

CIC Presents several indisputable facts regarding Area M:

Given the depressed status of many Alaska salmon stocks, in particular most Chinook and several chum stocks, the last action the Board should consider is any increase to the already massive interception fishery in Area M. Yet all proposals submitted by Area M fishers for this meeting seek to further increase their interception of fish from other regulatory areas, or introduce regulations to install State mandated Chinook chucking to align with a history of illegal chum chucking. In contrast, Chignik and all other regulatory areas submitting proposals for the 2026 Area M regulatory review seek to reduce interceptions and adopt shared conservation measures and long-term maximum sustainable yield objectives for their stocks.

All age classes of Chinook salmon are caught and bycaught repeatedly throughout the summer, as well as year after year in Area M. The cumulative impact of repeatedly catching these fish on consecutive openings as well as year over year has real consequences for brood classes of already depressed Chinook stocks. Even if 64–80% of intercepted Chinook are of non-Alaskan origin, the remaining 20–36% may be from critically depressed Alaska stocks. Additionally, year after year, processors and fishermen selectively retain larger Chinook, removing the genetic component of fish that grow faster and reach retention size earlier.

Just because a majority of the Chinook stocks harvested in Area M may be predominantly of non-Alaskan origin, that does not mean it is OK to discount in any way the impact on the Alaskan stocks that are harvested, nor does it excuse the indiscriminate harvest of those Chinook stocks bound for British Columbia and the West Coast.

Critics ask, “How can we justify changing regulations that have been in place for 21 years in Area M?” There are three clear answers:

1. Technological advances in vessels, gear, and electronics have dramatically increased harvesting power over time.
2. Long openings with short closures in an effort to boost the harvest of targeted sockeye stocks that vary in abundance exposes Western Alaska Chum and Statewide Chinook stocks to overharvest while they are at unprecedented low levels. The system was more forgiving in the past when non-target species were healthier.
3. The BOF actions taken in 2004 were in direct opposition to the “Policy for Management of Sustainable Salmon Fisheries” (SSFP:5AAC 39.222) and the “Mixed Stock Salmon Policy” (5AAC 30.220).

A pro-interception BOF in 2004 removed many long-standing conservation measures and drastically expanded access in both time and area beyond what had previously been allowed. Combined with increased harvest efficiency, these changes fundamentally altered fishery dynamics in Area M and in the districts whose stocks were intercepted.

During the first 15 seasons under the expanded time and area regulations adopted in 2004, there were effectively no windows to pass fish, as either seine, set, or drift nets were continuously fishing from June 7 to June 29. The small closure windows that were eventually established in 2019 do not offer near enough time for vulnerable migrating stocks to pass through the area.

Nearly all BOF proposals submitted by Area M fishermen and their Advisory Committee seek increased intercept harvest during June and July. These proposals are inconsistent with the BOF's Mixed Stock Policy and Policy on Sustainable Salmon Fisheries. During this period, the South Peninsula of Area M has no significant local stocks under management other than a small sockeye system in Orzinski Bay that is immaterial to the overall harvest of salmon in the area; the primary target is salmon migrating to other regulatory areas. Active escapement management by ADF&G that actually has the potential to restrict fishing time does not occur until local pink and chum management begins after July 25.

Except in SEDM, there is no existing policy requiring Area M intercept fisheries to share in the burden of conservation during poor return years. For example, in 2018 and 2020 there were no built-in safety mechanisms to curtail Area M fishing and allow fish to pass through to Chignik when a run failure was evident.

Adaptive management adopted at the 2023 BOF meeting does not constitute true adaptive management, as it lacks verifiable data, enforceable triggers, and accountability, and instead functions as an industry illusion.

Fish tickets from seine vessels do not record the number of sets made per day. In contrast, in the crab fisheries of Alaska, ADF&G requires BSAI crab harvest reports to include both the number of crabs harvested and the number of pots pulled, enabling calculation of CPUE. The number of seine permits or licenses fished is not a meaningful CPUE metric. Accurate salmon CPUE requires reporting sets per day with corresponding fish counts. Without this information, we believe ADF&G has a major data gap in effective salmon management.

Underreporting salmon harvested in Area M is a major problem. A long history of "chum chucking" has been well documented in the South Peninsula of Area M. Chinook are also underreported, with many simply discarded or kept for personal use without being recorded on fish tickets. Any published harvest numbers of Chums and Chinook must be seen as the absolute bare minimum number of those fish actually harvested.

Seine caught salmon are often not sorted on the fishing grounds in Area M when being transferred from fishing boats to the tenders. Instead, all the Sockeye, Chums, Pinks, Chinook and Coho are pumped off and weighed together, with the tender choosing one species to list all the weights under and providing a temporary (and illegal) fish ticket that provides only the total weight of all the salmon delivered, but not separated by species as is required by Statute. The salmon are then said to be sorted at the processing plant, and once that is done a new, legal fish ticket is sent to the fishermen. The opportunities for fraudulent reporting under this blatant circumvention of Alaska Statute are numerous.

Allowable Area M seine gear is 150 fathoms *longer* than any other area in the Central and Western Gulf of Alaska. They can be up to 400 fathoms long with seine and lead. Seines in PWS, Lower Cook Inlet and Chignik are limited to 225 fathoms in total length, while Kodiak is limited to 250 fathoms in total length. Purse seine depths are limited to 335 meshes in depth (includes 10 meshes of "hanging strip") in PWS, Lower Cook Inlet and Kodiak, while purse

seines in Area M and Chignik are allowed to be 375 meshes in depth. Chignik has a proposal in to bring their seine depths into line with the rest of the Central and Western Gulf seine fisheries.

Set gillnets are allowed to be 100 fathoms in length plus a 25 fathom seine lead attached to the shoreward end, resulting in 125 fathoms in fishable length. And set gillnet fishermen are allowed to operate 2 set gillnets at a time, 1800 ft. apart. That's 250 fathoms of aggregate length for set gillnetters. Further yet, they are allowed to set their nets as far as a half mile offshore. No other set gillnet fishery in the State has such advantages.

Drift gillnets are allowed to be 200 fathoms in length. That is significantly longer than the allowable length of drift gillnets in PWS, Cook Inlet and Bristol Bay.

Longer, deeper gear means more killing power. It really is that simple.