Eva Dawn Burk

Our Minto Nenana AC met jointly with the Tanana Rampart Manley (TRM) AC. We had 7 of our 11 members present. Please see ACs 12 and 17 for our comments. I will also reference the earlier comments made by Millena Jordan on behalf of the TRM AC. Our ACs support reductions in fishing time and gear modifications by reducing depth and seine lengths. We support supplemental June protections to strengthen passage time paired with fixed closures - proposals 130, 132, & 133. We oppose any proposals expanding fishing time.

I want the record to be clear. There are errors in the 1987 Eggers Tagging Study earlier referenced. Chum that were originally thought to be destined for Asia or Bristol Bay were actually headed to the AYK region. Additionally the same blame on in river issues and that the chum are of Asian origin were also used to deny action other than caps in years leading up to the first record low run seen on the Yukon and in the BB-AYK region in 2000. Please see RC 130.

Additionally, the chum that are traveling to AYK largely bypass Bristol Bay. They are traveling with the Alaska Coastal Current or Alaskan Stream. They may go down and around the Fox and Andreanof Islands and back up towards the Pribilofs, where Traditional Knowledge and pollock fishery data show presence of Yukon fall chum and most likely Yukon CWAK chum known as summer chum. The Yukon Chinook and summer chum run together and the summer chum and fall chum run together. Chinook tricklers are already present in river in May, under the ice. The salmon lead each other in the ocean, following the sea ice melting and eventually fresh water influx in spring, and are influenced by currents and winds. They are also teaching the younger fish, a lot of age 3, where to swim, what to feed on and when, and what is needed for each stage of life and for the massive migration home. They love age-0 pollock, which is hatching in Shelikoff strait and on the Bering Sea shelf edge near the Pribilofs each spring. The herring are also spawning each spring, signaling life and feeding many other species. They are important to protect in a changing climate. Everything is important. We are far behind the ecosystem based management, climate resilient fisheries, or gravel to gravel stewardship that is desperately needed to recover the last wild salmon runs of the world. Our waters were never meant to feed the world. Everything has a limit.

The Yukon River abundance largely drives the Western AK Chum Salmon Index as I testified to earlier in TK reports with RC33. There is a huge uncertainty in whose CWAK chum are being taken and which major river streams are being impacted in an area half the size of Alaska, which is lumped into one genetic group under CWAK. The department only has 6 years of genetic data for the Area M commercial fishery, which has been in existence since the late 1800s. Although on average nearly 60% of chum were CWAK in 2007-2009, there will several weeks in

June that consistently had about 80% CWAK chum. There is no real knowledge of the inter annual proportion of CWAK caught in Area M. And most problematically, the genetics have been collected during periods of less than average and extremely low WAK chum abundance. This is throwing the public perception that CWAK has been or is a small portion of the chum caught in Area M. Even in low abundance, CWAK chum consistently make up about 24% of the Area M chum take and roughly 20% of the Bering Sea pollock take. The pollock industry has the tools to keep their overall take less than 200,000 and their WAK take less than 45,000. This fishery is not there yet and it would take millions of dollars and years to get there. Our salmon need meaningful action now.

These numbers might seem insignificant when you're taking millions of fish. But remember the Yukon drives the WAK chum index. You need to make the safest decision for the system most at risk. Estimating half the CWAK to be Yukon would be conservative. The Area M fishery has been averaging close to 100,000 CWAK chum (2022-2024), and 50,000 could be Yukon. If we're having chum runs of 500,000. Area M would be allocated a 10% exploitation rate while in river subsistence users are managed to 0%.

There are natural cycles of salmon as I spoke about in TK reports with lows every 20 years now instead of roughly every 30 years. Everyone has historically done their part in times of extreme low abundance and the fishery managers put in restrictive measures that were warranted and effective. Engineers design for 50 and 100 year cycles. There were salmon crashes in 1919 and heat waves during 1925. We're in the 100 year cycle and hoping to see recovery. For the past two years, the Bering Sea has been in a transitional state from warm and hopefully trends towards cooling. Which I think we are seeing now. Back home we had several long deep freezes this winter and they're not predicted to end quite yet. Which is normal for us. And that's why we need our own salmon. It has the oils we need for our dark cold winters to keep us well. Imported sockeye doesn't quite do the trick although I am extremely grateful for it.

