continue with no meaningful restrictions that would protect Western Alaska chum stocks while they pass through that district. Meanwhile, our subsistence families have been restricted like never before on the Kuskokwim.

We need to do everything possible to protect Western Alaska chum throughout their migratory range so they come back to our rivers and people. Senate Bill 128 will help this effort. Please support this bill.

Quyana,



Dr. Michael Williams Sr.



yield and/or meet escapement goals for years, commonly in concert with a harvest, requires a newer look at the MSY principle and related harvest/escapement goal models as recently done by the Yukon River Panel via the US/Canada Yukon Salmon Treaty.

A consequence of the loss of AYK salmon harvest, due in part to Area M Fisheries, Board of Fisheries (BOF) decisions and ADFG mismanagement, is there are now long lasting impacts of all AKY salmon fisheries, and most unfortunate, is the destruction of a culture thousands of years old. Alaska's First Nation People living on the Kuskokwim and Yukon Rivers have no fish and no alternative food source; salmon are a cultural keystone species.

I'll leave you with the Alaska Fisheries conundrum:

How is it that Alaska's statewide salmon harvest is at an all time high yet coincides with complete salmon closures for Yukon River fishermen?

I remind you that the **Yukon River** used to be the **largest commercial Chinook salmon harvest in the state** (now zero harvest for decades), the **largest subsistence harvest of Chinook in the state** and the **largest subsistence fishery in the state as well as a commercial chum salmon harvest in the millions per year.**

How is it there are more salmon then ever in the Pacific Ocean yet the Yukon River, once a very productive area for Chinook and Chum salmon, has no salmon to harvest.

**The Area M intercept fisheries must be curtailed.**

April 21, 2023

Senator Donald C. Olson

**Alaska State Capitol**

Juneau, AK 99801

RE; SENATE BILL, 128

Dear Senator Olson;

My name is Carol Oliver, a life long resident of Golovin, Alaska.

I am in support of closing the commercial salmon fishery in a portion of the Alaska Peninsula and the Aleutian Islands (Area M) during the month of June.

I testified in the early 1990's on this same issue; the decline of our fisheries. Leadership predicted that this would occur and I don't know why prevention measures were not taken then.

As subsistence and past commercial fisher user, the decline of our fisheries, has had a devastating impact on our lifestyle, health and well-being. Before this decline, we were a happy people, we had plenty of fish, people were able to provide income for families.

We have asked as Tribal members, shareholders, voting citizens, to be at the table with the State and Federal government and other agencies, to jointly make decisions that will impact our lands, waters and resources. To take safe measures to protect what we do have and what we rely on. Now, someone has to be held accountable, this should never have happened. It breaks my heart.

Sincerely,



Carol Oliver

04/21/23

Senator Olson and distinguished members of the Alaska State Senate.

My name is Charlie Brown.

I live Golovin which is a fishing community that has been sustained by our salmon resources before statehood. During my childhood years families were very active and participated in the limited entry commercial fishery that provided the much needed revenue for many families and communities throughout the coastal areas and river systems that sustained our local economy. Aside from this, this salmon resource provides for the subsistence needs to feed our families throughout the long winter months with a variety of preservation methods used for generations.

Now with the focus of intercepting as much of our salmon on the Alaska Peninsula it has come to a point where State management has closed all salmon fishing activity for the largest producers of anadromous streams where salmon return to spawn.

Now hundreds of permit holders are suffering economic setbacks as a result of poor management that is geared towards international corporate interests that have flushed out the local small businesses. I would like to offer an amendment to SB 128 to not only delay to early commercial openers on the Alaska Peninsula, but to also include a State Management Strategy that applies to all State marine waters that the State of Alaska has jurisdiction over.

Because the Alaska Peninsula is a well known intercept fishery, most of the salmon species travelling through the area, AKA Area M are bound for river systems in western Alaska, including Alaska's largest river, the Yukon River.

The same time limits per weekly commercial openers need to be applied to the Alaska Peninsula before it is applied to the remainder of Western Alaska. The regulations on mesh size and gear length should also be applied in accordance to that being applied to Western Alaska.

Example: fishing times need to be restricted to 24 hour openers, followed by 24 hour closure, and no more than 48 hour commercial opener followed by another 48 hour closure to allow for escapement. This is where State management is failing Alaskans.



Charlie Brown

Golovin, AK 99762

April 20th, 2023

Senator Donald Olson

State Capitol Room 508 Juneau, AK 99801

(907) 465-3707

Dear Senator Olson,

The following are points of reason in favor of SB 128:

SB 128 will protect the migratory passage of AYK chum and chinook.

It will protect the migratory passage of Chignik chinook and Chignik Black Lake sockeye which are listed stocks of management concern.

It will most likely help the passage of Cook Inlet Chinook.

It will likely help the migratory passage of Nushagak Chinook which is also a management concern. The Nushagak chum aren't meeting escapements very well either and will benefit.

SB 128 has precedence and was similarly done in 1974 when a poor fishery was expected in Bristol Bay and the Board closed the South Peninsula.

The Chinook run in Chignik was 761 fish last year. That is 36% below minimum escapement. It is a six- and 7-year fish and won't survive that many years of interception pressure in the ocean from nets in its migration corridors. The South Peninsula of Area M has NO Chinook runs of its own but harvests numerous transient kings. They should be genetically tested.

WASSIP clearly identified AYK chum and Chignik stocks present in AREA M.

Chignik sockeye stocks are often the highest catch if compared to any single Bristol Bay Sockeye stock (there are 8 separately recognized Rivers combined as Bristol Bay in the WASSIP) at any given time in the WASSIP data. The impact on Chignik as a single river and in closer proximity to Area M is so much greater than the impact on 8 rivers combined to represent Bristol Bay.

The 2023 February Board of Fish meeting put protection in the hands of Area M fisherman (the fox) and processors, both of whom are not legally obliged to protect salmon stocks. They are only obliged to follow the regulations. Fishermen will and are free to pursue any legal method of fishing to maximize profits. The interception fishery of Area M must be reeled back in June while subsistence and escapements of salmon migrating through the area are struggling.

Many Alaska salmon stocks are at crisis levels due to inaction to protect migrating stocks. Alaska must return to a protocol of "salmon caught at the source" and only then when the source is fully restocked with escapement.

Sincerely,

Raechel Allen

██████████, Chignik, AK 99564



To the Alaska State legislature

Senate Bill 128

I am writing in support of SB128, the closure of the June Area M salmon fishery. The fishers, both commercial and subsistence of Area M, the Yukon River, The Kuskokwim River, Norton Sound, Bristol Bay, Chignik and other Gulf of Alaska areas all are affected by the management of Area M particularly in June. The regulation, 5AAC 39.220. Policy for the mixed stock salmon fisheries and 5AAC 39.222. Policy for the management of sustainable fisheries both speak to the top priority of management, adequate escapement. Even the subsistence priority is secondary to sustaining the runs. For the past three years the coastal western Alaskan chum stock has had the bulk of its habitat closed to chum and king salmon fishing. The pink salmon fisheries of western Alaska have a very limited market and even the coho stocks barely support fishing. The State Constitution, statutes and the regulations promulgated by the Board of fisheries all speak to sustainability and attaining escapement goals. The Department of Fish and Game and the Board of Fisheries have both dismissed the laws and have chosen to enact the most minimal fishing time restriction on a fishery that is well documented as the largest consumer of CWAK chum in recent years. How is it that publicly noticed laws are disregarded at the expense of ~130,000 residents and an area covering the size of Texas? The Board establishes regulation just to disregard them as the mood strikes? Public process should be followed. The Board should be held accountable for their charge in the Constitution, in statute and certainly in the regulations they established.