In 1994, the NPFMC implemented the chum salmon savings area, which was closed to all trawling during the entire month of August and had a cap of 42,000 chum in effect through October 14. Eventually, the BOF reluctantly implemented the 2001-2003 Area M June Management Plan when chum runs on the Yukon hit the first record low. Fishing time was effectively reduced to 144 hours. Interesting enough, the Yukon saw record recruits per spawner during the Area M strike in 2001. See slides 2 and 3 on my RC129.

Here we are in a much more serious predicament. I don't see any other way to reduce chum than to reduce fishing time. It's been effective before and we don't have guarantees of necessary data collection, mapping capabilities, and climate models, or years of historic genetic data and targeted species CPUE, collected for

the whole stat area for every day to inform future fishing behavior. Even the data collected in the Bering Sea only begins in 2011, far after a lot of the damage has been done on our stocks.

The various levels of Area M chum caps in effect from 1986 to 2000 did not help the salmon decline. The commercial fishery that existed on the Yukon also did not help, but those decisions to allow commercial openers on the Yukon when subsistence needs were not being met were made at this table. See RC 135. Our people have submitted many proposals over the years to reduce commercial fishing and restrict mesh net sizes and drifting practices. But those were denied in favor of commercial fishing. We need to follow the sustainable salmon and mixed stock fishery policies mentioned before me and prioritize subsistence. Logically, if subsistence wins everyone wins. There will be more fish for future generations.

Setting escapements for Yukon was not based on Indigenous Knowledge. The escapements set have been used to manage us into extinction. There are so many species of plants, trees, animals, birds, and bugs that rely on salmon other than humans. There is no such thing as over escapement. There is no need to prosecute a fishery the minute something jumps above an arbitrary line, the lower end of the escapement goal. A 1920 federal bureau of fisheries report said don't fish commercially on the Yukon, yet after statehood we see huge increases in commercial takes of all species in all waters, targeting our large iconic king salmon, king crab, and halibut, and by the 1980s everything was showing signs of decline. Yet 50 years later we're just now figuring out abundance based management. Fisheries historically collapse before science ever catches up. So reliance on science alone, which believe me has many great values but also shortcomings, especially in its ability to cross disciplines and knowledge systems.

There are multiple studies being done, one was submitted as an RC by Megan Krupa at BOF 2023, that showed how local proposals are often denied in favor of department or commercial interest proposals. Additionally, a recent NSF study showed how local and advisory committee proposals had a positive impact on terminal fisheries in the Area M Northern District versus the negative impact of nearly every proposal submitted by CAM, which have a 45% success rate vs the 4% of ACs and the 10% of locals. Non-local and ADFG proposals have success rates of 13% and 100% respectively but have negative impacts on terminal fisheries half of the time. The study also calls out overcapitalization and increased horsepower as contributing factors over the years.

In closing, when we protect chum we protect chinook and we protect communities that have had an unbroken intergenerational bond with salmon until just recently. Our people are not transient seasonal workers that manage two homes, or have access to other subsistence resources or commercial fisheries to prosecute. Our whole ecosystem is in collapse with huge population declines of caribou and

moose. It's partially climate and it's partially management that isn't with Tribes, doesn't incorporate Traditional Knowledge or plan for precautionary management in a changing climate. I hope this changes. Where Tribes are leading, salmon are returning. Look at the Kuskokwim. Only place with kings meeting escapement because of Tribal cooperation, management and subsistence sacrifices.

Notes:

Please see RCs 129 and with the graphs we submitted to show how CWAK can have the highest proportion of chum in Area M, even in times of low abundance.

CWAK was the highest proportion of chum in the June 15-18 2024 Seine Fishery in both the SE/SC and Unimak/SW districts and had takes of 10,000 CWAK for three of the openers. CWAK was by far the highest proportion in the June 6-28 Gillnet Fishery in the SE/SC district, even though overall harvest was low.

Additionally, CWAK was also by far the highest proportion in the June 11-13 and June 15-18 Gillnet openers in the Unimak/SW district with takes closer to 15,000 CWAK chum each opener.