Salmon crashes have occurred over the years. In the past, the state responded with more focused management. I have vivid memories of the chum crash of 1987 in Western Alaska. I was the area fisheries manager north of the Yukon. I was the first and only manager charged with establishing a Tier II salmon fishery. This was very unpopular, requiring all of my attention and the assistance of multiple layers of the Department and even the attention of the Department of Law due to a lawsuit and public outcry. I was shot at on two occasions, the Troopers had to accompany me to fishery meetings, the attorney general of the state and I were co-speakers at regional meetings. To make matters more interesting both my supervisor and his supervisor had nervous breakdowns, one never recovered. Today things have not boiled over to the same point...yet. However, talk to the managers and you will hear of incredible stress, not just of the staff but of the local residents losing culture and food security. Discussing fisheries proposal 140 with department leadership, I was told they viewed that proposal as punitive to the Area M fishers. That was spoken by someone with no experience actually closing fisheries for the long term and facing the disenfranchised public. The proposal would have reduced the June commercial fishery, a far cry from the complete and multi-year closure that is ongoing in AYK. The conscious decision to extirpate salmon stocks with chronic under-escapement and to forbid fishing over multiple regions of the state to avoid relatively small declines in the big business of the June Area M salmon fishery is far more punitive.

We have a crisis. The situation begs for attention. Area M has only grown for decades with no conservation regulation as required of all other fisheries in the state.

Charles Lean

Nome

My name is Brooke Woods, and I'm a fisherwoman, mother, and fisheries student from Rampart on Yukon. I serve on ten boards voluntarily for our salmon and Tribes (if you like the list, please let me know). I share this not to be boastful but to show my dedication. I've been a part of Tribal Governance and Yukon River fisheries work for over six years.

For the past three years, Tribes on the Yukon have been severely restricted, with no subsistence salmon fishing opportunity for any stocks. We bear the devastating impacts of conservation alone, which means no generational teaching, kinship, traditional and cultural practices, and individual and community well-being.

I support SB128; we need champions for our salmon communities; we are facing multi-species declines, food insecurity, and cultural loss.



The 2022 preseason outlooks for both Chinook and summer chum were for low run abundance and warranted a cautious management approach. State and Federal managers did not allow direct subsistence fishing for the species. The Eagle sonar operated from July 1 to October 6, with an estimated passage of roughly 12,000 Chinook salmon, which is 80% lower than the historical average. Fishermen were restricted and had to release all Chinook and summer chum salmon alive from nonsalmon gear. Due to very poor Chinook and summer chum salmon abundance and subsistence fishery closures, no commercial fishing occurred. Based on the recent 10-year average commercial harvest of 380,016 summer chum salmon, the Yukon River commercial fishing closure represents a loss of 1.4 million dollars to the region. For some families, this commercial fishery is their only income for the year and allows them to subsistence fish.

The Yukon fall chum salmon run was projected to be the third lowest on record (1974–2021). The Fall Chum salmon run was projected to be 240,000 fish compared to a historical run size of nearly 1 million fish. The in-season projections do not meet the threshold of 300,000 fish needed to allow subsistence. The State of Alaska did not expect the Fall Chum salmon run to meet drainage-wide escapement goals of 300,000–600,000 fish, tributary escapement goals, and Canadian treaty objectives.

**The 2023 Summer Chum estimate is 557,000, with high uncertainty; SB128 will support meeting escapement and future subsistence and commercial harvests. Based on the outlook, the management actions will be the same as in 2022, with no opportunity for families to catch the first fish, share, cut strips, fill their freezers, or set up fish camps or smokehouses.** This year the Fall Chum estimate is 251,000; in-season projections must meet the threshold of 300,000 required for subsistence. The chum run will not meet drainage-wide escapement goals or Canadian treaty objectives.

Like area M, our Yukon, the subsistence and commercial economies matter. Why are subsistence priority and small-scale commercial fisheries on the Yukon River wholly shut down for several years as many chums bound for our AYK rivers are harvested and sold in the Area M fishery? **The State doesn't allow Yukon River Tribal citizens to self-regulate or sign agreements to manage themselves like Area M fishermen, we are shut down for 2023, and the ice isn't out on the Yukon.** We need the state management measures and restrictions in place for Area M to protect a compromised and declining stock to make it back to natal streams to spawn. **Every village along the 1,900-mile-long river is shut down to protect salmon stocks and meet escapement objectives and treaty obligations.** The ADFG Commissioner has emergency authority to shut down a fishery. Numbers are so low that getting every spawner back to the Yukon River is critical.

What do restrictions for salmon stocks of concern look like for Yukon River fishermen? Severe restrictions planned preseason, no windows/openers, the required release of chum and king salmon in nonsalmon openers with 4-inch or smaller mesh gillnets (60 feet or shorter length). The commercial fishery in Yukon has used selective gear for over ten years and must release salmon species. Since 2012 we have adapted gear types. Why are the same restrictions not required by area M? During fall chum salmon closures, selective gear, and non-salmon gear used in 2020–2022 had low harvests due to inefficient or unavailable gear.

Salmon is the best source of omega-3 fatty acids, vitamin D, and (DHA).

A study of vitamin D in traditional foods showed that traditional meats, fish, and oils had high micronutrient levels and improved vitamin D intake. Salmon provide:

- antioxidant amino acid
- heart-health
- immune-support
- Energy-production
- muscle-building protein

In an excerpt from Changes in Sharing and Participation are Important Predictors of the Health of Traditional Harvest Practices in Indigenous Communities in Alaska (2022):

**Significant findings were that disruptions to Indigenous ways of life and Traditional harvest practices (THP) have been associated with the rise of suicide and mental health disparities in Alaska Native populations (Allen et al., 2011; Gone & Trimble, 2012). Efforts to reduce risk and promote well-being in young people and communities often indicate that active THPs are a primary prevention strategy (Rasmus et al., 2014a, 2019).**

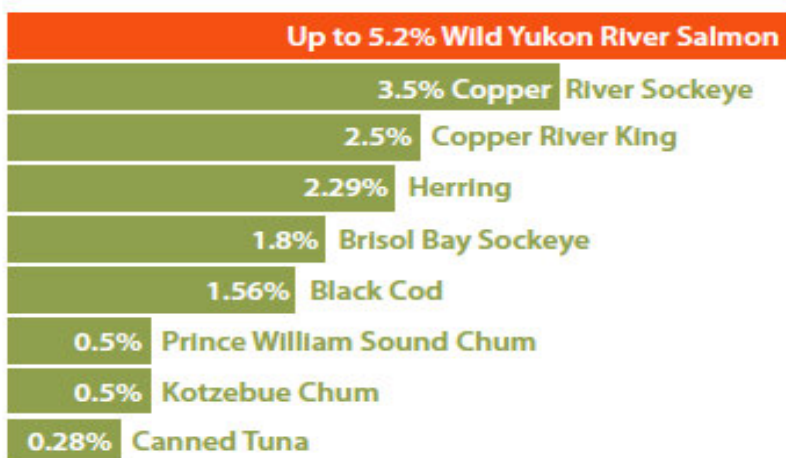
Area M has been a controversial issue for nearly 60 years. As far back as the late 1960s and early 1970's tension arose between Alaska Peninsula–Aleutians Islands and Bristol Bay fishers concerning the South Unimak and Shumagin Islands June fisheries.

### Yukon River Keta: Highest Omega-3 of any salmon.

Testing has shown Yukon River Keta salmon to have the highest Omega-3 content of any salmon or other seafood. Yukon River Keta salmon were found to contain up to 5.2g per 100g serving – the equivalent of 10 average potency fish oil capsules. The result – a fish that tastes better and is better for you.

### Omega-3s found in seafood

Grams of Omega-3 per 100g Serving



### Higher oil content than many Kings.

Recent testing done by Bodycote Testing Group in Portland, Oregon, established that Yukon River Keta salmon have oil contents that range from 9-20% – that is equivalent to most kings from other areas of Alaska.



In 1975, the Alaska Board of Fisheries (BOF) established guideline harvest levels (GHLs) based on average historic catches. The GHL for the Shumagin Islands was 1.5% of the latest inshore Bristol Bay projected sockeye salmon harvest, and the South Unimak fishery was allocated 6.8% of the Bristol Bay inshore projected sockeye salmon harvest. Although chum salmon have always been caught during the June fisheries, the unusually large chum salmon catches in 1982 and 1983 caused concern among fishers in the Arctic-Yukon-Kuskokwim (AYK) Region. Beginning with the 1984 season, the BOF placed a limit on fishing time, not to exceed 96 hours per week and not more than 72 consecutive hours to allow "escapement windows." **The "windows " aimed to limit the chum salmon harvest.** Due to the high sockeye salmon catch rate (and low chum-to-sockeye catch ratios) during 1984 and 1985, these restrictions were not implemented because the GHLs were easily met (Shaul and Dinnocenzo 2000). In 1986, the BOF placed a 400,000 chum salmon catch ceiling on both fisheries combined, eliminating fishing during the first ten days of June. It stopped fishing during the last GHL time period, June 26–30 (along with the sockeye salmon allocation for that period). These restrictions applied to the 1986 season only.

**After the 1997 season, the BOF lowered the chum salmon cap from 700,000 fish to a "floating cap" that could range from 350,000 to 650,000 depending on the projected strength of harvests of summer chum salmon in AYK Area in relation to the 1970–1997 average. If the projected AYK chum salmon harvest was less than 33% of the average catches, the South Peninsula cap would be 350,000 to 450,000 fish.** If the projected AYK summer run chum salmon harvest was between 33% and 67% of the 1970–1997 average, the South Peninsula cap would be between 450,001 and 550,000 chum salmon. If the AYK summer chum salmon harvest exceeded 67% of the 1970–1997 average, the South Peninsula chum salmon cap would be 550,001 to 650,000 fish. If ADF&G identified a summer chum salmon stock of concern, the upper end of the cap would be reduced by 50,000 fish. **Throughout the decades, management measures were implemented in Area M to protect AYK chum; in the early 2000s, chum crashed on the Yukon. Management measures in Area M were implemented that included salmon ratio, chum cap based on the forecast (it was a strict chum cap), and reduction of fishing times (fishing time to align with chum crashes). The most recent summer and fall chum crashes are far worse than we experienced in the early 2000s. The summer chum in 2000-2001 was 552,000 compared to the lowest run sizes in 2021-2022. In 2021, there was a run size of 154,000; in 2022, it was 439,000.**

Our chum rebounded in 2005 with strict measures put in place in Area M. It's proven a successful management plan; after our chum recovered, the restrictions ceased to exist.

All this information can be found in the publications below:

Area report- see appendix B (page 59-67) for history of Area M management and regulations.  
<https://www.adfg.alaska.gov/FedAidPDFs/FMR22-32.pdf>

From the 2022 ADF&G statewide salmon outlook publication. (The first paragraph is shown in the screen shot below):

Except for the Southeast Alaska Chinook salmon fisheries and the South Peninsula June fisheries, Alaska salmon management will be based on inseason estimates of salmon run strength. Alaska managers have the primary goal of maintaining spawning population sizes—not of reaching preseason harvest projections.

Salmon productivity, survival, and resulting returns are probably influenced by many freshwater and marine drivers including spawning escapements, hatchery releases, temperature, and complex trophic interactions such as prey availability, predation, and competition. Although a review of this topic is well beyond the scope of this report, NOAA’s Ecosystem Status Reports provide a summary of recent physical and ecological conditions encountered by a variety of species in the North Pacific, including salmon during their marine phase (Ferriss and Zador 2021, Siddon 2021; available at <https://www.fisheries.noaa.gov/alaska/ecosystems/ecosystem-status-reports-gulf-alaska-bering-sea-and-aleutian-islands>).

Table 1.—Projections of 2022 Alaska commercial salmon harvests, by fishing area and species, in thousands of fish.

Region & Area	Species					Total
	Chinook	Sockeye	Coho	Pink	Chum	
Southeast Alaska						
Natural production		739 <sup>a</sup>	1,167 <sup>a</sup>	16,000	1,007	18,914
Hatchery production <sup>b</sup>	<sup>c</sup>	50	605	476	7,387	8,517

Right now, there is no chum cap in the Area M fishery. The history of the AYK chum caps and other restrictions are in the 2018 South Peninsula AMR, Appendix B1, pages 52-60.

The State used to describe the Area M chum caps in annual Yukon Area Management reports in the late 1990s and early 2000s during the last Yukon fall and summer chum crash years (see

below).

### **Alaska Peninsula**

The majority of chum salmon captured during June in the Unimak and Shumagin Islands area, located on the south side of the Alaska Peninsula, are bound for Bristol Bay, Asia, and the Arctic-Yukon-Kuskokwim (AYK) Region. The chum salmon stocks contributing to the harvest in this fishery have been described by several studies, including a tagging study in 1987. Beginning in 1993, a genetic stock identification study was conducted using samples from South Unimak and Shumagin Islands fishery. Results of this study indicate chum salmon stock contribution was similar to the 1987 tagging study. Sockeye salmon is the target species in the June commercial fishery, but incidental catches of chum salmon are also taken. The sockeye salmon harvest is regulated according to a quota that is adjusted annually and based on the Bristol Bay sockeye salmon forecast.

From 1993 to 1997, a harvest cap of 700,000 chum salmon during the June fishery was in effect. In addition, the board allowed ADF&G to open the fishing season and establish fishing periods based on sockeye to chum salmon ratios in an effort to reduce incidental chum salmon harvests. In January 1998, the BOF changed the fishery management plan for the June False Pass fishery. The most significant change lowered the chum salmon cap from 700,000 fish to a floating cap ranging from 350,000 to 650,000 chum salmon. The floating cap is dependent upon the previous year's harvest of summer chum salmon in AYK. The chum salmon cap for 1999 was 350,000 to 400,000 fish. A total of 1,375,000 sockeye and 245,000 chum salmon were taken in the combined South Unimak and Shumagin Islands June commercial fishery in 1999.

In ADFG Commissioners Doug Vincent Lang's (DVL) report to the House Fisheries in 2022

he House Special Committee on Fisheries had requested that ADF&G provide a report on the findings of the low returns of chum salmon to the Yukon River drainage.

He stated that many reasons had been identified as a culprit for the low returns, including bycatch. He noted that sustainable management decisions were made by taking into consideration all the impacts of low returns and also taking into consideration the impacts and management of the fishing industry and communities. He stated the department had closed in-river and coastal fisheries, including subsistence commercial sport and personal use, due to poor returns of chum salmon to the area. He reminded the Committee of the Alaska State Constitution in statute men date that salmon fisheries be managed to the maximum sustained yield principle. When returns are low enough to put future returns at risk, the department is bound to close fishing, including subsistence fishing. **He noted that chum salmon in the Yukon Kuskokwim**

area had collapsed in the 1990s and had rebounded in the early 2000s. He stated that the State of Alaska is extremely concerned with the low returns of chum salmon experienced the prior summer impacting food security, culture, and economies. He stated that more than 50,000 residents throughout over 100 different communities are affected by chum salmon returns. **He mentioned that declining western Alaska chum caught could be caught in mixed fisheries in the Alaska Peninsula, an estimated 2.2 million chum were harvested, and through genetic testing, it is known that approximately 600,000 of those are of Western Alaskan origin, half of which are known to be a Bristol Bay origin.**

**He stated that he had also directed staff to identify opportunities to exercise his emergency order authority to reduce intercept of Western Alaska chum during the June season, should low returns occur.**

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=HFSH%202022-02-03%2011:00:00>

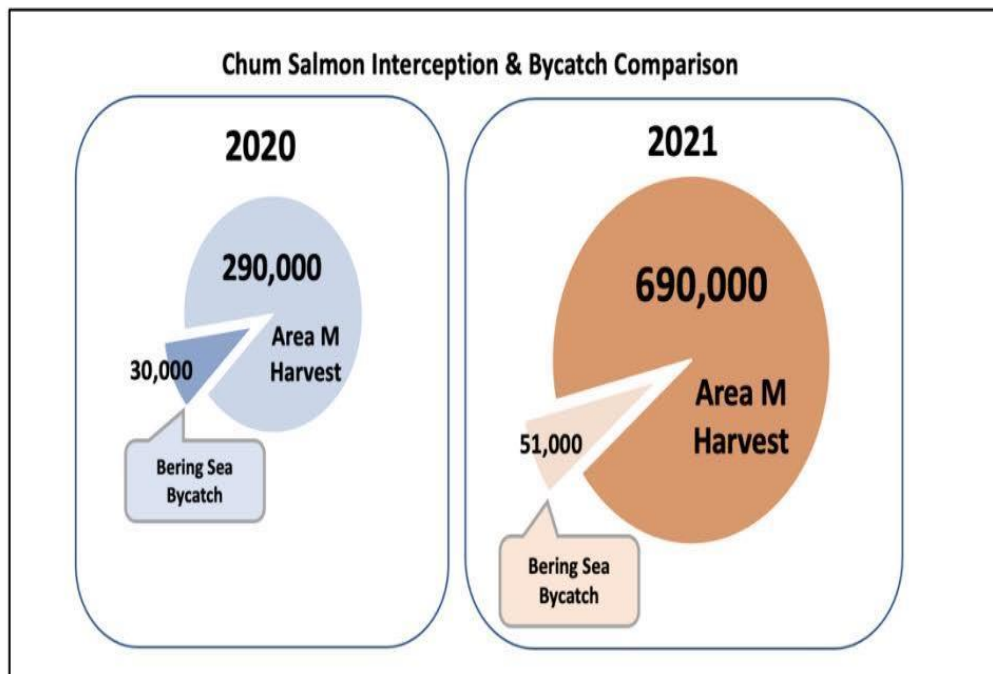


Figure 7: Catch of chum salmon from Coastal Western Alaska and the Middle- and Upper-Yukon in the BSAI pollock fishery (small pie slice) and the Area M South Alaska Peninsula salmon fisheries (remaining portion of pie) in 2020–2021. Stock composition source: Seeb and Crane (1999) and Foster and Dann (2022).

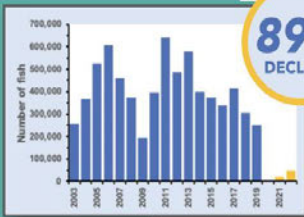
Graph from KRITFC Kuskokwim River Situational Report

Chum salmon are valuable to our Elders, families, and communities. SB128 is needed as a protective measure to restore chum numbers and subsistence livelihoods. I will acknowledge that conservation and management restrictions are complex and take time. I know firsthand how challenging restrictions are; we last had subsistence opportunities three years ago.



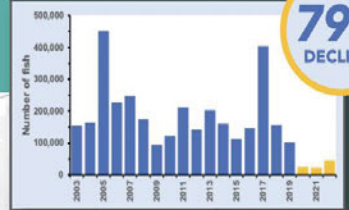
# Snapshot: Yukon River

SUMMER CHUM - ANVIK R.

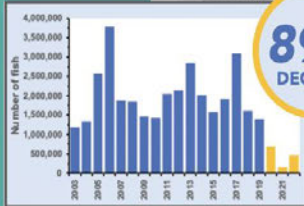


**89%  
DECLINE**

TOTAL FALL CHUM - CAN



**79%  
DECLINE**



**89%  
DECLINE**

TOTAL SUMMER CHUM PASSAGE  
AT PILOT STATION



**93%  
DECLINE**

SUMMER CHUM - CHENA R.

Graphic courtesy of BSEA/AYK SSI.

Graph from KRITFC Kuskokwim River Situational Report

I'll close by sharing a short video with historical context about Area M, an intercept salmon fishery at False Pass by Delta Review episode (1980's). The same concerns decades ago are shared for intercepted chum in False Pass, impacts to Tribes, unexpectedly low runs in 1982, and no escapement goals met.

<https://americanarchive.org/catalog/cpb-aacip-127-3331zk60?fbclid=IwAR2NoXo APAAdJc lKYlu6h-UhB9cfGJrpJNNrWIqFbHCZE5aPEgQGKkGek#>

**From:** Janet Woods [REDACTED]  
**Sent:** Wednesday, April 26, 2023 4:38 PM  
**To:** Sen. Donny Olson <[Sen.Donny.Olson@akleg.gov](mailto:Sen.Donny.Olson@akleg.gov)>  
**Subject:** RE: SB 128

Senator Olson,

Thank you so much for sponsoring SB 128. I didn't get a chance to testify, it was my understanding that there were 200 hundred people waiting and only 15 were able to testify. Sad to know so many wanted to have a chance to talk, including myself. As a fisherwomen for many years that was how I fed my family. Beautiful days when we were able to fish. Now nothing and what a difference it has made in our lives. Our babies won't even know what salmon tastes like because they don't feed them. You and I know that salmon can't even get to their spawning because of interception. No one has a commercial license anymore. So that no issue for us to be able to just eat fresh fish and come to cut and freeze is all we need. People don't know the further you get up the Yukon the fewer species of ocean marine we have to harvest. For us it's just the salmon. Fall chum, white fish, late in the fall lush. I don't know why Senators Bishop and Kawasaki didn't request a hearing in Fairbanks for our many Native people to testify. That makes me sad. Thank you again Senator Don Olson for doing a great thing for us and for thinking about us.

*Janet L Woods*

[REDACTED]

**From:** [REDACTED]  
**To:** [Senate Judiciary](#)  
**Subject:** SB 128  
**Date:** Thursday, April 27, 2023 9:52:00 AM

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Thank you Chair Claman and members of the Senate Judiciary Committee.

My name is Mary Elizabeth Kehrhahn-Stark I am representing my family, friends and all who know the Arctic-Yukon-Kuskokwim (AYK) salmon and subsistence users are suffering greatly. I live in Fairbanks, Senate District R.

I am strongly urging you to support SB 128, "An Act temporarily closing the commercial salmon fishery in a portion of the Alaska Peninsula and Aleutian Islands; and providing for an effective date."

The closure of the Area M June Commercial Salmon Fishery until AYK salmon stocks are healthy will provide, at least, a minimal yield to AYK fishermen (subsistence fishery) before allowing the Area M interception AYK salmon to continue. I only ask the Area M commercial fishermen share in the restoration effort by standing down for a short time and only in JUNE, which really works to their own long term benefit, and perhaps even avoiding a complete Area M closure should AYK salmon returns continue to decline. Alaska is not immune to an Endangered Species Act (ESA) or Species at Risk Act (SARA) listing, which could shut down all intercept and by-catch fisheries (EG Area M, Bering Sea Pollock, etc.). A small sacrifice to save all.

Area M Commercial Fishery has always intercepted AYK Region Chinook and Chum salmon, their target species being Sockeye Salmon. In the recent years, too few salmon return home to the Kuskokwim and Yukon rivers to afford any harvest and worse, meet even minimum escapement goals. The Area M Fishery is a sockeye fishery; Chinook and Chum salmon are incidentally harvested, non-target species, or by-catch.

Due to the dramatic decline in salmon productivity in the AYK region and interception in the Pollock and Area M Fisheries, salmon have likely already been extirpated from many smaller AYK salmon spawning streams and well below Maximum Sustained Yield (MSY) goals in all larger spawning stream. The many years of indiscriminate harvesting of Chum salmon in the Area M Fishery needs to slow down or stop completely in June when AYK fish are intercepted, such that AYK salmon stocks can rebuild themselves. Please just give them a chance and they will.

With AYK salmon returning in all time low numbers for so many years, it is clear that the MSY as employed by Alaska Department of Fish and Game (ADFG) to establish escapement goals and provide a sustainable yield, is no longer appropriate. Failure to provide a harvestable